

Figure 9-6 Racially or Ethnically Concentrated Areas of Poverty

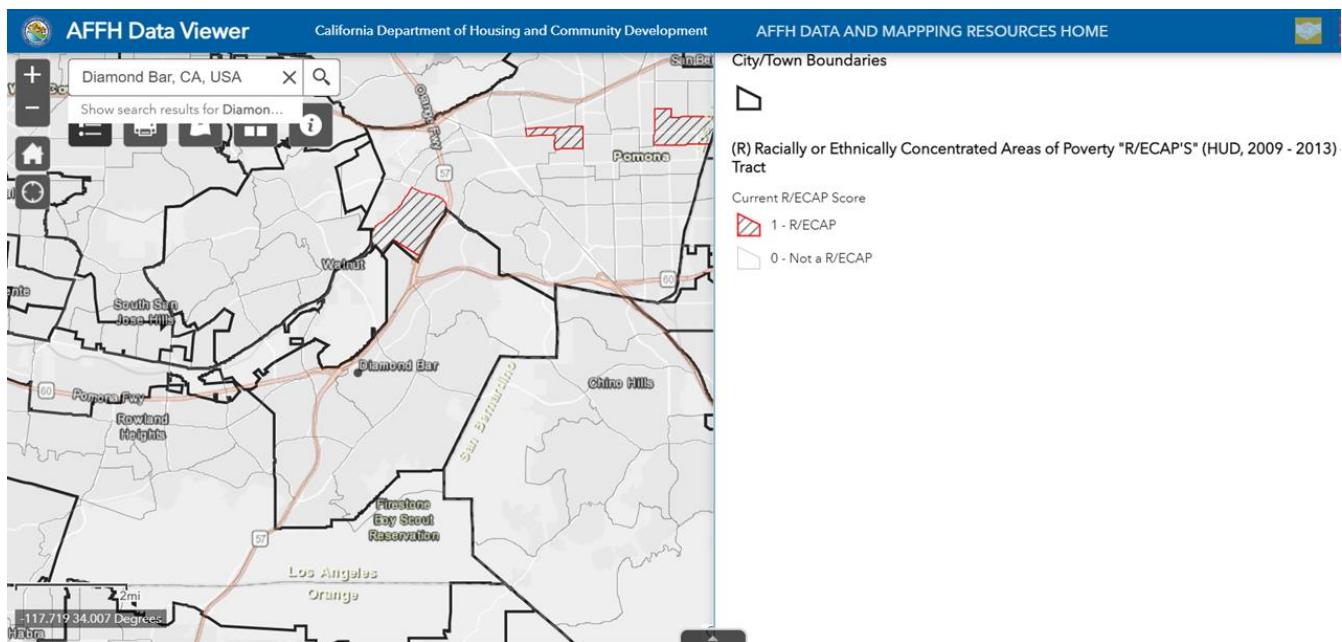


Figure 9-7 Disability Status

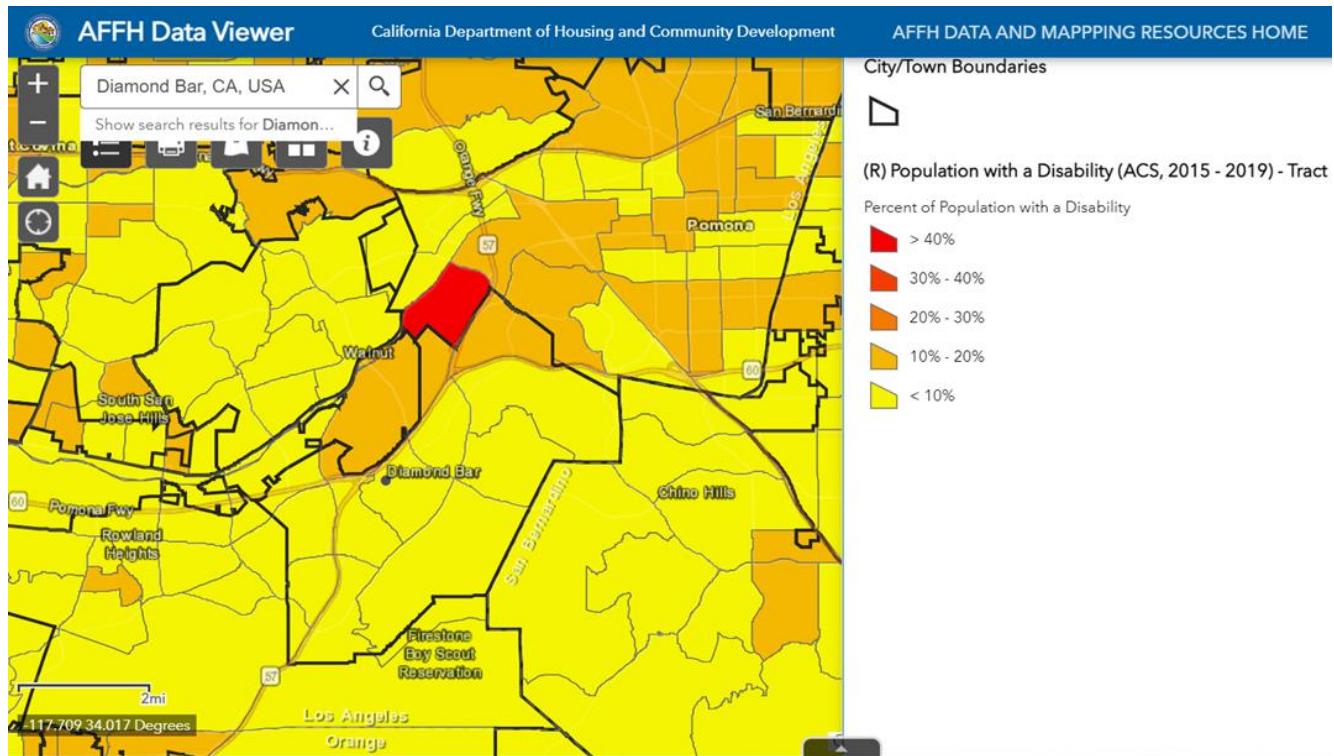
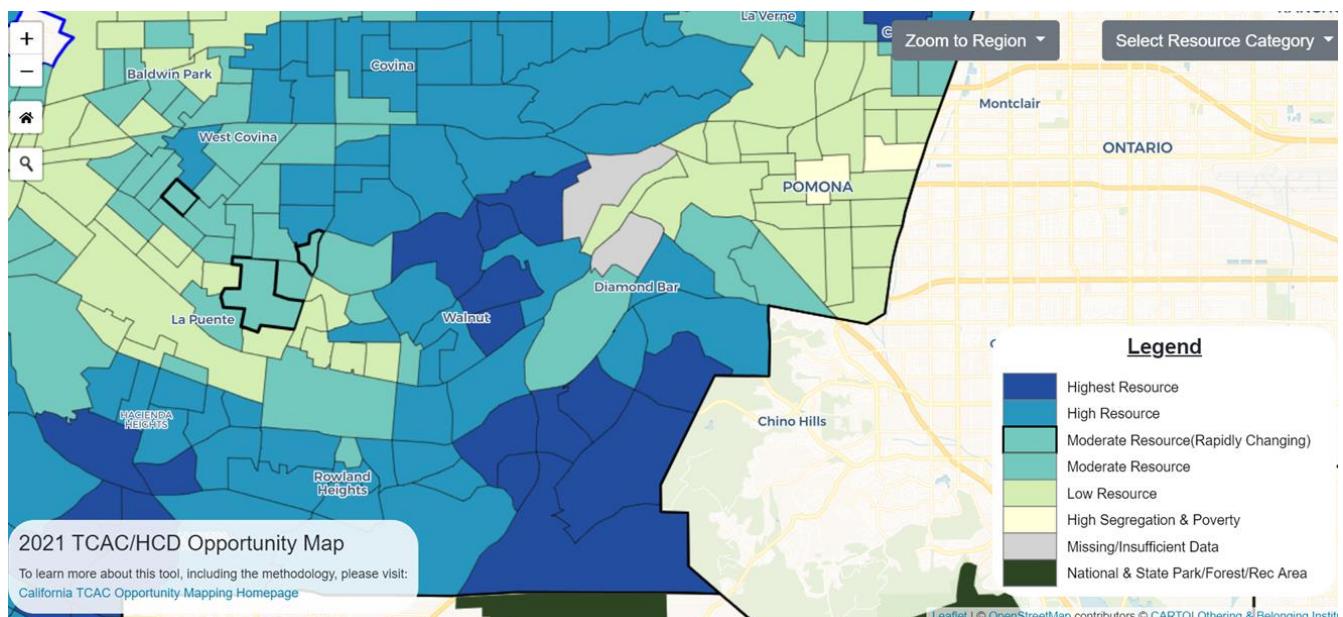


Figure 9-8 TCAC/HCD Opportunity Map

9.5 HOUSING ACTION PLAN

Sections 9.2 through 9.4 of this Housing Element describe the housing needs, opportunities and constraints in the City of Diamond Bar. This section presents the City's 8-year Housing Action Plan for

the 2021-2029 planning period. This Plan sets forth Diamond Bar's goals, policies, and programs to address the identified housing needs of the City.

GOALS AND POLICIES

It is the overall goal of the plan that there be adequate housing in the City, both in quality and quantity, to provide appropriate shelter for all without discrimination.

The goals and policies of the Housing Element presented below address Diamond Bar's identified housing needs

and are implemented through a series of housing programs offered through the Community Development Department. Within this overarching goal, the City has established goals and policies to address the development, maintenance and improvement of the housing stock.

- H-G-1** Preserve and conserve the existing housing stock and maintain property values and residents' quality of life.
 - H-P-1.1** Continue to offer home improvement and rehabilitation assistance to low- and moderate-income households, including seniors and the disabled.
 - H-P-1.2** Continue to facilitate improvement of substandard units in compliance with City codes and improve overall housing conditions in Diamond Bar.
 - H-P-1.3** Promote increased awareness among property owners and residents of the importance of property maintenance to long-term housing quality.
- H-G-2** Provide opportunities for development of suitable housing to meet the diverse needs of existing and future residents.
 - H-P-2.1** Provide favorable home purchasing options to low- and moderate-income households through County and other homebuyer assistance programs.
 - H-P-2.2** Continue outreach and advertising efforts to make more residents aware of homebuyer assistance programs and to enhance program utilization.
 - H-P-2.3** Maintain affordability controls on government-assisted housing units in the City.

- H-P-2.4** Facilitate the development of accessory dwelling units (ADUs) as a means to provide affordable housing opportunities in existing neighborhoods.
- H-G-3** Provide adequate sites through appropriate land use and zoning designations to accommodate future housing growth.
- H-P-3.1** Maintain an inventory of potential sites available for future housing development.
- H-P-3.2** Encourage infill and mixed-use opportunities within the General Plan Focus Areas.
- H-P-3.3** Coordinate with local colleges and universities to expand the availability of housing for faculty and staff.
- H-G-4** Mitigate potential governmental constraints which may hinder or discourage housing development in Diamond Bar.
- H-P-4.1** Continue to provide regulatory incentives and concessions to facilitate affordable housing development in the City.
- H-P-4.2** Promote the expeditious processing and approval of residential projects that meet General Plan policies and City regulatory requirements.
- H-P-4.3** Pursuant to the City's Affordable Housing Incentives Ordinance, allow modifications to development standards for projects with an affordable housing component.
- H-P-4.4** Periodically review City regulations, ordinances, departmental processing procedures and residential fees related to rehabilitation and/or construction to assess their impact on housing costs, and revise as appropriate.
- H-G-5** Encourage equal and fair housing opportunities for all economic segments of the community.
- H-P-5.1** Continue to support enforcement of fair housing laws prohibiting arbitrary discrimination in the building, financing, selling or renting of housing on the basis of race, religion, family status, national origin, physical handicap or other such circumstances.
- H-P-5.2** Refer persons with fair housing complaints to the appropriate agency for investigation and resolution.
- H-P-5.3** Encourage apartment managers and owners to attend fair housing seminars offered by the Apartment Association of Greater Los Angeles.

HOUSING PROGRAMS

Housing Element goals and policies are implemented through a series of housing programs described below. Pursuant to § 65583 of the Government Code, a city's housing programs must address the following major areas:

- Conserve and improve the condition of the existing supply of affordable housing;
- Assist in the development of adequate housing to meet the needs of extremely-low, very-low, low, and moderate-income households;
- Provide adequate sites to accommodate the city's share of the regional housing need for households of each income level;
- Remove governmental constraints to the maintenance,

improvement, and development of housing, including housing for all income levels and housing for persons with disabilities;

- Promote the creation of accessory dwelling units that can be offered at affordable rents;
- Affirmatively furthering fair housing and promote equal housing opportunity
- Include a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element.

Diamond Bar's programs for addressing these requirements are described in this section.

Conserve and Improve the Condition of Existing Affordable Housing

Conserving and improving the condition of the housing stock is an important goal for Diamond Bar. Although the majority of the City's housing stock is in good condition, a significant portion of the housing stock is over 30 years old, the age when most homes begin to require major rehabilitation improvements. By identifying older residential neighbor-

hoods for potential housing rehabilitation, the City has taken a proactive approach to maintaining the quality of its current housing stock. The focus neighborhoods identified by this Plan as evidencing physical problem conditions can be specifically targeted for City housing improvement assistance.

Program H-1. Residential Neighborhood Improvement Program

The City implements a proactive Neighborhood Improvement Program and neighborhood inspections are conducted on a regular basis throughout the entire City. The checklist for residential violations includes inoperable vehicles, trash storage, parking on paved areas only, structure maintenance, landscape maintenance, and fence and wall maintenance. After the neighborhood inspection, letters are sent out to all property owners in areas where violations have been observed. A follow-up inspection will be conducted, at which time any noticed properties found to be in violation of the Municipal Code are subject to a \$100 citation.

When problems are observed, inspectors may refer residents to the Home Improvement Program (see Program H-2).

Eight-year objective: Continue to implement the code enforcement program, and direct eligible households to available rehabilitation assistance to correct code violations. Provide focused code enforcement and rehabilitation assistance for 5 to 6 households during the planning period in neighborhoods evidencing concentrations of deteriorating units.

Responsible agency: Community Development Department.

Timeline: Throughout the planning period.

Program H-2. Home Improvement Program

The City uses CDBG funds for minor home repair through the Home Improvement Program, where low/moderate income householders may receive up to a \$20,000 no interest, deferred loan for home repair and rehabilitation. The City promotes and coordinates this program by posting information, reviewing applications and disbursing grant funds to eligible applicants.

Eight-year objective: Minor repair and rehabilitation for 4 units annually.

Responsible agency: Community Development Department.

Timeline: Throughout the planning period.

Program H-3. Section 8 Rental Assistance Program

The Section 8 Rental Assistance Program extends rental subsidies to extremely-low- and very-low-income households who spend more than 30% of their gross income on housing. Rental assistance not only addresses housing affordability, but also overcrowding by assisting families that may be "doubling up" to afford rent. The Los Angeles County Development Authority (LACDA) coordinates Section 8 rental assistance on behalf of the City. The City will continue to provide rental assistance information and referrals to LACDA.

Eight-year objective: Continue to direct eligible households to the County Section 8 program.

Responsible agency: LACDA.

Timeline: Throughout the planning period.

Program H-4. Preservation of Assisted Housing

Diamond Bar contains only one assisted housing project, the 149-unit Seasons Apartments (formerly Heritage Park) for senior citizens. This project was constructed in 1988 and was originally financed under the Los Angeles County Multi-Family Mortgage Revenue Bond program. The project was

refinanced in November 1999 under the California Community Development Authority's Multi-Family Housing Re-funding Bond, and was transferred to the Corporate Fund for Housing, a non-profit organization. According to the terms of the new bond agreement, income restrictions for residents and corresponding rent limits were set. For the duration of the bond, which expires December 2, 2034, all units will be affordable: 30 units (20%) will be very-low-income, 82 units (55%) will be low-income, and 37 units will be moderate-income (defined as 100% AMI).

Eight-year objective: Preserve 100% of the 149 low- and moderate-income units in the Seasons Apartments.

Responsible agency: Community Development Department

Timeline: Throughout the planning period Program H-5. Mobile Home Park Preservation

There are two mobile home parks in Diamond Bar, both located in the western portion of the City: Diamond Bar Estates and Walnut Creek Estates. These mobile home parks were developed before incorporation of the City on land previously designated as Industrial under the County's jurisdiction. The 2040 Diamond Bar General Plan Land Use Map designates both mobile home parks "residential" in order to preserve their status and prevent future inconsistencies. This designation in the General Plan works to preserve the parks since any proposed land use change would require an amendment to the City's General Plan and Zoning Ordinance, as well as adherence to State mobile home park closure requirements.

Eight-year objective: The City will continue to support preservation of its two mobile home parks as important affordable housing resources.

Responsible agency: Community Development Department

Timeline: Continuously throughout the planning period

Assist in the Development of Affordable Housing

To enable more households to attain homeownership in Diamond Bar, the City participates in two mortgage assistance programs: the Homebuyer Assistance Program and the Mortgage Credit Certificate (MCC). These programs are very important given that housing prices in Diamond Bar rank among the highest in eastern Los

Angeles County and northern Orange County. The City is also supportive of the development of senior housing to meet the needs of its growing senior population and multi-family rental housing for lower-income households, including working families and university students.

Program H-6. First-Time Homebuyer Assistance Programs

Los Angeles County offers a first-time homebuyer assistance program and Mortgage Credit Certificates. To be eligible, families must meet the specified income requirements and be able to pay a 1% down payment on their home. The City of Diamond Bar provides referral information to prospective buyers at the public counter and on the City website.

6.a Home Ownership Program (HOP)

The Los Angeles County Home Ownership Program (HOP) provides zero-interest loans with no repayment due until the home is sold, transferred, or refinanced. The loan is secured by a second trust deed and a promissory note. The home must be owner-occupied for the life of the loan.

6.b Mortgage Credit Certificate (MCC)

The Mortgage Credit Certificate (MCC) program is a federal program that allows qualified first-time homebuyers to take an annual credit against federal income taxes of up to 15% of the annual interest paid on the applicant's mortgage. This enables homebuyers to have more income available to qualify for a mortgage loan and make the monthly mortgage payments. The value of the MCC must be taken into consideration by the mortgage lender in underwriting the loan and may be used to adjust the borrower's federal income tax withholding. The MCC program has covenant restrictions to ensure the affordability of the participating homes for a period of 15 years. MCCs can be used in conjunction with the Home Ownership Program (HOP).

Eight-year objective: The City will advertise these programs and provide information to interested homebuyers. In addition, the City will work with realtors to make them aware of these programs.

