



# City of LA's 2021- 2029 Housing Element AFFH Analysis

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Maya Abood  
Jackie Cornejo  
Nancy Twum-Akwaboah

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# REAP 1.0

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# City of LA's REAP 1.0 Tasks

## Housing Department

- **Affirmatively Furthering Fair Housing**
- Fostering Inclusive Engagement Strategies + Education

## Department of City Planning

- Citywide RHNA Analysis and Studies to Inform Rezoning Options
- Citywide Tools to Meet Housing Need

# Overview and Background

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# Housing Department's REAP 1.0 Activities

1. Affirmatively Furthering Fair Housing
  - a. **Housing Element Assessment of Fair Housing**
  - b. Citywide Anti-displacement Tool
  - c. Affordable Housing Site Tool
2. Fostering Inclusive Engagement Strategies + Education
  - a. 2023-2028 Assessment of Fair Housing Community Engagement

# Housing Element Adoption

The Los Angeles City Council adopted the 2021-2029 Housing Element on **November 24, 2021**.

The California Department of Housing and Community Development (HCD) responded to the City's adopted Housing Element on **February 22, 2022**.

*"HCD applauds the substantial rezoning program and actions to facilitate housing choices, affordability and supply, the element now demonstrates adequate sites to accommodate the regional housing need allocation."*

**However**, HCD did require the City to revise the Adopted Housing Element to ensure compliance with the new Affirmatively Furthering Fair Housing (AFFH) state law requirements.



# Affirmatively Furthering Fair Housing

- AFFH adopted per **AB 686** (2018)
- AFFH is defined as “taking meaningful actions, in addition to **combating discrimination**, that overcome patterns of **segregation** and foster **inclusive communities** free from barriers that restrict **access to opportunity** based on protected characteristics.”
- With regards to housing elements, specific requirements include:
  - **Assessment of Fair Housing** with identification of contributing factors, barriers and AFFH priorities (Appendix 1.1)
  - Creation of **AFFH strategies and actions** expected to address these issues (Ch. 6).

## AFFH and the City’s Adopted Housing Element

### Assessment of Fair Housing

Summary (Chapter 1)

Detailed Analysis (Appendix 1.1)

### AFFH Analysis of Inventory of Sites and Rezoning Program

Summary (Ch. 4)

Detailed AFFH Data Analysis (Appendix 4.4)

### AFFH Strategies and Actions (Programs)

**AFFH Program 124** (Ch. 6) compiles many other Housing Element strategies and actions that further fair housing goals



# Existing AFFH Program 124

## 124. AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH) PROGRAM

Goal #: 4,1

Lead Agencies: LACP, LAHD

Supporting Agencies: HACLA

Funding Sources: Regional Early Action Planning (REAP) Grant

Objective: Compliance with US Housing and Urban Development (HUD) and AB 686 (2018).

Respective Policies: 4.1.4, 4.1.5, 4.2.3, 4.3.2, 1.1.6, 1.1.7, 1.1.9, 1.1.10, 1.3.1

Promote and affirmatively further fair housing (AFFH) opportunities throughout the community in all housing, planning and community development activities. Take a variety of actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity to promote diverse communities that grant all Angelenos access to housing. Increase place-based strategies to encourage community revitalization and protect existing residents from displacement through various policies, programs, and goal setting (e.g. AFH Plan).

The following specific actions are either ongoing activities or will be undertaken by LAHD and/or LACP as part of actions to address AFFH issue areas in partnership with key local stakeholders:

1. Significant Disparities in Housing Needs and Access to Opportunity

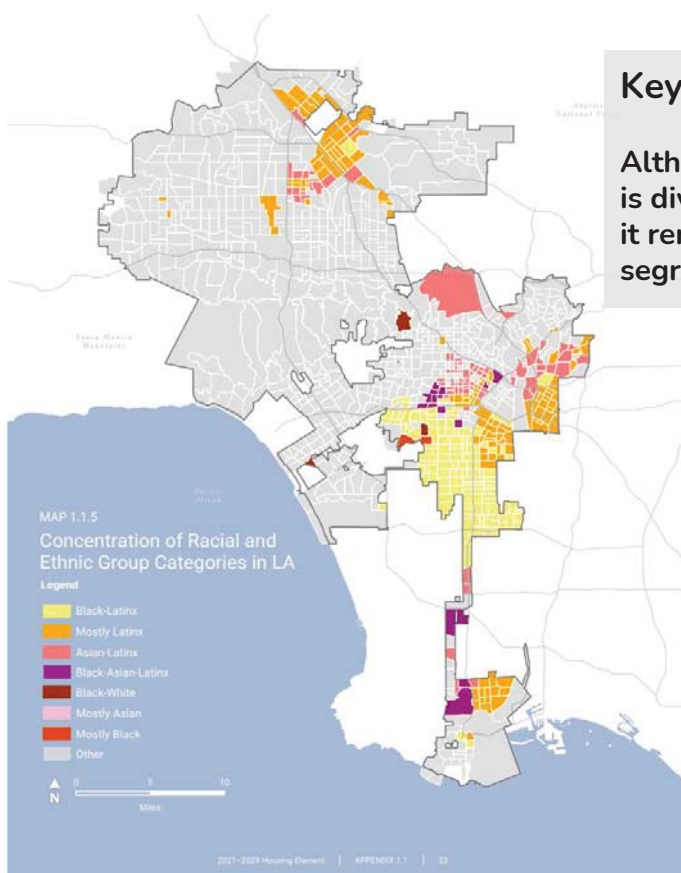
- e. Expand efforts for the preservation and rehabilitation of deed-restricted affordable housing, naturally occurring affordable housing, RSO units and residential hotels (Programs 10, 27, 30).
- f. Continue to develop greater tenant protections for City Council consideration, including rental assistance and legal representation services for lower-income households and protected classes (Programs 85, 86, 88, 89, 91).
- g. Continue the City's Systematic Code Enforcement Program (SCEP) activities that maintain housing stock while providing opportunities to legalize units and not displace existing tenants (See program 22).
- h. Provide housing voucher assistance and mobility-related services to families with children to encourage such families to move to lower-poverty areas, to expand their access to opportunity areas, pursuant to HUD's Mobility Demonstration Voucher NOFA (Programs 41, 93, 98, 102, 108).
- i. Expand the use of the City's Accessible and Affordable Housing Registry to provide a coordinated source of information about accessible and affordable housing opportunities (Program 8).

## Key Components of AFH

- Fair Housing Analysis of Race and Ethnicity, Economic Status, and Disability
- Displacement Analysis
- Fair Housing Enforcement and Outreach Capacity
- Site Inventory
- Prioritization of contributing factors to fair housing issues

