

Action Plan

Grantee: County of Los Angeles, CA

Grant: B-23-PH-06-0004

LOCCS Authorized Amount:	\$ 6,700,000.00
Grant Award Amount:	\$ 6,700,000.00
Status:	Reviewed and Approved
Estimated PI/RL Funds:	\$ 0.00
Total Budget:	\$ 6,700,000.00

Funding Sources

No Funding Sources Found

Narratives

Action Plan Summary:

The vision for the County of Los Angeles's Action Plan for the PRO Housing Grant is to enable increased production and preservation of affordable housing across a broad and diverse geographic area over a sustained timeframe through activities related to Infrastructure Planning, Transit Oriented Districts, and Equity/Fair Housing.

Infrastructure Planning: The County of Los Angeles (County) is undergoing an ambitious program to rezone sites for over 56,000 by-right residential units, approximately half of which is affordable to Low-Moderate Income (LMI) households, by February 2025. This rezoning strategy is supported by the development of multiple area plans, which are comprehensive land use plans for clusters of unincorporated communities throughout Los Angeles County. The preparation of capital improvement plans (CIPs) that prioritize new infrastructure and improvements to existing infrastructure is a significant opportunity to support the affordable housing created through these area plans. The CIPs will, at a minimum, focus on sewer and transportation facilities, given the direct impacts to housing costs; but can include water, stormwater, dry utilities, recreational and open space, and other infrastructure, based on the unique needs and characteristics of each planning area. The following are proposed activities: East San Gabriel Valley Planning Area CIP; Metro Planning Area CIP; South Bay Planning Area CIP; West San Gabriel Valley Planning Area CIP; and Westside Planning Area CIP.

Transit Oriented Districts: Transit Oriented Districts (TODs) are areas that are supported by major public transit infrastructure and have opportunities for a mix of higher intensity development, including multifamily housing, employment and commercial uses; design; compact development; and improvements that promote living streets and active transportation, such as trees, lighting, and bicycle lanes. Because of their scale, TODs also provide opportunities to implement focused affordable housing policy tools, such as value capture, to increase residential densities, strengthen anti-displacement policies, and garner community benefits. By coordinating increased residential densities with transportation, parking, community-serving uses and amenities, with an emphasis on pedestrian and bicycle safety, TODs can also create a welcoming, safe environment and contribute to mobility goals. This approach will be applied to the update of the East Los Angeles TOD Specific Plan.

Equity/Fair Housing: Past systemic racism and discriminatory housing practices, including the use of redlining maps and restrictive housing covenants, have not only resulted in long-term inequality, but have shaped the physical environment and significantly influenced the residential land use patterns that we know today. While many past practices of systemic racism have been discontinued or eliminated, they may still manifest in less overt ways, such as exclusionary policies in zoning codes and the siting of nuisance land uses adjacent to lower income residential communities. Removing these barriers and affirmatively furthering fair housing are important strategies to reversing land use patterns and unraveling the legacy of past systemic racism and combatting the systemic racist policies that persist today. The following are proposed activities: Missing Middle and Gentle Density Housing Program and Equity Audit.

The County of Los Angeles is not unfamiliar with managing large, complex grants and has the depth and experience to meet

all grant obligations. Specifically, the County's Department of Regional Planning (also known as LA County Planning) will be the lead internal agency for the implementation of the grant.

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FY2023 PRO Housing authorizing statute, the Consolidated Appropriations Act, 2023 (Public Law 117-328, approved December 29, 2022) and stating that FY23 PRO Housing requirements can be found in the PRO Housing Notice of Funding Opportunity (NOFO) (FR-6700-N-98, issued November 06, 2023).

Resources and Budget:

The budget for each activity has been prepared in accordance with the requirements of the PRO Housing Notice of Funding Opportunity (NOFO) (FR-6700-N-98, issued November 06, 2023). The budget is presented in the following table, which is organized by activity and by funding source. The budget is presented in the following table, which is organized by activity and by funding source. The budget is presented in the following table, which is organized by activity and by funding source.

Activity	Funding Source	Amount
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Need:

The need for the County's Action Plan is to enable increased production and preservation of affordable housing across a broad geographic area over a sustained timeframe through activities related to Infrastructure Planning, Transit Oriented Districts, and Equity/Fair Housing. The proposed activities are identified in the General Plan, which is a comprehensive plan adopted by the County Board of Supervisors (Board) in October 2015 for land use and growth for the unincorporated areas of Los Angeles County; and the Housing Element of the General Plan, which was adopted by the Board on May 17, 2022 and certified by the State of California Department of Housing and Community Development on May 27, 2022. These activities were identified through a lengthy public process for both the General Plan and Housing Element, which includes hundreds of meetings and community engagement activities with a diversity of stakeholders. The benefits from the County's Action Plan will be realized long-term--likely over the next decade. All projects will work in conjunction with other existing County policies related to rent stabilization; tenant protections; density bonuses for affordable housing; and affordable housing preservation, which requires the replacement of affordable housing and right of first refusal for displaced residents. In addition, the County has an existing inclusionary housing policy that requires a maximum 20% set

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Use of Funds - Soundness of Approach:

