

Caring for Our Coast

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December 7, 2020

TO: Supervisor Hilda L. Solis, Chair Supervisor Holly Mitchell Supervisor Sheila Kuehl Supervisor Janice Hahn Supervisor Kathryn Barger

FROM: Gary Jones, Director

SUBJECT: MARINA DEL REY AFFORDABLE HOUSING POLICY – FINAL REPORT ON POTENTIAL UPDATES TO CURRENT POLICY (ITEM 5, AGENDA OF MARCH 10, 2020)

On March 10, 2020, your Board instructed the Department of Beaches and Harbors (DBH), in collaboration with the Department of Regional Planning (DRP), the Los Angeles County Development Authority (LACDA), and County Counsel (Counsel) to present recommendations and modifications to the current Marina del Rey Affordable Housing Policy (Policy) and report back to the Board within 180 days. On September 3, 2020, DBH submitted an interim report to your Board, outlining the efforts to date, and requesting additional time to solicit feedback from a variety of Marina stakeholders on proposed recommendations to the Policy. This subsequent report contains recommendations requested by your Board in the March 2020 motion. An updated policy that reflects consideration of stakeholder feedback and final recommendations will be submitted to your Board at a later date.

Background

The Mello Act, adopted by the California State Legislature in 1982, mandates that each local government, whose jurisdiction falls, in whole or in part, within the California Coastal Zone (Coastal Zone) require: (a) the replacement of housing units occupied by low or moderate income persons or families when it approves the conversion or demolition of those existing units, and (b) the provision of housing units for persons and families of low or moderate income when it approves new housing developments in the Coastal Zone.

In 2002, the County of Los Angeles (County) adopted a policy to implement the Mello Act in Marina del Rey, which required the preservation and inclusion of affordable housing in new developments and redevelopments. In 2008, following a demand letter from affordable housing advocates, the Board directed County staff to negotiate policy revisions and a settlement agreement with People Organized for Westside Renewal (POWER). On November 18, 2008, the County adopted a further refined Affordable Housing Policy for Marina del Rey. This updated Policy established new standards for preserving existing affordable housing (replacement units) and creating new affordable housing units (inclusionary units), where feasible.

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On November 1, 2016, your Board instructed DBH, in collaboration with DRP, the Chief Executive Office (CEO), the Community Development Commission, now known as Los Angeles Community Development Association (LACDA), and County Counsel, to consult with Marina del Rey lessees and affordable housing stakeholders to examine the effectiveness of the current Policy. On September 28, 2017, DBH submitted a report to your Board which analyzed the efficacy of the current policy in creating and maintaining affordable units in the Marina. The report also compared how neighboring jurisdictions responded to the requirements of the Mello Act to create and preserve affordable housing within the Coastal Zone. The analysis included how various public financing methods could further encourage affordable development compared to the current use of rent credits, how the existing Policy could be revised to increase the number and level of affordable housing units in Marina del Rey, and how the County monitors and determines compliance with the Policy. Since receiving the 2017 affordable housing report, the Board has received recurring questions and concerns about affordable housing policies in the Marina and as such, requested that DBH, DRP, County Counsel, and LACDA revisit potential updates to the 2008 Marina del Rey Affordable Housing Policy as presented in the report.

Recommendations and Changes to the Current Policy

DBH, in collaboration with DRP, LACDA, and County Counsel, has developed the following recommendations and Policy amendments to address the March 2020 motion directives enumerated below.

1. Proposed amendments to the Marina del Rey Affordable Housing policy that will redefine "Substantial Rehabilitation" to include major renovation projects within that definition and ensure that such projects include affordable units in order to preserve coastal housing for all residents of California.

The term "substantial rehabilitation" shall be defined as construction work that exceeds \$40,000 per unit in construction costs for interior renovations only, including plumbing, electrical, and HVAC upgrades, new installations, and improvements, with the exception of rehabilitation work that is required due to government code mandated changes, emergency repairs and/or like for like replacements. The per unit construction maximum should be adjusted with regard to inflation. Substantial rehabilitation is triggered when major renovation work is done that upgrades the unit beyond the above amount and the construction limit does not apply to common area improvements such as parking, landscape, pool, gym, etc.

