

**DEPARTMENT OF
CITY PLANNING**

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN
PRESIDENT

CAROLINE CHOE
VICE-PRESIDENT

HELEN CAMPBELL
JENNA HORNSTOCK
HELEN LEUNG

YVETTE LOPEZ-LEDESMA
KAREN MACK
DANA M. PERLMAN
RENEE DAKE WILSON

**CITY OF LOS ANGELES
CALIFORNIA**



ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES

200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
(213) 978-1271

VINCENT P. BERTONI, AICP
DIRECTOR

SHANA M.M. BONSTIN
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

November 30, 2022

Los Angeles City Council
Office of the City Clerk
City Hall, Room 395
Los Angeles, CA 90012

Attention: Planning Land Use Management Committee

Dear Honorable Members:

REPORT RELATIVE TO THE METHODOLOGY THAT WOULD ENSURE THAT EQUITY IS AT THE CORE OF FUTURE LAND USE CONSIDERATIONS AND IMPLEMENTATION OF THE HOUSING ELEMENT (CF 21-1230)

I. INTRODUCTION

On November 24, 2021, the City Council adopted the 2021-2029 Housing Element Update. As part of the Council's consideration of the Housing Element Update, City Council instructed the Department of City Planning (DCP) to report on the development of a methodology that ensures equity is at the core of future land use considerations, including Citywide Rezoning and Community Plan Update programs. The report request was amended in a subsequent motion, adopted on August 5, 2022, to further instruct DCP, with the assistance of the Bureau of Engineering (BOE), the office of the City Administrative Officer (CAO), and any other relevant departments, in consultation with the Controller, to incorporate the findings in the Controller's Los Angeles Equity Index as part of its analysis.

This report provides an overview of the ongoing efforts to address equity in planning and land use, and presents an analysis of the methodologies and data tools available to address equity through these efforts. In particular, the report provides an overview of equity strategies and approaches that will be utilized as part of the implementation of the 2021-2029 Housing Element ("Housing Element"), including the Citywide Rezoning Program, active Community Planning programs and other Housing Element implementation programs.

The Citywide Rezoning Program presents an immediate opportunity to address important equity considerations as part of the land use planning process. Within the program, the City must both accommodate housing targets and Affirmatively Further Fair Housing, by expanding housing opportunities for all income groups and addressing patterns of racial and economic segregation. This report presents a high-level overview of how DCP plans to accomplish these goals and conduct a robust and inclusive community engagement process. The report also provides background information and discusses the relationship of the Citywide Rezoning Program to active rezoning programs including Community Plan Update programs.

In addition to rezoning, the report discusses key Housing Element implementation programs that aim to advance equity goals and citywide housing priorities, including tenant protection and anti-displacement strategies, place-based strategies, the creation of a Fair Share Housing Methodology (as described in Council File 19-0416) to allocate housing growth targets, and an update to the Framework Element of the General Plan. The latter two elements are longer term citywide efforts to embed an equity methodology into future land use decisions.

II. BACKGROUND

Equity in Land Use and Planning

Like much of the United States, systemic inequity exists in the city's land use patterns, zoning policies and practices. The current land use framework has not provided sufficient housing supply, choice, and affordability throughout the city, and this has disproportionately harmed low-income people of color. Disparities have compounded over time to exacerbate the current housing crisis, further entrench racial and economic segregation, and undermine the city's social, environmental, and racial justice goals. These disparities can be attributed to the racist and classist practices of racial covenants, redlining, inequitable zoning, and systematic disinvestment. Resource rich and affluent neighborhoods have resisted denser, more affordable housing, while communities of color have accommodated density but may have not had access to the necessary community-serving public investments to accompany the growth. The result is a city where one's life opportunities are too often dictated by one's zip code.

There are many definitions of equitable land use, but the American Planning Association defines it as the "just and fair inclusion into a society in which all can participate, prosper, and reach their full potential...by challenging those planning practices that result in policies, programs, and regulations that disproportionately impact and stymie the progress of certain segments of the population more than others." The overall aim is that one's neighborhood, race, income, or other characteristics cannot be used to predict life outcomes.

In 2020, the Department established the Office of Racial Justice, Equity, and Transformative Planning as a means to more deeply explore equitable outcomes in planning practices. The City Planning Commission (CPC) has created an Equity Committee and held four Equity focused public meetings where community members may share their experiences and offer strategies to address inequities in their communities. The CPC ratified a Value Statement that will serve as a living, guiding principle to center future decision-making on planning-related projects and policies around the Department's commitment to equity:

"Equitable planning demands that race does not determine whether or not one thrives in Los Angeles. The Los Angeles City Planning Commission prioritizes a planning process that centers the needs of those most harmed by systemic racism. Our goal is the creation of affordable, prosperous, resilient, and healthy communities where all Angelenos experience the feeling that they belong."