VISION

The vision for the County's Action Plan is to enable increased production and preservation of affordable housing across a broad geographic area over a sustained timeframe through activities related to Infrastructure Planning, Transit Oriented Districts, and Equity/Fair Housing. The proposed activities are identified in the General Plan, which is a comprehensive plan adopted by the County Board of Supervisors (Board) in October 2015 for land use and growth for the unincorporated areas of Los Angeles County; and the Housing Element of the General Plan, which was adopted by the Board on May 17, 2022 and certified by the State of California Department of Housing and Community Development on May 27, 2022. These activities were identified through a lengthy public process for both the General Plan and Housing Element, which includes hundreds of meetings and community engagement activities with a diversity of stakeholders. The benefits from the County's Action Plan will be realized long-term--likely over the next decade. All projects will work in conjunction with other existing County policies related to rent stabilization; tenant protections; density bonuses for affordable housing; and affordable housing preservation, which requires the replacement of affordable housing and right of first refusal for displaced residents. In addition, the County has an existing inclusionary housing policy that requires a maximum 20% set

aside for lower income (up to 80% AMI) households for rental housing. In addition, state law requires that all new by right housing developments on parcels rezoned to implement a housing element be required to set aside 20% of all units for lower income (up to 80% AMI) households. Through the local and state requirements for inclusionary zoning, the County expects to increase production of more units affordable to a variety of income levels. These efforts to increase the supply of affordable units affordable units must occur in concert with offsite infrastructure planning, site availability, and increased ease of permitting in high resource areas, and must address the legacy of redlining and other government restrictions to produce more equitable housing solutions.

Infrastructure Planning

The County is undergoing an ambitious rezoning program to accommodate over 56,000 by-right units, approximately half of which is affordable to LMI households, by February 2025. This rezoning strategy is supported by the development of multiple area plans, which are comprehensive land use plans for clusters of unincorporated communities within Los Angeles County. An opportunity exists to prepare capital improvement plans (CIPs) that prioritize new infrastructure and improvements to existing infrastructure that support affordable housing production that is incentivized through these area plans. It is not current practice for the County to develop CIPs for planning areas or to proactively coordinate infrastructure planning with land use planning. The proposed infrastructure planning activities will not only incentivize affordable housing production but will also streamline the development process and lead to greater investment in key areas identified within the area plans. The CIPs will, at a minimum, focus on sewer and transportation infrastructure given the direct impacts to housing costs; but can include water, stormwater, dry utilities, recreational and open space, and other infrastructure, based on the needs and unique characteristics of each planning area.

These activities address the national objective for planning and policy activities supporting affordable housing, specifically national objective S, by connecting infrastructure with area plans. The result would strategically connect housing, transportation, and economic growth at a regional scale. The activities also address the national objectives for infrastructure activities, specifically A, B, and E, by developing plans to identify new and upgraded infrastructure needs that expand the capacity for affordable housing. The infrastructure improvements would also enhance quality of life and emphasize public safety, such as bicycle lanes, controlled intersections, crosswalk improvements, planting of shade trees, and other improvements that can benefit LMI communities. The proposed activities also constitute eligible activities in that they benefit LMI households and prevent or eliminate "slums" or "blight" through the increased production of affordable housing and improve quality of life through the provision of infrastructure.

East San Gabriel Valley Planning Area CIP: The proposed activity develops a CIP for the East San Gabriel Valley Planning Area, located in the eastern portion of Los Angeles County. In May 2024, the Board of Supervisors adopted the East San Gabriel Valley Area Plan (ESGVAP), a comprehensive land use plan for 24 unincorporated communities that share a common geography. The ESGVAP implements the County's Housing Element rezoning program to identify sites for at least 2,978 units affordable to lower income (up to 80% AMI) households, as well as 4,152 market rate units. It also rezones an additional 1,498 parcels to increase residential densities on previously low-density single family zoned parcels, and 16,918 additional parcels rezoned from legacy agriculture zones to residential zones. The CIP will use the ESGVAP as the basis for analysis for increased infrastructure capacity.

Metro Planning Area CIP: The proposed activity develops a CIP for the Metro Planning Area. In May 2024, the Board of Supervisors adopted the Metro Area Plan (MAP), which is a long-range planning document that provides a policy framework for how and where seven unincorporated communities will grow in the next 15 years, while celebrating the culture and history of these communities. The seven contiguous urban communities are East Los Angeles, East Rancho Dominguez, Florence-Firestone, Walnut Park, West Athens-Westmont, West Rancho Dominguez-Victoria, and Willowbrook, and represent a population of nearly 310,000 residents. The MAP aims to streamline and update existing County regulations in these communities to encourage more housing development, and multi-modal transportation, while focusing on environmental justice issues. It implements the County's Housing Element rezoning program to create sites for at least 7,194 units affordable to very low income (up to 50% AMI) households, 3,253 units affordable to lower income (up to 80% AMI) households, and 9,250 units affordable to moderate income (up to 120% AMI) households, as well as 6,230 market rate units. The CIP will use the MAP as the basis for analysis for increased infrastructure capacity.

South Bay Planning Area CIP: The proposed activity develops a CIP for the South Bay Planning Area, located in the southwestern portion of Los Angeles County. The South Bay Area Plan (SBAP) is a community-based plan that responds to the unique and diverse character of the following non-contiguous unincorporated communities: Alondra Park/El Camino Village, Del Aire, Wiseburn, Hawthorne Island, La Rambla, Lennox, West Carson, and Westfield/Academy Hills. The SBAP will develop policies for future community growth and development and will address issues such as traffic congestion, air quality concerns, lack of developable land, good movement, environmental justice, and noise impacts. The SBAP, which is scheduled for completion in February 2025, implements the County's Housing Element rezoning program to create sites for at least 2,197 units affordable to very low income (up to 50% AMI) households and 3,801 market rate units. The CIP will use the SBAP as the basis for analysis for increased infrastructure capacity.