Responsible agency: Community Development Department

Timeline: Continuously throughout the planning period

Program H-7. Senior and Workforce Housing Development

With a growing portion of the City's population 65 years of age and above, Diamond Bar will continue to need housing and services for seniors. Particularly those seniors 75 years and older will begin to require housing with a supportive service component.

In addition, occupations for which high housing costs make it difficult for working-age households to live in Diamond Bar include teachers, police and firefighters. Several colleges and universities are also located within commuting distance of Diamond Bar. The City will continue to coordinate

with these institutions to identify potential partnership opportunities for affordable faculty/staff housing.

The City will encourage the development of senior and workforce housing, including units affordable to very-low- and extremely-low-income persons as well as units with 3-4 bedrooms suitable for large families, if feasible, in several ways. First, the City will identify suitable sites for multi-family development in the Housing and Land Use Elements, including zoning to encourage and facilitate lower-cost housing options such as SROs. Second, the City will offer regulatory incentives, and/or direct financial assistance appropriate to the project when feasible. The following are among the types of incentives which may be provided:

- Priority application processing
- Fee waivers or deferrals
- Coordination with off-site infrastructure improvements
- Flexible development standards
- Density bonuses
- City support to developers in affordable housing funding applications.

It must be recognized that the City's ability to offer direct financial subsidies is limited. The City has no local source of housing assistance funds, and its CDBG revenue is only about \$232,000 per year currently (see Section 9.3 for further discussion of the City's financial resources). Given these financial limitations, the City's primary efforts to encourage and facilitate affordable housing production are through its land use regulations and staff support to interested developers in applying for grant funds, and cooperation with the Los Angeles County Development Authority (LACDA) on its assistance programs.

Pursuant to the City's Affordable Housing Incentives Ordinance, the City provides modified development standards, including parking reductions, for senior and affordable projects. A portion of the City's CDBG funds can be used to help finance senior and workforce housing projects. New housing developments in Diamond Bar may also be eligible for funding sources identified in Section 9.3, Resources and Opportunities. Typically, local assistance can serve as gap financing to bridge the difference between the total project cost and the equity investment plus debt.

Eight-year objective: The City will identify sites suitable for new senior and workforce housing and post information on the City website throughout the planning period regarding the City's interest in assisting in the development of senior and workforce housing, provide information on available regulatory and financial incentives, and assist developers in applying for funds. The City will also collaborate with local colleges and universities to identify potential partnership opportunities for affordable housing. The City's quantified objectives for housing production during the 2021-2029 planning period are described in Table 9-35.

Responsible agency: Community Development Department

Timeline: Continuously throughout the planning period

Provide Adequate Sites to Accommodate the City's Share of Regional Housing Need

A major element in meeting the housing needs of all segments of the community is the provision of adequate sites for all types, sizes and prices of housing. The City's General Plan, Development Code and specific plans

describe where housing may be built, thereby affecting the availability of land for residential development. Specific housing sites are identified in Appendix B.

Program H-8. Land Use Element and Development Regulations

The City completed a comprehensive update to the General Plan in 2019. The Land Use Element of the General Plan, as discussed previously in Section 9.3, provides for a variety of housing types in Diamond Bar, with densities ranging up to 30 dwelling units per acre. In addition, the new General Plan established several "focus areas" where additional development and redevelopment are encouraged, including multi-family residential and mixed-use. As described in Appendix B, General Plan land use designations provide adequate capacity to accommodate the City's RHNA allocation at all income levels for the 2021-2029 period. The City is currently processing amendments to the Development Code to align development regulations with new General Plan land use designations and comply with the following requirements pursuant to Government Code Sec. 65583.2(h).

- Permit owner-occupied and rental multifamily uses by right for developments in which 20 percent or more of the units are affordable to lower income households. By right means local government review must not require a conditional use permit, planned unit development permit, or other discretionary review or approval.
- Permit the development of at least 16 units per site.
- Require a minimum density of 20 units per acre; and
- Ensure a) at least 50 percent of the shortfall of low- and very low-income regional housing need can be accommodated on sites designated for exclusively residential uses, or b) if accommodating more than 50 percent of the low- and very low-income regional housing need on sites designated for mixed-uses, all sites designated for mixed-uses must allow 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project.

As part of the Development Code update, residential and mixed-use parking requirements will be revised in conformance with General Plan policies described previously in Section 9.4 Constraints.

The Development Code update will also include revisions to streamline the review process, including SB 35 review procedures and objective standards to minimize constraints on housing supply and affordability.

The City shall continue to comply with the “no net loss” provisions of Government Code §65863 through ongoing project-by-project evaluation to ensure that adequate sites are available to accommodate the City’s RHNA share throughout the planning period. The City shall not reduce the allowable density of any site in its residential land inventory, nor approve a development project at a lower density than assumed in the Housing Element sites inventory, unless both of the following findings are made:

- a) The reduction is consistent with the adopted General Plan, including the Housing Element; and
- b) The remaining sites identified in the Housing Element are adequate to accommodate the City’s remaining share of regional housing need pursuant to Government Code §65584.

If a reduction in residential density for any parcel would result in the remaining sites in the Housing Element land inventory not being adequate to accommodate the City’s share of the regional housing need pursuant to §65584, the City may reduce the density on that parcel if findings are made identifying sufficient additional, adequate and available sites with an equal or greater residential density so that there is no net loss of residential unit capacity.

Eight-year objectives: Maintain adequate sites for housing development at all income levels in conformance with the RHNA and ensure compliance with No Net Loss requirements. Process a Development Code amendment within three years of Housing Element adoption to update land use regulations consistent with the 2040 General Plan.

Responsible agency: Community Development Department

Timeline: Development Code amendment within three years of Housing Element adoption

Program H-9. Mixed Use Development

The 2040 General Plan encourages mixed-use development in three focus areas, which could provide housing close to transit and places of employment (see additional discussion in Appendix B). The City will encourage property owners and developers to pursue mixed-use development in these focus areas to accommodate a portion of the city’s low- and moderate-income housing needs during this planning period.

Mixed-use can also reduce vehicle trips, make more efficient use of land and parking areas, and facilitate energy conservation.

Incentives the City may offer to encourage and facilitate redevelopment in these areas include the following:

- Coordination with off-site infrastructure improvements)
- Flexible development standards
- Density bonuses
- Support to developers in seeking funding for affordable housing

Eight-year objective: The City will prepare a handout and marketing materials encouraging mixed-use development where appropriate and make it available to interested developers throughout the planning period.

Responsible agency: Community Development Department

Timeline: Publish handout with marketing materials within 6 months of Housing Element adoption and continuously thereafter

Program H-10. Accessory Dwelling Units

Accessory dwelling units (ADUs) provide an important source of affordable housing for seniors, young adults and other low- and moderate-income households. The City adopted an amendment to the Development Code in 2021 to incorporate recent changes to State ADU law, and will continue to encourage ADU production through public information available at City Hall and on the City website.

Eight-year objective: Continue to encourage construction of ADUs through an informational handout available at City Hall and on the City website throughout the planning period.

Responsible agency: Community Development Department

Timeline: Publish ADU handout with marketing materials within 6 months of Housing Element adoption and continuously thereafter

Removing Governmental Constraints to Housing

Under current State law, the Housing Element must address, and where legally possible, remove governmental constraints affecting the maintenance, improvement, and development of housing. The following programs are designed to mitigate government constraints on residential development and facilitate the development of a variety of housing.

Program H-11. Emergency Shelters, Low Barrier Navigation Centers and Transitional/Supportive Housing

Senate Bill 2 of 2007 strengthened planning requirements for emergency shelters and transitional/supportive housing. The Development Code allows emergency shelters by-right in the Light Industry (I) zone in compliance with SB 2 and also allows transitional and supportive housing as a residential use subject to the same standards as other residential uses of the same type in the same zone.

In 2018 AB 2162 amended State law to require that supportive housing be a use by-right in zones where multi-family and mixed uses are permitted, including non-residential zones permitting multi-family uses, if the proposed housing development meets specified criteria.

AB 101 (2019) added the requirement that low barrier navigation centers meeting specified standards be allowed by-right in areas zoned for mixed use and in non-residential zones permitting multi-family uses pursuant to Government Code § 65660 et seq.

The City is currently processing a Development Code amendment to allow supportive housing and low barrier navigation centers consistent with State law.

The City will also continue to work cooperatively with the Los Angeles Homeless Services Authority and the San Gabriel Valley Council of Governments in its efforts to develop a regional strategy for addressing homelessness.

Eight-year objectives:

1. Continue to facilitate emergency shelters and transitional/supportive housing, and continue participating with LAHSA and SGVCOG on efforts to address homelessness throughout the planning period.
2. Process an amendment to the Development Code in 2022 to allow supportive housing and low barrier navigation centers consistent with State law.

Responsible agency: Community Development Department

Timeline: Development Code amendment in 2022; support efforts to address homelessness throughout the planning period

Program H-12. Affordable Housing Incentives/Density Bonus

To facilitate the development of affordable housing, the City utilizes Affordable Housing Incentives/Density Bonus Provisions (Development Code Chapter 22.18). Incentives described in Chapter 22.18 apply to developments of five or more dwelling units. If a density bonus and/or other incentives cannot be accommodated on a parcel due to strict compliance with the provisions of the Development Code, the Council may waive or

modify the development standards as necessary to accommodate bonus units and other incentives to which the development is entitled. AB 2345 of 2020 revised State Density Bonus Law to increase incentives for affordable housing. The City is currently processing an amendment to the Development Code in conformance with AB 2345.

Eight-year objective: The City will amend the Development Code in 2021 consistent with current Density Bonus Law and continue to encourage the production of affordable housing through the use of density bonus and other incentives.

Responsible agency: Community Development Department

Timeline: Development Code amendment in 2021/22

Program H-13. Efficient Project Processing

The City is committed to a streamlined development process and has adopted procedures to facilitate efficient permit processing. Prospective applicants are strongly encouraged to request a pre-application conference with the Community Development Department before formal submittal of an application. The purpose of this conference is to inform the applicant of City requirements as they apply to the proposed development project, review the procedures outlined in the Development Code, explore possible alternatives or modifications, and identify necessary technical studies or other supporting materials relating to the proposed development. This process helps to minimize the time required for project review by identifying issues early in the process before extensive engineering and architectural design work has been done.

Consistent with new transparency laws, zoning, development standards and fees will be posted on the City website.

Eight-year objective: The City will continue to offer the pre-application conference and streamlined development processing, and periodically review departmental processing procedures to ensure efficient project processing. Zoning, development standards and fees will be posted on the City website throughout the planning period.

Responsible agency: Community Development Department

Timeline: Post zoning, development standards and fees on the City website in FY 2021/22 and continuously thereafter

Affirmatively Furthering Fair Housing and Equal Housing Opportunities

To adequately meet the housing needs of all segments of the community, the City promotes housing opportunities for all persons regardless of race, religion,

gender, family size, marital status, ancestry, national origin, color, age, or physical disability.

Program H-14. Affirmatively Furthering Fair Housing

As a participating city in the Los Angeles County CDBG program, Diamond Bar has access to the services of the Housing Rights Center for fair housing outreach, education, and counseling on housing discrimination complaints. The City will continue to advertise the fair housing program through placement of fair housing service brochures at the public counter, at the Senior Center, through the City's newsletter, and on the City website. Apartment owners and managers are provided with current information about fair housing issues, rights and responsibilities. The Apartment Association of Greater Los Angeles conducts seminars on State, Federal and local Fair Housing laws and compliance issues. In addition, the City will:

- Ensure that all development applications are considered, reviewed, and approved without prejudice to the proposed residents, contingent on the development application's compliance with all entitlement requirements.
- Accommodate persons with disabilities who seek reasonable waiver or modification of land use controls and/or development standards pursuant to procedures and criteria set forth in the applicable development regulations.
- Work with the County to implement the regional Analysis of Impediments to Fair Housing Choice and HUD Consolidated Plan.
- Facilitate public education and outreach by posting informational flyers on fair housing at public counters, libraries, and on the City's website.
- Conduct public meetings at suitable times, accessible to persons with disabilities, and near public transit. Resources will be invested to provide interpretation and translation services when requested at public meetings when feasible.
- Encourage community and stakeholder engagement during development decisions.

Eight-year objective: The City will continue to promote fair housing practices, provide educational information on fair housing to the public, and cooperate with the Greater Los Angeles Apartment Association in providing fair housing information to landlords and at libraries, senior centers, recreation centers, and Social Security and employment offices. The City will continue to refer fair housing complaints to the Housing Rights Center.

Responsible agency: Community Development Department; Housing Rights Center

Timeline: Throughout the planning period

Program H-15. Reasonable Accommodation for Persons with Disabilities

State law requires cities to remove constraints or make reasonable accommodations for housing occupied by persons with disabilities. The City will continue to implement adopted procedures for reviewing and approving requests for reasonable housing accommodations pursuant to State law.

Eight-year objective: The City will continue to implement reasonable accommodation procedures for persons with disabilities in compliance with State law.

Responsible agency: Community Development Department

Timeline: Throughout the planning period

Table 9-35: Quantified Objectives 2021-2029, Diamond Bar

	Income Category					Totals
	Ex. Low	V. Low	Low	Mod	Above Mod	
New construction ^a	422	422	434	437	806	2,521
Rehabilitation	5	5	10	20	-	40
Conservation ^b	-	30	82	37	-	149

a Quantified objective for new construction is for the period 7/1/2021 – 10/15/2029 per the RHNA projection period

b The Seasons senior apartments



Appendix A

Evaluation of the Prior Housing Element

Section 65588(a) of the Government Code requires that jurisdictions evaluate the effectiveness of the existing Housing Element, the appropriateness of goals, objectives and policies, and the progress in implementing programs for the previous planning period. This appendix summarizes the results of the City's review of the housing goals, policies, and programs of the previous Housing Element, and evaluates the degree to which these programs have been implemented during the previous planning period.

As discussed in Section 9.4-Constraints, the City adopted a new General Plan in 2019. As part of this Housing Element update, the goals and policies of the previous Housing Element were reviewed for consistency with the new General Plan and current State housing law, and Policy H-P-3.2 was updated to reflect the new emphasis on mixed-use development in the General Plan Focus Areas.

All programs were also reviewed and updated to reflect current circumstances, including the needs assessment and potential constraints, and the evaluation of City progress in implementing prior programs.

Table A-1 summarizes the programs contained in the previous Housing Element along with program objectives, timeframe and accomplishments.

Table A-2 presents the City's progress toward the quantified objectives from the previous Housing Element.

Table A-1
2013-2021 Housing Element Program Evaluation
City of Diamond Bar

Housing Program	Program Objectives	Timeframe	Implementation Status and Future Actions
1. Residential Neighborhood Improvement Program	Proactive program conducts neighborhood inspections on a regular basis throughout the entire city/focused code enforcement linked with rehabilitation assistance to correct code violations.	Ongoing	The City continues to operate the code enforcement program. This program is successful and is being continued.
2. Home Improvement Program	Improve neighborhoods evidencing deferred maintenance through property maintenance and rehab. Provide minor repair and rehabilitation to 10 units annually.	Ongoing	The HIP is successful in improving housing conditions and should be continued at available funding levels.
3. Single-Family Rehabilitation Program	Provide ongoing advertisement of loans available through the County for qualified homeowners.	Ongoing	The program has been merged with Program 2.
4. Section 8 Rental Assistance Program	Direct eligible households to the County Section 8 program.	Ongoing	This program is beneficial in reducing problems such as overpayment and overcrowding. City continues to coordinate with the County on the Section 8 program. The program should be continued.
5. Preservation of Assisted Housing	Preserve 100 percent of the 149 low- and moderate-income units in The Seasons Apartments.	Ongoing	The Seasons Senior Apartments continued its affordability covenant throughout the planning period. This program is successful and will be continued.
6. Mobile Home Park Preservation	Support preservation of City's two mobile home parks as important affordable housing resources. Maintain residential zoning, and enforce State closure requirements as necessary.	Ongoing	Zoning for mobile home parks is successful in preserving this affordable housing option and is being continued. No proposals to close the parks were submitted. The program is being continued.
7. First-time Homebuyer Assistance Programs	Advertise County's Home Ownership Program (HOP) and Mortgage Credit Certificate (MCC) and provide information to interested homebuyers. In addition, the City will work with realtors to make them aware of these programs.	Ongoing	This program helps expand home ownership and the City will continue to provide information on this County program.
8. Senior and Workforce Housing Development	Identify and evaluate sites suitable for new senior and workforce housing. The City will post information on the City website during the first year of the planning period regarding the City's interest in assisting in the development of senior and workforce housing, provide information on available regulatory and financial incentives, and assist developers in applying for funds. The City will also contact local colleges and universities annually to identify potential partnership opportunities for affordable housing.	Ongoing	This program is intended to encourage affordable housing development and should be continued.
9. Land Use Element and Zoning	Maintain adequate sites commensurate with the RHNA.	Ongoing	The City has maintained adequate sites for housing development at all income levels and ensure compliance with No Net Loss requirements. This program is being revised and expanded to reflect the new RHNA allocation for the 2021-2029 period.
10. Mixed Use Development	The City will prepare a handout and marketing materials encouraging mixed use development where appropriate and make it available to interested developers during the first year of the planning period. A review of potential areas that may be	Ongoing	In December 2019, the City adopted the Comprehensive General Plan Update that created community visions and blueprint for growth and

Housing Program	Program Objectives	Timeframe	Implementation Status and Future Actions
	appropriate for mixed-use development will be initiated by 2015 as part of a comprehensive General Plan update.		development in the City through 2040. This program is an important component of the City's overall strategy to revitalize older areas and expand housing production and is being continued.
11. Second Units	Continue to encourage construction of accessory dwelling units pursuant to the provisions of its Accessory Dwelling Unit Ordinance, and make an informational handout available for distribution at the public counter.	Ongoing	In 2017, the City approved an amendment to the municipal code pertaining to accessory dwelling units to satisfy all of the requirements of Government Code §§65852.150-65852.2. Per AB 68 (Ting), AB 587 (Friedman), AB 671 (Friedman), AB 881 (Bloom), SB 13 (Wieckowski) that went into effect January 1, 2020. In 2021 the City adopted a subsequent amendment to ADU regulations in accordance with the new State laws. The City continues to encourage accessory dwelling units and this program is being continued.
12. Emergency Shelters and Transitional/Supportive Housing	Continue to facilitate emergency shelters and transitional/supportive housing, and continue participating in the SGVCOG homeless study to address homelessness.	Ongoing	This program creates opportunities for a variety of housing for persons with special needs and is being continued with revisions to ensure compliance with recent changes to State law.
13. Redevelopment of Underutilized Sites	Encourage interested property owners to pursue redevelopment of underutilized properties through the provision of incentives and concessions.	Ongoing	The City has continued to encourage the redevelopment of underutilized sites. This program is being continued and will be enhanced by the new General Plan and the Development Code update.
14. Affordable Housing Incentives/ Density Bonus	Encourage the production of affordable housing through the use of density bonus, and provide a handout summarizing the benefits and requirements of affordable housing incentives/density bonus provisions.	Ongoing	This program is being continued in compliance with recent changes to State density bonus law.
15. Efficient Project Processing	Continue to offer streamlined development processing, and periodically review departmental processing procedures to ensure efficient project processing.	Ongoing	The City continued to offer efficient permit processing. This program is appropriate and will be enhanced through revisions to the Development Code.
16. Fair Housing Program	Continue to promote fair housing practices, provide educational information on fair housing to the public, and cooperate with the Greater Los Angeles Apartment Association in providing fair housing information to landlords and at libraries, senior centers, recreation centers, and Social Security and employment offices. Continue to refer fair housing complaints to the San Gabriel Valley and Long Beach Fair Housing Foundation, and maintain an open dialogue with the Foundation regarding the nature of complaints received.	Ongoing	This program is being continued and expanded to reflect new requirements to affirmatively further fair housing.
17. Reasonable Accommodation for Persons with Disabilities	Continue to implement reasonable accommodation procedures for persons with disabilities in compliance with SB520.	Ongoing	This program is an important component of the City's overall efforts to address the special housing needs of persons with disabilities and is being continued.