Equity in land use is at the core of the City's recently adopted Housing Element and its implementation programs. The Housing Element thoroughly documented a wide range of housing and zoning disparities and adopted an updated set of objectives, policies, and implementation programs that aim to reverse them. In evaluating all new housing policies and programs, the Housing Element established a priority of advancing racial equity and access to opportunity by

committing to “proactively address racial and economic segregation in the city by creating housing opportunities that address historic patterns of discrimination and exclusion.”

Data and mapping tools provide important insight into the areas affected by inequity and inputs for measuring equity that can help develop accountability metrics. The Opportunity Map developed by the California Tax Credit Allocation Committee (TCAC) and the California Department of Housing and Community Development (HCD) was used extensively as part of the Housing Element update, including as a tool for documenting disparities in outcomes, analyzing the equity of existing land use and zoning, as well as the equitable distribution of potential candidate sites for rezoning (see the Assessment of Fair Housing in Appendix 1.1, Chapter 4, and Appendix 4.4). The Department’s Rezoning Program (discussion below) also is planned to rely upon the use of the Opportunity Map to prioritize areas with High and Highest Resources (called Higher Opportunity Areas) to avoid further concentration of poverty and segregation and encourage greater access to opportunity.

Other similar indices also exist, including the LA Equity Index developed by the City Controller, as well as the Health Atlas developed as part of the Plan for a Healthy LA, an element of the General Plan. The LA Equity Index was released in 2021, providing an online interactive tool to measure structural disparities and barriers to opportunity in Los Angeles. It features different categories, as well as an overall composite index, both made up of a series of scored (or weighed) individual indicators. This tool shows communities that may be the highest priority for investment of resources based on relative need. The CAO’s Equity, Performance Management and Innovation Group is working with various departments to develop a new Citywide Equity Index tool, based on learnings from the Controller’s LA Equity Index and other commonly used indices. It is currently in early stages of development, with a pilot version expected in 2023. The Health Atlas was released in 2015 alongside the Health Element, as a series of maps illustrating measures of community wellbeing. This tool was updated in 2021 with the latest data.

All three mapping tools combine important data inputs related to environmental air/health quality, education level, poverty rates and home ownership, with some variation on other factors. They generally highlight very similar themes and data points, in terms of the unequal access to opportunities and other disparities across communities. As discussed below, these tools all provide valuable resources as the Department makes progress on implementing programs of the Housing Element. In alignment with state law, the Housing Element utilized the TCAC Opportunity Maps as a framework for the rezoning program, as the program is further developed the equity factors from the Controller’s LA Equity Indexed will be further evaluated. Examples of these map tools are provided as an Appendix. The Opportunity Map has the advantage of being updated annually per state law as it is used for funding affordable housing projects.

As an example of data informed equity work, in May 2021, the Department of City Planning and the Los Angeles Housing Department (LAHD) issued a joint report pursuant to CF 19-0146 (Citywide Equitable Distribution of Affordable Housing) that analyzed housing production trends that have led to an unequal distribution of affordable housing opportunities (e.g., only 6% of subsidized affordable housing was built in higher resource areas over a ten-year period). The report highlighted constraints in the development of affordable housing, and found that residential zoned density is not distributed equitably throughout the City. Using the Opportunity Maps described above, the report found that the City’s past land use and zoning practices reserved more land in higher resource areas for single-family housing, while limiting and concentrating multifamily housing in areas where it may exacerbate existing high segregation and poverty. The report identified potential strategies to address the equitable distribution of affordable housing, including a recommendation to address these concerns through many of the strategies that were later identified in the Housing Element Update as implementation programs.

Finally, the Department has commissioned data-driven research, such as the pending Historic Land Use and Anti-Displacement studies, which will further inform future land use policies. Better understanding of past inequitable policies, as well as best practices around anti-displacement, can help ensure past failures are not repeated.

2021-2029 Housing Element

The Housing Element of the General Plan contains detailed goals, policies, and implementation programs related to housing, providing key guidance on housing issues to decision makers at all levels of City government. As such, the Housing Element is a key policy tool for ensuring equity in land use. The most recent update to the Housing Element covers the period from 2021 to 2029 and was adopted by the City Council in November 2021, and was amended in June 2022.

A cornerstone of the Housing Element is the requirement to demonstrate adequate zoned capacity to accommodate the Regional Housing Needs Assessment (RHNA) Allocation. The RHNA Allocation is intended to create a regional “fair share” allocation of housing, by ensuring that all jurisdictions plan for enough housing to accommodate all economic segments of the community. If a jurisdiction cannot demonstrate adequate existing zoning capacity to accommodate the RHNA Allocation, the Housing Element must identify a rezoning program to create the needed additional housing capacity during the planning period. For the 2021-2029 planning period, the City of Los Angeles did not identify sufficient capacity to accommodate a RHNA Allocation of 456,543 units and is therefore required to rezone to accommodate at least 255,432 new homes by February 2025 as part of a Rezoning Program (Program 121).