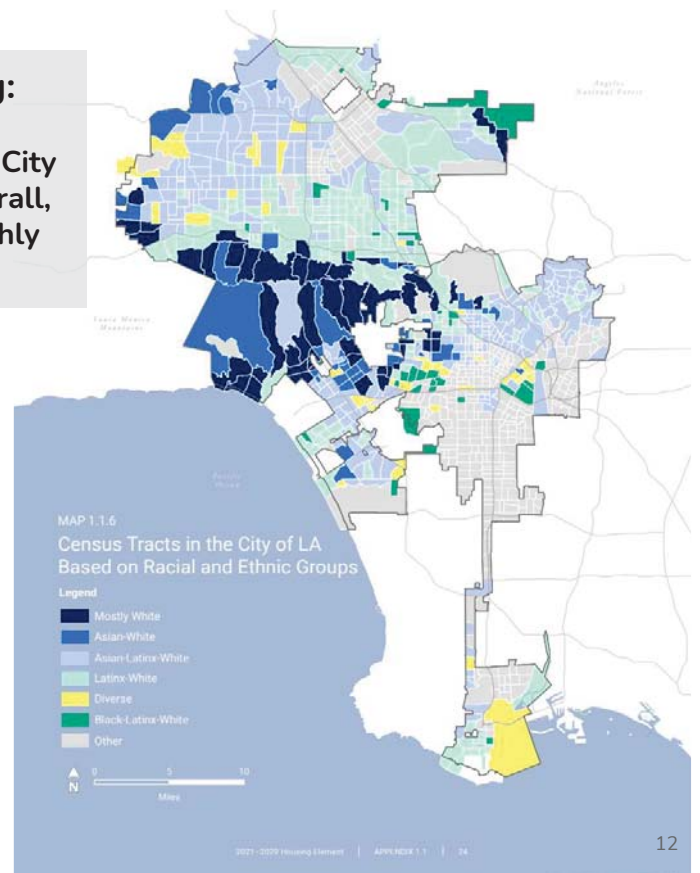
# What we did well

*Finding the story in the data*

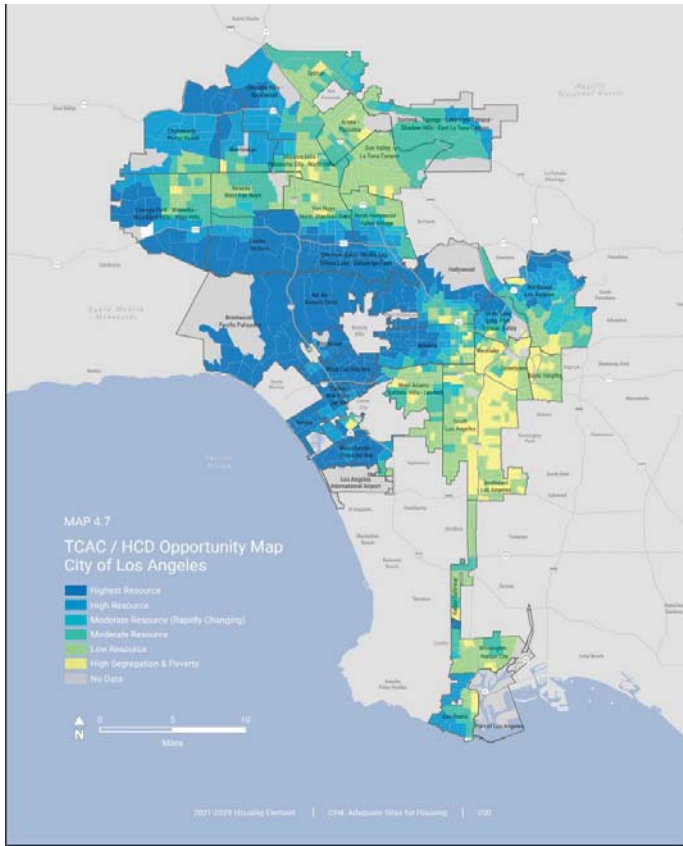


## Key Finding:

Although the City is diverse overall, it remains highly segregated



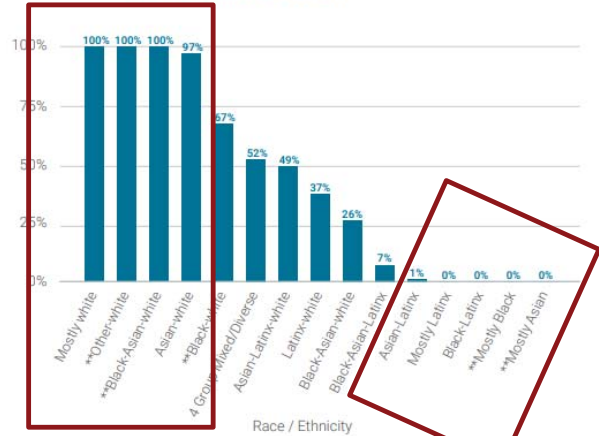




### Key Finding:

White neighborhoods have the greatest access to opportunity. Black and Latinx neighborhoods have the least access to opportunity

Chart 1.1.19: Percent High & Highest Resource by Neighborhood Category



Source: 2020 Data HCD Data Portal \*\*There are less than five census tracts in the City that fall into this category

### Key Finding:

65% of white residents live in high opportunity areas. 1 in 4 Black and Latinx residents live in High Segregation, High Poverty Areas