Alternatively, substantial rehabilitation also applies to a building if it is rendered uninhabitable or tenants are relocated for a duration longer than 30 days, when the renovations being made are voluntary in nature. No existing tenant may be displaced for more than 30 days, unless granted written authorization by the Department of Beaches and Harbors Director (Director). If a tenant can be permanently relocated into a comparable unit within the same development, substantial rehabilitation will not be triggered due solely to the relocation. Although relocating a tenant within the same development is preferred, if the lessee can accommodate the tenant in another comparable unit, either next to or within close vicinity to the building being renovated, the Director has the authority to approve this relocation. In the matter of the determination of substantial rehabilitation, DBH will make the final review and determination of the proposed construction cost and whether to require incorporation of affordable units if there is the potential of the rehabilitation exceeding the defined amount above.

In the current Policy, converted or demolished residential units that are occupied by lowor moderate-income persons or families must be replaced. In addition, new residential projects must provide affordable inclusionary housing units at very low, low, and moderate-income levels. The current Policy does not address standards that would apply to the rehabilitation of an existing residential building. Therefore, rehabilitation of existing structures have not required preservation or creation of affordable units. Many of the major renovation projects that have occurred in the Marina since 2008 would have been required to include affordable units, if substantial renovation was defined as shown above. Projects that include relatively minor building improvements, necessary repair and maintenance projects, or baseline updates to units, generally, would not fall under this definition.

2. Proposed amendments to the Marina del Rey Affordable Housing policy that will increase the percentage of affordable units from the current 15% goal to 20%, applicable to both new construction and Substantial Rehabilitation, with recommendations on the percentage of units at different affordability levels.

The revised Policy now includes a requirement that new residential projects and existing developments that undergo substantial rehabilitation, must provide affordable inclusionary housing units. Subject to an analysis of each project's feasibility, a 20% inclusionary affordable housing requirement shall be calculated based on the total number of units that would be present on site after construction or rehabilitation is complete. Previously, the Policy's inclusionary requirements only applied to "net new units" in a given project. Since the Mello Act does not contain any provisions to support the "net new units" limitation, this limitation has been removed to ensure that the County has the most successful policy possible.

In addition, more affordable units and a deeper level of affordability can be created by revising the current policy to require affordability levels geared towards lower income tenants. The requirements for tenant qualification of units as "lower income" as published by the U.S. Department of Housing and Urban Development (HUD) is generally referenced as families earning less than 80% of the area median income (AMI) for the Los Angeles-Long Beach Metropolitan statistical area. The following are HUD's commonly used income limits to categorize affordability levels based on local AMIs.

- Extremely low income: 0-30% of AMI
- Very low income: 30% to 50% of AMI
- Low income: 50% to 80% of AMI
- Moderate income: 80% to 120% of AMI

The Policy currently sets affordability levels such that 1/3 of units are reserved for very low-income tenants, 1/3 reserved for low-income, and the remaining 1/3 are reserved for moderate-income persons and families. In the event the product of the inclusionary unit calculation does not evenly divide by three, the remaining unit(s) would be designated as

a low-income unit(s). Final recommendations for the percentage of units at different affordability levels will take stakeholder feedback into consideration and be included in the forthcoming revised policy.

 Recommendations and options to expedite lease negotiations and entitlements pertaining to development of a 100% affordable housing project on Marina del Rey Lease Parcel 147 (OT), along with any associated feasibility and financing analyses or recommendations that may be relevant.

Marina del Rey Lease Parcel 147 (a portion of Assessor's Parcel Number 4224-006-900) is a 2.06-acre lease parcel bound by Washington Boulevard to the northwest, Lease Parcel P to the northeast, Admiralty Way to the southeast and Lease Parcel 145 to the southwest. The subject property is currently being used as a public parking lot. Lease Parcel P is an open space parcel utilized as a drainage lagoon, and Lease Parcel 145 is currently occupied by the Hilton Garden Inn Hotel.

The subject property is in the unincorporated community of Marina del Rey and within the Playa del Rey Zoned District. Land use and development in the Marina del Rey Community is governed by the Marina del Rey Local Coastal Program ("LCP"), which consists of the Marina del Rey Land Use Plan ("LUP"), a part of the Los Angeles County General Plan, and the Marina del Rey Specific Plan ("Specific Plan"), a part of the Los Angeles County Zoning Code. The property's current zone and land use designation are Specific Plan and SA (Senior Accommodations), respectively, and the property is also located within the Marina del Rey Mixed Use Overlay Zone.

Entitlements & Lease Negotiations

In response to the motion by the BOS, DRP has examined the development feasibility of a 100-percent affordable housing project on the subject property and sees three paths forward for approval of such a project.