Table A-2
Progress in Achieving Quantified Objectives – 2013-2021
City of Diamond Bar

Program Category	Quantified Objective	Progress
New Construction		
Very Low (Ex. Low)	308 (154)	1 (0)
Low	182	12
Moderate	190	0
Above Moderate	466	312
Total	1,146	325
Rehabilitation		
Very Low		
Low	25	
Moderate	25	
Above Moderate		
Total	50	
Conservation		
Very Low	76*	76*
Low	82	82
Moderate	37	37
Total	195	195

*46 Section 8 units + 30 senior apartments (The Seasons)

Appendix B Residential Sites Inventory

The assumptions and methodology for the residential sites inventory are provided below.

Methodology for the Sites Inventory Analysis

The residential sites inventory is comprised of three components: 1) approved projects; 2) underutilized (non-vacant) sites with potential for additional residential development or redevelopment; and 3) potential accessory dwelling units (ADUs).

Potential sites for residential development during the 2021-2029 planning period are summarized in Table B-1. As shown in this table, adequate capacity is available to accommodate the City's RHNA allocation in all income categories; however, zoning amendments are required to reconcile development regulations with the recently adopted General Plan (see Program H-8 in Section 9.5). Additional analysis to support this finding is provided in the discussion below and in Tables B-2 through B-6.

Table B-1
Residential Sites Summary

Site Category	Income Category				
	VL	Low	Mod	Above Mod	Total
Approved projects (Table B-2)	-	-	-	12	12
Town Center Mixed Use Sites to be Rezoned (Table B-3)	-	-	196	215	411
Neighborhood Mixed Use Sites to be Rezoned (Table B-4)	500	351	262	1,781	2,894
Transit-Oriented Mixed Use Sites to be Rezoned (Table B-5)	397	398	-	-	795
Potential ADUs (Table B-6)	10	18	1	13	42
Total sites inventory	912	777	459	2,028	4,176
RHNA 2021-2029	842	433	436	805	2,516
Adequate Sites?	Yes	Yes	Yes	Yes	Yes

Source: City of Diamond Bar, 2021

Approved Projects

Table B-2 summarizes residential developments that have received some form of approval and will become available during the planning period. The income levels for these projects are based upon the expected sales prices or rents.

Table B-2
Approved Projects

Project / Location	Income Category				
	Very Low	Low	Moderate	Above Moderate	Total
Custom homes (Country)	-	-	-	12	12
Total Units	-	-	-	12	12

Source: City of Diamond Bar, 2021

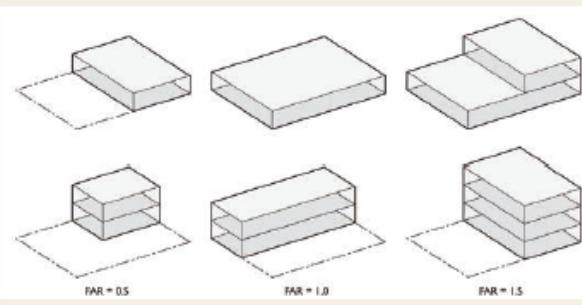
Underutilized Sites

Underutilized sites with potential for additional residential development or redevelopment are listed in Tables B-3 through B-5. These sites are within the General Plan Focus Areas discussed below. Sites that allow residential or mixed-use development at a density of at least 30 units/acre are considered suitable for all income categories based on State default density, while sites allowing up to 20 units per acre were assigned to the moderate or above-moderate income categories.

In the Focus Areas where mixed-use development is encouraged, development intensity is regulated by floor area ratio as described in the following chart.

FLOOR AREA RATIO

Floor Area Ratio (FAR) refers to the ratio between a building's total floor area and the total area of the site and is used as a measure of non-residential development intensity. For instance, as shown in this illustration, a one-story building occupying one half of a parcel has an FAR of 0.5; a two-story building occupying a quarter of the same parcel also has an FAR of 0.5.



Focus Areas. As described in Section 9.4, Constraints, the City adopted a comprehensive General Plan update¹⁰ in 2019. One of the key features of the new General Plan was the establishment of several new Focus Areas where substantial land use changes are planned as part of a strategy to provide walkable mixed-use activity centers. These Focus Areas provide opportunities for infill development that can incorporate a range of housing, employment, and recreational uses to meet the needs of families, young people, senior citizens, and residents of all incomes. Three of these Focus Areas, summarized below, are expected to facilitate the development of a significant portion of the City's RHNA allocation during the planning period. Development standards include residential densities (housing units per acre) and floor area ratio (FAR), which is the ratio of building floor area to lot area.

- The **Town Center Focus Area**, located along Diamond Bar Boulevard between SR-60 and Golden Springs Drive, is intended to build on the success of recent commercial redevelopment in that area. The Town Center is designated for mixed-use development that would serve as a center of activity for residents and provide housing, entertainment and retail opportunities and community gathering spaces in a pleasant, walkable environment. The General Plan establishes a maximum residential density of 20.0 dwelling units per acre and a maximum FAR up to 1.5 for this Focus Area (Table B-3).
- The **Neighborhood Mixed Use Focus Area** is envisioned as a combination of residential and ancillary neighborhood-serving retail and service uses to promote revitalization of the segment of North Diamond Bar Boulevard between the SR-60 interchange and Highland Valley Road. This neighborhood has potential to benefit from its proximity to Mt. San Antonio College and Cal Poly Pomona. This General Plan land use designation has an allowable residential density of up to 30.0 dwelling units per acre and a maximum FAR of 1.25 (Table B-4).
- The **Transit-Oriented Mixed Use Focus Area** leverages underutilized sites adjacent to the Metrolink commuter rail station to provide for higher-density housing, offices, and supporting commercial uses close to regional transit. This area encourages new employment and housing development in a key location that emphasizes multi-modal transportation options. This General Plan designation allows residential development at a density of 20.0 to 30.0 dwelling units per acre and a maximum FAR of 1.5 (Table B-5).

The 2040 General Plan provides the guiding framework for development in these Focus Areas; however, zoning regulations have not yet been amended to reflect General Plan policy for these areas. The City is currently in the process of updating the Development Code to revise land use regulations for these Focus Areas consistent with the standards established in the new General Plan within three years, pursuant to Government Code §65583(c)(1)(A) (see Program H-8 in Section 9.5). The development assumptions reflected in Tables B-3 through B-5 are based upon the new General Plan land use designations rather than current zoning designations.

Realistic Capacity and Suitability of Non-Vacant Sites. Since the General Plan designation for the Focus Areas is for mixed use, the capacity for new housing is

10 <https://www.diamondbarca.gov/961/General-Plan-2040>

estimated as 50% of the total allowable number of units on each parcel. In addition, parcels smaller than 0.5 acre have been conservatively excluded from the potential unit totals pursuant to Government Code §65583.2(c)(2)(A). Pursuant to Government Code §65583.2(h), zoning for the sites listed in Tables B-3, B-4 and B-5 shall ensure that:

- a) at least 50% of the shortfall of low- and very low-income regional housing need can be accommodated on sites designated for exclusively residential uses; or
- b) if accommodating more than 50% of the low- and very low-income regional housing need on sites designated for mixed-uses, all sites designated for mixed-uses must allow 100% residential use and require residential use to occupy at least 50% of the floor area in a mixed-use project.

The estimated yield of parcels in the Focus Areas is considered to be realistic due to the significant development potential compared to existing development FAR. As seen in Tables B-3 through B-5, the existing FAR for most properties is well below 0.5 and the average FAR for all properties are as follows:

Town Center Mixed Use:	0.33 average FAR
Neighborhood Mixed Use:	0.09 average FAR
Transit-Oriented Mixed Use:	0.27 average FAR

The significant potential increase in development creates a strong economic investment incentive for redevelopment, and as a result, the existing uses are likely to be discontinued during the planning period.

Affirmatively Furthering Fair Housing. Sites for additional housing are located throughout the community to affirmatively further fair housing. For example, the three new mixed-use areas provide significant potential for housing in areas with good access to jobs, transportation, education and services, while opportunities for ADUs are located in the city's lower-density single-family neighborhoods, thereby avoiding segregated living patterns and facilitating truly integrated and balanced living patterns and areas of opportunity.

Table B-3
Town Center Mixed Use Sites to be Rezoned

Address	APN	Existing Zoning	Acreage	Allowable Density	Existing Use	Existing FAR	Publicly Owned?	Income Level			Total Potential Units
								Lower	Mod	Above Mod	
23525 GOLDEN SPRINGS DR	8281010047	C-2	0.91	20	Commercial	0.19	No		4	5	9
206 S DIAMOND BAR BLVD	8281010049	C-3	0.54	20	Commercial	0.08	No		2	3	5
218 S DIAMOND BAR BLVD	8281010050	C-3	1.23	20	Commercial	0.59	No		6	6	12
240 S DIAMOND BAR BLVD	8281010051	C-3	2.40	20	Commercial	0.63	No		11	13	24
350 S DIAMOND BAR BLVD	8281010054	C-3	0.56	20	Commercial	0.07	No		2	4	6
300 S DIAMOND BAR BLVD	8281010057	C-3	1.16	20	Commercial	1.01	No		5	7	12
Not assigned	8281010060	C-3	2.16	20	Commercial	1.01	No		10	12	22
324 S DIAMOND BAR BLVD	8281010061	C-3	0.40	20	Commercial	0.31	No		0	0	0
334 S DIAMOND BAR BLVD	8281010062	C-3	0.70	20	Commercial	0.20	No		3	4	7
150 S DIAMOND BAR BLVD	8281024052	C-3	0.86	20	Commercial	0.03	No		4	5	9
23525 PALOMINO DR NO 45E	8281024053	C-2	3.24	20	Commercial	0.55	No		16	16	32
121 S DIAMOND BAR BLVD	8717008001	C-3	0.25	20	Commercial	0.65	No		0	0	0
121 S DIAMOND BAR BLVD	8717008002	C-3	0.16	20	Commercial	1.02	No		0	0	0
141 S DIAMOND BAR BLVD	8717008003	C-3	0.39	20	Commercial	0.54	No		0	0	0
141 S DIAMOND BAR BLVD	8717008004	C-3	0.33	20	Commercial	0.55	No		0	0	0
205 S DIAMOND BAR BLVD	8717008005	C-3	0.46	20	Commercial	0.57	No		0	0	0
205 S DIAMOND BAR BLVD	8717008006	C-3	0.21	20	Commercial	0.63	No		0	0	0
Not assigned	8717008010	C-3	0.06	20	Commercial	0.00	No		0	0	0
249 S DIAMOND BAR BLVD	8717008019	C-3	7.24	20	Commercial	0.30	No		36	36	72
235 S DIAMOND BAR BLVD	8717008020	C-3	0.87	20	Commercial	0.11	No		4	5	9
301 S DIAMOND BAR BLVD	8717008026	C-3	0.18	20	Commercial	0.04	No		0	0	0
301 S DIAMOND BAR BLVD	8717008027	C-3	0.07	20	Commercial	0.09	No		0	0	0
315 S DIAMOND BAR BLVD	8717008028	C-3	0.60	20	Commercial	0.30	No		3	3	6
303 S DIAMOND BAR BLVD	8717008029	C-3	3.96	20	Commercial	0.17	No		19	21	40
23341 GOLDEN SPRINGS DR	8717008032	C-2	0.66	20	Commercial	0.38	No		3	4	7
23347 GOLDEN SPRINGS DR	8717008033	C-2	2.46	20	Commercial	0.19	No		12	13	25
414 S PROSPECTORS RD	8717008034	C-2	1.01	20	Commercial	0.25	No		5	5	10
225 GENTLE SPRINGS LN	8717008038	C-3	0.65	20	Commercial	0.15	No		3	4	7
233 GENTLE SPRINGS LN	8717008039	C-3	0.62	20	Commercial	0.08	No		3	3	6
325 S DIAMOND BAR BLVD	8717008185	C-2	4.20	20	Commercial	0.33	No		20	22	42
379 S DIAMOND BAR BLVD	8717008186	C-2	0.53	20	Commercial	0.33	No		2	3	5
245 GENTLE SPRINGS LN	8717008187	C-3	1.33	20	Commercial	0.15	No		6	7	13
259 GENTLE SPRINGS LN	8717008188	C-3	2.71	20	Commercial	0.46	No		13	14	27
Not assigned	8717008189	C-3	0.96	20	Commercial	0.00	No		4	6	10
Not assigned	8717008902	C-3	0.02	20	Commercial	0.00	No		0	0	0
Not assigned	8717008903	C-3	0.14	20	Commercial	0.00	No		0	0	0
Totals				44.2					196	215	411

Notes:

1. The General Plan designation for all parcels is *Town Center Mixed Use*
2. Allowable density based on current General Plan and proposed zoning standards
3. Parcels less than 0.5 acre are excluded from unit totals
4. Total capacity estimated as 50% of allowable residential units

Table B-4
Neighborhood Mixed Use Sites to be Rezoned

Address	APN	Existing Zoning	Acres	Allowable Density	Existing Use	Existing FAR	Publicly Owned?	Lower	Mod	Above Mod	Estimated Total Units ⁴
574 N DIAMOND BAR BLVD	8706001001	OP	0.8	30	Commercial	0.08	No	3	1	8	12
542 N DIAMOND BAR BLVD	8706001003	OP	0.3	30	Commercial	0.17	No	0	0	0	0
530 N DIAMOND BAR BLVD	8706001004	OP	0.4	30	Commercial	0.17	No	0	0	0	0
504 N DIAMOND BAR BLVD	8706001007	OP	0.5	30	Commercial	0.05	No	0	0	0	0
23425 SUNSET CROSSING RD	8706001008	OP	1.2	30	Commercial	0.30	No	5	1	12	18
554 N DIAMOND BAR BLVD	8706001013	OP	0.5	30	Commercial	0.19	No	2	0	6	8
556 N DIAMOND BAR BLVD	8706001014	OP	2.8	30	Commercial	0.39	No	12	4	26	42
520 N DIAMOND BAR BLVD	8706001015	OP	0.4	30	Commercial	0.09	No	0	0	0	0
506 N DIAMOND BAR BLVD	8706001016	OP	0.8	30	Commercial	0.20	No	3	1	8	12
554 N DIAMOND BAR BLVD	8706001800	OP	0.1	30	Commercial	0.00	No	0	0	0	0
732 N DIAMOND BAR BLVD	8706002012	OP	1.1	30	Commercial	0.35	No	4	1	11	16
780 N DIAMOND BAR BLVD	8706002015	OP	1.0	30	Commercial	0.32	No	4	1	11	16
796 N DIAMOND BAR BLVD	8706002016	OP	1.1	30	Commercial	0.30	No	4	1	12	17
900 N DIAMOND BAR BLVD	8706002021	OP	4.3	30	Commercial	0.73	No	19	6	39	64
990 N DIAMOND BAR BLVD	8706002022	OP	0.9	30	Commercial	0.96	No	4	1	9	14
600 N DIAMOND BAR BLVD UNIT 1B	8706002027	OP	5.1	30	Commercial	0.01	No	23	7	47	77
600 N DIAMOND BAR BLVD UNIT 1A	8706002028	OP	5.1	30	Commercial	0.01	No	23	7	47	77
612 N DIAMOND BAR BLVD	8706002029	OP	5.1	30	Commercial	0.01	No	23	7	47	77
618 N DIAMOND BAR BLVD	8706002030	OP	5.1	30	Commercial	0.01	No	23	7	47	77
620 N DIAMOND BAR BLVD UNIT 4B	8706002031	OP	5.1	30	Commercial	0.01	No	23	7	47	77
620 N DIAMOND BAR BLVD UNIT 4A	8706002032	OP	5.1	30	Commercial	0.01	No	23	7	47	77
628 N DIAMOND BAR BLVD UNIT 5A	8706002033	OP	5.1	30	Commercial	0.01	No	23	7	47	77
628 N DIAMOND BAR BLVD UNIT 5B	8706002034	OP	5.1	30	Commercial	0.01	No	23	7	47	77
634 N DIAMOND BAR BLVD UNIT 6A	8706002035	OP	5.1	30	Commercial	0.01	No	23	7	47	77
634 N DIAMOND BAR BLVD UNIT 6B	8706002036	OP	5.1	30	Commercial	0.01	No	23	7	47	77
640 N DIAMOND BAR BLVD UNIT 7B	8706002037	OP	5.1	30	Commercial	0.01	No	23	7	47	77
640 N DIAMOND BAR BLVD NO 7A	8706002038	OP	5.1	30	Commercial	0.01	No	23	7	47	77
646 N DIAMOND BAR BLVD UNIT 8A	8706002039	OP	5.1	30	Commercial	0.01	No	23	7	47	77
646 N DIAMOND BAR BLVD UNIT 8B	8706002040	OP	5.1	30	Commercial	0.01	No	23	7	47	77
654 N DIAMOND BAR BLVD UNIT 9B	8706002041	OP	5.1	30	Commercial	0.01	No	23	7	47	77
654 N DIAMOND BAR BLVD UNIT 9A	8706002042	OP	5.1	30	Commercial	0.01	No	23	7	47	77
700 N DIAMOND BAR BLVD UNIT 10A	8706002043	OP	5.1	30	Commercial	0.01	No	23	7	47	77
700 N DIAMOND BAR BLVD UNIT 10B	8706002044	OP	5.1	30	Commercial	0.01	No	23	7	47	77
706 N DIAMOND BAR BLVD UNIT 11B	8706002045	OP	5.1	30	Commercial	0.01	No	23	7	47	77
706 N DIAMOND BAR BLVD UNIT 11A	8706002046	OP	5.1	30	Commercial	0.01	No	23	7	47	77
712 N DIAMOND BAR BLVD UNIT 12A	8706002047	OP	5.1	30	Commercial	0.01	No	23	7	47	77
712 N DIAMOND BAR BLVD UNIT 12B	8706002048	OP	5.1	30	Commercial	0.01	No	23	7	47	77