Chart 1.1.23: Percent of Each Racial Group by Opportunity Area in LA



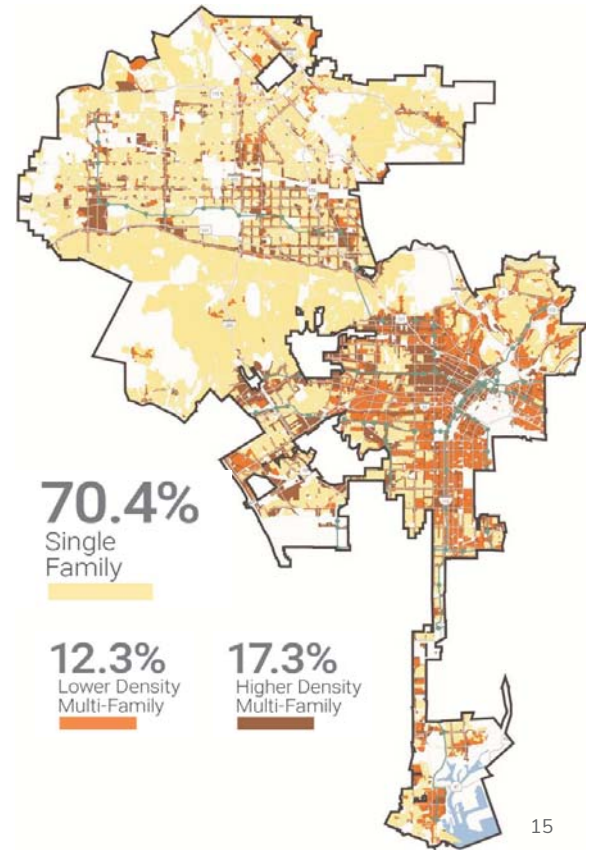
Source: 2020 HCD Data Portal

### Key Finding:

Zoning is rooted in racial discrimination and continues to reinforce racial disparities in access to opportunity

Table 4.30: Existing Conditions Analysis: Share of Residential Land Zoned for Single-Family Residential Use by TCAC/HCD Resource Category

Resource Category	Percent of Residentially Zoned Land Restricted to Single-Family Housing*	Percent of Residentially Zoned Land that Allows Multi-family Housing**
Citywide	72%	28%
Racially Concentrated Areas of Affluence	95%	5%
Highest Resource	81%	19%
High Resource	74%	26%
Moderate Resource (Rapidly Changing)	51%	49%
Moderate Resource	74%	26%
Low Resource	54%	46%
High Segregation & Poverty	18%	82%



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Table 4.31: Affordable Units Permitted in the City by TCAC/HCD Resource Category, 2009-2018

Resource Category	Affordable Units	% of Total	% of City Tracts*
High Segregation & Poverty	4,104	35%	24%
Low Resource	3,160	27%	23%
Moderate Resource	2,737	24%	18%
High Resource	1,038	9%	18%
Highest Resource	553	5%	17%
Insufficient/Missing Info*	11	<1%	0%
<b>Total</b>	<b>11,603</b>	<b>100%</b>	<b>100%</b>

### Key Finding:

Inequitable zoning also contributes to a lack of affordable housing in higher resource areas

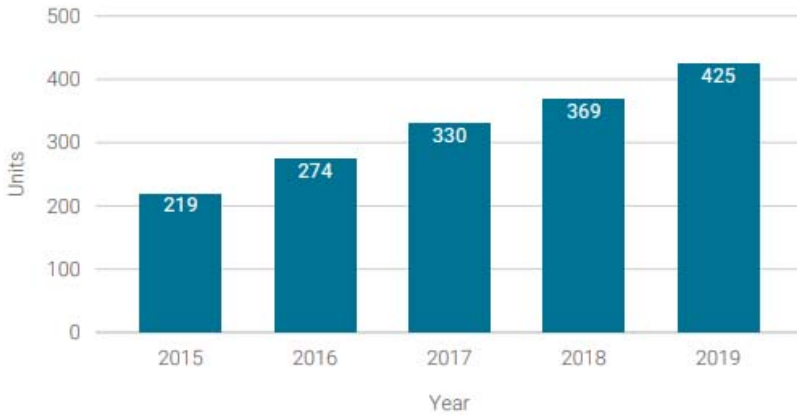
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## Key Finding:

Displacement increasingly threatens the economic stability of BIPOC tenants and communities

Chart 1.1.45: Demolitions of RSO Units



Source: LAHD

Table 1.1.9: Neighborhoods with 2+ Tracts with Above Average Vulnerability and Economic Opportunity and at least 4 Displacement "Red Flags"