In addition to the equitable Rezoning Program, which is further discussed below, the Housing Element identifies over 130 implementation programs which all provide various opportunities to advance the goals and policies of the plan. Some of these programs that touch most directly on the concerns of this Council motion will also be discussed below, but overall they seek to provide a systematic and comprehensive set of actions for increasing housing access, affordable housing preservation, housing stability, and production. Specific implementation strategies are discussed below. As these programs are developed and implemented, there will be substantial additional opportunities for public outreach and engagement, as well as additional consideration by the City Council, as further discussed below.

III. CITYWIDE REZONING PROGRAM

Program Goals

The Rezoning Program aims to create sufficient housing development capacity, particularly new opportunities for deed restricted affordable housing, for the City to meet its state housing obligations and provide greater housing access. It will incorporate several different citywide strategies and concepts, including many pending community planning updates, as well as future code amendments and citywide ordinances. These various programs will work together to create the necessary zoning capacity needed to accommodate at least 255,432 units, with more than half of the program focused on the development of lower-income housing.

The Rezoning Program is anticipated to be implemented through a number of work efforts that are detailed in Program 121 of the Housing Element, and further outlined in Chapter 4. While the Housing Element identified potential candidate sites for rezoning that would exceed 1.4 million

units of capacity, further analysis, community outreach and decision-maker review will refine the types of strategies that are ultimately adopted, which will affect the number of sites that would be affected. Inclusive outreach and engagement strategies that build off the Housing Element process are being planned to ensure that Angelenos who are not traditionally engaged in planning processes are included (see discussion of outreach strategies, below).

A central strategy of the Rezoning Program is to create the majority of all newly created housing capacity in Higher Opportunity Areas. These are areas that are often currently inaccessible due to historical land use and zoning policies, but have been identified by the HCD/TCAC Opportunity Maps as offering a dense concentration of place-based characteristics linked to critical life outcomes, such as educational attainment, employment, health and life expectancy, and economic mobility. These efforts would allow for increased access to higher resourced communities for lower-income households. In consultation with the Controller, the Office of the CAO and BOE, DCP will continue to refine potential criteria for identifying areas of opportunity. This strategy also responds to the findings and recommendations regarding the inequitable distribution of affordable housing and zoning capacity in the Housing Element, and equitable distribution report described above (CF 19-0416).

As access to opportunity is expanded, the program will also ensure areas subject to existing housing pressures are better protected, by expanding tenant protections for Angelenos vulnerable to displacement. The Rezoning Program will strategically “capture” the value of rezoning by delivering more affordable housing, with longer affordability terms, enhanced community and tenant benefits, strengthened housing replacement requirements, and by ensuring tenants’ right to return.

The Rezoning Program will also focus housing in areas that improve the lives of Angelenos, by promoting housing near jobs and transit and along major corridors and avoiding environmentally sensitive areas (such as areas vulnerable to Sea Level Rise and Very High Fire Hazard Severity Zones). This approach will facilitate reduced greenhouse gas emissions, create resilient housing stock, and support the use of community amenities.

As the program framework is refined, community input to help guide the details of these various strategies will be critical. The second section below provides information on anticipated milestones and the types of inclusive outreach and engagement strategies being planned to ensure that Angelenos who are not traditionally engaged in planning processes are included in the process.

Rezoning Program Strategies and Concepts

The Rezoning Program encompasses a wide array of multifaceted efforts. The largest component is anticipated to be the combination of updates to (up to) 16 Community Plans (four West Los Angeles plans and six Southeast/Southwest Valley plans, two Downtown plans, Boyle Heights, Hollywood, Harbor-Gateway and Wilmington) and three neighborhood plans (Cornfield Arroyo Seco Specific Plan, Orange Line Transit Neighborhood Plan, and Slauson Transit Neighborhood Plan). Some of these efforts have already been approved by the City Planning Commission but are pending final adoption. Others are not expected to be completed prior to the state rezoning deadline of February 2025.

Many of these local planning efforts are incorporating place-based elements that directly address land use equity, including how to both accommodate growth and address the needs of vulnerable/segregated neighborhoods. This includes new environmental justice protections,

robust and tailored affordable housing production and preservation strategies, as well as targeting place-based investments to support communities.