Address	APN	Existing Zoning	Acres	Allowable Density	Existing Use	Existing FAR	Publicly Owned?	Lower	Mod	Above Mod	Estimated Total Units ⁴
718 N DIAMOND BAR BLVD NO 13B	8706002049	OP	5.1	30	Commercial	0.01	No	23	7	47	77
718 N DIAMOND BAR BLVD NO 13A	8706002050	OP	5.1	30	Commercial	0.01	No	23	7	47	77
724 N DIAMOND BAR BLVD	8706002051	OP	5.1	30	Commercial	0.01	No	23	7	47	77
724 N DIAMOND BAR BLVD	8706002052	OP	5.1	30	Commercial	0.01	No	23	7	47	77
730 N DIAMOND BAR BLVD	8706002053	OP	5.1	30	Commercial	0.01	No	23	7	47	77
730 N DIAMOND BAR BLVD	8706002054	OP	5.1	30	Commercial	0.01	No	23	7	47	77
750 N DIAMOND BAR BLVD	8706002055	OP	2.1	30	Commercial	0.40	No	9	3	19	31
800 N DIAMOND BAR BLVD	8706002056	OP	5.4	30	Commercial	0.72	No	24	8	48	80
660 N DIAMOND BAR BLVD. 100	8706002058	OP	1.4	30	Commercial	0.02	No	6	2	13	21
660 N DIAMOND BAR BLVD 108	8706002059	OP	1.4	30	Commercial	0.01	No	6	2	13	21
660 N DIAMOND BAR BLVD 118	8706002060	OP	1.4	30	Commercial	0.02	No	6	2	13	21
660 N DIAMOND BAR BLVD 128	8706002061	OP	1.4	30	Commercial	0.02	No	6	2	13	21
660 N DIAMOND BAR BLVD 138	8706002062	OP	1.4	30	Commercial	0.02	No	6	2	13	21
660 N DIAMOND BAR BLVD 168	8706002063	OP	1.4	30	Commercial	0.03	No	6	2	13	21
660 N DIAMOND BAR BLVD 178	8706002064	OP	1.4	30	Commercial	0.01	No	6	2	13	21
660 N DIAMOND BAR BLVD 188	8706002065	OP	1.4	30	Commercial	0.01	No	6	2	13	21
660 N DIAMOND BAR BLVD 198	8706002066	OP	1.4	30	Commercial	0.02	No	6	2	13	21
660 N DIAMOND BAR BLVD 200	8706002067	OP	1.4	30	Commercial	0.03	No	6	2	13	21
660 N DIAMOND BAR BLVD 208	8706002068	OP	1.4	30	Commercial	0.01	No	6	2	13	21
660 N DIAMOND BAR BLVD 218	8706002069	OP	1.4	30	Commercial	0.02	No	6	2	13	21
660 N DIAMOND BAR BLVD 228	8706002070	OP	1.4	30	Commercial	0.01	No	6	2	13	21
660 N DIAMOND BAR BLVD 238	8706002071	OP	1.4	30	Commercial	0.01	No	6	2	13	21
660 N DIAMOND BAR BLVD 258	8706002072	OP	1.4	30	Commercial	0.01	No	6	2	13	21
660 N DIAMOND BAR BLVD 268	8706002073	OP	1.4	30	Commercial	0.02	No	6	2	13	21
660 N DIAMOND BAR BLVD 278	8706002074	OP	1.4	30	Commercial	0.03	No	6	2	13	21
660 N DIAMOND BAR BLVD 288	8706002075	OP	1.4	30	Commercial	0.02	No	6	2	13	21
660 N DIAMOND BAR BLVD 298	8706002076	OP	1.4	30	Commercial	0.01	No	6	2	13	21
Totals			194.5					851	262	1,781	2,894

Notes:

1. The General Plan designation for all parcels is *Neighborhood Mixed Use*
2. Allowable density based on current General Plan and proposed zoning standards
3. Parcels less than 0.5 acre are excluded from unit totals
4. Site capacity estimated as 50% of allowable residential units

Table B-5
Transit-Oriented Mixed-Use Sites to be Rezoned

Address	APN	Existing Zoning	Acres	Allowable Density	Existing Use	Existing FAR	Publicly Owned?	Lower	Mod	Above Mod	Estimated Total Units
21035 WASHINGTON AVE	8719010009	I: Light Industrial	3.5	30	Commercial	0.20	No	26	26		52
680 BREA CANYON RD 100	8719010023	I: Light Industrial	0.9	30	Commercial	0.05	No	7	7		14
680 BREA CANYON RD 158	8719010024	I: Light Industrial	0.9	30	Commercial	0.03	No	7	7		14
680 BREA CANYON RD 168	8719010025	I: Light Industrial	0.9	30	Commercial	0.05	No	7	7		14
680 BREA CANYON RD 178	8719010026	I: Light Industrial	0.9	30	Commercial	0.03	No	7	7		14
680 BREA CANYON RD 188	8719010027	I: Light Industrial	0.9	30	Commercial	0.05	No	7	7		14
680 BREA CANYON RD 200	8719010028	I: Light Industrial	0.9	30	Commercial	0.03	No	7	7		14
680 BREA CANYON RD 208	8719010029	I: Light Industrial	0.9	30	Commercial	0.03	No	7	7		14
680 BREA CANYON RD 258	8719010030	I: Light Industrial	0.9	30	Commercial	0.04	No	7	7		14
680 BREA CANYON RD 268	8719010031	I: Light Industrial	0.9	30	Commercial	0.05	No	7	7		14
680 BREA CANYON RD 278	8719010032	I: Light Industrial	0.9	30	Commercial	0.03	No	7	7		14
680 BREA CANYON RD	8719010033	I: Light Industrial	0.9	30	Commercial	0.05	No	7	7		14
618 BREA CANYON RD UNIT A	8719010035	I: Light Industrial	1.7	30	Commercial	0.04	No	13	13		25
618 BREA CANYON RD UNIT B	8719010036	I: Light Industrial	1.7	30	Commercial	0.02	No	13	13		25
618 BREA CANYON RD C	8719010037	I: Light Industrial	1.7	30	Commercial	0.02	No	13	13		25
618 BREA CANYON RD D	8719010038	I: Light Industrial	1.7	30	Commercial	0.04	No	13	13		25
618 BREA CANYON RD E	8719010039	I: Light Industrial	1.7	30	Commercial	0.04	No	13	13		25
618 BREA CANYON RD F	8719010040	I: Light Industrial	1.7	30	Commercial	0.03	No	13	13		25
618 BREA CANYON RD G	8719010041	I: Light Industrial	1.7	30	Commercial	0.02	No	13	13		25
618 BREA CANYON RD H	8719010042	I: Light Industrial	1.7	30	Commercial	0.02	No	13	13		25
618 BREA CANYON RD I	8719010043	I: Light Industrial	1.7	30	Commercial	0.02	No	13	13		25
618 BREA CANYON RD J	8719010044	I: Light Industrial	1.7	30	Commercial	0.02	No	13	13		25
655 BREA CANYON RD	8760021005	I: Light Industrial	18.7	30	Commercial	0.01	No	140	140		280
20955 LYCOMING ST	8760027001	I: Light Industrial	1.0	30	Commercial	0.12	No	8	8		15
20955 LYCOMING ST	8760027002	I: Light Industrial	0.4	30	Commercial	0.78	No	0	0		0
780 PINEFALLS AVE	8760027003	I: Light Industrial	0.5	30	Commercial	0.47	No	0	0		0
760 PINEFALLS AVE	8760027004	I: Light Industrial	0.4	30	Commercial	0.52	No	0	0		0
750 PINEFALLS AVE	8760027005	I: Light Industrial	0.6	30	Commercial	0.43	No	4	4		9
755 PINEFALLS AVE	8760027006	I: Light Industrial	0.8	30	Commercial	0.34	No	6	6		12
761 PINEFALLS AVE	8760027007	I: Light Industrial	0.3	30	Commercial	0.52	No	0	0		0
773 PINEFALLS AVE	8760027008	I: Light Industrial	0.1	30	Commercial	1.47	No	0	0		0
773 PINEFALLS AVE	8760027009	I: Light Industrial	0.2	30	Commercial	0.07	No	0	0		0
787 PINEFALLS AVE	8760027010	I: Light Industrial	0.4	30	Commercial	0.45	No	0	0		0
770 PENARTH AVE	8760027011	I: Light Industrial	0.4	30	Commercial	0.43	No	0	0		0
766 PENARTH AVE	8760027012	I: Light Industrial	0.3	30	Commercial	0.45	No	0	0		0
750 PENARTH AVE	8760027013	I: Light Industrial	0.8	30	Commercial	0.35	No	6	6		12
751 PENARTH AVE	8760027014	I: Light Industrial	0.8	30	Commercial	0.33	No	6	6		12

Address	APN	Existing Zoning	Acres	Allowable Density	Existing Use	Existing FAR	Publicly Owned?	Lower	Mod	Above Mod	Estimated Total Units
761 PENARTH AVE	8760027015	I: Light Industrial	0.2	30	Commercial	0.49	No	0	0		0
767 PENARTH AVE	8760027016	I: Light Industrial	0.1	30	Commercial	2.35	No	0	0		0
767 PENARTH AVE	8760027017	I: Light Industrial	0.3	30	Commercial	0.03	No	0	0		0
771 PENARTH AVE	8760027018	I: Light Industrial	0.5	30	Commercial	0.43	No	0	0		0
Totals			57.3					397	398		795

Notes:

1. The General Plan designation for all parcels is *Transit-Oriented Mixed Use*
2. Allowable density based on current General Plan and proposed zoning standards
3. Parcels less than 0.5 acre are excluded from unit totals
4. Total capacity estimated as 50% of allowable residential units

Figure B-1
Sites Inventory Map

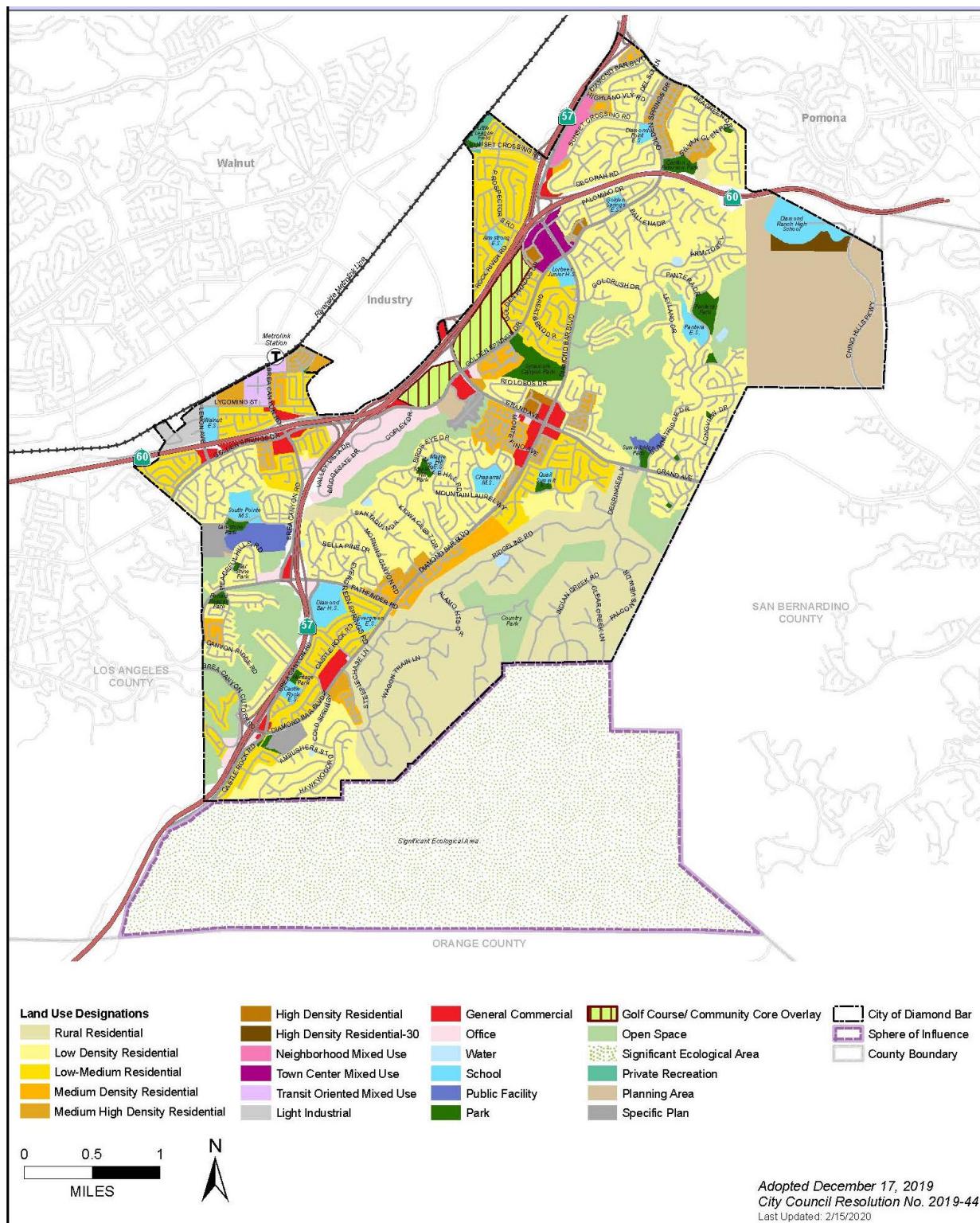
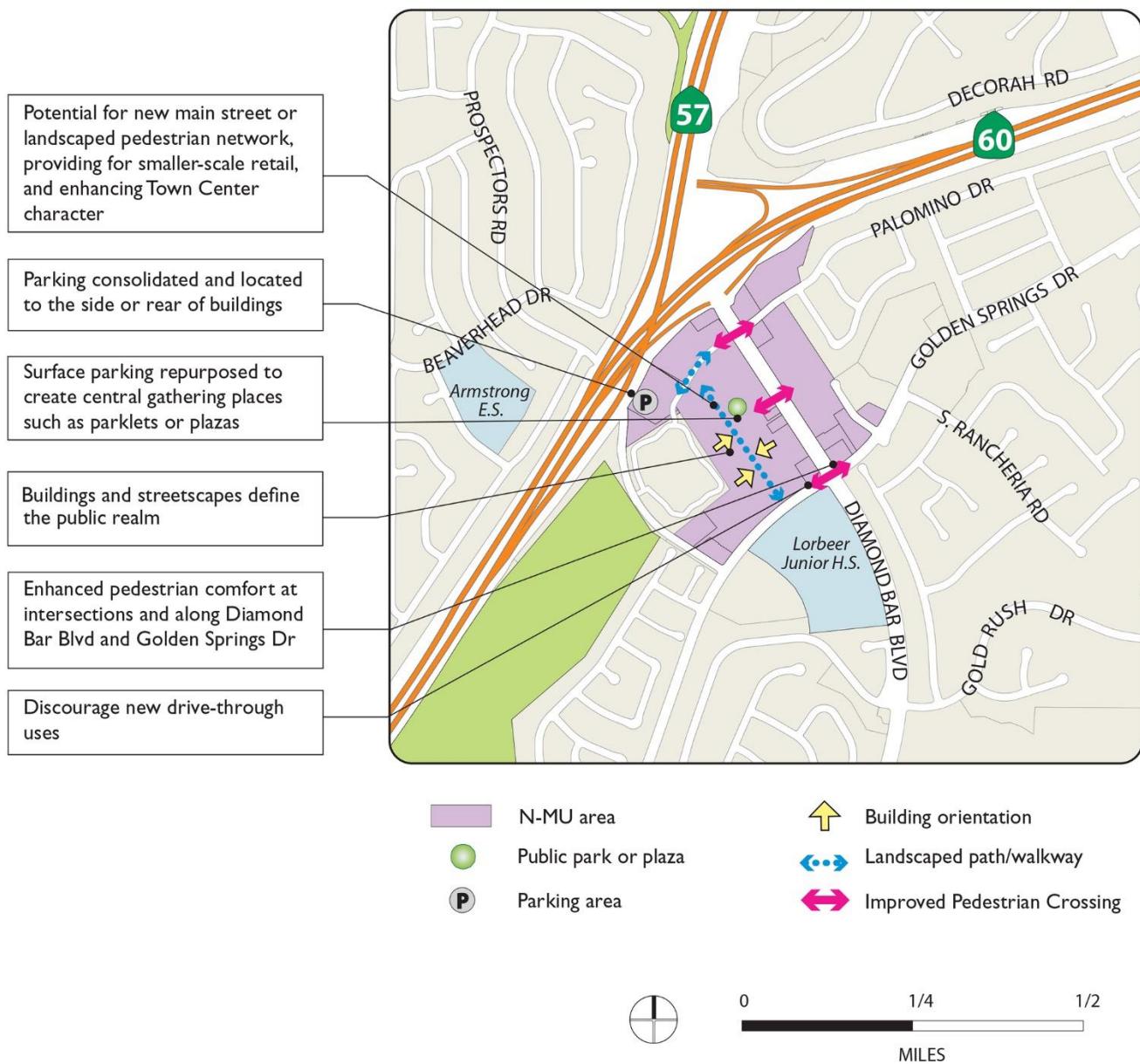
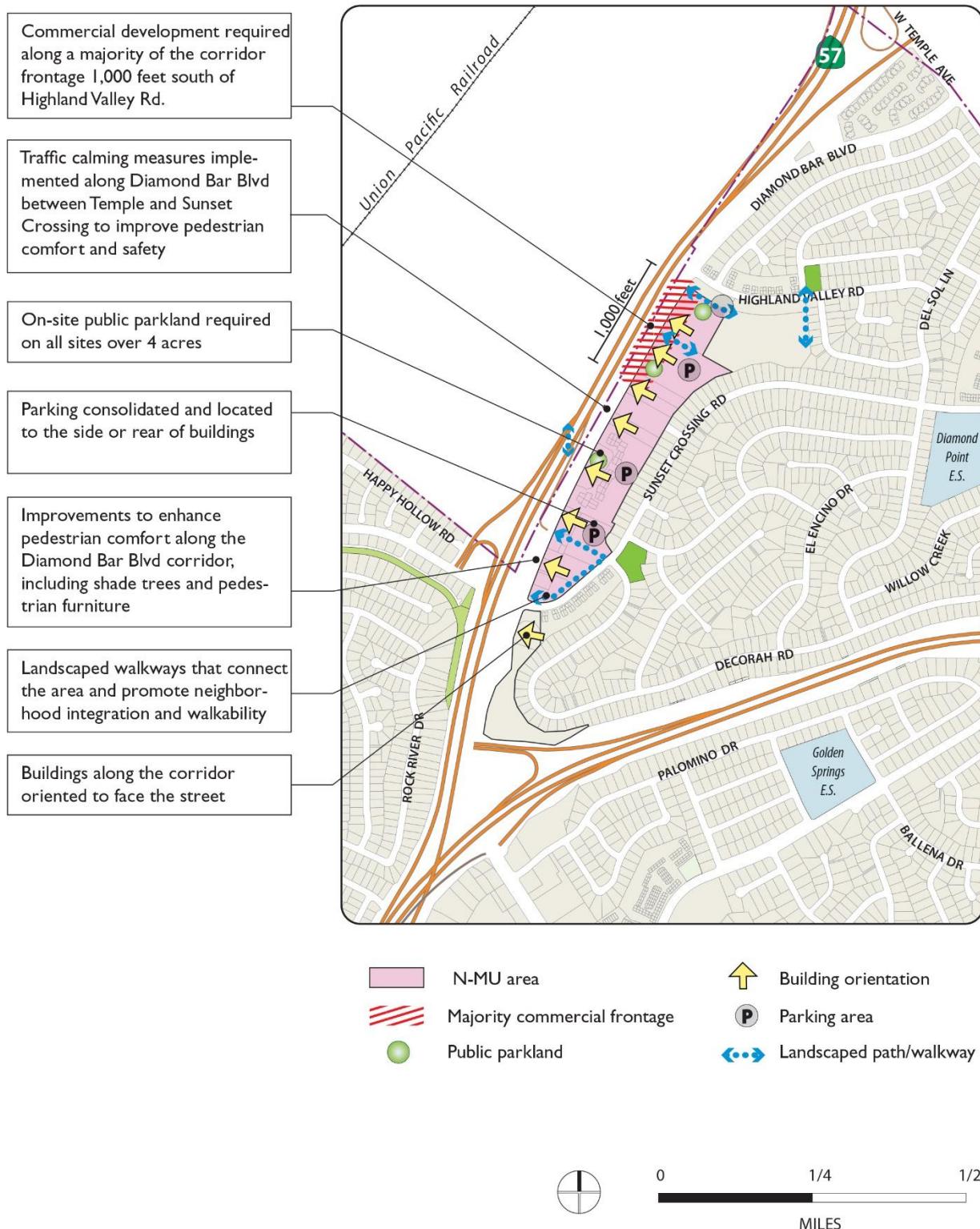