West San Gabriel Valley Planning Area CIP: The proposed activity develops a CIP for the West San Gabriel Valley Planning Area, which encompasses eight non-contiguous suburban communities of Altadena, East Pasadena-East San Gabriel, Kinneloa Mesa, La Crescenta-Montrose, San Pasqual, South Monrovia Islands, South San Gabriel, and Whittier Narrows, and is scheduled for adoption in February 2025. It implements the County's Housing Element rezoning program to create sites for at least 1,860 units affordable to very low income (up to 50% AMI) households, and 184 units affordable to lower income (up to 80% AMI) households, and 6,168 market rate units. The CIP will use the WSGVAP as the basis for analysis for increased infrastructure capacity, and will support the principles of walkability, pedestrian safety, connectivity, and community vibrancy. The CIP will use the WSGVAP as the basis for analysis for increased infrastructure capacity.

Westside Planning Area CIP: The proposed activity develops a CIP for the Westside Planning Area, which is located north of the South Bay Planning Area in Los Angeles County. The Westside Area Plan (WSAP), scheduled for adoption in February 2025, covers the non-contiguous and disparate communities of Ladera Heights, View Park-Windsor Hills, Franklin Canyon, West Los Angeles Sawtelle VA, unincorporated Del Rey, and Marina del Rey, as well as two unincorporated islands referred to as Gilmore Island and Beverly Hills Island. It aims to streamline and update existing County regulations to encourage more housing development, historic preservation, and multi-modal transportation, while focusing on environmental justice issues around oil wells and future development. The WSAP implements the County's Housing Element rezoning program to create sites for at least 1,646 units affordable to very low income (up to 50% AMI) households, and 735 units affordable to lower income (up to 80% AMI) households and 2,534 market rate units. The CIP will use the WSAP as the basis for analysis for increased infrastructure capacity.

Transit Oriented Districts

Transit Oriented Districts are areas that are supported by major public transit infrastructure and provide opportunities for a mix of higher intensity development, including multifamily housing, employment, and commercial uses. TODs typically offer opportunities for integrated design solutions, allow compact development and support improvements that promote Complete Streets and active transportation, such as trees, lighting, pedestrian crosswalk enhancements, and bicycle lanes. Based on its scale, TODs also provide opportunities to implement focused affordable housing policy tools, such as value capture, to increase residential densities, strengthen displacement policies, and garner community benefits. By coordinating higher residential densities with transportation, parking, community-serving uses, and amenities that support pedestrian and bicycle safety, TODs can also create a welcoming, safe environment and contribute to mobility goals. The proposed activities address the national objective for planning and policy activities supporting affordable housing, specifically B, by developing TOD specific plans to encourage housing development or preservation of existing higher density projects. The proposed activities also constitute eligible activities in that they benefit LMI households, and by encouraging equitable redevelopment, they also prevent or eliminate "slums" or "blight."

East Los Angeles TOD Specific Plan Update: The proposed activity updates the existing East Los Angeles TOD Specific Plan (TOD Specific Plan), which was adopted by the Board in November 2014. The TOD Specific Plan established a new form-based code, with standards and strategies to encourage and support sustainable, transit-supportive, pedestrian-friendly, and economically vibrant areas surrounding four Metro E Line stations in unincorporated East Los Angeles. Highly innovative at the time of its adoption, the TOD Specific Plan needs to be updated to remove barriers to new higher density housing and further encourage Complete Street improvements and mixed-use development that incorporate local commercial-serving uses and multifamily housing. LA Metro is currently planning an expansion of the E Line, which currently ends at Atlantic Station in the TOD Specific Plan. The pending rail project will extend the E Line south toward the City of Whittier. As the extension may run along Atlantic Boulevard and result in an additional Metro E Line Station within unincorporated East Los Angeles, the update to the TOD Specific Plan is timely and will require a focus on anti-displacement and anti-gentrification efforts for both commercial and residential uses.

Equity/Fair Housing

In July 2020, the County Board of Supervisors adopted the first Anti-Racist, Diversity, and Inclusion (ARDI) Initiative. This broad-based initiative governs the County's commitment to fighting systemic and systematic racism in all forms affecting Black, Indigenous, and People of Color (BIPOC) communities. Past systemic racism and discriminatory housing practices by government agencies such as the use of redlining maps and restrictive housing covenants have not only resulted in long-term inequality but have shaped the physical environment and significantly influenced the residential land use patterns that we know today. For example, over 70% of residential land in unincorporated Los Angeles County is zoned for single-family residences. While many past practices of systemic racism have been eliminated, they may still manifest in less overt ways, such as racist definitions and exclusionary policies in zoning codes. Removing barriers and affirmatively furthering fair housing are important strategies to reversing land use patterns and unraveling the legacy of past systemic racism and combatting the systemic racist policies that persist today. The activities address the national objective for planning and policy activities supporting affordable housing, specifically B, E, and L by removing barriers to affordable housing development and preservation in plans and in zoning codes, by expanding affordable housing programs to low density and high-opportunity neighborhoods, and affirmatively furthering fair housing by encouraging missing middle housing types in single family zoned areas. The proposed activities also constitute eligible activities in that they benefit LMI households through the creation of affordable housing opportunities in high resource areas and remove discriminatory policies.