Beyond these local planning efforts, the Housing Element outlines a wide array of citywide incentive based strategies, which will be implemented through one or more zoning code amendments developed simultaneously. As outlined above, this program will be tailored to maximize affordability, focus on geographies near transit and opportunity areas, increase the production of affordable housing, and minimize displacement. These incentive based ordinances will not modify the underlying zoning of a property, but will instead offer density, floor area, height, parking, and other incentives in exchange for the provision of affordable housing units. While there are multiple ways these strategies can be grouped (given some overlap), the following six concepts highlight the major areas of focus for this incentive program:

Opportunity Corridors - The Opportunity Corridor strategy advances a holistic vision for livable and sustainable communities by increasing housing capacity along major streets located in Higher Opportunity Areas through an incentive program. Underlying zoning will not be modified as part of this effort but instead zoning incentives will be offered to build on existing zoning to incentivize the production of affordable housing. This strategy will focus in particular on corridors with transit access, to provide affordable housing options near transit and amenities. A variety of approaches are expected to be developed through new incentives to reflect differences in commercially (C) zoned stretches compared to residential (R) zoned areas, reflecting the varying densities and site conditions that are currently in place on these corridors. The strategy will also plan around mobility options including corridor/network designations in City's 2035 Mobility Plan. In sites adjacent to the Opportunity Corridors, the Department is exploring a range of medium scale and missing middle strategies to encourage walkable communities that support a variety of housing options.

Density Bonus and TOC program expansion - The local Density Bonus and TOC programs will be amended and expanded to provide tailored affordability, reflect recent updates to state law, and serve as the overall incentive based framework for the program. Revisions will expand housing development opportunities on sites that have been unable to take advantage of existing incentive programs due to their zone's underlying use (parking, public facilities) or density, and expand the types of incentives offered to better meet citywide priorities. These updates will be reflected in both the current (LAMC Chapter 1) and new Zoning Code (LAMC Chapter 1A), with a menu of incentives customized to the new code requirements.

Affordable Housing Overlay Zone - The Affordable Housing Overlay would provide tailored land use incentives for affordable housing developments and incentivize affordable housing on underutilized Faith Based Owned (FBO) properties, parking lots, and publicly owned sites (including Public Facility Zones). Again, underlying zoning will not be modified as part of this effort but instead incentives will be offered to build on existing zoning to incentivize the production of affordable housing projects. New incentives will reflect differences in commercially (C) zoned and residential (R) zoned areas and reflect varying densities currently in place on these sites. The program will include citywide incentives for underutilized land and tailored incentives in Moderate, High and Highest Resource areas of the City to facilitate the development of affordable housing in areas which have historically underproduced affordable housing.

Adaptive Reuse - In a parallel work effort, the updated Adaptive Reuse ordinance will expand the adaptive reuse program citywide, removing process barriers and streamlining the conversion of vacant office and commercial properties into mixed-income housing. It would also expand adaptive reuse incentives to allow higher densities and smaller unit sizes, the conversion of hotels, and the inclusion of more recently constructed buildings between 25 and 50 years of age.

As adaptive reuse conversions can be economically challenging, due to the expense of structural retrofitting and updated building codes; affordability requirements will be carefully tailored through an economic study.

Missing Middle Housing - The missing middle strategy will remove limitations to facilitate the construction of various types of “low scale” (“low rise”) housing, commonly built before the 1950s, to fill the gap in housing options that exists between detached single-family homes and mid-rise apartment buildings, including Accessory Dwelling Units and two-unit developments. This strategy will be accomplished through various ordinances including the incentive based programs described above and through a standalone low density ordinance tailored to Senate Bill 9, ADU, and less than four unit developments. Incentive programs will be tailored to ensure contextual neighborhood scales and will be focused in high opportunity areas of the City and areas near transit. Issues related to equity, including affordability, expanding homeownership opportunities as well as anti-displacement, are anticipated to be discussed more thoroughly in the pending SB9 report back (see CFs 21-1414 and 21-1045) Both approaches will expand housing access in high resource areas and protect against tenant/homeowner displacement in lower resource areas of the City.

Process Streamlining - Across all strategies in the program, the rezoning program will remove procedural barriers and create efficient and expedited processes for projects with an affordable housing component. This will be accomplished through creating an administrative ministerial planning review process for projects that meet objective zoning standards, as outlined in the Affordable Housing Overlay Zone report (see CF 19-0416). In addition to removing process barriers and offering significant streamlining, DCP is also proposing to explore the modification of site specific zoning barriers such as density limitations, parking, and other restrictive standards that prevent affordable housing, and evaluate the expansion of areas where affordable housing can be built. This approach will facilitate the ministerial processing of many more affordable and/or mixed-income projects compared to today, which will greatly reduce project timelines and legal vulnerability for qualifying projects.