Neighborhoods	Number of Tracts	Neighborhoods	Number of Tracts
East Hollywood	4	Exposition Park	1
Pico-Union	4	Glassell Park	1
Westlake	3	Harvard Heights	1
Downtown	2	Hollywood	1
Koreatown	2	Jefferson Park	1
Mid-City	2	Lincoln Heights	1
Chinatown	1	North Hollywood	1
Echo Park	1		

Source: "Mapping Vulnerability, Preserving Stability: Designing an Anti-Displacement Tool for HCIDLA" by Andrew Miller, 2020

# What we did well

*Directing rezoning to high opportunity areas*

# Our Rezoning Need



Target Capacity of 486K recognizes need for a buffer over 456K RHNA allocation

Realistic capacity recognizes small likelihood any given site can be developed for housing in next 8 years

City has three years to adopt necessary rezoning plans

## The Rezoning Program

Rezoning focuses on **corridors, areas near public transit, and higher opportunity areas.**

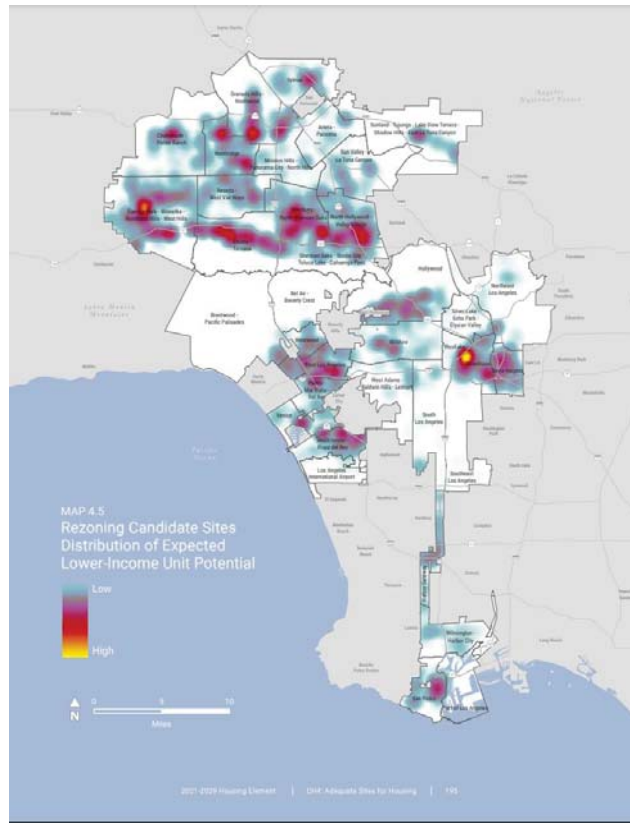
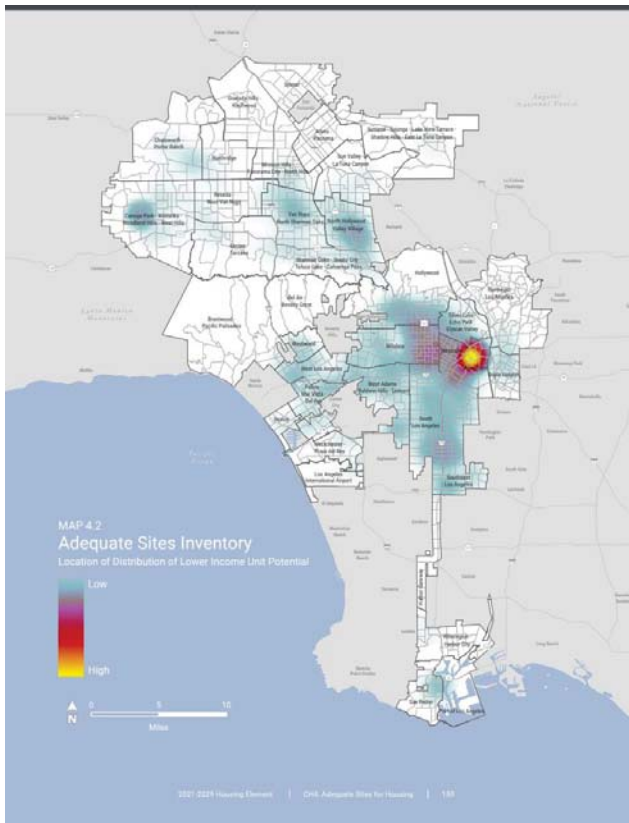
Seeks to avoid **areas sensitive to displacement pressures and environmental hazards** such as fire zones and sea level rise.

