



Housing Element Accomplishments

David J. Barboza, AICP
Director of Policy and Research
Abundant Housing LA
david@abundanthousingla.org
10/27/2022

Introduction

Abundant Housing LA (AHLA) has been conducting detailed reviews of the housing elements of 15 jurisdictions in Los Angeles County. The jurisdictions AHLA is tracking include the cities of Alhambra, Beverly Hills, Burbank, Culver City, Glendale, Long Beach, Los Angeles, Pasadena, Redondo Beach, Santa Monica, South Pasadena, Torrance, West Hollywood and Whittier as well as Los Angeles County. Housing elements are local housing plans which are part of the General Plan each local government must prepare pursuant to state law. Housing elements are currently being updated in Los Angeles County for the sixth planning cycle, which covers 2021-2029. Housing elements are the primary local tool by which jurisdictions plan to do their part to address the housing shortage at all income levels, which is at the heart of our region's housing affordability crisis. Each jurisdiction receives a Regional Housing Needs Allocation (RHNA) target for housing production at a variety of income levels from the Southern California Association of Governments (SCAG). The affordability levels are very low income (VLI), low income (LI), moderate income (MI) and above moderate income (AMI). AHLA provides feedback to the local jurisdiction and to the California Department of Housing and Community Development (HCD), which reviews housing elements to ensure that they comply with the letter and spirit of state law. All of our letters can be found on the [Housing Element Letters and Resources page](#) of AHLA's website.

Generally speaking, AHLA's reviews have improved housing element outcomes by providing additional scrutiny, constructive suggestions and a pathway for our members to engage in the planning process. When local governments know their work is being watched closely, they are under increased pressure to put forward meaningful plans and actually implement them. This is not to say that we are always satisfied by the results. Given the urgency of the housing affordability crisis, AHLA typically criticizes local housing plans and recommends that HCD use its authority to force local governments to make them more meaningful instead of certifying them as presented. However, this critical approach sometimes overshadows the progress that is being made. The purpose of this report is to briefly describe for each of the 15 jurisdictions the progress that has been made, in part as a result of our engagement in the process, even though in our view typically more progress is needed in order to fulfill the letter and the spirit of state housing element law. AHLA remains committed to providing feedback on local housing elements and also to overseeing their implementation, so that the parts of the plans that are constructive come to fruition and bring us closer to ensuring that housing is affordable for all.

Summary Table

The summary table below provides perspective on how the 6th housing element cycle (2021-2029) may compare with the 5th cycle (2013-2021). The figures in this table include overall RHNA numbers and disregard the requirements to meet RHNA at the various affordability levels. In the fifth cycle, 9 of the 15 jurisdictions exceeded their RHNA overall. However, the RHNA numbers are much higher in the 6th cycle. We have provided projections of the number of units we expect during the 6th cycle. Where our consultant, MapCraft, prepared an analysis for a jurisdiction, the projection is the RHNA minus the average of the low and high

end estimates of the production shortfall. Where a MapCraft analysis was not available, RHNA numbers were multiplied by 68.6%, which was the average of the quotients of the MapCraft projection divided by the RHNA number. For the City of Los Angeles, the projection is equal to the RHNA, due to our assessment that this is a high-quality housing element. Overall, we expect about 589,000 housing units to be permitted this cycle in our 15 tracked jurisdictions, compared to 169,000 units permitted during the 5th cycle, an increase of 420,000 homes or 249%.

Jurisdiction	5th Cycle RHNA	5th Cycle Units Permitted	% of 5th Cycle RHNA Permitted	6th Cycle RHNA	6th Cycle Projected Units	Increase in Projected Development vs. 5th Cycle
Alhambra	1,492	511	34%	6,825	4,682	816%
Beverly Hills	3	244	8133%	3,104	2,129	773%
Burbank	2,684	1,081	40%	8,772	7,072	554%
Culver City	185	623	337%	3,341	1,841	196%
Glendale	2,017	4,039	200%	13,425	11,175	177%
Long Beach	7,048	5,202	74%	26,502	17,002	227%
Los Angeles (City)	82,002	136,717	167%	456,643	456,643	234%
Los Angeles County	30,145	9,201	31%	90,052	64,552	602%
Pasadena	1,332	3,417	257%	9,429	7,779	128%
Redondo Beach	1,397	623	45%	2,490	1,708	174%
Santa Monica	1,674	3,098	185%	8,895	6,245	102%
South Pasadena	63	129	205%	2,067	1,418	999%
Torrance	1,450	395	27%	4,939	2,239	467%
West Hollywood	77	2,131	2768%	3,933	3,083	45%
Whittier	878	1,338	152%	3,439	1,889	41%
Total	132,447	168,749	127%	643,856	589,457	249%