Relationship of Citywide Incentives with Community Plan Rezoning

The Citywide Incentive Program will work alongside the Community Plan updates to create citywide incentive-based and streamlining strategies aimed at creating more housing, especially more affordable housing. While the Citywide program will be designing housing incentives based on general criteria and not modifying the underlying zoning, the Community Planning programs will be looking at communities at the local level to fine tune land use designations and zoning regulations at the parcel level. To ensure consistent implementation, certain citywide rezoning strategies will apply citywide (adaptive reuse, process streamlining, ADUs, etc.) and others will apply Citywide but be based on specific factors that may result in application in only particular geographies (Opportunity Corridors, Affordable Housing Overlay Zone, etc.). Like Density Bonus and TOC, these new incentives will create land use incentives on top of the underlying zoning that Community Plans may opt to further refine. Citywide Rezoning strategies generally rely upon identifying specific priority geographic characteristics (transit access, higher opportunity areas, job access, etc.) where certain new zoning incentives will apply. Ongoing coordination between the citywide and community planning teams with respect to content and schedule will ensure that efforts are aligned and compatible.

Program Timeline, Key Milestones, and Outreach Strategies

Following HCD’s certification of the Housing Element in June 2022, the Department began preliminary background work and studies needed for the creation of the Citywide Rezoning

Program. This included creation of the project timeline and outreach strategy, as well as onboarding needed consultants to complete related technical studies. Earlier this summer, the Department in coordination with LAHD, began work on a market and economic study for the Citywide Program. The study will identify market areas to facilitate the tailoring of affordability geographically, will analyze the expansion of tenant protections including replacement requirements, and will include economic feasibility testing of the citywide strategies outlined above. This work will occur concurrently with the outreach efforts described below ensuring public input is reflected.

Beginning in early 2023, the Department will formally launch the Citywide Rezoning Program, working towards the statutory deadline of February 2025 to complete adoption of the program. The timeline and milestones are designed to ensure the Department has adequate time to conduct the amount of analysis and outreach needed to ensure positive results. Below is an overview of the project timeline and key milestones.

Fall - Spring 2023	Website Launch Public Concepts Workshops Focused CBO Outreach
Fall 2023	Release Draft Ordinance for Public Input Public Draft Workshops
Winter 2023 - 2024	Release Revised Draft Ordinance for Public Input Staff Public Hearing
Spring - Summer 2024	City Planning Commission City Council Committees
Fall - Winter 2024	City Council Consideration and Adoption

Building on the Housing Element's vision established by two years of extensive public outreach, the Citywide Rezoning Program seeks to engage a broad representation of Angelenos to further refine the program details. This will include traditional methods such as workshops and online webinars, as well as a variety of intentional efforts to engage and obtain feedback from harder to reach populations. The program has also received state funding through the Regional Early Action Planning (REAP) Grant program for a public outreach campaign to allow the Department to distribute small grants to community-based organizations to conduct meetings to successfully engage hard-to-reach and vulnerable populations, meeting people where they are, and developing program outreach materials and advertising directly and specifically to these populations.

Outreach will launch in early 2023 with a series of webinars, outlining the concepts described in this report and seeking public feedback on the overall program. Following the webinars, the CBO outreach campaign will be launched, where outreach will be conducted at community events and through physical material distribution door-to-door, art popups, targeted online advertising, phone banking/SMS texting, and language inclusivity. Concurrently DCP staff will host higher level meetings on rezoning and Housing Element implementation more generally, as well as additional targeted meetings on specific topics, such as Opportunity Corridors, Affordable Housing Overlay Zones, Density Bonus and TOC Program Expansion, Missing Middle, Adaptive Reuse, process streamlining, etc.

In early fall 2023, following the completion of the economic analysis, the draft ordinances will be released alongside public webinars. CBO based outreach will continue during the phase of outreach, ensuring the public is aware of the program evolution. Alongside public outreach, DCP will conduct focused stakeholder meetings with Neighborhood Council Alliances, non-profit housing developers, the development community, and housing advocates. Following these engagements, the draft ordinances will be revised before proceeding to public hearing in winter 2023.

IV. RELATED HOUSING ELEMENT IMPLEMENTATION PROGRAMS

Aside from the Rezoning Program, the Housing Element identifies several key implementation programs that are intended to further advance the goals and citywide priorities established in the Plan. These programs look beyond the need to establish additional capacity to meet the RHNA, to further advance equity goals. Below is a brief summary of these efforts which are currently underway.

Tenant Protections and Anti-Displacement Strategies

The Housing Element contains a strong central focus on preventing displacement and advancing protections for renters and low-income communities of color. Important tenant protection strategies identified in the Housing Element are currently being advanced by the City Council (e.g., Just Cause eviction protections, Program 85). In addition, the passage of the United to House LA ballot measure offers the promise of significant new funding for various Housing Element strategies such as the expansion of the City's Eviction Defense Program (right to counsel and emergency rental assistance, Program 88), further supporting anti-tenant harassment (Program 86), creation of community land trusts (Program 4), promoting tenant and shared ownership (Program 90), and purchase of naturally occurring affordable housing projects (Program 30).