The first pathway, which we will herein refer to as the "Expedited Path," is to direct a developer to submit an application for a project that is consistent with all of the requirements of the LCP and qualifies for an exemption under the California Environmental Quality Act ("CEQA"). An Expedited Path project will be required to obtain a Coastal Development Permit. To fully benefit from the Expedited Path, the project would be required to be a 100% affordable project and would be limited to 114 Senior Accommodation Units, as allowed by the LCP. The LCP and the Specific Plan prohibit the inclusion of a kitchen within the Senior Accommodation units and require a communal dining facility in the building. The project would also need to include the continued provision of all existing public parking currently found on the subject property. Because the lot is currently being used as a public parking lot, the LCP requires that these parking spaces continue to be provided as part of the project in order to maintain public access to coastal resources and to meet the parking replacement requirements outlined therein. Additionally, the project would need to be designed to gualify for an Expedited Environmental Review for Environmental Mandated Projects under CEQA (Section 21159.25, for example), and the submitted application would need to include information required to substantiate any location criteria noted therein.

A second, less expedient path, referred to herein as the "Mixed-Use Path," would include the 114 Senior Accommodation Units and public parking outlined above as well as 72 traditional affordable dwelling units. If the project scope were to include the additional 72 dwelling units, a Conditional Use Permit would be required to benefit from the provisions of the Mixed-Use Overlay Zone as outlined in section 22.46.1750 of the County Code. The additional 72 traditional affordable units represent the remaining traditional residential development potential in Development Zone II as outlined in the LCP.

Based on our existing project review process, known community concerns about new development in Marina del Rey, and the involvement of agencies outside of the County (such as the California Coastal Commission) in the approval process, we estimate that the processing time for an Expedited Path project is one to two years and the processing time of the Mixed-Use Path to be two to three years. It is unlikely that a project of this scope could obtain the necessary permits in less than one year due to the complexity of required entitlements, CEQA review, and anticipated appeals if the project is ultimately approved by the County. In an effort to streamline and expedite lease negotiations, determination of terms and conditions of the ground lease should be the sole responsibility of the DBH. The LACDA should assist the developer with financing options.

With the current LCP and Specific Plan prohibitions on individual kitchens, a 100-percent affordable housing project on the property is not financially feasible. The exclusion of individual unit kitchens limits the project's eligibility for Section 8 project-based rental assistance at a level necessary to sustain project operations. In addition, the lack of individual kitchens makes the project ineligible for tax credits from the California Tax Credit Allocation Committee because it does not comply with standard project regulations. Based on these financing considerations, it is recommended that the amendments described below be secured in order to move forward with the project.

The third pathway, herein referred to as the "LCP Amendment Path," includes the same entitlements and CEQA exemption sought in the Mixed-Use Path plus amendments to the LCP. As previously mentioned, the LCP prohibits kitchens in the Senior Accommodations units. This prohibition is articulated in both LUP (part of the General Plan) and the Specific Plan (part of the Zoning Code). These amendments would seek to alter the LCP's prohibition of kitchens in the Senior Accommodations units and remove the LCP's requirement to provide a communal dining facility in the building. These amendments would allow the project to qualify for a wider pool of financing options and align the project more closely with affordable and senior housing best practices.

These LCP amendments would be processed concurrently with the application for a 100percent affordable housing project on the property. Typically, a Plan Amendment and Zone Change in the Coastal Zone can be expected to have a processing time of one to three years. Although LCP amendments are typically exempt from CEQA requirements, project approvals are not, and extensive coastal resources impact analyses may be required as part of the amendment process. Analysis may include, but are not limited to, a traffic impact analysis, parking and public access impacts, noise and air quality impact analyses, and a sea level rise analysis, among others. These required analyses would have to be completed prior to application submittal to DRP and the time required to complete them should be added to the one to three year estimate above¹. The parameters of this scenario lead DRP staff to conclude that a total time required to execute the LCP Amendment Path would be a minimum of two years and upwards of five years.

In light of the analysis above, DRP staff defers the recommendation of which pathway is most prudent to DBH and LACDA and stands ready to provide additional information necessary so that DBH and LACDA can conduct an informed analysis of the regulatory requirements and constraints, and provide a recommendation to the Board based on that analysis.

