Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

August 3, 2016

TO: Supervisor Hilda L. Solis, Chair
Supervisor Mark Ridley-Thomas
Supervisor Sheila Kuehl
Supervisor Don Knabe
Supervisor Michael D. Antonovich

FROM: Richard J. Bruckner
Director

REPORT ON BOARD MOTION REGARDING AFFORDABLE HOUSING (AGENDA ITEM NO. 3, JULY 5, 2016)

On July 5, 2016, the Board of Supervisors (Board) instructed the Director of the Department of Regional Planning (DRP) to report back in 30 days on existing practices employed by the County to expedite entitlement and environmental reviews for affordable housing developments and opportunities that may exist to further expedite these reviews. The following report details DRP's current affordable housing project entitlement process, existing efforts to streamline the process, and opportunities to further expedite reviews. It also identifies environmental review streamlining opportunities for affordable housing developments based on the California Environmental Quality Act (CEQA).

As an immediate next step, DRP and County Counsel will prepare the necessary findings pursuant to the recently adopted County General Plan and coordinate with the Governor's Office of Planning and Research (OPR) to expand the applicability of CEQA streamlining provisions and exemptions for affordable housing, housing near transit, and infill development to the unincorporated areas.

Part I: Practices to Expedite Affordable Housing

Currently, DRP employs the following practices to expedite project review and entitlement for affordable housing developments:

- Expedited case intake appointments.
- Pre-submittal one stop counseling for the applicant to receive project-specific guidance early in the process. This counseling may involve DRP staff only or staff from other reviewing departments (e.g., Department of Public Works (DPW), Fire Department (Fire), Department of Public Health (DPH), the Community Development Commission (CDC).

- Coordination with reviewing departments to provide comments and recommended conditions on an expedited basis.
- Meetings with the applicant throughout the process to identify and resolve issues.
- A processing timeline to ensure timely project completion. To the extent possible, project review, report preparation, and public hearings are expedited to meet funding deadlines.
- For discretionary approvals, a recommendation to applicants to conduct public outreach with established community groups early on in the process.

Additional Opportunities

DRP has identified the following next steps, which can enhance current practices to expedite affordable housing:

- Assignment of a staff position in the Current Planning Division of DRP that is dedicated to affordable housing project entitlements. This position would be responsible for consultations, project review, and providing comments and recommended conditions to applicants. The staff member in this position also help track legislative changes and coordinate with staff in the Advance Planning Division of DRP on the implementation of affordable housing incentive programs and other efforts.
- Integration of EPIC-LA across all reviewing departments of affordable housing developments (DPW, DPH, Fire, DPH, and CDC). For example, DPW intends to implement EPIC-LA e-review in early 2017.

Part II: Environmental Review of Affordable Housing Developments – Opportunities for California Environmental Quality Act Streamlining and Exemptions

There are existing provisions in CEQA to promote streamlining and exemptions for affordable housing, housing near transit, and infill housing. CEQA Statutes for Infill Projects Streamlining (State Public Resources Code Section 21094.5) and the affordable housing exemption (State Public Resources Code Sections 21159.23 through 21159.24) provide streamlining and exemptions for residential and non-residential projects to support and incentivize certain types of development. Typically, CEQA streamlining and exemptions apply to affordable housing, development near transit stations, and infill development. However, the applicability of these provisions is limited for county unincorporated areas. With the following recommended actions, there is an opportunity for the County to expand the applicability of these exemptions to the unincorporated areas.

Current Opportunities

To qualify for streamlining and exemptions, CEQA states that projects within the unincorporated areas must be located within an "urban area" or "urbanized area." An "urban area" or "urbanized area" must meet the following criteria:

- The population of the unincorporated area and the surrounding cities equals at least 100,000; and
- The population density of the unincorporated area at least equals the population density of the surrounding cities.