Alhambra

Alhambra has recently submitted a subsequent draft of its housing element, which HCD found noncompliant on 10/10/2022. Alhambra's RHNA is 6,825 homes, including 1,774 VLI, 1,036 LI, 1,079 MI and 2,936 AMI. AHLA has submitted three letters on Alhambra's Housing Element dated [10/15/2020](#), [9/24/2021](#) and [4/1/2022](#). We most recently recommended that HCD not certify the plan until it is revised to address our concerns. Improvements to the plan that align with AHLA feedback include:

- A rigorous approach to estimating sites' realistic capacity and assessing rezoning needs
- Reporting on non-vacant sites' likelihood of development in a reasonable way
- Reporting on the proportion of sites from the 5th cycle that were redeveloped

- Committing to implement the rezoning program early in the cycle, by 2022
- Program to expand the density bonuses in Downtown Alhambra
- Use of sensible pre screening criteria to determine parcels included in the sites inventory
- Program committing to a mid-cycle review to evaluate progress towards the RHNA

Beverly Hills

Beverly Hills has an adopted housing element under review by HCD. Beverly Hills' RHNA is 3,104 homes, including 1,008 VLI, 680 LI, 602 MI, and 814 AMI. AHLA has submitted four letters on Beverly Hills' housing element dated [10/16/2020](#), [6/7/2021](#), [9/15/2021](#) and [10/20/2021](#). We most recently recommended that HCD not certify the plan until it is revised to address our concerns. Improvements to the plan that align with AHLA feedback include:

- Improved information about public outreach methods
- More complete disclosures in the sites inventory
- More detailed analysis of the suitability of non vacant sites for residential development
- More specific timeframes for actions to promote Accessory Dwelling Units (ADUs)

Burbank

Burbank's housing element was certified by HCD on 10/7/2022. Burbank's RHNA is 8,772 homes, including 2,553 VLI, 1,418 LI, 1,409 MI and 3,392 AMI. AHLA commissioned an analysis by MapCraft Labs dated [12/16/2021](#) which found that Burbank's expected housing capacity could fall short by between 1,100 and 2,300 units. AHLA has submitted five letters on Burbank's housing element dated [10/12/2020](#), [5/24/2021](#), [9/29/2021](#), [12/16/2021](#) and [5/13/2022](#). We most recently recommended that HCD not certify the plan until it is revised to address our concerns. Improvements to the plan that align with AHLA feedback include:

- Programs to promote ADUs through standard plans and reduced fees
- Commitment of redevelopment successor agency funding for affordable housing preservation

Culver City

Culver City's adopted housing element was certified by HCD on 10/10/2022. Culver City's RHNA is 3,341 homes, including 1,108 VLI, 604 LI, 560 MI and 1,069 AMI. AHLA commissioned an analysis by MapCraft Labs dated [12/7/2021](#) which found that Culver City's expected housing capacity could fall short by between 1,000 and 2,000 units. AHLA has submitted four letters on Culver City's housing element dated [10/15/2020](#), [7/30/2021](#), [12/7/2021](#) and [4/15/2022](#). We most recently recommended that HCD not certify the plan until it is revised to address our concerns. Improvements to the plan that align with AHLA feedback include:

- A local affordable housing funding source, the linkage fee on commercial development
- Commitments to make surplus public land available for housing
- A local density bonus program that is more generous than state density bonus law
- The plan now commits to a mid-cycle review, with associated constraint removal actions if the review finds that housing production is not keeping pace with RHNA obligations

- The plan clarified public outreach efforts to reach underrepresented groups, such as presentations to the Advisory Committee on Housing and Homelessness