Table 4.38: Rezoning Analysis: Candidate Sites for Rezoning by TCAC/HCD Opportunity Area

TCAC/HCD Opportunity Area	Percent of City's Census Tracts	Percent of Candidate Sites	Percent of Rezoned Development Potential	Percent of Lower-Income Rezoned Development Potential
Highest Resource	19%	23%	22%	29%
High Resource	15%	23%	21%	27%
Moderate Resource	17%	14%	12%	11%
Moderate Resource Rapidly Changing	5%	2%	2%	2%
Low Resource	28%	18%	21%	20%
High Segregation and Poverty	16%	20%	20%	11%
Unknown	1%	1%	1%	1%

55%

Source: TCAC/HCD Opportunity Area Map, 2021



# What we did well

## *Addressing Displacement*

# Housing Element Anti-Displacement Strategies

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## **Integrate anti-displacement strategies into planning**

- Equitable Rezoning Strategy
- Prioritize underrepresented voices in planning
- Anti-Displacement Studies

## **Strengthen the protection of tenants rights**

- Eviction Defense Program
- Just cause ordinance
- Strengthening enforcement of Ellis Act/RSO Tenant Anti-Harassment Ordinance
- Housing replacement (not net loss) + right to return
- Preservation of “at-risk” affordable housing

## **Expand ownership opportunities**

- Community and tenants opportunity to purchase
- Shared equity models and community land trusts
- Expand down payment assistance

## **Leverage public resources**

- Public land / new models of affordable housing
- Expand/improve the Affordable Housing Registry
- Conduct outreach and education to inform the public on what constitutes tenant harassment

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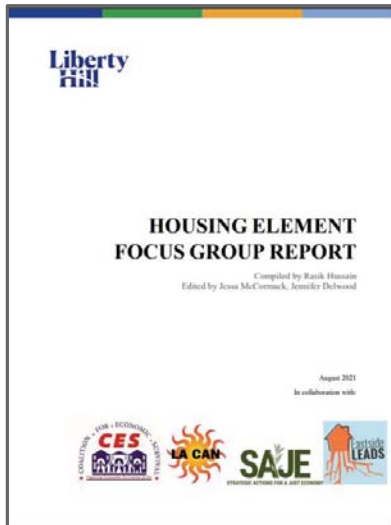
## **What we did well**

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*Engaging traditionally excluded groups*

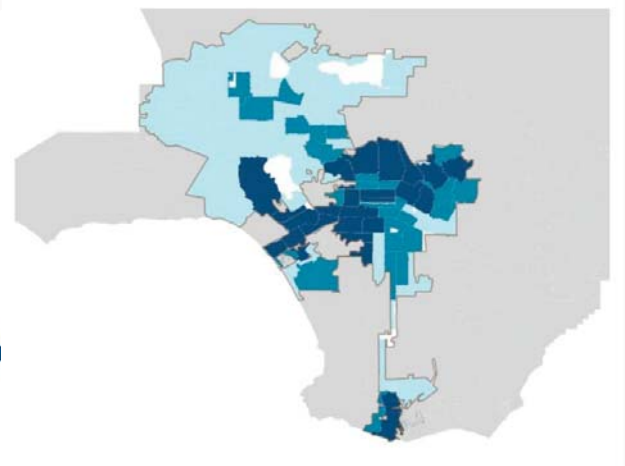
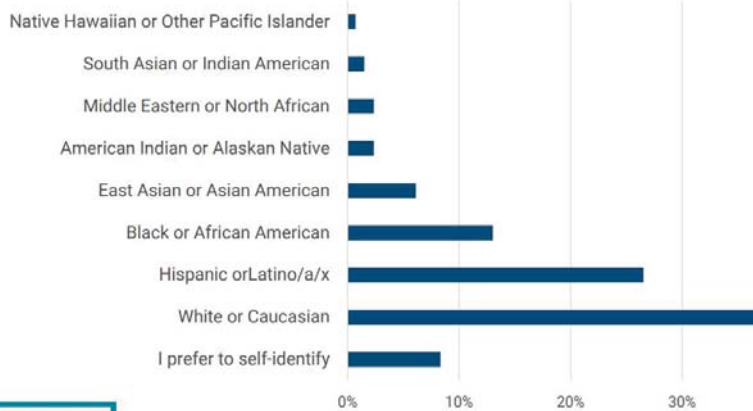
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# Targeted Outreach Efforts