Furthermore, CEQA states that counties must issue a finding that the general plan and other related policies promote compact development and affordable housing. Specifically, the legislative body must take the following actions as stated in Section 21071(b) (2) of the CEQA Guidelines:

> *(A) [Issue] a finding that the general plan, zoning ordinance, and related policies and programs applicable to the unincorporated area are consistent with principles that encourage compact development in a manner that does both of the following:*
>
> > *(i) Promotes efficient transportation systems, economic growth, affordable housing, energy efficiency, and an appropriate balance of jobs and housing.*
> >
> > *(ii) Protects the environment, open space, and agricultural areas.*
>
> *(B) [Submit] a draft finding to the Office of Planning and Research at least 30 days prior to issuing a final finding, and [allow] the office 30 days to submit comments on the draft findings to the board of supervisors.*

As shown in Attachment A, there are 23 unincorporated areas that meet the criteria for "urban area" or "urbanized area." These unincorporated areas are also listed in Attachment B.

Given that the County General Plan, which was adopted by the Board on October 6, 2015, is consistent with the compact growth principles described above, DRP and County Counsel will prepare the necessary findings and coordinate with the OPR to expand the applicability of these streamlining provisions and exemptions to these 23 unincorporated areas.

Additional Opportunities

In conjunction to the findings, DRP, County Counsel, and the Chief Executive Office will continue to advocate for legislative changes in CEQA to further expand the applicability of streamlining provisions and exemptions for affordable housing, development near transit stations, and infill development in the unincorporated areas. This is important, given that Los Angeles County has the third largest population density in the State.

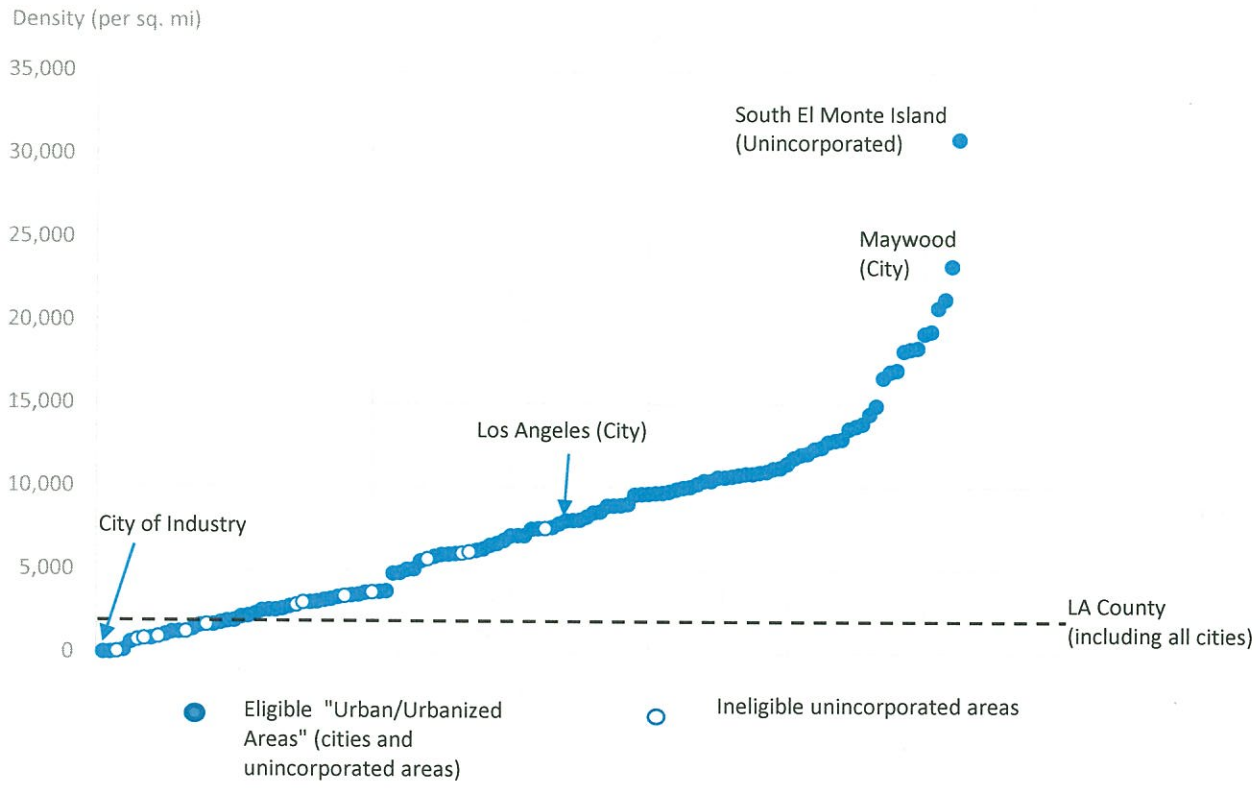
CEQA's definitions of "urban areas" and "urbanized areas" are inadequate because they exclude unincorporated areas that are as dense as eligible incorporated cities. Attachments C and D identify unincorporated areas that are not eligible for CEQA streamlining or exemptions because they are less dense than the average density of the surrounding incorporated cities. However, these unincorporated areas are located adjacent to or in close proximity to cities and with comparable or greater population densities than eligible cities.