As discussed, an important part of the equitable Rezoning Program is to link rezoning and production strategies to anti-displacement measures, including ensuring a "no net loss" of affordable housing and a low-income tenant's right to return to any new housing development (Program 29). The Department, in collaboration with LAHD, is currently analyzing the feasibility of expanding these provisions, including evaluating a 1:1 replacement of all RSO units with dedicated affordable units. The program also aims to promote housing stability by analyzing extending affordability covenant terms to 99 years for unsubsidized projects and incentivizing community land trusts and other tenant/community owned opportunities.

Finally, the Department, in collaboration with LAHD, is placing increased emphasis on education and empowerment for both tenants and homeowners. For example, new state zoning provisions such as SB 9 and ADUs may be designed and promoted in a way that benefits existing residents and encourages housing production and preservation. These tools offer powerful ways to promote homeownership and build wealth in communities of color, if intentionally supported to do so.

Place-Based Strategies to Encourage Community Revitalization

Equitable land use also requires place-based strategies to encourage community revitalization, including preservation of existing affordable housing, particularly in High Segregation & High Poverty areas and in Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

The Housing Element includes several implementation programs that highlight the City's ongoing efforts related to place-based strategies. This includes the City's five-year Consolidated Plan (Program 52), which is an ongoing process where the City makes place-based investment decisions to allocate federal funding towards community development strategies. The Housing Element also includes Program 16 which prioritizes public land for new models of affordable housing development and control, including community land trusts or social/public housing. The Assessment of Fair Housing (AFH) (Program 123) also provides a planning process whereby the City will recommend and prioritize actions to address fair housing barriers, as well as outline goals, milestones, and metrics for implementing actions to address fair housing issues in the City. Currently, work is underway to update the City's five-year Assessment of Fair Housing Plan, with community engagement sessions starting in fall 2022. Additionally, several programs capture non-housing related place-based efforts that are implemented across City Departments including Housing Element Programs 133 to 136.

Livable Communities Initiative

Another Housing Element program related to the place-based strategies described above is the Livable Communities Initiative (LCI - Program 131). The program calls for advancing a more holistic vision for building livable, healthy, and sustainable communities along the City's transit-rich corridors by combining mixed-use, mixed-income housing along with improvements to mobility and sustainability infrastructure by transforming the street and public realm. This may include public improvements such as adding or improving wide sidewalks, tree canopy, outdoor dining, bicycle infrastructure, transit shelters, fast and frequent transit, and public seating and plazas. This strategy complements the "Opportunity Corridor" rezoning strategy (see above) which links new housing opportunities on mixed-use corridors, to desired transportation and sustainability improvements. A City Council motion (CF 21-1230-S2) asking City Planning, along with other agencies, to report back on potential implementation of this strategy is currently proceeding through Committees and has not yet been adopted. Additional staffing resources may be necessary to facilitate implementation of this program, these needs will be further explored as the Livable Communities Initiative moves forward.

Citywide Housing Needs Assessment and Update to Growth Strategy

The Housing Element includes important longer-term strategies to ensure equity is embedded in future land use decisions and address the inequitable distribution of affordable housing in the city. One important concept is to create a citywide methodology to allocate housing capacity targets across communities in a manner that balances traditional citywide growth criteria (proximity to transit, jobs and amenities) alongside equity considerations such as access to opportunity, addressing segregation and anti-displacement (see Program 49). As equity considerations are developed, DCP will consult with the Controller, the Office of the CAO, and BOE to develop potential methodological criteria, including potential incorporation of the Controller's Equity Index. These targets will guide future local planning efforts such as Community Plan Updates. In contrast, the current approach bases local growth targets largely on population growth models that are self-enforcing that continue to perpetuate inequities in the city and are subject to the type of influence that largely benefits wealthier communities, where the most change is needed. A numerical methodology can assign housing growth targets by community, including by income category, ensuring adequate densities for affordable housing are spread more equitably. As directed in this motion, this methodology will be informed by equity driven statistical findings, ensuring the methodology is reflective of the City's goal for equitable access to housing.

To make the types of deep structural changes needed, the City's General Plan growth strategy requires update (see Program 50). Beyond supporting a more equitable land use framework, an

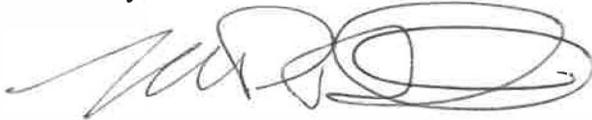
update to the growth strategy is needed to ensure that the citywide housing shortage is not hamstrung by inadequate zoning capacity. The Department has recently begun background technical work related to these efforts and anticipates conducting initial public engagement related to developing factors for equity (Program 49) in late 2023.