- Provided a grant to Liberty Hill Foundation (LFH). LFH subcontracted with four community-based organizations to conduct focus groups.
- Emphasis on quality over quantity
- Over 64 people attended
- Emphasis on accessible conversations that link to people's' lived experiences
- Primarily Black and Latinx attendees living in lower-income neighborhoods

# Demographics of the Online Survey Recipients



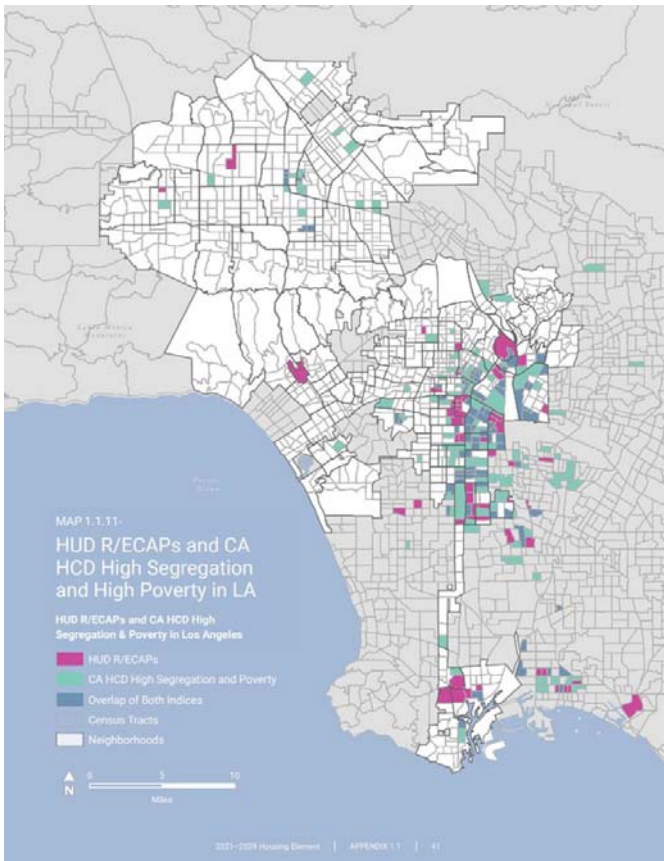
\*This question asked respondents to check all that apply. Total will not add to 100%

Respondents (n) = 1,406



# Targeted Revisions

## Identifying Place-based Displacement Strategies



City	High Segregation High Poverty Census Tract	Percent of the City's Census Tracts
Los Angeles city	126	11%
Fresno city	41	30%
Sacramento city	20	14%
Bakersfield city	19	22%
San Bernardino city	17	24%
Stockton city	15	19%
San Diego city	14	4%
Long Beach city	12	8%
Oroville city	12	34%
Oakland city	11	8%
San Francisco city	7	3%



# Added Place Based Programs

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- Mobility Improvements in Low-Income Neighborhoods (Program #133)
- Promote Equitable Economic Development in High Poverty & High Unemployment Areas (#134)
- Place-Based Community Revitalization Efforts (#135)
  - Participatory Budget Fund
  - Racial Equity Adult
  - Racial Equity Action Plans
  - Park Equity Ballot Measure
  - METRO investments
  - Clean Streets
  - Great Streets Initiative
  - Climate Vulnerability Assessment