4. Proposed amendments that would 1) require all properties in the Marina with affordable units under covenant to change their current wait list and affordable unit leasing procedures to conform with the development and implementation of a Centralized Wait List registration and referral system that would simplify and improve the process for prospective tenants applying for available affordable units in Marina del Rey, 2) identify any priorities or preferences that could help prevent economic displacement of existing Marina del Rey residents, 3) make recommendations for any other priorities or preferences that help support the goals of County housing and homelessness prevention initiatives, and 4) identify cost- sharing mechanisms and recommended amendments to existing monitoring agreements in support of new Marina del Rey wait list and tenant referral mechanisms

The September 2017 Marina del Rey Affordable Housing Policy report included a preliminary analysis for a "Consolidated Waitlist" to help streamline and improve the lease up and monitoring procedures for affordable units in Marina del Rey. Moving forward, the Consolidated Waitlist will be referred to as the Centralized Waitlist. This change was made to better reflect the purpose of the waitlist as a central location from which referrals can be made for existing and future units, rather than a long-term consolidation of existing waitlists. The main benefits of the Centralized Waitlist include increased access to affordable housing opportunities, consistent protocol for screening applicants, decreased potential for discrimination or fair housing violations and increased opportunity to appeal eligibility determinations, and a universal application for the centralized waitlist system, reducing labor time for the applicant and waitlist administrator.

While the benefits listed above are extremely valuable, it is important to note that the Centralized Waitlist does not address the vast disparity between the supply and demand for affordable units in LA County. For example, when Neptune Marina opened applications for its affordable housing unit lottery, 560 people applied for 81 units. Presumably, more people would have applied if there had been no cut off for the number of people allowed to enter the lottery. The Centralized Waitlist will not prevent something similar from occurring for future units, nor will it significantly expedite the lease up process, however, it will provide the public with a more equitable and accessible system through which they can apply for multiple affordable housing units at once.

¹ This timeline is complicated by the common reality that "opening up" the General Plan for amendment often results in a cascade of requests for additional amendments (by County and other government agencies, non-government organizations, and private actors) to correct or alter perceived shortcomings in the existing Plan. Because of the of time-consuming process of amending the LCP, these varied and sundry requests are commonly considered and implemented when a Plan goes through the amendment process, further lengthening the time required to complete the amendment.

During the time that has elapsed since the 2017 report, the LACDA has continued to explore issues and options for the optimum development and operation of a Centralized Waitlist. In that analysis, LACDA has determined the most efficient and cost-effective option is to work with internal staff to develop an in-house Centralized Waiting List with features similar to existing LACDA waiting lists used for other purposes.

Conversion of Existing Waitlists

There are currently seven properties in Marina del Rey with existing waitlists for affordable units. These waitlists are individually controlled by the on-site property management staff or a contracted third party and operate under a range of procedural and maintenance practices. There are multiple steps LACDA recommends in order to ensure a fair transition from individual property waitlists to reach the end goal of a Centralized Waitlist system for all Marina del Rey affordable units. The first step requires contacting every household on the existing waiting lists to confirm continued interest in remaining on an existing list. Once the lists are cleaned and updated based on household feedback, they will remain in their original order and be operated uniformly under LACDA control. The intention of maintaining the existing lists separately from the broader Centralized Waitlist is to prevent any household from losing their longstanding place in line for a desired affordable unit at a specific property. The next step in moving toward a Centralized Waitlist system is referring all households from the existing lists to available units at their preferred property until all referrals have been exhausted. Once all existing waiting lists have been exhausted, the system should begin to make referrals from the established Centralized Waitlist. It is recommended that households on existing waitlists remain eligible to apply to the broader Centralized Waitlist.

Anti-Displacement Preferences

The current Marina del Rey policy includes a provision that prioritizes existing low- and moderate-income tenants for replacement affordable units required by the Mello Act. Tenants who fall into this category are currently given the opportunity to apply for those affordable replacement units prior to any household on the broader Centralized Waitlist. It is recommended that the updated policy maintain this provision and offer any Mello Act replacement units to existing tenants residing in low and moderate income households. This provision will help to ensure that any existing low or moderate income tenant will have the opportunity to continue living in Marina del Rey in the event that their current unit is either demolished, substantially rehabilitated, or converted. It is recommended that the Centralized Waitlist system include a portal to capture and maintain updated contact information for existing or former tenants who gualify for replacement units. When replacement units become available, those households should be contacted first to apply. before any referrals from the broader Centralized Waitlist are made. If replacement units are provided on a rolling basis in the case of a substantial rehabilitation project, a lottery will determine the order in which existing or former tenants are offered the opportunity to apply to available affordable units.