Missing Middle and Gentle Density Housing Program: The proposed activity implements the Missing Middle and Gentle Density Housing Program, which is a countywide strategy. Understanding that high density residential development may not be financially feasible in all areas of unincorporated Los Angeles County due to high land costs or required infrastructure investment, this program will assess land use tools that encourage the development of low to mid-density housing types, such as bungalow and cottage courts, duplexes, triplexes, and fourplexes that are context-sensitive in existing residential neighborhoods. The assessment will study the feasibility of these 'gentle density' building typologies in unincorporated Los Angeles County and will enact by right implementation mechanisms. The resulting program will include anti-displacement strategies to increase housing opportunities in traditionally low-density residential zones, particularly High or Highest Resource areas as determined by the California Tax Credit Allocation Committee. This program will also build on the existing Compact Lot Subdivision Ordinance that allows for single family development on smaller parcel sizes in certain residential zones.

Equity Audit: The proposed activity is a comprehensive review of the General Plan, all community-based plans and specific plans, and the Zoning Code from an anti-racist and equity lens. It will identify and remove barriers to equitable housing production, remove racist definitions and terminology, remove exclusionary policies, prevent incompatible land uses from affecting BIPOC communities, address the unique housing needs of members of protected class groups, and make proactive changes to promote more inclusive communities. This will be implemented through various Zoning Code and plan amendments.

NEEDS

The proposed activities for Infrastructure Planning and Transit Oriented Districts address the Needs identified in this Action Plan in a number of ways. Because of the County's geographic diversity and the diversity of housing types, preparing plans by planning area and district help to align policies to increase affordable housing opportunities with the unique characteristics and needs of each area. The proposed activities for the Transit Oriented Districts and Equity/Fair Housing remove barriers to the Zoning Code. All of the proposed activities work in conjunction with existing anti-displacement policies, and the Transit Oriented Districts will explore opportunities to build on and strengthen those protections. The proposed activities for Equity/Fair Housing address the Needs identified in this Action Plan by removing exclusionary policies and creating housing opportunities in higher resource areas. We have seen that there is a great demand for missing middle housing types. For example, when state laws allowing accessory dwelling units (ADUs) by right became effective in 2017, several jurisdictions, including the County, saw a significant increase in applications and construction activity for ADUs. In 2022, the County approved 20 times more ADUs than in 2016. By removing barriers, the proposed activities will also increase housing production and preservation in a way that is equitable, does not lead to displacement, and affirmatively furthers fair housing. Furthermore, all proposed activities will help streamline the entitlement process and reduce costs by removing barriers and adding certainty to the review of projects. In particular, infrastructure issues, such as a required sewer study, can be an unexpected requirement for project, as they are requested on a case by case basis. While the improvements to infrastructure will in the long run reduce housing costs, in the short term, having the CIPs in place will help

streamline the entitlement process by providing certainty to housing developers.

Infrastructure Planning

Although CIPs are commonly used by local jurisdictions to plan for new and to upgrade existing infrastructure, it is not a current practice for the County. In addition, the County has not proactively coordinated infrastructure planning with land use planning at a planning area level. This could be due, in part, to the County's fragmented planning areas in between 88 cities, as well as the organizational structure of the County. LA County Planning focuses on land use planning, while Public Works focuses on infrastructure. The County can learn from the City of Austin's collective Capital Improvement Program and their experience that led to the establishment of a Capital Planning Office in 2010. The impetus for that effort came from recognizing the need to align their comprehensive long-range plan with capital projects. The County can emulate the City of Austin's efforts to use CIPs to overcome organizational challenges, which can help facilitate coordination between departments, streamline, and add certainty to the development process, and increase the production of housing. The City also offers models for developing CIPs for plans at varying scales, including area plans.

While preparing CIPs for area plans is not a current practice for the County, the proposed activities are appropriate and timely, given the near completion of the area plans and rezoning effort, and the opportunity to ensure the success of the housing policies in the area plans through the provision of infrastructure. The County can overcome the geographic challenges by proactively coordinating with adjacent cities and tapping into existing networks.

Transit Oriented Districts

The County has prepared multiple TOD specific plans: Florence-Firestone TOD Specific Plan, 2023; West Athens-Westmont TOD Specific Plan (Connect Southwest LA Specific Plan), 2019; West Carson TOD Specific Plan, 2019; Willowbrook TOD Specific Plan, 2018; and East Los Angeles TOD Specific Plan (East Los Angeles Third Street Specific Plan), 2014. One lesson-learned from the experience of preparing TOD specific plans is to better coordinate the interplay between the TOD specific plan and the General Plan so that they are not perceived to be stand-alone documents. Another lesson-learned is to use the opportunity, in preparing or updating a TOD, to incorporate bold, innovative housing policies, such as value capture, which may be too complex to implement at a larger scale. To ensure success with the proposed activities, the County will clearly reflect the linkages to the General Plan in the TOD specific plan, and commit early on to identifying affordable housing tools that can be incorporated.

Equity/Fair Housing

The County can learn from equity efforts in King County, WA, which stemmed from a desire to incorporate equity into their long-range plans and municipal functions. In 2015, King County developed the Equity Impact Review tool to assess, identify gaps, and communicate the impact of county policies and program on equity. While the County's proposed activities are focused on removing barriers in plans and the Zoning Code, the County can emulate King County's tools and approaches to correct and reverse systemic racism within their programs and policies in a meaningful and significant way.