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## Targeted Revisions

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*Setting Metrics*

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Strategies and Actions	Implementing Program Summaries		AFFH Category
	Primary Contributing Factor(s)	(see individual Programs for detailed Objectives and Program Descriptions)	
<p><b>E.</b> Prioritize local resources, such as funding and public land, in areas of high opportunity, and evaluate revisions to funding metrics or policies that may act as a barrier to projects locating in high resource areas. Seek partnerships with other public and private entities to facilitate new potential development sites in these areas for affordable housing.</p>	<p><b>1.</b> Lack of Access to Opportunity Due to High Housing Costs</p>	<p><b>6:</b> Prepare annual NOFA biannually, 500 units produced per year. Set-aside of 250 units of supportive housing include priority scoring for projects in high resource areas with the goal of funding at least 8% of units in Higher Opportunity Areas.</p>	<p><b>1.</b> Mobility and Inclusion</p> <p><b>2.</b> Access to Opportunity</p>
	<p><b>3.</b> Affordable and Accessible Units in a Range of Sizes</p> <p><b>4.</b> Lack of Affordable Housing</p>	<p><b>15:</b> Increase the utilization of public land for affordable housing with particular emphasis in high resource and gentrifying areas; Identify publicly owned housing opportunity sites and issue RFPs to develop the sites by 2023, and annually thereafter; Ensure AFFH is incorporated into the public land selection process. Rezone PF (Public Facility) zoned public to allow affordable housing by-right through rezoning process by 2024; Maintain a publicly accessible citywide inventory of publicly owned sites. Prioritize public land for new models of affordable housing development and control (see Program 16).</p> <p><b>30:</b> Prioritize the acquisition of naturally occurring affordable housing properties in Higher Opportunity Areas.</p>	

Table 6.1: Target Capacity for Inventory of Sites and Rezoning Program


Strategies and Actions	Implementing Program Summaries		AFFH Category
	Primary Contributing Factor(s)	(see individual Programs for detailed Objectives and Program Descriptions)	
<p><b>C.</b> Provide housing vouchers, voucher assistance and mobility-related services to expand access to Higher Opportunity Areas.</p>	<p><b>1.</b> Lack of Access to Opportunity</p>	<p><b>102:</b> Provide <u>1,950 Mobility Demonstration Vouchers</u> per year beginning in 2022 for low-income city and county residents interested in living in Higher Opportunity Areas.</p>	<p><b>1.</b> Mobility and Inclusion</p>
	<p><b>4.</b> Lack of Affordable Housing</p>	<p><b>128:</b> Provide 3,365 Emergency Housing Vouchers annually to qualifying households (homeless, at-risk, those fleeing domestic violence, sexual assault, stalking or human trafficking; or recently homeless). Prioritize the Most Disadvantaged Communities (using CalEnviroScreen data), chronically homeless and justice-system involved individuals.</p> <p><b>99:</b> Provide information to homeless service providers to connect homeless voucher holders with newly constructed Extremely Low Income units in projects located near transit.</p>	

# Moving Forward: 2023-2028 AFH



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## City of Los Angeles' 2023-2028 AFH Team

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- The City of LA's 2023-2028 Assessment of Fair Housing (AFH) update process is led by the Los Angeles Housing Department (LAHD) in collaboration with the Housing Authority of the City of Los Angeles (HACLA)
  - Consultant partner is Mosaic Community Planning
  - Lead community engagement partner is Liberty Hill Foundation

# Affirmatively Furthering Fair Housing: Federal Requirement

HUD's Affirmatively Furthering Fair Housing (AFFH) rule calls on cities and counties to take [meaningful actions](#) to:

- Overcome patterns of segregation
- Foster inclusive communities
- Reduce affordable housing needs
- Address barriers that reduce access to opportunity

## Summary of AFH Community Participation

### Community Meetings

150 Participants  
7 Meetings

### Surveys

500 Community Members  
75 Organizations

### AFH Website

11,600+ Website Visits  
500+ YouTube Views

### Focus Groups

178 Participants  
12 Focus Groups

### Consultation Meetings

275 Participants  
19 Meetings



## Draft AFH Fair Housing Goals

1. Increase access to and supply of affordable housing, especially in higher opportunity areas, where high housing costs are a significant barrier
2. Preserve, improve, and maintain the quality of existing affordable housing, including subsidized and RSO Units
3. Prevent displacement of people in protected classes and low- and moderate-income households
4. Ensure equal access to housing for people in protected classes, extremely-low to moderate-income households, and people experiencing homelessness
5. Expand access to opportunity and community assets in neighborhoods with limited resources

## City of LA AFH Approval: Next Steps

- **HACLA Board of Commissioners and City Council Approval Process:**
  - February and March 2024
- **Submission of LA's AFH to HUD following HACLA's Board of Commissioners' and Los Angeles City Council's Approval**



# Thank You

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