Figure B-2a
Town Center Mixed Use Area Map



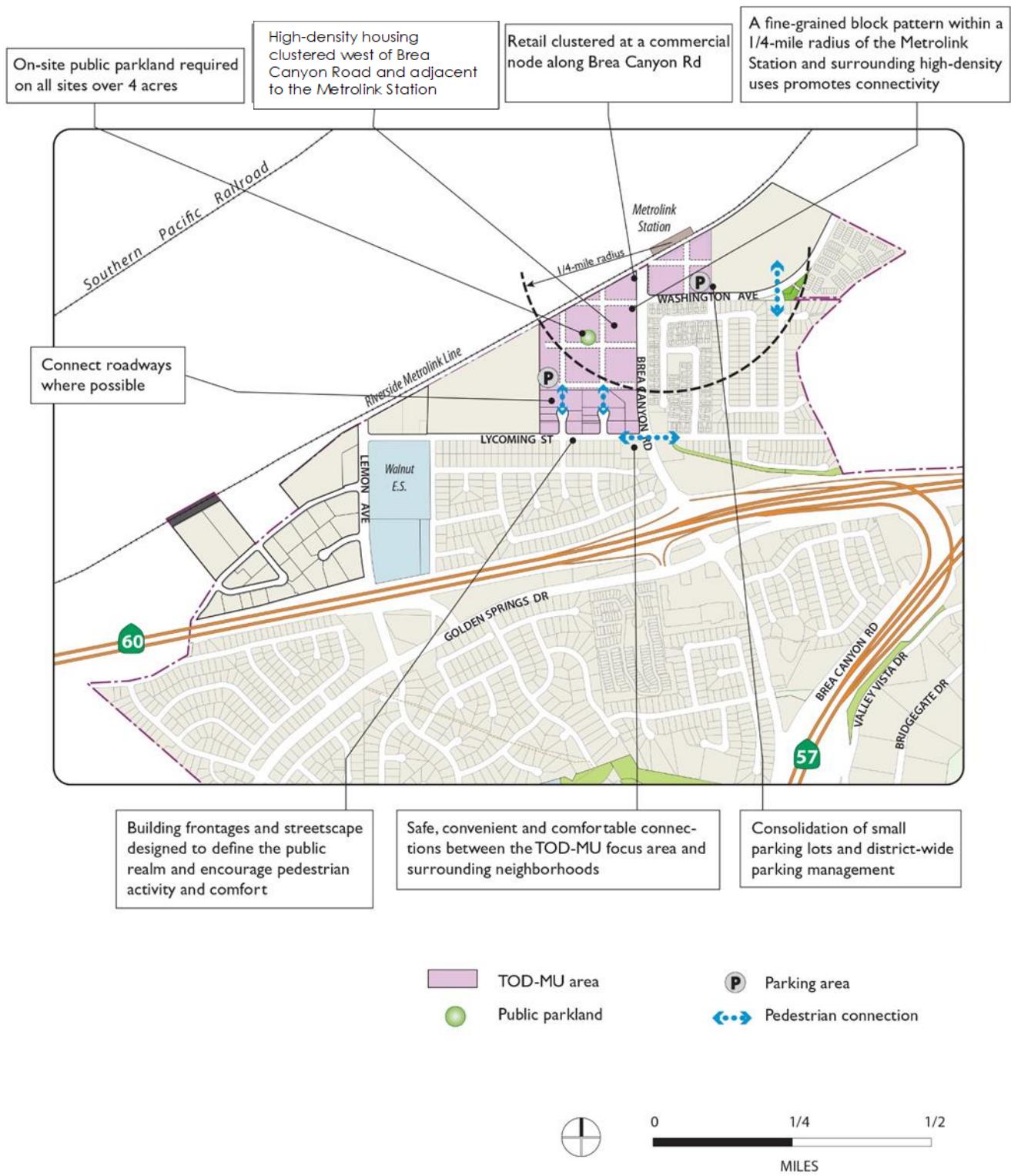
Source: Figure 3-3: Town Center Mixed-Use Focus Area Concept Illustration; Diamond Bar General Plan 2040

Figure B-2b
Neighborhood Mixed Use Area Map



Source: Figure 3-2: Neighborhood Mixed-Use Focus Area Concept Illustration; Diamond Bar General Plan 2040

Figure B-2c
Transit-Oriented Mixed Use Area Map



Source: Figure 3-4: Transit-Oriented Mixed-Use Focus Area Concept Illustration; Diamond Bar General Plan 2040

Potential Accessory Dwelling Units

Accessory dwelling units (ADUs) represent a significant opportunity for affordable housing, particularly for single persons or small households including the elderly, college students, young adults, and caregivers. Recent changes in State law have made the construction of ADUs more feasible for homeowners, and the City has seen an increase in ADU development applications recently.

Table B-6 shows ADU permit trends during 2018-2020 in Diamond Bar. The average rate of ADU permits over this 3-year period is 5.3 units per year. At that rate, it is estimated that approximately 42 additional ADUs will be permitted during the 2021-2029 planning period. Based on recent analysis conducted by SCAG¹¹ over two-thirds of future ADUs are expected to be affordable to low- and moderate-income households.

Table B-6
Accessory Dwelling Units Permitted

Year	Permits Issued
2018	2
2019	6
2020	8

Source: City of Diamond Bar, 2021

11 SCAG, Regional Accessory Dwelling Unit Affordability Analysis, 2020 (https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527)



Appendix C Public Participation Summary

Public participation is an important component of the planning process, and this update to the Housing Element has provided residents and other interested stakeholders numerous opportunities to provide comments and recommendations. Early in the update process a Housing Element web page was created on the City website¹² and a *Housing Element Frequently Asked Questions* was prepared (Figure C-1) and posted on the website. Public notice, agendas and materials for all Housing Element meetings were posted on the website and at City Hall in advance of each meeting and also sent by direct mail to housing advocates and non-profit organizations representing the interests of lower-income persons and special needs groups (see Table C-1). Notices of public hearings were also published in the local newspaper.

For each public meeting the City offered reasonable accommodation for persons with disabilities to assist them in participating in the meeting, including the provision of transcription of meeting minutes for non-English speakers. Transcribed minutes may be easily translated into other languages via free web applications such as Translate.Google.com.

After receiving comments on the draft Housing Element from the State Housing and Community Development Department, a proposed final Housing Element was prepared and made available for public review prior to adoption by the City Council.

The following is a list of opportunities for public involvement in the preparation of this Housing Element update.

Joint Planning Commission/City Council study session	January 26, 2021
Planning Commission hearing to review Draft Housing Element	March 23, 2021
City Council hearing to review Draft Housing Element	April 6, 2021
Planning Commission hearing	October 13, 2021
City Council hearing	November 2, 2021

A list of interested parties that were notified of meetings is provided in Table C-1 and a summary of comments and responses is provided in Table C-2. Comments were incorporated into the draft Housing Element where appropriate.

¹² <https://www.diamondbarca.gov/963/Housing-Element-Update>

Figure C-1
Housing Element FAQ



DIAMOND BAR
HOUSING ELEMENT

2021 Housing Element FAQ

1. What is a Housing Element?

State law¹ requires each city to adopt a comprehensive, long-term General Plan for its physical development. General Plans include several “elements” that address various topics. The Diamond Bar General Plan² was comprehensively updated in 2019 and includes the following elements:

- Land Use and Economic Development
- Community Character and Place Making
- Circulation
- Resource Conservation
- Public Facilities and Services
- Public Safety
- Community Health and Sustainability
- Housing³

While most portions of General Plans typically have a time horizon of 20-25 years, State law requires that the Housing Element be updated in 8-year “cycles.” The City is currently preparing a Housing Element update for the 2021 to 2029 planning period, which is referred to as the “6th Housing Element cycle” in reference to the six required updates that have occurred since the comprehensive revision to State Housing Element law in 1980.

State law⁴ establishes detailed requirements for Housing Elements, which are summarized in California Government Code Section 65583:

The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.

¹ California Government Code Sec. 65300 *et seq.*

² <https://www.diamondbarca.gov/961/General-Plan-2040>

³ The Housing Element was last updated in 2014 and was not part of the 2019 General Plan update

⁴ California Government Code Sec. 65580 *et seq.*



2021 Housing Element FAQ

2. What is Housing Element “certification” and why is it important?

The State Legislature has delegated to the California Department of Housing and Community Development (“HCD”) the authority to review Housing Elements and issue findings regarding the elements’ compliance with the law.⁵ When HCD issues a letter finding that the Housing Element is in substantial compliance with State law it is referred to as “certification” of the Housing Element.

Housing Element certification is important for two main reasons:

- **Local control.** The General Plan and its various elements provide the foundation for the City’s land use plans and development regulations, and the Housing Element is part of the General Plan. If the City were challenged in court on a planning or zoning matter and the General Plan were found by the court to be invalid, the court could order changes to City land use plans or regulations and assume control over City land use decisions. HCD certification establishes a “rebuttable presumption of validity”⁶ that the Housing Element complies with State law, which would support the City’s legal defense. Recent laws also allow for courts to impose fines on a jurisdiction if it fails to adopt a Housing Element in compliance with State law.⁷
- **Eligibility for grant funds.** Some State grant funds are contingent upon Housing Element certification. Grants can help to cover the cost of some projects that would otherwise rely on the City’s General Fund.

3. What are the most important issues that must be addressed in the Housing Element?

The major issues that must be addressed in the Housing Element are: 1) how City policies, plans and regulations help to meet the region’s housing needs for persons and families of all income levels; and 2) how City land use regulations accommodate the special housing needs of those with disabilities or other difficulties.

- **Accommodating Regional Housing Needs.** Under State law⁸ all cities are required to plan for additional housing to accommodate population growth and address existing housing problems such as overcrowding and high housing cost. State law recognizes that cities generally do not build housing, since that is typically the role of private and non-profit developers and builders. However, cities are required to adopt policies, development regulations and standards to encourage a variety of housing types that are affordable for persons of all income levels, such as rental apartments and accessory dwelling units (“ADUs”). The Regional Housing Needs Assessment (“RHNA”) is the method by which each jurisdiction’s share of new housing needs is determined (see #5 below).

⁵ California Government Code Sec. 65585

⁶ California Government Code Sec. 65589.3.

⁷ AB 101 of 2019

⁸ California Government Code Sec. 65583



2021 Housing Element FAQ

- **Housing for Persons with Special Needs.** Under State law⁹ cities must also ensure that their plans and regulations encourage the provision of housing for persons with special needs including:

- ✓ Reasonable accommodation for persons with disabilities
- ✓ Transitional housing
- ✓ Supportive housing
- ✓ Emergency shelters and other facilities serving the homeless
- ✓ Large (5+) families

4. What is “affordable” housing?

By definition, housing is considered “affordable” when total housing cost, including utilities, is no more than 30% of a family’s gross income. State law describes five income categories, which are based on county median income as shown in Table 1.

Table 1. Household Income Categories

Income Category	% of county median income
Extremely low	Up to 30%
Very low	31-50%
Low	51-80%
Moderate	81-120%
Above moderate	Over 120%

Source: California Government Code Sec. 65584(f)

Affordable housing costs for all jurisdictions in Los Angeles County are determined based on these income categories as shown in Table 2. These incomes, rents and housing prices are based on a 4-person family and are adjusted for different family sizes.

Table 2. Income Categories and Affordable Housing Costs – Los Angeles County

Income Category	Maximum Income	Maximum Affordable Rent	Maximum Affordable Price (est.)
Extremely low	\$33,800	\$845	*
Very low	\$56,300	\$1,407	*
Low	\$90,100	\$2,252	*
Moderate	\$92,750	\$2,319	\$375,000
Above moderate	Over \$92,750	Over \$2,319	Over \$375,000

Assumptions:

- Based on a family of 4 and 2020 State income limits
- 30% of gross income for rent or principal, interest, taxes & insurance plus utility allowance
- 10% down payment, 3.75% interest, 1.25% taxes & insurance, \$300 HOA dues
- * For-sale affordable housing is typically at the moderate-income level

Source: Cal. HCD; JHD Planning LLC

⁹ California Government Code Sec. 65583(a)(5)



2021 Housing Element FAQ

5. What is the “RHNA” why is it important?

Each California city is required to plan for new housing to accommodate a share of regional needs. The Regional Housing Needs Assessment (“RHNA”) is the process established in State law¹⁰ by which housing needs are determined.

Prior to each planning cycle the total new housing need for each region of California is determined by HCD based upon economic and demographic trends, existing housing problems such as overcrowding and overpayment, and additional housing needed to ensure reasonable vacancy rates and replace units lost due to demolition or natural disasters.

Diamond Bar is located within the Southern California Association of Governments (“SCAG”) region, which includes Los Angeles, Orange, Riverside, San Bernardino, Imperial and Ventura counties. The total housing need for the SCAG region is distributed to cities and counties by SCAG based upon objectives and criteria established in State law.¹¹

In 2019 HCD determined that the total new housing need for the entire SCAG region in the 6th Housing Element cycle is 1,341,827 units. SCAG is currently finalizing the RHNA plan for the 6th cycle, which must fully allocate the total RHNA to jurisdictions in the SCAG region.¹² SCAG expects to adopt the final RHNA plan by March 2021.

The RHNA also distributes each jurisdiction’s total housing need into four income categories (the extremely-low and very-low categories are combined for RHNA purposes). Diamond Bar’s preliminary 6th cycle RHNA allocation by income category is shown in Table 3.

Table 3. Draft 6th RHNA by Income Category – Diamond Bar

Extremely Low + Very Low	Low	Moderate	Above Moderate	Total
842	433	436	805	2,516

Source: SCAG, 9/4/2020

¹⁰ California Government Code Sec. 65584 et seq.

¹¹ California Government Code Sec. 65584(d)

¹² <http://www.scag.ca.gov/programs/pages/housing.aspx>



2021 Housing Element FAQ

6. Is the RHNA a construction mandate?

The RHNA allocation identifies the amount of additional housing a jurisdiction would need in order to have enough housing at all price levels to fully accommodate its assigned share projected growth over the 8-year planning period. The RHNA is a *planning requirement* based upon housing need, *not a construction quota or mandate*. Jurisdictions are not required to build housing or issue permits to achieve their RHNA allocations, but some provisions of State law establish specific requirements when housing production falls short of RHNA allocations. One such requirement is streamlined review and approval of housing development applications that meet specific standards.¹³ Other than requirements for streamlined permit processing, there are currently no legal or financial penalties imposed on cities for failing to achieve their RHNA allocations.

7. What must cities do to comply with the RHNA?

The Housing Element must provide an evaluation of the city's capacity for additional housing based on land use patterns, development regulations, other development constraints (such as infrastructure availability and environmental conditions) and real estate market trends. The analysis must be prepared at a parcel-specific level of detail and identify properties (or "sites") where additional housing could be built consistent with City regulations. This evaluation is referred to as the "sites analysis" and State law requires the analysis to demonstrate that the city has adequate capacity to fully accommodate its RHNA allocation in each income category. If the sites analysis does not demonstrate that adequate capacity exists to fully accommodate the RHNA, the Housing Element must describe what steps will be taken to increase capacity commensurate with the RHNA – typically through amendments to land use and zoning regulations that could facilitate additional housing development. Such amendments typically include increasing the allowable residential density or allowing housing to be built in areas that are currently restricted to only non-residential land uses.

Diamond Bar's new General Plan, adopted in December 2019, estimates that up to 3,750 new housing units could be built in the city by 2040, depending on market conditions. It is expected that much of this growth would occur within the Town Center Mixed Use, Neighborhood Mixed Use, Transit Oriented Development and Community Core Overlay focus areas, while most existing residential neighborhoods will experience less growth and change. While the General Plan identifies potential for significantly more new housing than the draft 6th RHNA allocation of 2,514 units, the Housing Element must demonstrate that realistic capacity exists for the amount of new housing in each income category to be built during the 2021-2029 planning period based on zoning, site conditions and market trends. This analysis is expected to be the primary focus of the Housing Element update.