V. CONCLUSION

As discussed in this report, the recently-adopted Housing Element established a new framework for integrating principles of equity in land use and planning, including through the identification of the Rezoning Program and implementation programs focused on tenant protections, anti-displacement, place-based strategies, and ensuring an equitable distribution of growth in the long term. The Department appreciates this opportunity to provide further information and clarification on ongoing efforts to holistically advance racial equity as part of its land use and planning work, and looks forward to meaningful discussion and community engagement on each of these work efforts as they move forward in the coming months.

For questions, please contact Senior City Planner Blair Smith at blair.smith@lacity.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Vincent P. Bertoni', with a large, stylized flourish at the end.

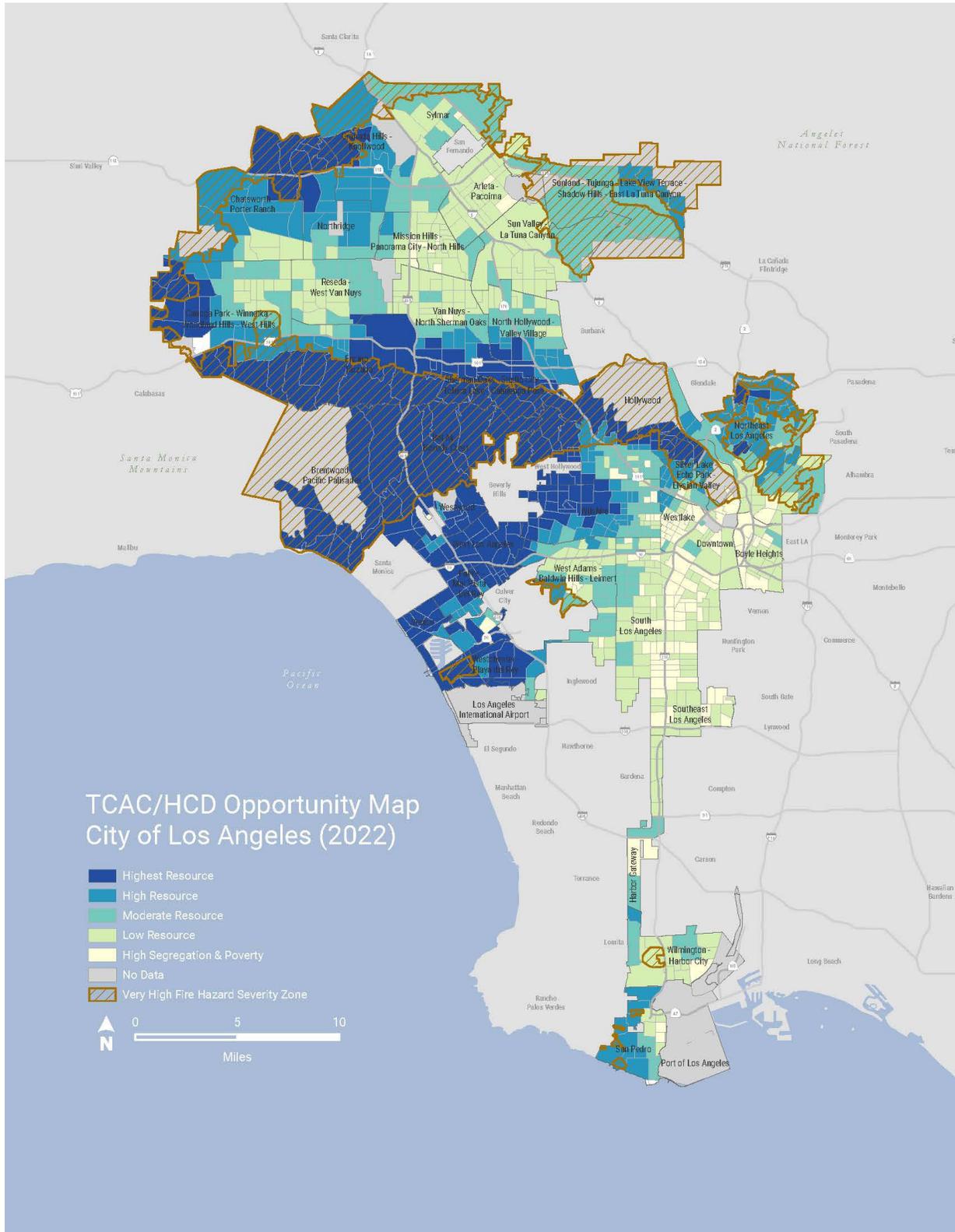
VINCENT P. BERTONI, AICP
Director of Planning