Glendale

Glendale's adopted housing element was deemed out of compliance by HCD on 4/22/2022 and HCD's website does not show an attempt to resubmit with revisions. Glendale's RHNA is 13,425 homes, including 3,439 VLI, 2,163 LI, 2,249 M and 5,574 AMI. AHLA commissioned an analysis by MapCraft Labs dated [12/16/2021](#) which found that Glendale's expected housing capacity could fall short by between 1,500 and 3,000 units. AHLA has submitted three letters on Glendale's housing element dated [10/12/2020](#), [11/19/2021](#) and [2/15/2022](#). We most recently recommended that HCD not certify the plan until it is revised to address our concerns.

Improvements to the plan that align with AHLA feedback include:

- Programs to address the need for local funding to preserve existing affordable housing
- Commitment to align density bonus ordinance with state law
- Commitment to publishing a list of surplus city-owned properties
- Signaling an intent to lower guest parking requirements

Long Beach

Long Beach's adopted housing element was certified by HCD on 4/8/2022. Long Beach's RHNA is 26,502 homes, including 7,141 VLI, 4,047 LI, 4,158 MI and 11,156 AMI. AHLA commissioned an analysis by MapCraft Labs dated [11/29/2021](#) which found that Long Beach's expected housing capacity could fall short by between 6,000 and 13,000 units. AHLA has submitted four letters on Long Beach's housing element dated [10/12/2020](#), [7/30/2021](#), [11/10/2021](#) and [3/22/2022](#). We most recently recommended that HCD not certify the plan until it is revised to address our concerns. Improvements to the plan that align with AHLA feedback include:

- The Religious Facility Housing Overlay, which accounts for many of the sites in exclusionary eastside neighborhoods that are included in the sites inventory
- The Enhanced Density Bonus program, with incentives for affordable housing that exceed the minimums in state density bonus law
- Streamlining strategies such as tiering CEQA reviews and ministerial review for 100% affordable projects through the Site Plan Review Committee
- Reasonable pre-screening criteria for sites inventory
- Adequate no net loss buffer
- Spanish language community workshop
- Mid-cycle review program

Los Angeles (City)

Los Angeles' adopted housing element was certified by HCD on 6/29/2022. Los Angeles' RHNA is 456,643 homes, including 115,978 VLI, 68,743 LI, 75,091 MI and 196,831 AMI. AHLA has submitted six letters on Los Angeles' housing element dated [1/19/2021](#), [2/4/2021](#), [2/16/2021](#),

[7/27/2021](#), [10/6/2021](#), [5/20/2022](#). We most recently recommended that HCD certify the plan. Improvements to the plan that align with AHLA feedback include:

- Plan lays out a realistic pathway for the construction of the entire RHNA, about 457,000 new homes by 2029
- Rigorous methodology for estimating realistic development capacity
- Programs to upzone equitably throughout the city
- Programs to protect tenants
- Programs to better fund affordable housing

Los Angeles County

Los Angeles County's adopted housing element was certified by HCD on 5/27/2022. Los Angeles County's RHNA for the unincorporated areas is 90,052 homes, including 25,648 VLI, 13,691 LI, 14,180 MI and 36,533 AMI. AHLA commissioned an analysis by MapCraft Labs dated [11/9/2021](#) which found that Los Angeles County's expected housing capacity could fall short by between 17,000 and 34,000 units. AHLA has submitted four letters on Los Angeles County's housing element dated [4/28/2020](#), [7/19/2021](#), [8/31/2021](#) and [10/14/2021](#). We most recently recommended that HCD not certify the plan until it is revised to address our concerns. Improvements to the plan that align with AHLA feedback include:

- Place-based strategies for community revitalization in racially and ethnically concentrated areas of poverty
- Commitment to create an adaptive reuse ordinance
- Commitment to develop certain County-owned sites in incorporated areas using sovereign immunity
- ADU incentives, including standard plans
- Comprehensive rezoning program, including in areas that are currently inaccessible due to exclusionary zoning and community opposition to housing