¹³ California Government Code Sec. 65913.4 (SB 35 of 2017)



2021 Housing Element FAQ

8. Why are cities in high-cost areas expected to have affordable housing? Low-cost housing is not economically feasible here due to high land prices.

State housing laws are based on the premise that every city has an obligation to accommodate a range of housing types for persons at all income levels. Every community is dependent on a variety of low- and moderate-income workers in jobs such as landscaping, building maintenance, child and elder care, medical technicians, personal services, clerical support and retail trade. While the existing housing stock serves the needs of many residents, market rents and prices are higher than some families can afford. In addition, low-wage jobs have increased at a much faster rate than affordable housing is being built.

While cities are not required to build new housing, they must ensure that their land use regulations encourage a full range of housing types. Rental apartments typically provide the majority of affordable housing, but other types of housing such as accessory dwelling units¹⁴ (ADUs) can also help to address this need. Various governmental programs provide funding assistance for affordable housing, but if a city's development regulations are too restrictive, affordable housing may be infeasible and the housing needs of the local workforce will be shifted to other cities.

9. There is very little vacant land suitable for housing development left in Diamond Bar. Why is the RHNA allocation so high?

SCAG's 6th cycle RHNA allocation for the entire 6-county region is 1,341,827 units compared to 412,137 units in the 5th cycle. There are two main reasons why the 6th RHNA allocation is so much higher than the 5th cycle.

First, the 5th cycle RHNA allocation was established in 2012 while the severe economic effects of the "Great Recession" were discouraging growth. As a result, the 5th RHNA was uncharacteristically low. For comparison, SCAG's 4th cycle (2006-2013) RHNA allocation was approximately 700,000 housing units.

Second, for the 6th cycle the State made a major modification to the process for determining RHNA allocations. In prior RHNA cycles, total housing need was based only on *projected population growth*. However, for the 6th RHNA cycle the State added *existing need* to the total RHNA calculation. Existing need includes households that are currently overcrowded (defined as more than one person per room) or are overpaying for housing (defined as more than 30% of gross income).

¹⁴ "Accessory dwelling unit" means an attached or a detached residential dwelling unit that provides complete independent living facilities for one or more persons and is located on a lot with a proposed or existing primary residence. It shall include permanent provisions for living, sleeping, eating, cooking, and sanitation on the same parcel as the single-family or multifamily dwelling is or will be situated. (Government Code Sec. 65852.2(j)(1))



2021 Housing Element FAQ

The total 6th cycle RHNA allocation for the SCAG region is comprised of the sum of existing need and projected need, as follows:

Existing need:	577,422 units
Projected need:	764,405 units
Total need:	1,341,827 units

As seen from this breakdown, if existing need were excluded (as was the case in prior RHNA cycles) the total need would be similar to the 4th cycle RHNA.

With regard to jurisdictional RHNA allocations, the methodology adopted by SCAG for the 6th cycle places greater emphasis on the proximity of jobs and public transit rather than vacant developable land. As a result, the urbanized areas of Los Angeles and Orange counties are assigned much higher housing need as compared to prior cycles even though they generally have much less vacant land than inland areas.

Diamond Bar's RHNA allocation in the 5th cycle was 1,146 units; therefore, the draft 6th cycle allocation of 2,514 units is about 2.2 times the prior cycle. By comparison, SCAG's total 6th RHNA allocation is 3.3 times the 5th cycle total.

...

Table C-1
Public Notice List

Southern California Association of Non Profit Housing 501 Shatto Place, Suite 403 Los Angeles, CA 90020	National Community Renaissance Attn: John Seymour 4322 Piedmont Drive San Diego, CA 92107	LINC Housing Corporation 110 Pine Ave., Suite 500 Long Beach, CA 90802
C & C Development Attn: Barry Cottle 14211 Yorba Street, Suite 200 Tustin, CA 92870	City Ventures Attn: Bill McReynolds 2850 Red Hill Avenue, Suite 200 Santa Ana, CA 92705	Jamboree Housing Corp. Laura Archuleta 17701 Cowan Avenue, Suite 200 Irvine, CA 92614
The Related Companies of California Frank Cardone 18201 Von Karman Ave Ste 900 Irvine, CA 92612	Abode Communities 701 East 3rd Street, Suite 400 Los Angeles, California 90013	Meta Housing 1640 S Sepulveda Blvd. Los Angeles, CA 90025
SOCAL Housing Development Corp 9065 Haven Ave Rancho Cucamonga, CA 91730	Mercy Housing 1500 South Grand Ave., Suite 100 Los Angeles, California 90015	Abundant Housing LA 515 S Flower Street, 18th Floor Los Angeles, CA 90071
Gary Busteed 20850 Gold Run Drive Diamond Bar, CA 91765	Community Development Director City of Brea 1 Civic Center Circle Brea, CA 92821	City of Pomona Community Development Director 505 South Garey Avenue Pomona, California 91766
Brittany Irvin Province Group/Newport Equities LLC 26 Corporate Plaza, Suite 260 Newport Beach, CA 92660	City of Walnut Community Development Director 21201 La Puente Road Walnut, CA 91789	City of La Habra Heights City Manager 1245 North Hacienda Road La Habra Heights, CA 90631
Robert A. Hamilton, President 316 Monrovia Avenue Long Beach, CA 90803	Joann Lombardo City of Chino Hills Com. Dev. Dept. 14000 City Center Dr. Chino Hills, CA 91709	Troy Helling, City Manager City of Industry 15625 East Stafford Street Industry, CA 91744

Richard Martinez, Superintendent Pomona Unified School District 800 S. Garey Ave. Pomona, CA 91766	Richard Macedo, Branch Chief CA Department of Fish & Wildlife Habitat Conservation Planning 1416 Ninth Street, 12 th Floor Sacramento, CA 95814	Ed Pert, Regional Manager California Dept. of Fish & Wildlife South Coast Region 5 3883 Ruffin Rd. San Diego, CA 92123
Fish and Wildlife Biologist U.S. Fish and Wildlife Service 2177 Salk Ave., Suite 250 Carlsbad, CA 92008	State Clearinghouse P.O. Box 3044 Sacramento, CA 95814	Colonel Kirk E. Gibbs, 61 st Commander US Army Corps of Engrs. LA District 915 Wilshire Blvd Los Angeles, CA 90017
Lijn Sun, Program Supervisor SCAQMD Intergovernmental Review 21855 Copley Dr. Diamond Bar, CA 91765-4182	Michael Y. Takeshita, Acting Chief Los Angeles County Fire Department - Forestry Div 1320 N. Eastern Los Angeles, CA 90063-3294	Alfred Reyes, Captain Los Angeles County Sheriff Dept 21695 Valley Boulevard Walnut, CA 91789
Deborah Smith, Executive Officer Regional Water Quality Control Bd Los Angeles Region 320 W. 4 th Street, Suite 200 Los Angeles, CA 90013-2343	John Andres Southern California Gas Company 9400 Oakland Avenue Chatsworth, CA 91311	Alex Villanueva, Sheriff Los Angeles County Sheriff Department 4700 Ramona Boulevard Monterey Park, CA 91754
Erik Hitchman, General Manager Walnut Valley Water District 271 South Brea Canyon Road Walnut, CA 91789	San Bernardino County Planning Department County Government Center 385 North Arrowhead Ave San Bernardino, CA 92415	Anthony Nyivih LA County Department of Public Works Land Development Division P.O. Box 1460 Alhambra, CA 91802-2460
Mark Pestrella, Director Los Angeles County Department of Public Works 900 S. Fremont Avenue Alhambra, CA 91803	Pui Ching Ho, Library Manager Los Angeles County Public Library Diamond Bar Branch 21800 Copley Dr Diamond Bar, CA 91765	Amy J. Bodek, Director County of Los Angeles Department of Regional Planning 320 W. Temple St, 13 th Floor Los Angeles, CA 90012
Jared Dever, District Manager San Gabriel Valley Mosquito & Vector Control District 1145 N. Azusa Canyon Road West Covina, CA 91790	Miya Edmonson California Dept. of Transportation District 7 – Env Planning 100 S. Main Street Los Angeles, CA 90012	Robert C. Ferrante, Chief Eng County Sanitation Districts of Los Angeles County 1955 Workman Mill Road Whittier, CA 90607-4998
Robert Taylor Walnut Valley Unified School Dist. 880 S. Lemon Street Walnut, CA 91789	Metropolitan Water Dist. of So. Calif Attention: Environmental Planning 700 N. Alameda St. Los Angeles, CA 90012	Marisa Creter, Executive Director San Gabriel Valley Council of Gov. 1000 S. Fremont Avenue #42 Alhambra, CA 91803
Kome Ajise Exec. Director of So. California Association of Governments 900 Wilshire Blvd. #1700 Los Angeles, CA 90017	Daniel J. Johnson, Interim AVP Facilities Planning Cal Poly Pomona 3801 W Temple Ave, Bldg 81 Pomona, CA 91768	Eileen Sobeck, Executive Director State Water Quality Control Board 1001 I Street P.O. Box 100 Sacramento, CA 95814

Battalion Commander Los Angeles County Fire Station 120-Battalion 1051 S. Grand Avenue Diamond Bar, CA 91765-2210	Skye Patrick County Library Director LA County Library 7400 E. Imperial Highway Downey, CA 90242	County of Los Angeles Department of Parks and Rec Alina Bokde, Deputy Director 1000 S. Fremont Ave, Unit #40 Alhambra, CA 91803
Anita D. Gutierrez, AICP Acting Dev Services Director City of Pomona - Dev Svcs. 505 South Garey Avenue Pomona, CA 91766	Metro Development Review Los Angeles County Metropolitan Transp. Authority One Gateway Plaza, MS 99-22-1 Los Angeles, CA 90012-2952	Julianne Polanco, SHPO Calif. Dept. of Parks & Recreation Office of Historic Preservation 1725 23rd Street, Suite 100 Sacramento, CA 95816
Tom Weiner Director of Community Dev City of Walnut 21201 La Puente Road Walnut, CA 91789	Salvador Flores Southern California Edison 2 Innovation Way Pomona, CA 91768	Southern California Gas Co Centralized Correspondence PO Box 3150 San Dimas, CA 91773
David Perez Valley Vista Services, Inc. 17445 E Railroad Street City of Industry, CA 91748	Steven D. Lowry Southern California Edison Co Real Prop, Title & Real Estate Svcs 2131 Walnut Grove Blvd. 2nd Fl Rosemead, CA 91770-3769	Southern California Edison Co. Local Governmental Affairs – Land Use/Environmental Coord 2244 Walnut Grove Avenue Rosemead, CA 91770
Grace P. Brandt Department of Conservation 5816 Corporate Ave #100 Cypress, CA 90630	Orange County Planning & Development Department P.O. Box 4048 Santa Ana, CA 92703	Rowland Heights Community Coordinating Council P.O. Box 8171 Rowland Heights, CA 91748
Three Valleys Municipal Water District 1021 E Miramar Ave Claremont, CA 91711	Douglas Bassett Spectrum Cable Company 4781 Irwindale Avenue Irwindale, CA 91706	Asia Powell Frontier Communications 510 Park Ave. San Fernando, CA 91340
Gary Nellesen, Director Facilities Planning & Mgmt Mt. San Antonio College 1100 N. Grand Ave Walnut, CA 91789	Teri G. Muse Public Sector Solutions Rep Waste Mgmt San Gabriel/Pomona 13940 E. Live Oak Avenue Baldwin Park, CA 91706	Claire Schlotterbeck, Exec Dir Hills for Everyone P.O. Box 9835 Brea, CA 92822-1835
Gabrieleno Band of Mission Indians- Kizh Nation Andrew Salas, Chairperson P.O. Box 393 Covina, CA 91723	La City/County Native American Indian Comm. 3175 West 6 th St Los Angeles, CA 90020	San Gabriel Band of Mission Indians Anthony Morales, Chief P.O. Box 693 San Gabriel, CA 91778
California Native American Heritage Commission 1550 Harbor Blvd, Suite 100 West Sacramento, CA 95691	Gabrielino-Tongva Tribe Charles Alvarez 23454 Vanowen Street West Hills, CA, 91307	Gabrielino-Tongva Tribe Linda Candelaria, Co-Chairperson 23453 Vanowen St West Hills, CA 91307

Gabrielino Tongva Nation
Sandonne Goad, Chairperson
106 1/2 Judge John Aiso St, #231
Los Angeles, CA 90012

San Fernando Band of
Mission Indians
Donna Yocom, Chairperson
P.O. Box 221838
Newhall, CA, 91322

Douglas Barcon
23535 Palomino Dr #545
Diamond Bar, CA 91765

Pauma Band of Luiseno Indians –
Pauma & Yuima Reservation
Temet Aguilar, Chairperson
PO Box 369
Pauma Valley, CA 92061

Soboba Band of Luiseno Indians
Joseph Ontiveros
Cultural Resource Director
PO Box 487
San Jacinto, CA 92581

Diamond Bar – Pomona Valley Sierra
Club Task Force
324 S. Diamond Bar Blvd. #230
Diamond Bar, CA 91765

Gabrielino Tongva Indians of
California Tribal Council
Robert F. Dorame, Chairperson
P.O. Box 490
Bellflower, CA 90707

Torres Martinez
Desert Cahuilla Indians
Michael Mirelez, Cultural Res Co
PO Box 1160
Thermal, CA 92274

Janet Cobb & Angela Moskow
CA Wildlife Foundation/CA Oaks
428 13th Street, #10A
Oakland, CA 94612

Table C-2
Summary of Public Comments and Responses

Comment	Response
We have a housing crisis	Yes, the State Legislature has declared there is a housing crisis in California
The housing market is strongly influenced by investors	Yes
Children who grew up in Diamond Bar have difficulty finding affordable housing that enables them to continue living here	One of the main purposes of the Housing Element is to increase the availability of housing at all income levels so that grown children can afford to remain in the community.
The City should consider an inclusionary housing program	"Inclusionary housing" refers to a requirement that a portion of new housing is made available at affordable rents or prices. There are valid arguments for and against such policies, and each city must evaluate whether inclusionary requirements are appropriate.
Diamond Bar doesn't have sufficient transportation and parking infrastructure to handle the amount of development assigned in the RHNA, such as streets serving the Metrolink station	Transportation issues must be a part of future planning and development decisions, along with the analysis of housing needs and the appropriate locations for new housing.
Future planning and development of the Focus Areas needs to be done thoughtfully so that these areas enhance the quality of life in Diamond Bar	Detailed planning for the Focus Areas will be done based on the policy framework established in the General Plan and site-specific analysis conducted during the preparation of specific plans and development regulations for these areas.
If a site is listed in the inventory, is it required to be developed for affordable housing?	No, the sites inventory only describes where additional housing could be built based on zoning regulations. Property owners will decide if and when development occurs. The City or the State cannot force property owners to develop their property for housing.

Appendix D

Contributing Factors to Fair Housing Issues

I. Executive Summary

Impediments/Contributing Factor	Priority	Justification	Service Area
Barriers to mobility	High	<p>According to 2015 ACS data, an estimated 9.2 percent of persons in the Urban County had a disability. The ability for persons with disabilities to access infrastructure, public facilities, and housing units is limited by barriers to mobility, such as physical accommodations for access. Some 37.6 percent of survey respondents with a disability indicated that it was difficult or somewhat difficult getting about their neighborhood or housing complex. In addition, an estimated 10.5 percent of respondents in Los Angeles County indicated that there are problems with their home that create physical/accessibility issues for their households. Based on a survey of participating cities regarding their CDBG spending priorities, over 80% indicated that they will use CDBG funds if available during the next five (5) years to address accessibility improvements such as sidewalks, public facilities, or housing. Participating cities considered the needs identified through assessments and input from residents to set their CDBG spending priorities.</p> <p>Barriers to mobility limits access to opportunities, creating a disproportionate access and contributing to fair housing issues. As such, this factor has been rated as a high priority.</p> <p>While the CDC and HACoLA have made continued efforts in the past to increase access for persons with disabilities, the need remains. The CDC and HACoLA must establish goals to increase access in order to diminish any disproportionate access to opportunity that persons with disabilities in the Urban County experience.</p>	<p>Los Angeles Urban County</p> <p>HACoLA</p>
Lack of affordable housing in a range of sizes	High	<p>According to the 2017 HUD AFFH data, approximately 74 percent of family households with five or more members experience housing problems such as cost burdens or overcrowding. The high percentage of families that need appropriately sized housing makes this contributing factor a high priority.</p> <p>Almost a quarter of all households surveyed expressed severe cost burdens which impact racial and ethnic minorities at an even higher rate. The lack of affordable housing units available in a wide variety of household sizes is evident in the proportion of households with severe cost burdens.</p> <p>The 2017-18 Resident Survey found that countywide the need for housing for seniors and persons with disabilities, ranked out of a possible 4, were 3.36 and 3.28, respectively.</p> <p>Although the CDC has encouraged the development of affordable units for special needs and low income households, the need for additional housing options is striking compared to available units. As a high priority, the CDC will continue to direct efforts and resources to promoting affordable housing options that comply with federal and state fair housing requirements, including Section 504 of the Rehabilitation Act (Section 504), Title II of the Americans with Disabilities Act (ADA), and the Fair Housing Act.</p>	<p>Los Angeles Urban County</p>
Lack of sufficient accessible housing in a range of unit sizes	High	<p>While 2015 ACS data states that 9.2 percent of persons in the Urban County had a disability, according to the County's 2015 Health Survey, 22.6 percent had a disability countywide. Barriers to mobility are compounded with limited access to affordable housing to create a lack of accessible housing options. Service providers echo this sentiment, highlighting the need for additional accessible units for varying households. The 2017-2018 Resident Survey found that, countywide, the rated need for housing for persons with disabilities was 3.28 out of 4.</p> <p>Lack of sufficient accessible housing in a range of unit sizes is rated as a high priority due to its impact on persons with disability to access fair housing options. This factor is a core function of both the CDC and HACoLA to address fair housing issues in the County.</p> <p>HACoLA and the CDC have been increasing the number of accessible units in the County through various efforts over time. However, these efforts still do not meet the need of persons with disabilities to access housing. In establishing goals to meet this need, the CDC and HACoLA will help decrease the disparity in access to housing options and access to opportunity for persons with disabilities.</p>	<p>Los Angeles Urban County</p> <p>HACoLA</p>