The County is also learning from the experience of the City of Seattle and the City of Minneapolis to allow missing middle housing types, such as duplexes, triplexes, and fourplexes in traditionally single-family neighborhoods. Both efforts entailed a significant outreach component but took different approaches to zoning. City of Seattle upzoned their single-family areas, while City of Minneapolis modified the single-family zone. Furthermore, in recent years, the State of California has enacted several laws to allow accessory dwelling units, lot splits, and other forms of "gentle density" to increase housing opportunities.

Recently, the Minneapolis 2040 Plan, which incorporates the missing middle strategy, encountered legal roadblocks related to its environmental analysis. From the County's own experience with implementing recent state laws, missing middle housing in single family neighborhoods is a controversial and divisive issue, but an important policy that can help to address the housing crisis and affirmatively further fair housing. Based on lessons-learned, the County will ensure that the proposed activities include a comprehensive environmental analysis, robust community engagement program, and strong emphasis on design.

ALIGNMENT

The proposed activities for Infrastructure Planning, Transit Oriented Districts, and Equity/Fair Housing align with several existing County and regional initiatives, policies and programs, including but not limited to:

- Anti-Displacement and Affordable Housing: Housing Element (General Plan), Homeless Initiative, Inclusionary Housing Ordinance, Density Bonus Ordinance, Affordable Housing Preservation Ordinance, Rent Stabilization Ordinance, County tenant protections.
- General Plan: Area plans, Transit Oriented Districts, SCAG SoCal Connect 2024.
- Sustainability: Climate Action Plan (General Plan), OurCounty Sustainability Plan, Climate Vulnerability Assessment.
- Equity: Anti-Racism, Diversity, and Inclusion Initiative; LA County Planning Strategic Plan; Equity Indicators Tool; Green Zones Program; Environmental Justice Screening Method Tool; Equity Explorer Tool.
- Infrastructure: Delete the Digital Divide; Equity in Infrastructure Initiative; Vision Zero Plan; Pedestrian Plans (General Plan); Bicycle Master Plan (General Plan).

As the proposed activities are informed by the General Plan, it is also in alignment with Connect SoCal 2024, which the regional transportation plan for the Southern California Association of Governments region. Alignment with these initiatives, policies, and programs ensure that the proposed activities will increase and preserve affordable housing, and directly benefit LMI households in an equitable, holistic, and meaningful way. The proposed activities will work in conjunction with these initiatives to ensure that existing residents and LMI households have equal access to the safe and welcoming environments, and access to public transit, jobs, public services, and amenities created by the proposed activities. By increasing housing production and aligning with land use and economic development strategies in the General Plan, the proposed activities also support job creation and retention efforts.

GEOGRAPHIC SCOPE

The County of Los Angeles is responsible for land use and infrastructure for the unincorporated areas of Los Angeles County, which represent approximately 2,600 square miles, or 65% of the land area. The unincorporated areas are in and around 88 incorporated cities in Los Angeles County and serve over 1 million people across 125 distinct communities. The proposal includes activities that apply to all unincorporated areas and those that focus on the following six planning areas, which comprise unincorporated areas located outside of environmentally sensitive, agricultural, rural, and hazardous (wildfire, seismic, food) areas: East San Gabriel Valley, Metro, South Bay, West San Gabriel Valley, and Westside. The proposed TOD specific plan update is focused on areas near Metro transit stations in unincorporated East Los Angeles (Metro Planning Area).

The Action Plan encompasses Census tracts that are HUD Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs). They are in the Metro Planning Area (3 Census tracts); South Bay Planning Area (1 Census tract); and Westside Planning Area (1 Census tract). The Action Plan also comprise all opportunity areas defined by the State of California Tax Credit Allocation Committee: Highest Resource, High Resource, Moderate Resource (Rapidly Changing), Moderate Resource, Low Resource, or areas of High Segregation and Poverty. This is summarized below:

- East San Gabriel Valley Planning Area: Low, Moderate, High, and Highest Resource tracts
- Metro Planning Area: High Segregation and Poverty, Low, Moderate, and Moderate (rapidly changing) Resource tracts
- South Bay Planning Area: Low, Moderate, and High Resource tracts
- West San Gabriel Valley Planning Area: Moderate, High, and Highest Resource tracts
- Westside Planning Area: Low, Moderate, High, and Highest Resource tracts

It should be noted that Metro Planning Area does not include High or Highest Resource tracts and West San Gabriel Valley Planning Area does not include Low Resource tracts. Given the geographic scope and scale of the Action Plan, there are opportunities to both preserve and create housing units in high opportunity areas and expand opportunity in underserved communities. This can be achieved by planning area and/or as well as between planning areas.

AIR HOUSING

The proposed activities for Equity/Fair Housing will remove barriers to the development of affordable housing in well-resourced areas of opportunity by allowing missing middle housing types in traditionally single-family neighborhoods in High and Highest Resource tracts. BIPOC communities are expected to benefit from the proposed activities.

The Action Plan includes four unincorporated areas with R/ECAP Census tracts: West Athens-Westmont (2)(Metro Planning Area); Florence-Firestone (Metro Planning Area); Lennox (South Bay Planning Area); West Los Angeles (Sawtelle VA) (Westside Planning Area); and Willowbrook (Metro Planning Area).

The Hispanic/Latino population makes up the majority in the West Athens-Westmont, Florence-Firestone, Lennox, and Willowbrook R/ECAP tracts. In the West Los Angeles (Sawtelle VA) R/ECAP tract, 36.8 percent of the population is White, 26.5 percent of the population is Hispanic/Latino, and 22.4 percent of the population is Black.