Population Density Comparison by Geographic Area

Geographic Area	Population (2010 Census)	Population Density (Persons per square mile)
California	37,253,956	239
Los Angeles County (including all cities)	9,818,605	2,420
Los Angeles County Unincorporated Areas	1,031,885	392
Los Angeles County Urban Unincorporated Areas	798,410	7,190

Source: DRP GIS Section

Population Densities for Eligible and Ineligible Areas for Select California Environmental Quality Act Streamlining and Exemptions in Los Angeles County



Source: DRP GIS Section

In addition to changes to CEQA, at the Board's request, DRP is pursuing other opportunities for affordable housing creation and preservation. As part of the County's Homeless Initiative, and under the Equitable Development Work Program associated with the General Plan, DRP will assess strategies such as value capture, inclusionary zoning, a linkage fee, community land trust and other shared equity models.

For questions related to Part I of this report, please contact Maria Masis in the Zoning Permits East Section at mmasis@planning.lacounty.gov and (213) 974-6435. For questions related to Part II of this report, please contact Connie Chung in the General Plan Development and Housing Section at cchung@planning.lacounty.gov and (213) 974-6417.

RJB:MM:CC:ems

Attachment A: Map of Eligible Unincorporated Areas Meeting CEQA Urban/Urbanized Areas Definition
Attachment B: Eligible Unincorporated Areas Meeting CEQA Urban/Urbanized Areas Definition
Attachment C: Map of Ineligible Unincorporated Areas with Population Densities Comparable to Cities in Los Angeles County
Attachment D: Ineligible Unincorporated Areas with Population Densities Comparable to Cities in Los Angeles County

c: Executive Office, Board of Supervisors
County Counsel
Chief Executive Office
Community Development Commission
Fire
Public Health
Public Works