I. Executive Summary

Impediments/Contributing Factor	Priority	Justification	Service Area
Lack of sufficient publicly supported housing for persons with HIV/AIDS	High	<p>The HIV/AIDS population in Los Angeles County has seen 85,500 cumulative diagnosis of HIV/AIDS, according to the 2015 Annual HIV Surveillance Report, which also estimates that 60,000 persons are currently living in the County with HIV/AIDS. This report also suggests that the Hispanic population is disproportionately affected, as well as persons in San Fernando and San Gabriel Valley. The U.S. Department of Health and Human Services states that stable housing options for this population has been linked to better ability to access care and supportive services, as well as maintenance of treatment.² The continued need for housing options for persons with HIV/AIDS was emphasized during the AI process through service providers and public input.</p> <p>The lack of sufficient publicly supported housing for persons with HIV/AIDS limits access to housing options for this special needs population. This directly impacts access to opportunity and exacerbates levels of segregation. Due to these impacts, this factor has been given a high priority.</p> <p>Housing efforts have been undertaken county-wide to increase housing option for person with HIV/AIDS. However, the need for additional housing options is still prominent for this special needs community. The CDC will Establish a goal to increase housing options to help diminish the disparities in access for persons with HIV/AIDS.</p>	Los Angeles Urban County
Land use and planning decisions restrict fair housing choice for persons with disabilities and affordable housing in general	High	<p>The location of accessible and affordable housing units in the Urban County may indicate that land use and planning decisions are restricting the housing options for eligible households. Affordable housing options tend to be located in or adjacent to R/ECAP areas, as seen in the maps in Section F.</p> <p>Land use and planning decisions restricting fair housing choice for persons with disabilities and affordable housing in general plays an immediate impact on fair housing issues by limiting housing choices, diminishing access to opportunity, and further exacerbates segregations among minorities and for persons with disabilities. For these reasons, this factor has been placed as a high priority.</p> <p>While the CDC and participating cities have reviewed and implemented Housing Elements and other plans, the need for additional review and revision exists in order to identify restrictions to accessible and affordable housing. Identifying and revising existing land use and planning decisions will expand housing options and increase access to fair housing options within the County.</p>	Los Angeles Urban County
Presence of lead poisoning exposure	High	<p>Lead poisoning exposure continues to be an issue for households, particularly for low income households. Between 2011 and 2015, over 15,000 children under the age of 6 test positive for lead.³ However, the number of those children that have elevated blood lead levels is unclear, and under-testing appears to be a continued problem⁴. According to the Response and Surveillance System for Childhood Lead Exposure (RASSCLE), the highest levels of lead poisoning exposure can be found in Central and South Los Angeles. Elevated blood levels are more prevalent among low income households.⁵ In addition, CDC studies have found that black populations have been found to be more likely to have elevated blood levels.⁶</p> <p>This heightened risk limits access to healthy neighborhoods and safe housing environments. It is selected as a high priority due to its impact of access to healthy housing options and increases disproportionate housing needs within R/ECAP areas.</p> <p>The CDC has funded lead abatement procedures, but the continued risk threatens the health and safety of households, especially those with children. The CDC will continue efforts to promote increased access to healthy and safe housing options through lead abatement efforts and review.</p>	Los Angeles Urban County

² <https://www.hiv.gov/hiv-basics/living-well-with-hiv/taking-care-of-yourself/housing-and-health>

³ "Lead's Hidden Toll", Joshua Schneyer, April 20, 2017. Reuters Investigates. <http://www.reuters.com/investigates/special-report/usa-lead-la/>.

⁴ <https://www.reuters.com/article/us-usa-lead-la-a-health-officials-misstated-some-cases-of-childhood-lead-exposure-idUSKBN18S66J>

⁵ <http://www.epi.umn.edu/et/nutri/disparities/causes.shtml>

⁶ <https://www.cdc.gov/mmwr/volumes/65/wr/mm6539a9.htm>

I. Executive Summary

Impediments/Contributing Factor	Priority	Justification	Service Area
Significant disparities in the proportion of members of protected classes experiencing substandard housing when compared to the total population	High	<p>Housing problems impact a large proportion of households in LA County. Racial and ethnic minorities, people with disabilities, families with children, and other protected classes face housing problems at higher rates than the total population. For example, black and Hispanic households face housing problems at a rate of 58.7 and 66.5 percent, respectively, and families with 5 or more people face housing problems at a rate of 74.0 percent, according to HUD AFFH Data.</p> <p>The rate at which protected classes face housing problems compared to the general population exemplifies the disproportionate housing need in the County, particularly those in R/ECAPs. This is a high priority as it impacts the level of access to fair housing options for these households in the County.</p> <p>While the CDC has directed resources to address disparities in access to housing in at-need areas, continued efforts are needed in order to guarantee access to housing options. The CDC will continue to establish meaningful and impactful goals to increase access for protected classes to access housing and decrease disproportionate need.</p>	Los Angeles Urban County
Noise Pollution due to plane traffic from Los Angeles International Airport	High	<p>R/ECAPs in the Urban County are more likely to face environmental issues, such as noise pollution from LAX. There are an estimated 8,424 dwelling units impacted by noise from LAX.⁷ Noise pollution continues to be a hazard for low income households and for R/ECAPs.</p> <p>Noise pollution decreases quality of life and limits access to healthy neighborhoods. This factor has been selected as a high priority due to the enormous need and its effect on persons living in R/ECAPs as well as the ability of the CDC to work with Federal Aviation Administration and Los Angeles World Airports to address the need.</p> <p>The CDC has recognized the impact of noise pollution on household access to healthy neighborhood, and is creating goals to help diminish the impact of noise pollution on access to healthy neighborhoods.</p>	Los Angeles Urban County
Poor land use and zoning situating sources of pollution and environmental hazards near housing	High	<p>The disparity in access to healthy neighborhoods shows a marked disparity for racial and ethnic minorities in accessing healthy neighborhoods. The location of housing adjacent to environmental hazards may continue to allow for disparities to exist and limit household access to lower pollution levels. R/ECAP areas in the Urban County tend to have higher levels of toxic emissions and environmental hazards, as seen in Map IV.110.</p> <p>Poor land use and zoning policies diminish access to opportunity and healthy neighborhoods. Siting decisions increase the disproportionate level of access to unhealthy neighborhoods for racial and ethnic minorities and low-income households, particularly those in R/ECAPs. These limiting factors to fair housing options, places this factor as a high priority.</p> <p>While the CDC and participating cities have reviewed and implemented Housing Elements and other plans, the need for additional review and revision exists in order to identify restrictions to accessible and affordable housing. Identifying and revising existing land use and planning decisions will expand housing options and increase access to fair housing options within the County. In addition, the CDC will continue its policy in the Notice of Funding Availability for affordable housing that applicants that propose projects within 500 feet of a freeway will not qualify for funding such as HOME Partnerships Investment and other applicable funding. Participating cities will also be trained on the policy and encouraged to implement it within their jurisdictions</p>	Los Angeles Urban County

⁷ http://www.lawa.org/uploadedFiles/LAX/pdf/3q17_20171115_Quarterly_Report.pdf

I. Executive Summary

Impediments/Contributing Factor	Priority	Justification	Service Area
Access to quality healthcare	Low	<p>Healthy Neighborhoods focus groups highlighted the poor access to quality healthcare in areas with higher concentrations of poverty. The 2015 LA County Health Survey found that 43.0 percent of persons below the Federal Poverty Line had difficulty accessing medical care. Racial and ethnic minorities also have more difficulty accessing medical care, with 31.2 percent of Hispanic and 26.8 percent of Asian adults having difficulty, compared to 12.7 percent of white adults.</p> <p>While this issue remains vital to the overall well-being of Urban County households and impacts the ability of households to access healthy neighborhoods, the CDC has limited capacity to make effective change with its available resources to provide access to quality healthcare. The Department of Public Health and other agencies throughout Los Angeles County are responsible for healthcare and the CDC partners with these agencies where possible.</p> <p>The CDC has funded community efforts to promote access to community health services. The CDC will continue these efforts by establishing goals to create more access to healthcare and healthy neighborhoods.</p>	Los Angeles Urban County
Food insecurity - Access to healthy and nutritious food options	Moderate	<p>Food insecurity continues to be an issue for many households in Los Angeles County. The 2015 County Health Survey found that 41.1 percent of households below the FPL had low or very low food security. In addition, Latino, black, and American Indian households had a markedly higher rate of low or very low food security.⁸ Many areas experience limited access to fresh food, particularly R/ECAPs in the County, as shown by USDA food atlas.⁹ This sentiment was echoed by the Healthy Neighborhoods Focus Groups.</p> <p>Limited access to food options and food insecurity are directly impactful to access to healthy neighborhoods. Since the County is seeing disproportionate access for R/ECAPs and low-income and minority populations in food security, the priority for this factor is moderate. It is rated as a moderate priority as the CDC will focus more resources on issues directly related to fair housing choice.</p> <p>Increasing access to food options will reduce the level of disparity that low-income and minority populations face in access to healthy neighborhoods. In light of this, although it's a moderate priority, HACoLA and the CDC can establish goals to help increase access to food options and social services with its limited resources.</p>	Los Angeles Urban County HACoLA
Location and access to local businesses, especially in economically depressed areas	Moderate	<p>Access to local businesses may limit job proximity and labor force engagement. As seen in the Opportunity Indices, Labor force engagement for some racial and ethnic minorities is markedly lower than for white Urban County residents. Labor market index scores for black and Hispanic households were 44.4 and 34.9, respectively, while those for white households were 69.4.</p> <p>Location and access to local businesses, especially in economically depressed areas such as R/ECAPs, limits access to opportunity. This is directly connected to fair housing issues and the CDC continues to invest in business assistance in R/ECAPs. However, it is rated as a moderate priority as the CDC will focus more resources on issues directly related to fair housing choice.</p> <p>Areas with high concentrations of racial and ethnic minorities and poverty, or R/ECAPs, are inundated with lower level of access to opportunity and access to local businesses. The CDC will implement activities to increase access to increased business activity in R/ECAPs in order to decrease disparities in access to opportunity.</p>	Los Angeles Urban County

⁸ <http://www.publichealth.lacounty.gov/ha/LACHSDataTopics2015.htm>

⁹ <https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas.aspx>

I. Executive Summary

Impediments/Contributing Factor	Priority	Justification	Service Area
Lack of Information on Affordable Housing	High	<p>Public input brought to light the limitation of current outreach practices that do not provide sufficient reach for eligible households to access information regarding affordable housing opportunities in the Urban County.</p> <p>Limited access to information on affordable housing directly impacts access to housing options. Disparities in access to housing options relates directly to fair housing issues and is placed as a high priority.</p> <p>Efforts to increase access to information have been on-going throughout the County. Efforts by the CDC to increase knowledge about federal and state fair housing requirements will decrease disparities in access and increase the accessibility of fair housing options.</p>	Los Angeles Urban County
Increasing measures of segregation	High	<p>The Urban County has seen moderate to high levels of segregation since the 1990s. Most of these levels have remained high into 2015, with Black/White segregation and Hispanic/White segregation remaining virtually unchanged since 2000 at 67.21 and 62.72, respectively, in 2015, according to AFFH Table 3. These areas of segregation continue to limit access to high opportunity areas, as well as compounding housing problems in R/ECAPs.</p> <p>The rate of segregation is a direct limiting factor in access to fair housing opportunities. As the rate of segregation in the Urban County remain high, the priority of this contributing factor remains high as well.</p> <p>The CDC will increase access to housing in low minority and high opportunity areas through the introduction of pertinent goals, such as developing housing outside of areas of minority concentrations with low opportunities. Increasing access to low minority areas will impact the rate of segregation.</p>	Los Angeles Urban County
Discrimination in private rental and homes sales markets	High	<p>According to Fair Housing public input and HMDA data, racial and ethnic minorities, as well as other protected classes, face discrimination in private rental and homeowner markets. HMDA data shows that some racial and ethnic minorities are more likely to be denied a mortgage. In addition, HUD Fair Housing Complaint Data showed over 2,600 complaints between 2008 and 2016. The basis of these complaints was most likely to be disability, race, or familial status.</p> <p>Discrimination in the private rental and home sales market has been selected as a high priority affecting the fair housing issues of disparities in access to opportunity, discrimination, and segregation. It is selected as a high priority because it directly relates to fair housing choice and restricts a person's ability to secure housing based on protected class status or some other arbitrary reason. The CDC also has the ability to contract with a fair housing service provider to address this contributing factor.</p> <p>Although the CDC has contracted with a fair housing service provider to investigate alleged violations of fair housing law in the past, the complaints still remain each year so there needs to be enhanced, on-going enforcement as well as fair housing education. In addition, to adequately determine and address patterns of discrimination, more specific complaint data needs to be collected such as where the resident currently lives, where the alleged infraction occurred, protective class, and issue code (type of discrimination). As a high priority, the CDC will need to set goals to ensure meaningful actions are implemented so that discrimination in the private rental and homes sales market can be decreased or eliminated.</p>	Los Angeles Urban County
Access to Financial Services	Moderate	<p>The Fair Housing survey found that 9.3 percent of respondents indicated that their home loan application was denied in the past five years. According to HMDA data, between 2008 and 2015, black mortgage applicants are denied at a rate more than 7 percentage points higher than white applicants, and Hispanic applicants are denied at a rate more than 5 percentage points higher than non-Hispanic applicants.</p> <p>Access to financial services is related directly to housing options, and contributes to segregation, R/ECAPs, disparities in access to opportunities, and disproportionate housing needs. While this factor contributes to fair housing issues, it is rated as a moderate priority as the CDC is not able to address this issue on a large scale due to funding as well as the fact that state and regulatory agencies are in a better position to ensure compliance.</p> <p>Although this factor is rated as a moderate priority, the CDC will conduct outreach and education services through a fair housing service provider to help additional households access financial services in the Urban County.</p>	Los Angeles Urban County

I. Executive Summary

Impediments/Contributing Factor	Priority	Justification	Service Area
Lack of coordination with other Planning Processes and Programs to address contributing factors	Moderate	<p>Throughout the planning and evaluation process, the CDC acknowledges gaps in coordination and planning processes that may limit the impact of programs and resources that are used to address fair housing. The size of the Urban County, and coordination among the numerous cities and unincorporated areas is limited by scale and resources to implement large scale planning efforts.</p> <p>Lack of coordination contributes to a number of fair housing issues including segregation, R/ECAPs, disparities in access to opportunity, and disproportionate housing needs. At the time of preparing the AI, there were initiatives that were in process that could address some of these fair housing issues such as a County tenant protection ordinance. However, the role of the CDC was not defined. The CDC will continue to participate in various meetings to define these roles and will take active steps to coordinate with the agencies taking the lead in applicable planning and programming efforts. While this factor is important to reducing these fair housing issues, the role of the CDC is undefined at this point. As such, it is rated as moderate.</p> <p>In spite of the fact that this factor is rated as moderate, the CDC will address this factor with steps to increase coordination across agencies through active participation in the planning and development of future programs and policies to address fair housing issues as well as implementation of these initiatives where appropriate..</p>	Los Angeles Urban County

I. Executive Summary

Impediments/Contributing Factor	Priority	Justification	Service Area
Public safety concerns	High	<p>Crime data reported by LA County, as well as public sentiment, pointed to a high level of need for public safety measures. This is particularly striking in R/ECAPs. According to the 2017 Fair Housing Survey, an estimated 37 percent of residents in R/ECAPs felt unsafe in their neighborhood at night, compared to 20 percent for the Urban County overall.</p> <p>Safety is a primary concern for promoting access to healthy neighborhoods. The diminished access to safety also diminishes access to healthy neighborhoods, and therefore establishes this factor as a high priority.</p> <p>Efforts to increase public safety, particularly for those households in R/ECAPs will increase access to healthy neighborhoods and decrease public safety concerns. The CDC's and HACoLA's efforts will promote community involvement and crime prevention through annual goals.</p>	Los Angeles Urban County HACoLA
Violent and drug related crime in public housing	High	<p>Violence and crime in public housing is a real concern for residents because it impacts their quality of life, particularly those in R/ECAPs. Violent crimes continued to grow and had jumped for a third time by 2016.¹⁰ Increased incidents of crime and drug related offences have been linked to areas with higher concentrations of poverty. According to the Fair Housing Survey, only 46.7 percent of public housing residents felt safe or very safe in their public housing development at night, and 38.6 percent felt safe or very safe in their neighborhood at night.</p> <p>Violent and drug related crime in public housing directly impacts access to healthy neighborhoods. Residents in R/ECAPs are facing diminished access to healthy neighborhoods, and therefore this factor is rated as a high priority.</p> <p>HACoLA has engaged in crime and safety programs, including the Community Policing Team (CPT) Program, and Crime Prevention through Environmental Design. However, crime and safety are a continued issue for public housing residents. Continued efforts are necessary to reduce the number of violent and drug related crime incidents in public housing.</p>	HACoLA
Minority and low-income communities experience higher rates of crime and violence	High	<p>As demonstrated by higher levels of crime in R/ECAP areas, access to safe neighborhoods are limited for low-income household. The perception of neighborhood safety is markedly lower for low income and minority households. Only 68.9 percent of households below the Federal Poverty Line (FPL) felt their neighborhoods were safe, compared to almost 80 percent of households between 100 and 199 percent FPL.¹¹ In addition, Latino and African American households were more than 15 percentage points lower in perceived neighborhood safety than white households. The Portrait of Los Angeles County report found that areas in Los Angeles County, including Cudahy, Westmont, Lennox, East Rancho Dominguez, and Florence-Graham, have higher crime rates.¹²</p> <p>Disproportionate rates of violence and crime create disproportionate access to healthy neighborhoods. The factor is selected as high priority because of the impact on minority and low-income communities, and the disparities in access to safe neighborhoods and environments.</p> <p>The CDC and HACoLA's efforts to address crime and violence in minority and low-income communities will increase access to healthy neighborhoods. The CDC and HACoLA will establish goals to increase resources to combat the disproportionate rate of violence and crime for these communities.</p>	Los Angeles Urban County HACoLA

¹⁰ <http://www.latimes.com/local/lanow/la-me-crime-stats-20161227-story.html>¹¹ <http://www.publichealth.lacounty.gov/ha/LACHSDataTopics2015.htm>¹² <https://ssrc-static.s3.amazonaws.com/moa/PoLA%20Full%20Report.pdf>