Communities where racial/ethnic minorities are the predominant population are generally located in the southern, southeastern, and northeastern areas of Los Angeles County. The following unincorporated areas have the largest non-White majority populations in the areas addressed by the proposed activities:

- Lennox (South Bay), Florence-Firestone (Metro), Walnut Park (Metro), Willowbrook (Metro), East Rancho Dominguez (Metro), East Los Angeles (Metro), Avocado Heights (East San Gabriel Valley), West Puente Valley (East San Gabriel Valley), Valinda (Est San Gabriel Valley), South San Jose Hills (East San Gabriel Valley) have Hispanic/Latino majority populations.
- View Park-Windsor Hills (Westside) and West Athens-Westmont (Metro) have Black majority populations.
- Hacienda Heights (East San Gabriel Valley) and Rowland Heights (East San Gabriel Valley) have Asian majority populations.

As previously discussed, past systemic racism and discriminatory housing practices by government agencies, such as the use redlining maps and restrictive housing covenants, have not only resulted in long-term inequality, but have shaped the physical environment and significantly influenced the residential land use patterns that we know them today.

These are some of the policies and practices that have caused segregation and maintaining these land use patterns perpetuates the legacy of these policies and practices. For example, over 70% of residential land in unincorporated Los Angeles County is zoned for single-family residences. While many past practices of systemic racism have been eliminated, they may still manifest in less overt ways, such as racist definitions and exclusionary policies in zoning codes. Removing barriers and affirmatively furthering fair housing are important strategies to reversing land use patterns and unraveling the legacy of past systemic racism and combatting the systemic racist policies that persist today.

The County will ensure that the ActioPlan will not cause affordable housing to be further concentrated in low-opportunity areas or in areas that already have ample affordable housing through the Missing Middle and Gentle Density Housing Program, which will focus on creating housing opportunities in higher resource areas. Also, the area plans that will serve as the basis for the CIPs are guided by the Housing Element affirmatively furthering fair housing analysis, which is how the County can ensure that affordable housing will not be further concentrated in low opportunity areas.

The proposed activities come from the General Plan and Housing Element, which were prepared in conjunction with the 2018 Analysis of Impediments to Fair Housing Choice prepared by the Los Angeles County Development Authority for the Urban County.

The risk of displacement will be directly addressed with policies in the proposed activities and work in conjunction with existing policies. There are existing anti-displacement policies, such as replacement and right of first refusal in the Affordable Housing Preservation Ordinance, and relocation assistance and tenant protections in the Rent Stabilization Ordinance. The proposed activities will build off the existing policies to strengthen them to ensure that they do not lead to the displacement of vulnerable residents in communities of color.

The proposed activities will work in conjunction with existing County policies to address the housing needs of people with disabilities and increase their access to accessible affordable housing, including the Reasonable Accommodations Ordinance. The Equity Audit will also focus on identifying and removing barriers to fair housing and affirmatively furthering fair housing to increase housing choice. The County will work with Los Angeles County Development Authority's goals to enhance accessible housing, supportive services, and transit to persons with disabilities to ensure compliance with the Americans with Disabilities Act. The County will also ensure compliance for meetings, hearings, and community engagement activities. The County will focus on extensive environmental analysis and a robust community engagement process to address resistance to the proposed activities. Recognizing that missing middle housing and increases in density are controversial and divisive issues, the County will provide meaningful, extensive, and inclusive engagement opportunities to ensure that all voices are heard.

The equity-related educational resources, tools, and public input that have informed the County's Action Plan comes from the Government Alliance on Race and Equity (GARE), of which the County is a member, and other racial equity resources and trainings that have been offered through the County's ARDI Initiative. The County's Equity Indicators Tool, Environmental Justice Screening Tool, and Equity Explorer have informed the development of the Action Plan, as well as the State of California CalEnviroScreen 4.0 tool and the State of California CTCAC/HUD Opportunity Area Maps. The County's Action Plan works in conjunction with existing County policies for business preference programs that encourage business owners who are minorities, women, disadvantaged or disabled veterans to capitalize on opportunities in government and private-sector procurement programs. The County ARDI Initiative has informed the County's and LA County Planning's strategic plans to be equity-focused. Other equity considerations include noting that the number of people experiencing homelessness in Los Angeles County continues to increase, with 75,518 people experiencing homelessness on any given night in 2023. The Los Angeles Homeless Services Authority (LAHSA) noted that Latinos made up the largest share of the homeless population in Los Angeles County, with 30,350 individuals counted, followed by Blacks with 22,606 individuals counted. Furthermore LAHSA found that in 2017, Black people represented only 9% of the general population in Los Angeles County but comprised 40% of the population experiencing homelessness. While the proposed activities do not directly address these disturbing trends, land use and zoning have always been a part of the County's Homeless Initiative strategies to remove barriers and increase production and preservation of affordable housing to combat homelessness. The County will track the progress and evaluate the effectiveness of the proposed activities to advance racial equity by collecting qualitative data as available from Los Angeles County Development Authority and other agencies. Using GIS equity mapping tools, the County can track the effectiveness of these programs over time. The County can also use surveys and community engagement to garner feedback and collect qualitative data from the community.