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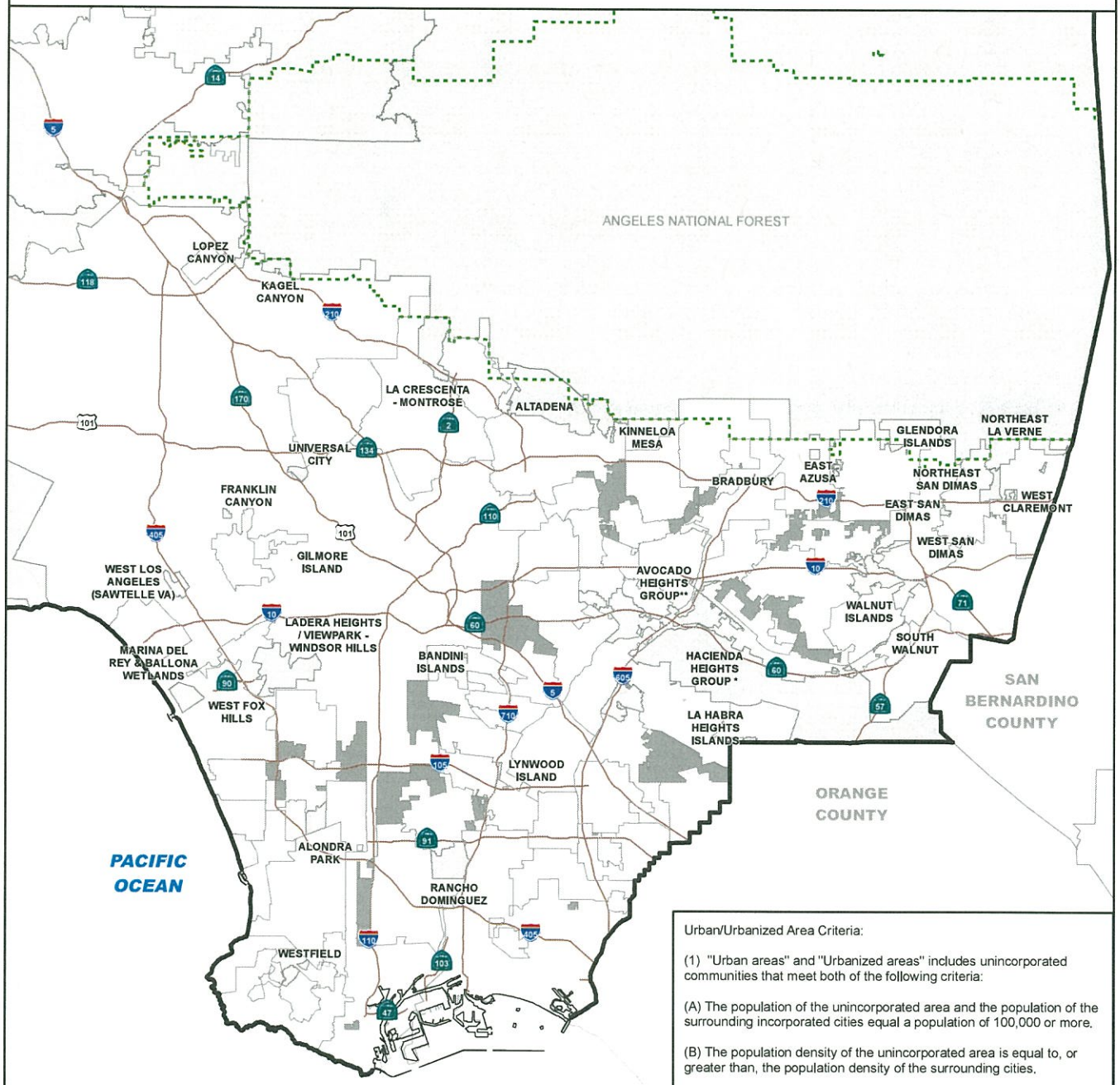
Attachment A: Map of Eligible Unincorporated Areas Meeting CEQA Urban/Urbanized Areas Definition



Urban/Urbanized Area Criteria:

(1) "Urban areas" and "Urbanized areas" includes unincorporated communities that meet both of the following criteria:

(A) The population of the unincorporated area and the population of the surrounding incorporated cities equal a population of 100,000 or more.

(B) The population density of the unincorporated area is equal to, or greater than, the population density of the surrounding cities.

NOTE:
* Population, acreage and density for the contiguous area made up of West Whittier-Los Nietos, North Whittier, Hacienda Heights, Rowland Heights & South Diamond Bar was combined with an adjacent Orange County unincorporated area.

** Population, acreage and density for the contiguous area is made up of Avocado Heights, Whittier Narrows & South San Gabriel.