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Additional Priorities and Preferences

The purpose of the Waitlist is to provide a central entry point for all LA County residents interested in applying for available affordable housing units in Marina del Rey. It does not intend to replicate more specifically focused waitlist and referral systems such as the Coordinated Entry System, however it would be beneficial to include preferences that reflect County-wide goals and efforts to address increasing homelessness and economic displacement. Centralized waiting list systems within the County and State intending to address similar issues were looked at as examples for potential preferences. It is recommended that the Centralized Waitlist include the referral preferences listed below, which all may require additional documentation at the time of unit application. The Centralized Waitlist system will be designed to weigh these preferences when sorting referrals for available affordable units. As indicated in the previous two sections of this report, households on existing waiting lists and current low and moderate income residents eligible for Mello Act replacement units should be given priority to apply for appropriate units prior to any household referred from the broader Centralized Waitlist.

Priority for Units with Existing Waitlists & Mello Act Replacement Units

- Households on existing waiting lists
- Current low and moderate income Marina del Rey residents as identified during replacement unit determinations

Preference for Inclusionary Units

- Current LA County residents
- Current LA County residents experiencing homelessness
- Current LA County residents facing severe rent burden

In the case that there are fully accessible units available in projects, it is recommended that a separate list be maintained for those units and that priority is given to applicants who qualify for an accessible unit.

Cost-sharing Mechanisms and Recommended Fees

Cost Sharing Mechanisms

The initial cost to build the Centralized Waitlist system was estimated at \$165,000 with an annual maintenance fee of \$30,000. LACDA's most recent budget estimates indicate a much lower cost to build the Centralized Waitlist system with initial implementation set at \$50,000 and an annual maintenance fee of \$10,000.

Costs should be shared equally across Marina del Rey properties and the County. The table below demonstrates cost-sharing amounts for the initial budget estimates and the implementation budget for the Centralized Waitlist system. The proposed cost-sharing mechanism also considers two options where Marina del Rey properties may pay for 25% or 50% of the Centralized Waitlist costs.

Table A – Cost-Sharing

Building System	Total Cost	25%		50%	
CWL System	\$ 50,000	\$	1,563	\$	3,125
		Per MdR Property			

Monitoring Agreement Amendments

Monitoring Agreements for all Marina del Rey properties should be updated to include a provision requiring that Lessees utilize and pay the appropriate fees for the Centralized Waitlist system. Any provision that currently requires and regulates an internal property affordable housing waiting list should be removed from existing Monitoring Agreements. Additionally, it is recommended that all monitoring agreements be updated to align with similar agreements for projects utilizing public land, and that a provision be added stating compliance with all current and future housing-related state laws and local ordinances.

Lastly, it is recommended that Monitoring Agreements be amended to include a provision regarding increases in existing tenant income. All tenants must initially income qualify for a designated affordable unit. Upon annual review, however, it is recommended that tenant income may be allowed to increase up to one hundred and forty percent (140%) of the qualifying income. This update aligns with current California Tax Credit policy and the recently executed Mariners Village Affordable Housing Plan. It allows for longer tenancies and accounts for common income fluctuation. To be consistent, the amended tenant income provision should mirror that of the provision in the Mariners Village Affordable Housing Plan included below.

c. Increases in Tenant's Household Income. Resident acknowledges and agrees as follows with respect to increases in Resident's Household income during the term of the Lease: If, upon recertification, a Very Low-Income Resident's Household Income exceeds the qualifying income for a Very Low Income household, the household will still be considered a Very Low Income household and continue to pay the Affordable Rent for a Very Low Income unit, but if a household residing in a Very Low Income Unit has income that exceeds 140% of the qualifying income for a Very Low Income household, the household will be given notice that they are no longer eligible under the Mariners Village Affordable Housing Program and therefore will not be eligible for a qualifying Affordable Rent. To carry this out, at the time of annual income certification, an aboveincome household whose household income exceeds 140% of the qualifying income for a Very Low Income household will be notified that their income exceeds the limits for the Mariners Village Affordable Housing Program and that they will have one year from notice to either pay market-rate rent or elect to move to a unit that is not part of the Mariners Village Affordable Housing Program. If Resident fails to check either option. Resident shall be in default under the Lease and Landlord shall be entitled to exercise any and all remedies set forth in the Lease.