Use of Funds - Method of Distribution (State grantees only):

N/A

Grantee and Partner Capacity:

The County of Los Angeles is an affiliate with multiple state, county, and local agencies and has the ability and experience to meet all grant objectives. The County's experience includes the planning and implementation of a wide range of projects, including the development of the County's Strategic Plan, the County's Environmental Justice Screening Tool, the County's Equity Explorer, the County's CalEnviroScreen 4.0 tool, and the County's CTCAC/HUD Opportunity Area Maps. The County's Action Plan works in conjunction with existing County policies for business preference programs that encourage business owners who are minorities, women, disadvantaged or disabled veterans to capitalize on opportunities in government and private-sector procurement programs. The County ARDI Initiative has informed the County's and LA County Planning's strategic plans to be equity-focused. Other equity considerations include noting that the number of people experiencing homelessness in Los Angeles County continues to increase, with 75,518 people experiencing homelessness on any given night in 2023. The Los Angeles Homeless Services Authority (LAHSA) noted that Latinos made up the largest share of the homeless population in Los Angeles County, with 30,350 individuals counted, followed by Blacks with 22,606 individuals counted. Furthermore LAHSA found that in 2017, Black people represented only 9% of the general population in Los Angeles County but comprised 40% of the population experiencing homelessness. While the proposed activities do not directly address these disturbing trends, land use and zoning have always been a part of the County's Homeless Initiative strategies to remove barriers and increase production and preservation of affordable housing to combat homelessness. The County will track the progress and evaluate the effectiveness of the proposed activities to advance racial equity by collecting qualitative data as available from Los Angeles County Development Authority and other agencies. Using GIS equity mapping tools, the County can track the effectiveness of these programs over time. The County can also use surveys and community engagement to garner feedback and collect qualitative data from the community.

LA County Planning is currently working with a diversity of stakeholders, and with input received from hundreds of meetings and community engagement activities. Key stakeholders include residents; business owners; employees; community leaders and stewards; environmental groups; community-based organizations; community organizers; town councils; transit and bicycle advocates; economic development corporations; trade associations; organized labor; people experiencing homelessness; people with disabilities; homeowners associations; renters; state, local and regional agencies; cities; developers/building industry representatives; chambers of commerce and business federations; legal aid; environmental justice advocates, and other County agencies and departments. The County will continue to reach out to stakeholders throughout the grant period. In addition to working with organizations, holding events and community meetings (in person and virtual), and other traditional forms of engagement, the County will focus on its "ground game" through direct outreach to stakeholders at schools, parks, senior centers, churches and other faith-based organizations, supermarkets and community gathering places, pre-scheduled events, and "office hours" like walk-and-talks held within the community. The County will also use a pre-approved master agreement established by the Department of Public Health to quickly onboard and compensate CBOs that have established trust within communities and the ability to organize people; use alternative means to disseminate information, such as door to door engagement; and can provide invaluable insight into how stakeholders get their information and stay informed (eg., community message board, radio, online, text, word of mouth, regularly scheduled meetings, etc.). The County will also use project web pages to document the process and promote transparency. Furthermore, LA County Planning will implement its robust language access policy to proactively provide translation and interpretation, based on documented need using GIS and Census tract information.



Stakeholder Engagement and Public Participation Summary:

The proposed activities are committed actions from the General Plan and Housing Element, which were developed in partnership with a diversity of stakeholders, and with input received from hundreds of meetings and community engagement activities. Key stakeholders include residents; business owners; employees; community leaders and stewards; environmental groups; community-based organizations; community organizers; town councils; transit and bicycle advocates; economic development corporations; trade associations; organized labor; people experiencing homelessness; people with disabilities; homeowners associations; renters; state, local and regional agencies; cities; developers/building industry representatives; chambers of commerce and business federations; legal aid; environmental justice advocates, and other County agencies and departments. The County will continue to reach out to stakeholders throughout the grant period. In addition to working with organizations, holding events and community meetings (in person and virtual), and other traditional forms of engagement, the County will focus on its "ground game" through direct outreach to stakeholders at schools, parks, senior centers, churches and other faith-based organizations, supermarkets and community gathering places, pre-scheduled events, and "office hours" like walk-and-talks held within the community. The County will also use a pre-approved master agreement established by the Department of Public Health to quickly onboard and compensate CBOs that have established trust within communities and the ability to organize people; use alternative means to disseminate information, such as door to door engagement; and can provide invaluable insight into how stakeholders get their information and stay informed (eg., community message board, radio, online, text, word of mouth, regularly scheduled meetings, etc.). The County will also use project web pages to document the process and promote transparency. Furthermore, LA County Planning will implement its robust language access policy to proactively provide translation and interpretation, based on documented need using GIS and Census tract information. Specific to the proposal that informed this Action Plan, LA County Planning made a public presentation at a regularly scheduled Countywide Community Services meeting (virtually) on September 27, 2023, wherein staff discussed the draft

application. The County made the draft application available for public review on October 6, 2023, and the Board of Supervisors held a public hearing on October 24, 2023. This public hearing was held in a hybrid (in person and virtual) format that provides language access options and accessibility accommodations. The County also developed a dedicated accessible web page, with language translation features, for the application at <https://planning.lacounty.gov/long-range-planning/pro-housing/>; posted newspaper ads in English and Spanish; posted announcements on social media in English and Spanish; and sent email blasts in English and Spanish to 4,957 email addresses using the Department's courtesy contact list, which comprise contacts for community leaders, community-based organizations, building industry representatives, and other housing industry stakeholders engaged in housing policy issues. Additionally, the County's sister agency, the Los Angeles County Development Authority, a HUD grantee, distributed notices of the application's availability through its contact lists. The County made available bilingual Spanish-speaking and Mandarin Chinese-speaking staff and other language access tools to answer questions and collect public comments on the draft application.