Eligible Urban/Urbanized Area

Ineligible Urban/Urbanized Area

Incorporated City

Miles

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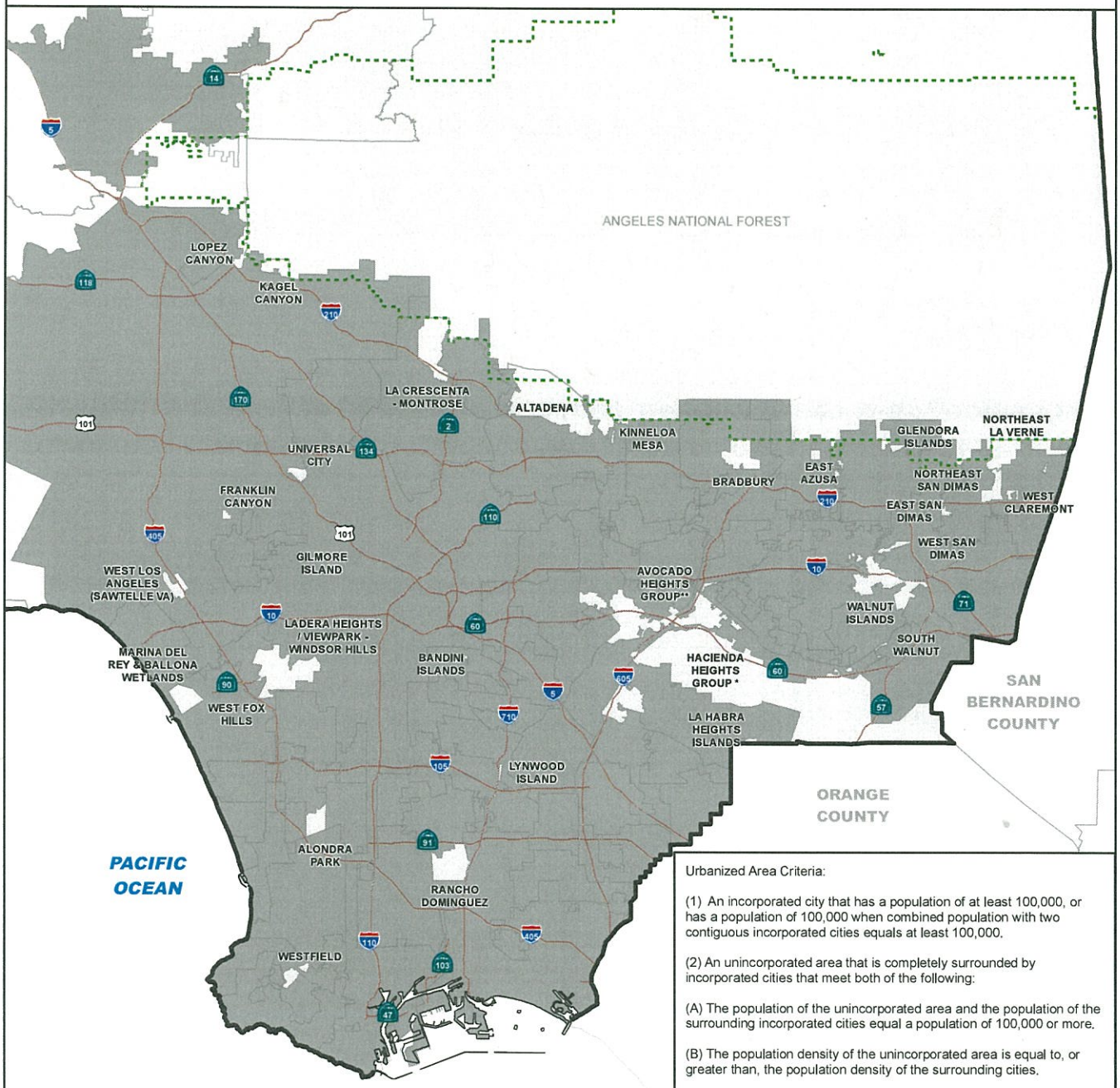
Attachment B: Eligible Unincorporated Areas Meeting CEQA Urban/Urbanized Area Definition