5. Recommended protocols and procedures to require Marina lessees to provide income and occupancy surveys for Marina del Rey properties that seek approvals for demolition and/or substantial renovations that would trigger affordable housing requirements, with an emphasis on mechanisms to require surveys at the earliest stage of application or feasibility study, along with any additional recommendations to identify actions such as tenant buyout agreements that are intended to evade or dilute compliance and conformity with the intentions and goals of the Policy and Mello Act

The recommendations made in this section will build upon much of what was presented in the 2017 report. The recommendations will include an overview of what will trigger surveys, how replacement determinations will be made, and the look back period for surveys.

Replacement Trigger and Determination

The trigger to determine the number of replacement requirements should occur upon the initiation of lease or term sheet negotiations, or another date early in the development process as recommended by staff. In order to move forward with the negotiation process, Lessees should be required to pay a third party selected by LACDA to complete and submit income and occupancy surveys to the County within 60 days of initial lease or term sheet negotiations. LACDA should provide a determination to DRP and DBH for the number of required replacement units within 60 days of LACDA receiving the completed income surveys.

If a unit is occupied at the time of the income survey, the replacement unit determination, including the affordability level, should be based on household income or rent. If any unit is vacant at the time of the survey, it should be counted as an affordable unit set at a lower income, unless it can be demonstrated that the unit was not previously occupied by a low or moderate income household. Additional replacement triggers are currently under review to align with existing County ordinances and neighboring Mello Act ordinances that require replacement units. Incorporating similar triggers will ensure consistent development regulations and contribute to stronger anti-displacement policies desired by the Board. It is recommended that no term sheet or lease negotiations should be approved until LACDA has made a final replacement unit determination.

Survey Lookback Period

It is recommended that the survey lookback period be limited to a maximum of three months prior to the initiation of the income survey. This should help reduce the time it takes to complete surveys and result in a swift determination for the number of replacement units based on income surveys. It may also help increase the number of completed surveys submitted to LACDA or a designated third party, which in turn could provide a more accurate replacement unit determination.

6. Recommendations for proposed changes to the fees charged by LACDA for review, recordation and monitoring of affordable units required in Marina del Rey properties

LACDA requires up to \$165 per unit for annual compliance monitoring for all Marina del Rey affordable units. This fee may be adjusted annually according to CPI. Additionally, the County Rent Stabilization Ordinance requires that every Marina del Rey property pay a Rental Registry fee between \$30 to \$90 per unit for the entire property. In order to minimize the annual fees charged to Marina del Rey lessees, it is recommended the County pay up to 50% of the building and annual maintenance costs for the Centralized Waitlist system. Table B identifies all three required fees Lessees must pay annually. It is expected that as more Marina del Rey affordable units are set-aside, the annual maintenance fee shall be reduced accordingly.

Table B – LA County Monitoring, Rent Stabilization, and CWL Costs Per Unit

Total LA County Fees		50%		
MdR Monitoring		165		
Rent Registry		30		
MdR CWL System		11		
Total Per Unit, Per Year		206		

Conclusion

With the current policy recommendations presented to your Board for the Marina del Rey Affordable Housing Policy, we believe the Policy will be more successful in producing a larger number of affordable units. In particular, by redefining substantial rehabilitation to include projects that would otherwise be exempt from the current Policy and increasing the inclusionary housing requirement from 15% to 20%, we believe a greater number of projects in the Marina would be required to adhere to the inclusionary housing requirement. The recommendations for implementing a Centralized Waitlist, updating monitoring agreements, and modifying protocols for income and occupancy surveys would result in increased efficiency for implementing various aspects of the Policy. Finally, the presented options to expedite development of a 100% affordable housing project on Marina del Rey Lease Parcel 147 (OT), in regards to lease negotiations and entitlements, should prove beneficial in determining the most prudent pathway to advance the project. The draft policy is currently being circulated for comment among Marina stakeholders, including affordable housing advocacy groups and the Marina del Rey Lessees Association. An updated policy that reflects consideration of stakeholder feedback and final DBH, DRP, LACDA and County Counsel recommendations will be submitted to your Board at a later date.

If you have any additional questions regarding the recommended policy changes, please contact me at (424) 526-7771 or <u>GJones@bh.lacounty.gov</u>, or Michael Tripp of my staff at (424) 526-7745 or <u>MTripp@bh.lacounty.gov</u>.

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c: Marina Board Deputies Executive Office of the Board of Supervisors Chief Executive Officer County Counsel Department of Regional Planning Los Angeles County Development Authority