Some of the stakeholder input that informed the proposal include documented comments from the County's recent update to its Housing Element. Several stakeholders expressed concerns over the impacts of upzoning parcels to accommodate higher residential densities without consideration for potential displacement and gentrification, infrastructure capacity, increased traffic, and missed opportunities to capture community benefits. Other comments and recommendations from the Housing Element process include concerns over the loss of commercial uses to residential uses, a need for more missing middle housing types, a need for more affordable housing, and frustration over approach to community engagement. The proposed activities combined will address all of these issues.

To encourage participation, the County will use traditional forms of outreach as well as direct outreach to stakeholders at schools, parks, churches, supermarkets, gathering places, events, and "office hours" held within the community. The County will also establish formal relationships with community-based organizations to ensure that all voices are represented and heard throughout the development of the proposed activities. This direct and proactive outreach, and the use of different approaches, will ensure that the County engages those who are most likely to benefit from the proposed activities. The County will engage with stakeholders early and often, which will help build trust and a better understanding of the proposed policies. Also, creating more opportunities for stakeholders to inform and shape the policies can help obtain community buy-in.

Long-Term Effect:

Upon completion of the grant-funded activities, the County will have developed CIPs for the East San Gabriel Valley Planning Area, Metro Planning Area, South Bay Planning Area, West San Gabriel Valley Planning Area, and Westside Planning Area. Also, the County will have updated the TOD Specific Plan for East Los Angeles. Furthermore, the County will have removed barriers and made amendments to the General Plan and Zoning Code to affirmatively further fair housing and ensure that policies are equitable. By the end of the grant period, all proposed activities will have undergone a comprehensive public process and will have been approved and adopted by County Regional Planning Commission and County Board of Supervisors. The proposed actions will shape future implementing actions, and in doing so, will permanently produce and preserve affordable housing beyond the grant period.

Major roadblocks are the uncertainty, and potential changes or delays that can occur to the proposed activities during the public hearings due to stakeholder opposition. The best way to counteract these roadblocks is to ensure that the community engagement process is extensive, and to obtain buy-in from stakeholders, which is accounted for in the Action Plan. In addition, the County will ensure that accurate information on the proposed activities is available in an inclusive and comprehensive way.

The proposed activities will not only produce and preserve affordable housing, but coordinate the housing with infrastructure, land use planning, and creating access to transit, amenities, public services, jobs, schools, and other important community assets and locations. The proposed activities for Infrastructure Planning and Transit-Oriented Districts will directly create access, amenities, and community assets for LMI households, while the proposed activities for Equity/Fair Housing will increase affordable housing opportunities in High and Highest Resource areas, which have greater access to such services and amenities.

Because the unincorporated areas are diverse and span across Los Angeles County, in between 88 cities, the proposed activities can provide comparable local examples and resources for other jurisdictions to replicate and scale. The County selected proposed activities that have been tried and tested by other jurisdictions, and in some cases, by the County. The County's successful completion and implementation of the proposed activities can add to the country's knowledgebase that these solutions, while challenging, are not insurmountable to establish, and that they do effectively produce and preserve affordable housing.

The unincorporated areas most significant environmental risks are wildfires, flooding, and seismic areas, which are becoming worse due to the effects of climate change. The Action Plan is in alignment and consistent with the Safety Element and Climate Action Plan, which are also components of the General Plan, and informed by the County's Climate Vulnerability Assessment, which identifies specific risks for Los Angeles County and analyzes impacts, particularly on frontline communities. The Safety Element and Climate Action Plan address these environmental risks, as well as policies that promote community resilience to mitigate the impacts of climate change. For example, the rezoning program does not include parcels that are within Very High Fire Hazard Severity Zones. The Climate Action Plan ensures that the benefits of measures and implementing actions are prioritized for frontline communities.

Success at the end of the period of performance and beyond will be having adopted policies in the General Plan and Zoning Code that address the Needs identified in this Action Plan by producing and preserving affordable housing, streamlining the housing development process with the removal of barriers, creating livable communities, and reversing legacy racist land use patterns that contribute to the housing crisis. The following metrics will measure these successful outcomes:

- Number of by-right affordable housing units produced/preserved: 53,519 affordable units (25,648 units affordable to households with incomes at 50% AMI and below; 13,691 units affordable to households with incomes at 80% AMI and below; and 14,180 units affordable to households with incomes at 120% AMI and below).
- Number of total by-right housing units produced: 90,052 units
- Percentage of the total number of 100% affordable housing developments that are produced in High and Highest Resource tracts: at least 50%
- Percentage of the total number of 100% affordable housing developments that are produced in High Segregation and

Poverty, Low Resource, and R/ECAP tracts: 0%

- Percentage of infrastructure identified in CIPs implemented: 75%
- Percentage of by-right units produced in TODs/High Quality Transit Areas: 75%

All proposed activities will be guided by the County's equity goals and goals to affirmatively further fair housing. The Missing Middle and Gentle Density Housing Program and the Equity Audit will directly work toward removing barriers to reverse land use patterns that have resulted from exclusionary practices and policies rooted in systemic racism. The proposed activities in Infrastructure Planning and Transit Oriented Districts will not only increase the production and preservation of affordable housing, but provide the necessary ingredients to build communities and improve quality of life for LMI households.

Substantial and Non-substantial Amendments (if applicable):

N/A

Project Summary

Project #	Project Title	Grantee Activity #	Activity Title	Grantee Program
9999	Restricted Balance		<i>No activities in this project</i>	



Action Plan History

Version

B-23-PH-06-0004 AP#1

Date

02/13/2025