VPB:AV:NPM:mg:bs:ch:eg:bb

Attachment 1: TCAC / HCD - Opportunity Map City of Los Angeles
Attachment 2: Racially/Ethnically Concentrated Areas of Poverty and Affluence
Attachment 3: City of Los Angeles Equity Index Map

Attachment 1

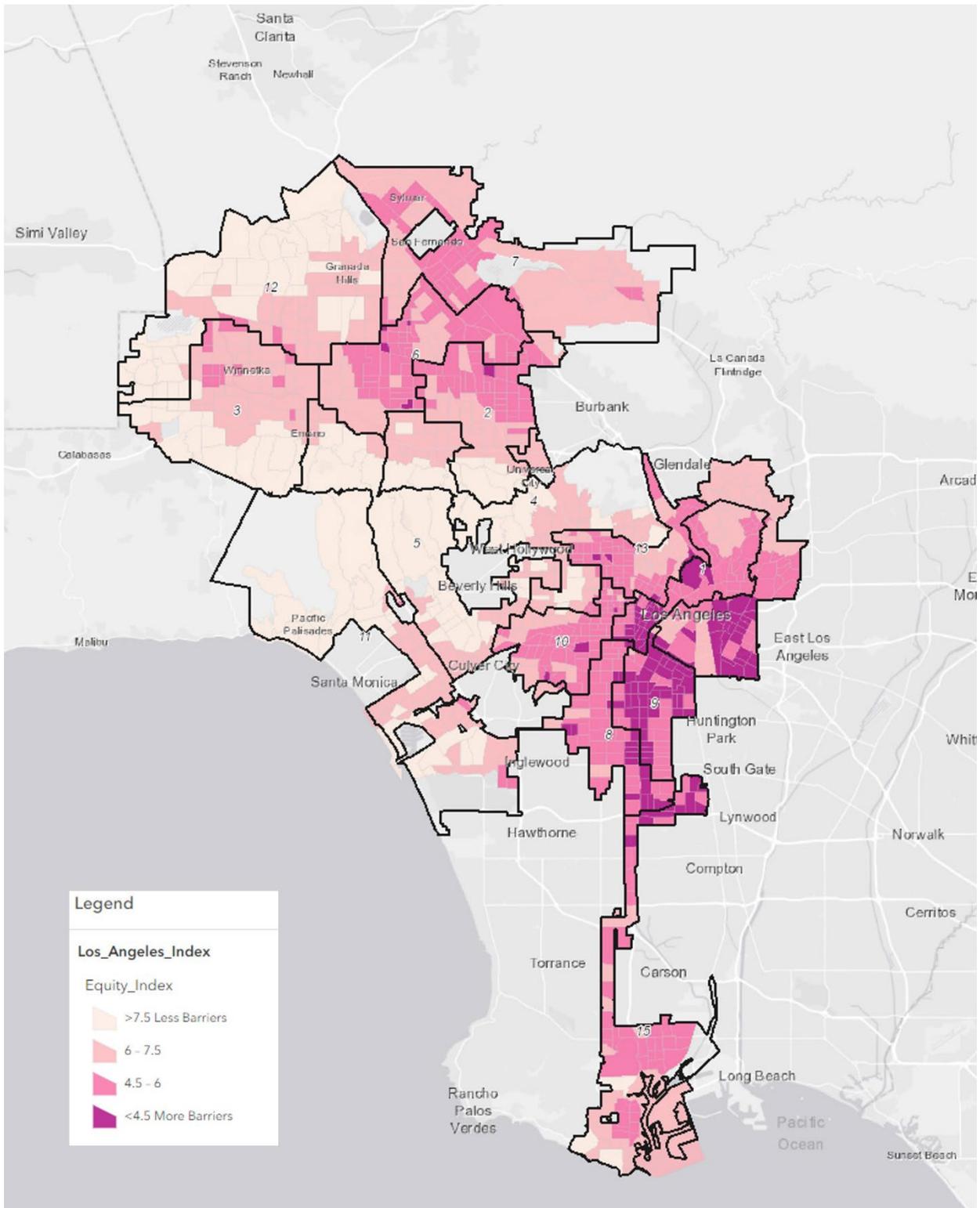
TCAC / HCD - Opportunity Map City of Los Angeles



Source: California Tax Credit Allocation Committee (TCAC) / Housing and Community Development (HCD) - Opportunity Maps <https://www.treasurer.ca.gov/ctcac/opportunity.asp>

Attachment 2
Racially/Ethnically Concentrated Areas of Poverty and Affluence

Attachment 3
City of Los Angeles Equity Index Map



Source: Office of the Los Angeles City Controller
<https://lacontroller.org/data-stories-and-maps/equityindex/>