I. Executive Summary

Impediments/Contributing Factor	Priority	Justification	Service Area
Criminal activity in public housing facilities	High	<p>Crime data reported by Los Angeles County, as well as public sentiment, pointed to a high level of need for public safety measures. This is particularly striking in R/ECAPs. According to the 2017 Fair Housing Survey, an estimated 37 percent of residents in R/ECAPs felt unsafe in their neighborhood at night, compared to 20 percent for the Urban County overall. According to the Fair Housing Survey, only 46.7 percent of public housing residents felt safe or very safe in their public housing development at night, and 70.6 percent felt safe or very safe in their development during the day.</p> <p>Criminal activity in public housing facilities not only impacts the residents' quality of life but also access to healthy neighborhoods. This impact on fair housing issues places this factor as a high priority.</p> <p>HACoLA has engaged in a variety of efforts to decrease criminal activity. Continued efforts are necessary to increase access to safe and healthy neighborhoods and diminish disparities in access to opportunity.</p>	HACoLA
Juvenile crime activity	High	<p>The rate of juvenile crime, echoing the rate of the crime statistics, is prevalent in lower income communities. In 2015, the juvenile felony arrest rate was 513 per 100,000 county-wide.¹³ This rate has lowered over the past couple years for the County.</p> <p>Disproportionate rates of juvenile crime activity not only affects the residents' quality of life but also creates disproportionate access to healthy neighborhoods. The factor is selected as high priority because of the impact on minority and low-income communities, and the disparities in access to safe neighborhoods and environments.</p> <p>HACoLA has undertaken the Juvenile Justice Crime Prevention Act (JUCPA) Program to encourage lower rates of juvenile crime. The CDC also funds a gang and drug intervention program for youth in the RECAP areas. While rates are lowering county-wide, they still remain a crucial issue for neighborhood safety and access to healthy neighborhoods. Continued efforts to combat juvenile crime may help lower the disparities in access to safe and healthy neighborhoods.</p>	Los Angeles Urban County HACoLA
Increase independence for the elderly or families with disabilities	High	<p>The 2015 County Health survey found that 22.6 percent of the population had a disability and 41.9 percent of those over 65 had a disability. In addition, those under the FPL had a higher disability rate than average, at 28.6 percent. Independence is reliant on access to a variety of components, including accessibility and services. Barriers to mobility and access to accessible housing are two primary hurdles to increasing independence.</p> <p>Limited independence for the elderly or families with disabilities is a primary barrier for access to housing options and opportunity. This factor contributes directly to fair housing issues, such as disparity in access to opportunity, and is therefore rated as a high priority.</p> <p>Efforts to increase independence will help integrate households with disabilities and negate any disparities in access to opportunity. HACoLA's established goals to encourage independence will support overarching fair housing goals and provide more equitable access to housing.</p>	HACoLA
People with disabilities becoming homeless	High	<p>Homelessness continues to be a major issue in Los Angeles County, and increased by 23 percent between 2016 and 2017 to 57,794 county-wide.¹⁴ In 2016, more than 15 percent of the homeless population had a physical disability, and more than 3 percent had a developmental disability.¹⁵</p> <p>Homelessness is a critical issue throughout Los Angeles County, particularly for households with disabilities. This contributing factor limits access to housing options and is considered a high priority.</p> <p>Identifying people with disabilities at risk of becoming homeless will decrease the number of persons who enter homelessness each year. HACoLA will address the growing need for affordable and accessible housing by setting goals that target at-risk persons with disabilities.</p>	HACoLA

¹³ <http://casi.cjcj.org/Juvenile/Los-Angeles>

¹⁴ <https://www.lahsa.org/documents?id=1385-2017-homeless-count-results-los-angelescounty-presentation.pdf>.

¹⁵ <https://www.lahsa.org/dashboards?id=18-2016-greater-los-angeles-homeless-count-demographic-summary>

I. Executive Summary

Impediments/Contributing Factor	Priority	Justification	Service Area
Lack of mental health services for school age children of public housing	High	<p>Mental health concerns continue to be a crisis for public housing residents, impacting school age children. An estimated 7.4 percent of children in LA County attempted to access mental health care.¹⁶ The incidence of violence and poverty have a documented impact on mental health for children, coupled with limited access to mental health services has continued to keep child mental health as a high priority.¹⁷</p> <p>Access to mental health services is an essential part of a healthy household and community, and limited access is a part of limited access to healthy communities. This factor is set as a high priority because of its impact on households' ability to access healthy neighborhoods and vital services.</p> <p>Although HACoLA has promoted mental health activities in the past, there is a continued need within public housing to promote access to mental health, particular for school aged children. Efforts to increase access must be implemented in order to eliminate any disparities in access to these services.</p>	HACoLA
Access to affordable internet	Moderate	<p>Data and public input have revealed a digital divide for low income households that do not have equitable access to affordable internet options. Areas with higher concentrations of poverty in LA County are the least connected to internet options.¹⁸ About a third of low-income households do not have internet, more than double the general population.¹⁹</p> <p>This digital divide may have far reaching consequences, including limitations to service information, and limited access to educational and employment opportunities. This creates disparities in access to opportunity, but is rated as a moderate priority due to a lack of HACoLA resources to address the factor on a wide scale.</p> <p>Efforts to decrease the digital divide will help eliminate the disparities in access to educational and employment opportunities. HACoLA efforts must attempt to bridge this divide in order to establish more equitable access to opportunities in the County.</p>	HACoLA
Industries not in compliance with health regulations - Pollution in Neighborhoods	Moderate	<p>Access to healthy neighborhoods is markedly diminished in low income areas and R/ECAPs from industry practices. However, industry practices are not within the authority of HACoLA. The highest rates of pollution were found in areas of high poverty, and according to the Portrait of LA County report, were in Cudahy, Westmont, Lennox, East Rancho Dominguez, and Florence-Graham.²⁰ In addition, Latino, black, Native Hawaiian or other Pacific Islander (NHOPI) and Native American households were more likely to be in areas with high pollution levels.²¹</p> <p>Pollution directly impacts health and access to healthy neighborhoods. Disproportionate access to healthy neighborhoods for low-income and minority population creates a significant need. However, the ability of HACoLA to address industry policy is limited, and therefore this factor is weighed as moderate.</p> <p>Efforts by HACoLA to diminish disparities in access to healthy neighborhoods may be achieved through increased access and dissemination of information to residents. HACoLA goals to decrease exposure to pollution will help increase access to healthy neighborhoods.</p>	HACoLA

¹⁶ <http://publichealth.lacounty.gov/ha/LACHSDataTopics2015.htm#Child>¹⁷ <https://www.urban.org/urban-wire/poverty-toll-mental-health>¹⁸ <http://amicusc.org/wp-content/uploads/2017/07/Policy-Brief-2.pdf>¹⁹ <http://amicusc.org/wp-content/uploads/2017/07/Policy-Brief-2.pdf>²⁰ <https://ssrc-static.s3.amazonaws.com/moa/PoLA%20Full%20Report.pdf>²¹ <https://ssrc-static.s3.amazonaws.com/moa/PoLA%20Full%20Report.pdf>

I. Executive Summary

Impediments/Contributing Factor	Priority	Justification	Service Area
Illegal Dumping - Proximity to environmental hazards, especially in communities of color	High	<p>Environmental hazards are more likely to impact low-income households and R/ECAPs, as shown by the Environmental Health Index, the CalEnviroScreen, and the consultation process. Latino, black, NHOPU, and Native American households were more likely to be in areas with high pollution levels.²²</p> <p>These hazards limit access to healthy neighborhoods and increase health hazards in vulnerable communities. This diminished access to healthy neighborhoods is a contributing factor to fair housing issues and is rated as a high priority.</p> <p>Efforts by HACoLA to diminish disparities in access to healthy neighborhoods may be achieved through increased monitoring and information. HACoLA goals to decrease exposure to pollution will help increase access to healthy neighborhoods.</p>	HACoLA
Enhance adequacy of life skills (e.g. Housekeeping, healthy eating, financial management)	Moderate	<p>The 2015 LA County Health survey indicated that households below the FPL may have less access to support for enhancing life skills. Additionally, public involvement and consultation provided insight on inadequacy of life skills for many households throughout the County. These may include housekeeping, healthy eating, and financial management.</p> <p>The impact of life skills on quality of life and access to healthy neighborhoods is a contributing factor to fair housing issues and disproportionate access to opportunity. The capacity of HACoLA to impact these skills may be minimal on a large scale, and is therefore rated as a moderate priority.</p> <p>Efforts to increase the adequacy of life skills may impact the disparity in access to opportunity by increasing access to healthy neighborhoods. HACoLA will enhance current programs to increase life skills.</p>	HACoLA
Enhance air quality within housing development sites	Low	<p>Studies have found that public housing residents nationwide are twice as likely to have asthma as the general population, advocating for the elimination of smoking in public housing units.²³ In December, 2016, HUD published a final rule requiring public housing agencies to initiate a smoke-free policy by July, 2018.</p> <p>Diminished access to healthy air limits access to healthy neighborhoods. While enhancing air quality within housing development sites is of high importance, HACoLA has already made great strides in improving air quality and rates it as a priority of low.</p> <p>Between 2013 and 2014, HACoLA implemented a smoke-free policy for its housing developments to protect the residents, including families, youth, and the elderly and disabled. HACoLA continues to make strides to protect the air quality within housing development sites, and promote the health of all public housing residents.</p>	HACoLA
Instances of absentee/bad landlords	Low	<p>The cases of bad and absentee landlords, as established by public input, diminish the quality of housing options for many low-income households throughout the Urban County. Over 19 percent of respondents to the Fair Housing survey indicated that they were not able to communicate with their landlord; and 21 percent of public housing residents were not able to communicate with their landlord. For the public housing program, HACoLA will improve the perception of absentee landlords by effectively communicating and meeting with the residents.</p> <p>The impact of these landlords on sub-par conditions is important in establishing equal access to housing, however, may be difficult to monitor on a County-wide scale, especially in the private rental market. While this may impact access to housing options, this factor has been rated as a low priority.</p> <p>Efforts to increase the responsibility of landlords will help encourage access to housing options. Establishing goals may be limited by the capacity of HACoLA, but may be focused on public housing residents to increase access to opportunity.</p>	HACoLA

²² <https://ssrc-static.s3.amazonaws.com/moa/PoLA%20Full%20Report.pdf>

²³ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4716462/>

I. Executive Summary

Impediments/Contributing Factor	Priority	Justification	Service Area
Lack of opportunities for residents to obtain housing in higher opportunity areas	High	<p>As seen in the Disparities in Access to Opportunity section of this document, R/ECAPs have a markedly lower level of access to education, employment, and healthy neighborhoods. A lack of affordable housing options in higher opportunity areas, with access to transportation, jobs, and education, limit access to these areas for low income and racial and ethnic minority households.</p> <p>Lack of opportunities for residents to obtain housing in higher opportunity areas directly contributes to fair housing issues of disparities in access to opportunity. This contributing factor has been rated as a priority due to the level of disparate impact on fair housing choice for minority and low income households.</p> <p>Efforts to increase access to high opportunity areas have not mitigated the disparity in access to opportunity faced by households in low opportunity areas. Increasing housing options in high opportunity areas, through measureable goals, will help establish higher levels of access to minority and low income households.</p>	HACOLA
Lack of knowledge of Fair Housing, Section 504 and ADA laws	High	<p>The Fair Housing survey indicated that 39 percent of respondents were not aware of their right to request accommodations. Fair housing outreach indicated a lack of knowledge of fair housing, Section 504 and ADA laws throughout the Urban County. In addition, some 30.9 percent of public housing resident respondents were not aware of their rights to request accommodations.</p> <p>Limited knowledge limits access to services for eligible households. This limited access is a contributing factor to fair housing in limiting access to opportunity. This factor is rates as a high priority.</p> <p>HACoLA efforts to increase knowledge of fair housing laws will continue and increase access to opportunities and decrease disparities for households with disabilities.</p>	HACOLA
Disconnect in matching people with disabilities with the right housing resources	High	<p>The Fair Housing survey indicated that 39 percent of respondents were not aware of their right to request accommodations, and 11 percent were in need of a housing accommodation. Additionally, consultation with agencies and public input indicated that eligible households were not effectively matched with appropriate resources, especially accessible housing options.</p> <p>Persons with disabilities that are not matched with appropriate services are contributing factors to fair housing issues and decreasing access for persons with disabilities to housing options. This factor is a rated as a high priority due to its impact of fair housing.</p> <p>HACoLA has increased efforts to match persons with disabilities with services, but are not currently meeting the existing need. Establishing goals to remediate this factor through increased services will help close the gap in disparate access.</p>	HACOLA
Discrimination in the private accessible rental markets	High	<p>According to Fair Housing public input and HMDA households with disabilities face discrimination in private rental and homeowner markets. HUD Fair Housing Complaint Data showed over 2,600 complaints between 2008 and 2016 for Los Angeles County, with the most common basis of these complaints being a disability.</p> <p>Discrimination in accessible units has been selected as a high priority because it related directly to fair housing and access to opportunity.</p> <p>Although efforts had been made to investigate violations of fair housing law in the past, discrimination still remains an on-going continuing factor that limits access to fair housing. As a high priority, HACoLA will continue efforts to enhance access to housing options and resources to encourage fair housing practices in the marketplace.</p>	HACOLA

I. Executive Summary

Impediments/Contributing Factor	Priority	Justification	Service Area
Disparities in job readiness and educational achievement	High	<p>The Education index as well as other data sources, indicated a marked disparity in school proficiency. While white households had a school proficiency index of 73.65, black and Hispanic household indices were 44.24 and 44.35, respectively. This disparity in job readiness has far reaching consequences, including future economic opportunities.</p> <p>Disparities in job readiness and educational achievement has been placed as a high priority due to its impact on fair housing issues and access to opportunity. This factor limits access to fair housing choice and economic security.</p> <p>Since disparities in access still exist in the County, particularly for racial and ethnic minorities, HACoLA will set goals to ensure meaningful actions are implemented to increase job readiness and educational achievement, so disparities in access can be reduced.</p>	HACoLA
Availability of scholarships	Moderate	<p>Limited availability of scholarships create a barrier for households to access proficient educational opportunities. As seen in the School Proficiency Index, some racial and ethnic minorities overall, and R/ECAPs experience lower levels of school proficiency compared to white households in the Urban County. Black and Hispanic households have a school proficiency index of 44.2 and 44.4, respectively, compared to 73.7 for white households.</p> <p>The limited availability of scholarships limits access to education opportunities. This factor is related to the fair housing issue of access to opportunity, but is not within the capacity of HACoLA to impact on a wide scale, and is therefore rated as a moderate priority.</p> <p>Efforts to increase access to educational opportunities will decrease the disparities in access to educational opportunities for low income households. R/ECAPs with particularly low school proficiency and educational achievement levels can be directly impacted by efforts to increase access to sustained educational opportunities.</p>	HACoLA
Enhance programs to help at-risk homeless population	High	<p>Homelessness continues to be a major issue in Los Angeles County, and increased by 23 percent between 2016 and 2017 to 57,794 county-wide.²⁴ More than 74 percent of the counted homeless population in 2017 were unsheltered.</p> <p>The growing rate of homelessness places this factor as a high priority in the County.</p> <p>While HACoLA have taken substantial efforts to combat homelessness, it continues to be a growing problem in the County. In an effort to help stabilize and even reduce homelessness, HACoLA will establish goals to provide services for at-risk households. Any effort to help reduce the growth of the homeless population will help decrease disparities in access to housing options.</p>	HACoLA
Access to transportation	Low	<p>A 2017 Metro study found that 84 percent of bus riders did not have a car, and that the median income for riders in 2016 was \$15,620.²⁵ Public input and consolation activities reiterated the fact that many households with children struggle to access transportation options, limiting access to opportunity.</p> <p>Limited access to transportation is a key component in access to fair housing and disparities in access to opportunities. Limited access to transportation for families, including parents and children is rated as a low priority for addressing fair housing issues in the County due to a lack of capacity for HACoLA to address this factor.</p> <p>However, HACoLA has undertaken programs to increase access to transportation services, but the gap in access persists. Increasing the availability of transportation options for parents and children will help close this gap in access to opportunity.</p>	HACoLA

²⁴ <https://www.lahsa.org/documents?id=1385-2017-homeless-count-results-los-angelescounty-presentation.pdf>.

²⁵ <https://www.metro.net/about/metro-disparity-study/>

I. Executive Summary

Impediments/Contributing Factor	Priority	Justification	Service Area
Lack of resources and services for working families (e.g., helping find housing for minorities)	High	<p>Resources and services for working class families are essential to bridge the gap in access to housing and other services. 2015 Health Survey data suggest that low income households have lower knowledge about where to turn for support when compared to higher income households.</p> <p>A lack of these resources acts as a barrier in access, and remains a high contributing factor to access to fair housing. This factor has been rated as a high priority due to its impact on access to opportunity.</p> <p>Increasing access to resources and services will help decrease any disparities in access to opportunities for low income households. Efforts by HACoLA can be achieved in measurable goals to connect working families with applicable resources.</p>	HACoLA
Access to affordable childcare	Moderate	<p>Affordable childcare is a barrier for many households to enter or remain in the workforce, with an estimated 31.6 percent of LA County housing facing difficulties finding childcare.²⁶ The rate was even higher for those living below the FPL, at 41.9 percent. Public involvement and outside consultation reiterated the importance of affordable childcare that acts as a barrier to economic opportunities for low income households.</p> <p>Access to affordable childcare is directly linked with access to employment. Inequitable access to childcare creates disproportionate access to opportunity and therefore is a contributing factor to fair housing issues. While it is vital for households to have access to childcare options, it is not within the ability of HACoLA to impact change on a wide scale. Therefore, this factor is rated as moderate.</p> <p>While there have been past efforts to increase access to childcare, it still remains a critical issue for many households. Any efforts by HACoLA to increase access to services will decrease disparities in access to opportunity for low-income households.</p>	HACoLA
Enhance place based investments	Moderate	<p>The availability of services and access to opportunities varies for protected classes in Los Angeles County. This is exemplified by the opportunity index, such as access to low poverty areas. While non-Hispanic white households have a low poverty index of 70.81, black households have an index of 48.72, and Hispanic households have an index of 41.00.</p> <p>Disparities in access to opportunity are directly linked to limiting access to fair housing. Enhancing place based investments will increase access to opportunity and is therefore rated as a moderate priority.</p> <p>HACoLA will increase place based investments through the use of additional funding for rental assistance, resident service programs, and addressing homelessness.</p>	HACoLA
Facilitate Access to proficient schools	Moderate	<p>Minority populations in the Urban County have significantly lower school proficiency indices than white non-Hispanic households. While white households have index ratings at 73.66 for school proficiency, black households have 44.24, and Hispanic households have 44.35.</p> <p>Disparities in access to opportunity, such as disparities in access to proficient schools are a significant issue for the Urban County. However, due to the lack of control over the education system, facilitating access to proficient schools has been rated as a moderate priority.</p> <p>HACoLA will continue to increase access to educational opportunities for public housing residents in an effort to increase access to proficient schools, and decrease disparities in access to opportunity.</p>	HACoLA

²⁶ <http://publichealth.lacounty.gov/ha/LACHSDataTopics2015.htm#Child>