Pasadena

Pasadena's recently-adopted housing element was found out of compliance by HCD on 10/14/2022. Pasadena's RHNA is 9,429 homes, including 2,747 VLI, 1,662 LI, 1,565 MI and 3,455 AMI. AHLA commissioned an analysis by MapCraft Labs dated [12/21/2021](#) which found that Pasadena's expected housing capacity could fall short by between 1,100 and 2,200 units. AHLA has submitted four letters on Pasadena's housing element dated [10/9/2020](#), [7/27/2021](#), [1/20/2022](#) and [9/2/2022](#). We most recently recommended that HCD not certify the plan until it is revised to address our concerns. Improvements to the plan that align with AHLA feedback include:

- Commitment to develop new standards to promote transit oriented development
- Removal of a discretionary review process, the Affordable Housing Concessions Permit
- Aligning density bonus ordinance to state law
- Requirement for relocation assistance to tenants in a no-fault eviction
- AFFH program to prioritize investments in northwest Pasadena

Redondo Beach

Redondo Beach's adopted housing element was certified by HCD on 9/1/2022. Redondo Beach's RHNA is 2,490 homes, including 936 VLI, 508 LI, 490 MI and 556 AMI. AHLA has submitted four letters on Redondo Beach's housing element dated [10/16/2020](#), [5/20/2021](#), [9/15/2021](#) and [8/12/2022](#). We most recently recommended that HCD not certify the plan until it is revised to address our concerns. Improvements to the plan that align with AHLA feedback include:

- The use of a reasonable set of pre-screening criteria in the sites inventory
- Raising the threshold for when a Conditional Use Permit is required for housing developments
- Fee reductions and deferrals for affordable housing units
- Aligning municipal code with state density bonus law
- Program to drop charges against people experiencing homelessness when they accept certain services
- 2,300 homes proposed under the "builder's remedy" in the Housing Accountability Act due to noncompliance with the original certification deadline early in 2022¹.

Santa Monica

Santa Monica's adopted housing element was certified by HCD on 10/14/2022. Santa Monica's RHNA is 8,895 homes, including 2,794 VLI, 1,672 LI, 1,702 MI and 2,727 AMI. AHLA commissioned an analysis by MapCraft Labs dated [12/9/2021](#) which found that Santa Monica's expected housing capacity could fall short by between 1,800 and 3,500 units. AHLA has submitted six letters on Santa Monica's housing element dated [10/9/2020](#), [3/16/2021](#), [6/1/2021](#), [9/8/2021](#), [10/8/2021](#) and [7/13/2022](#). We most recently recommended that HCD not certify the plan until it is revised to address our concerns. Improvements to the plan that align with AHLA feedback include:

- A no net loss buffer in the sites inventory is provided overall and at most affordability levels
- The sites inventory employs reasonable pre-screening criteria
- Single-family upzoning program allowing six-unit developments
- "Right of return" affordable housing priority program for Black, indigenous and other communities of color displaced by past redevelopments, such as the 10 Freeway
- "Preserving our diversity" program providing cash assistance for lower-income seniors
- 4,500 homes proposed under the "builder's remedy" in the Housing Accountability Act due to noncompliance with their original certification deadline early in 2022².

¹ Dillon, Liam (10/24/2022). ["Thousands of apartments may come to Santa Monica, other wealthy cities under little-known law."](#) Los Angeles Times.

² Dillon, Liam (10/24/2022). ["Thousands of apartments may come to Santa Monica, other wealthy cities under little-known law."](#) Los Angeles Times.

South Pasadena

South Pasadena has submitted a subsequent draft of its housing element, which is currently under review by HCD. South Pasadena's RHNA is 2,067 homes, including 757 VLI, 398 LI, 334 MI and 578 AMI. AHLA has submitted five letters on South Pasadena's housing element dated [7/4/2020](#), [3/10/2021](#), [4/23/2021](#), [11/22/2021](#) and [6/17/2022](#). We most recently recommended that HCD not certify the plan until it is revised to address our concerns. Improvements to the plan that align with AHLA feedback include:

- The statewide upward trend in ADU production is reflected in South Pasadena
- The city's inclusionary zoning requirements automatically trigger state density bonuses
- Program to remove racial covenants from property deeds, as a public acknowledgement of past racist land use regulations

