

Attachment 1: Findings

FINDINGS

Housing Element Consistency Discussion and Findings

A. General Plan Consistency Discussion

The proposed targeted amendments to the adopted 2021-2029 Housing Element only affect implementation programs related to the AFFH strategy and provide relatively minimal revisions to clarify existing programs and commitments. The project also includes minor technical corrections. This includes corrections of typographical and formatting errors, including but not limited to accrediting staff, adding references to the amendment case number and adoption dates, and revisions to Appendix 4.1 (Inventory of Adequate Sites for Housing (Table A)). These minor technical revisions do not affect the substance of the plan, the sites identified in the inventory, or the overall evaluation of potential site capacity. The goals, policies, and objectives included in the adopted 2021-2029 Housing Element are not proposed to be amended or modified. The amended programs are supported by the existing goals, policies, and objectives in the 2021-2029 Housing Element, and are intended to provide the necessary tools to implement and carry out the vision established by those goals, policies, and objectives. Therefore, the proposed amendments do not result in a substantive change to the adopted 2021-2029 Housing Element, and the findings adopted by the City Council on November 24, 2021 are applicable to the proposed project.

Furthermore, the four new proposed Implementation Programs (Programs 133, 134, 135, and 136) are intended to capture existing place-based efforts that have been identified in prior planning efforts and/or implemented across City Departments. These are all existing work programs, and the metrics and commitments associated with them have been previously established through grant requirements, council report backs, or existing department policies. These programs are consistent with the General Plan, and several of the programs reflect existing implementation programs identified in elements of the General Plan, including the Mobility Plan (Program 133) and the Safety Element (Program 135).

For all the reasons provided above, the proposed targeted amendments to the 2021-2029 Housing Element fair housing programs and the minor technical corrections mentioned in this report are consistent with the City of Los Angeles General Plan.

B. State Housing Element Findings (California State Government Code Section 65580 - 65589.11)

Consistency with State Law - Statutory requirements for the housing element are delineated in California State Government Code Section 65580 - 65589.11. The housing element is required to be updated every eight years in accordance with a specific schedule of dates established by the California Department of Housing and Community Development (HCD). This Housing Element is part of the sixth cycle, which covers the period of October 15, 2021 through October 15, 2029 for the SCAG region.

The City is required to comply with all applicable state housing element requirements, including submitting the adopted Housing Element to HCD for its review and findings on substantial compliance.

On November 24, 2021, the Los Angeles City Council adopted a General Plan Amendment for the 2021-2029 Housing Element Update. Following adoption, the Plan was submitted to HCD for formal review and certification on November 24, 2021.

On February 22, 2022 the City received a letter from HCD (Exhibit D) stating that additional revisions were needed to the Housing Element's programs to ensure compliance with new Affirmatively Furthering Fair Housing (AFFH) requirements in state law.

The City collaborated with HCD to respond to guidance, directions and technical assistance to make the needed targeted revisions to bring the City's Housing Element into full compliance. On April 21, 2022, the City released a draft of the targeted amendments for public review and provided notice to all interested parties. On April 28, 2022, the City submitted the proposed targeted modifications to HCD for formal compliance review, meeting the statutorily required seven-day public review period in advance of HCD's formal review. On May 11, 2022, the City received a letter from HCD (Exhibit D) stating that, "The revised draft element meets the statutory requirements described in HCD's February 22, 2022 review ... As a result, the revised element will comply with State Housing Element Law (Article 10.6 of the Gov. Code) when the revisions are adopted and submitted to HCD, pursuant to Government Code section 65585." As such, absent any further changes to the revised draft that may impact the finding, the proposed Housing Element is consistent with state housing element law (California State Government Code Section 65580 - 65589.11), and no further findings are required.

CEQA Findings

The Proposed Project has been reviewed by the City of Los Angeles in pursuant to Sections 15162 and 15164 of the California Environmental Quality Act (CEQA) Guidelines, and Section 21166 of the Public Resource Code. As supported by the Addendum, attached in Exhibit C, and the Environmental Impact Report (EIR) prepared for the Citywide Housing Element 2021-2029 and Safety Element Update, SCH No. 2021010130 ("2021-2029 Housing Element EIR"), and the whole of the record, the Proposed Project was analyzed in the EIR and no subsequent or supplemental EIR is required.