Community Name	Density (per square mile)	Population*
SOUTH EL MONTE ISLAND	30,989	138
HAWTHORNE ISLAND	21,361	2,488
LENNOX	20,828	22,792
EAST RANCHO DOMINGUEZ	18,415	15,135
FLORENCE - FIRESTONE, WALNUT PARK	18,334	79,353
EAST LOS ANGELES	16,977	126,492
WEST PUENTE VALLEY	12,911	24,105
W ATHENS - WESTMONT	12,745	40,582
SOUTH SAN JOSE HILLS, VALINDA	12,315	43,373
COVINA ISLANDS	11,958	15,482
CERRITOS ISLANDS	10,941	661
EAST IRWINDALE	10,814	15,922
NORTH POMONA	10,605	544
SOUTH WHITTIER - SUNSHINE ACRES	10,393	66,913
DEL AIRE	9,861	10,001
LA RAMBLA	9,730	2,034
CHARTER OAK	9,655	9,670
SOUTH MONROVIA ISLANDS	9,637	16,259
LONG BEACH ISLAND	9,592	1,410
WEST CARSON	8,520	21,700
EAST PASADENA - EAST SAN GABRIEL	8,204	28,829
SAN PASQUAL	8,001	2,041
W RANCHO DOMINGUEZ - VICTORIA, WILLOWBROOK	7,989	45,206

Source: DRP GIS Section

*Note: Per CEQA Statute 21094.5.(e).(5).A and 21071(b)(1)(A)(i), these communities meet the minimum population requirement because the population of the unincorporated area and the surrounding incorporated cities equal not less than 100,000 persons.

Attachment C: Map of Ineligible Unincorporated Areas with Population Desnisties Comparable to Cities in Los Angeles County



Urbanized Area Criteria:

(1) An incorporated city that has a population of at least 100,000, or has a population of 100,000 when combined population with two contiguous incorporated cities equals at least 100,000.

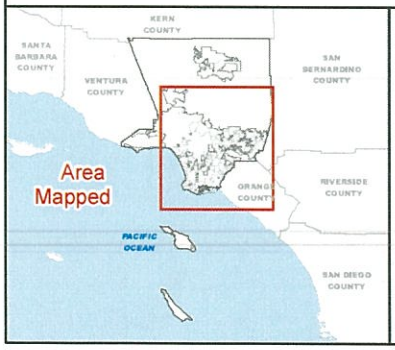
(2) An unincorporated area that is completely surrounded by incorporated cities that meet both of the following:

(A) The population of the unincorporated area and the population of the surrounding incorporated cities equal a population of 100,000 or more.

(B) The population density of the unincorporated area is equal to, or greater than, the population density of the surrounding cities.

NOTE:
* Population, acreage and density for the contiguous area made up of West Whittier-Los Nietos, North Whittier, Hacienda Heights, Rowland Heights & South Diamond Bar was combined with an adjacent Orange County unincorporated area.

** Population, acreage and density for the contiguous area is made up of Avocado Heights, Whittier Narrows & South San Gabriel.



Eligible Urban/Urbanized Area

Ineligible Urban/Urbanized Area

Miles
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Attachment D: Ineligible Unincorporated Areas with Population Densities Comparable to Cities in Los Angeles County

Unincorporated Area	Density (per square mile)	Population*
ALONDRA PARK	7,518	8,592
MARINA DEL REY	6,094	8,866
WEST FOX HILLS	5,670	255
LADERA HEIGHTS / VIEWPARK - WINDSOR HILLS	3,660	17,573
AVOCADO HEIGHTS, SOUTH SAN GABRIEL, WHITTIER NARROWS	3,425	25,697
HACIENDA HEIGHTS, NORTH WHITTIER, ROWLAND HEIGHTS, SOUTH DIAMOND BAR, WEST WHITTIER-LOS NIETOS	3,040	133,839
WESTFIELD	2,902	2,005
WALNUT ISLANDS	1,285	4,841
RANCHO DOMINGUEZ	966	2,597
WEST LOS ANGELES (SAWTELLE VA)	770	702

Source: DRP GIS Section

*Note: Per CEQA Statute 21094.5.(e).(5). and 21071(b).(1).(A), these communities meet the minimum population requirement because the population of the unincorporated area and the surrounding incorporated cities equal not less than 100,000 persons. However, they do not meet the minimum density requirement because the density of the unincorporated area is less than that of the surrounding incorporated cities.