Torrance

Torrance's adopted housing element was certified by HCD on 10/12/2022. Torrance's RHNA is 4,939 homes, including 1,621 VLI, 846 LI, 853 MI and 1,619 AMI. AHLA commissioned an analysis by MapCraft Labs dated [12/22/2021](#) which found that Torrance's expected housing capacity could fall short by between 1,800 and 3,600 units. AHLA has submitted two letters on Torrance's housing element dated [10/16/2020](#) and [11/1/2021](#). We most recently recommended that HCD not certify the plan until it is revised to address our concerns. Improvements to the plan that align with AHLA feedback include:

- Rezoning program for some parcels along commercial corridors
- Program to align local density bonus ordinance with state law
- Commitments to assess development standards such as parking, open space, FAR, etc.
- Some positive steps on community engagement

West Hollywood

West Hollywood has submitted a subsequent draft of its housing element to HCD, where it is currently under review. West Hollywood's RHNA is 3,933 homes, including 1,066 VLI, 689 LI, 682 MI and 1,496 AMI. AHLA commissioned an analysis by MapCraft Labs dated [12/20/2021](#) which found that West Hollywood's expected housing capacity could fall short by between 600 and 1,100 units. AHLA has submitted two letters on West Hollywood's housing element dated [10/26/2020](#) and [8/23/2021](#). We most recently recommended that HCD not certify the plan until it is revised to address our concerns. Improvements to the plan that align with AHLA feedback include:

- Program to align density bonus ordinance with state law
- Commitments to redevelop certain city-owned sites with housing
- Specification of sites to be granted relief from FAR caps and height limits

Whittier

Whittier's adopted housing element was certified by HCD on 10/12/2022. Whittier's RHNA is 3,439 homes, including 1,025 VLI, 537 LI, 556 MI and 1,321 AMI. AHLA commissioned an analysis by MapCraft Labs dated [12/3/2021](#) which found that Whittier's expected housing capacity could fall short by between 1,000 and 2,100 units. AHLA has submitted five letters on Whittier's housing element, dated [10/16/2020](#), [6/30/2021](#), [9/28/2021](#), [10/11/2021](#) and [9/29/2022](#). We most recently recommended that HCD not certify the plan until it is revised to address our concerns. Improvements to the plan that align with AHLA feedback include:

- Commitments to redevelop the two largest shopping centers in the city as mixed-use developments
- Recently lowered parking requirements in Uptown and commitments to do so in other parts of the city as well
- Lower per unit fees for multifamily housing compared to single-family

Conclusion

Several factors came together to create more promising housing element outcomes at this early stage of the 6th cycle. State law was revised to change the way that RHNA numbers are calculated, significantly increasing the targets at all income levels. State law also imposed new requirements around affirmatively furthering fair housing, which provide new leverage to push cities to open up exclusionary neighborhoods. SCAG's distribution of the RHNA placed an unprecedented emphasis on locating new housing close to jobs, transit and in historically exclusionary areas. HCD, with support from the Governor and the Legislature, has a political mandate to rigorously oversee housing elements, including new enforcement resources. Housing advocates, including Abundant Housing LA, have invested significant resources in pouring over these complex plans, which typically run to hundreds of pages, with the aim of advocating to make them more meaningful, often in the face of fierce local opposition. Going forward, oversight of plan implementation will be critical. The General Plan Annual Progress Reports (APRs), which jurisdictions must submit each April, provide invaluable data about housing permitting activity at the various affordability levels as well as progress on the programmatic commitments in the plans. The APRs provide an opportunity for advocates and HCD to hold local governments accountable to their promises and assess how effective these plans are in practice, which will help guide both local and state housing advocacy. It will also be critical to engage on reforms to state housing element law, to ensure that the process can benefit from more objective standards and that enforcement mechanisms such as the Builder's Remedy in the Housing Accountability Act are usable in cases where jurisdictions fail to obtain timely certification of their plans. How meaningful the 6th housing element cycle ends up being in terms of its ultimate goal of solving California's housing shortage and affordability crisis will depend on whether local governments implement their plans in good faith. We do not presume that the problem is solved, even for the plans that seem most promising, but we remain committed to the work of securing housing abundance at the local level.