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November 30, 2023

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

Attention: Planning and Land Use Management Committee

Dear Honorable Members:

**REPORT AND RECOMMENDATIONS RELATIVE TO STAFFING NEEDS TO FULLY
IMPLEMENT EXECUTIVE DIRECTIVE 1 STREAMLINING (CF 23-0623)**

On June 27, 2023, the City Council adopted a motion directing City Planning and other agencies to provide to Council a briefing on the staffing needs associated with ensuring the full implementation of the provisions outlined within Mayor Bass's Executive Directive 1 (ED1).

I. RECOMMENDATIONS

In consultation with the City departments described herein, the following recommendations outline requests for the funding of various positions that will support the continued full implementation of Executive Directive 1, as well as the proposed Affordable Housing Streamlining Ordinance that codifies Executive Directive 1 within the Los Angeles Municipal Code:

1) Department of City Planning (DCP)

- a) Four (4) City Planning Associates for the Priority Housing Project (PHP) processing of 100 percent affordable housing projects filed under the Affordable Housing Streamlining Ordinance.

2) Los Angeles Department of Building and Safety (LADBS)

- a) One (1) Electrical Inspector,
- b) One (1) Plumbing Inspector,
- c) One (1) HVAC Inspector, and
- d) One (1) Fire Sprinkler Inspector.

These positions have been included in LADBS' FY 24/25 budget request.

3) Los Angeles Fire Department (LAFD)

- a) One (1) Fire Protection Engineering Associate II.

4) Los Angeles Housing Department (LAHD)

- a) Two (2) additional Management Analyst positions assigned to the Land Use Section to stabilize and improve processing timelines,
- b) One (1) Deputy City Attorney 111 be assigned to the Land Use Section to support the legal review of affordability covenants and Replacement Unit Determinations,
- c) One (1) Management Analyst assigned to the Occupancy Monitoring (OM) Section to act as a Lease-Up Coordinator for Permanent Supportive Housing (PSH) projects, including Proposition HHH and Project Homekey properties, as included in LAHD's FY 24/25 budget request,
- d) Two (2) Accounting Clerk Trainee positions from the Bridges to jobs program to provide technical operational support to the Rehabilitation Construction Specialist (RCS) staff responsible for review of draw payment applications, as included in LAHD's FY 24/25 budget request,
- e) Two (2) Management Analyst positions to ensure compliance with prevailing wage requirements and processing payment drawdowns, as included in LAHD's FY 24/25 budget request, and
- f) One (1) Rehabilitation Construction Specialist 111, one (1) Rehabilitation Construction Specialist 11, and one (1) Management Analyst within the Accessible Housing Program (AcHP) to support the approval of building plans and conducting inspections, as included in LAHD's FY 24/25 budget request, and one (1) additional Management Analyst to provide additional support for the Construction team to enable reviews and inspections to be expeditiously conducted.

II. BACKGROUND

Mayor Karen Bass signed Executive Directive 1 (ED 1) on December 16, 2022, to expedite the processing of 100 percent affordable housing and shelter projects and address the housing and homelessness crisis in the City of Los Angeles. With certain exceptions, ED 1 exempts 100 percent affordable housing projects from discretionary review if they comply with applicable objective development standards. In addition to removing barriers of discretionary approval, ED 1 directs various City departments, including the Department of City Planning, to expedite the processing of City approvals for qualifying projects to meet a 60-day timeline, with a notice of all required changes or amendments to applications on or before the 30th day following the submission of a completed application. Today, the average ED 1 project receives approval from City Planning within 43 days of a submitted complete application. Specific directive and timelines for other City departments are also provided in the Executive Directive.

Meeting the ED1 target timeframes requires sufficient staffing across City departments to ensure the expedited review of 100 percent affordable housing projects does not create delays in the review and processing of other non-ED 1 housing projects. City Planning staff largely review and process ED 1 cases utilizing overtime hours to achieve the requisite 60-day timeline. This has also allowed for the Department to maintain its service levels for the review of non-ED 1 cases and minimize the need to place these cases on hold while ED 1 cases are prioritized.

In addition to describing the specific staffing resources that would support requirements of City Planning, this report includes information from prior report backs to City Council on staffing needs for other departments that would facilitate the streamlined review of 100 percent affordable housing projects.

Prior Reports:

On October 5, 2021, the City Council instructed (Council File No. [21-0658](#)) the Department of City Planning (DCP), with the assistance of other City departments, to report to the City Council with a strategic plan to streamline 100 percent deed-restricted affordable housing projects, including necessary staffing needs.

On April 27, 2022, a report was submitted in response to Council File 21-0658, which detailed recommendations from the Department of City Planning (DCP), the Los Angeles Department of Building and Safety (LADBS), the Los Angeles Housing Department (LAHD), the Los Angeles Fire Department (LAFD), the Bureau of Engineering (BOE) and the Office of the City Administrative Officer (CAO) to increase departmental resources necessary to facilitate shorter staff review times, shorter appeal times, and the accelerated prioritization for 100 percent affordable housing projects. The report considered increased departmental resources to facilitate shorter staff review times, including the accelerated prioritization for 100 percent affordable housing projects and the use of an administrative review process for 100 percent deed-restricted affordable housing projects. The report additionally considered establishing full-time dedicated case managers in each development service-related department to better coordinate on

permitting of affordable housing projects and included technological and staffing resource needs, among other things.

Following the adoption of the FY 22/23 Budget, City Planning submitted a supplemental report on August 11, 2022 that modified the various City department position recommendations from the April 27, 2022 report. In the City Council's consideration of this supplemental report, additional staffing resources, further described below, were granted to various departments.

Department of City Planning (DCP)

Within the April 2022 report, DCP requested the position authorities for twenty-one (21) new positions funded by the General Fund to facilitate shorter staff review time and accelerate 100 percent affordable project processing. These positions included:

- 1) Twelve (12) positions consisting of one (1) Senior City Planner, two (2) City Planners, eight (8) City Planning Associates, and one (1) Senior Administrative Clerk within the Department's Housing Services Unit to decrease preliminary application processing time, and
- 2) Nine (9) positions to support the Department's Priority Housing Project (PHP) processing across varying geographies consisting of four (4) City Planners, four (4) City Planning Associates, and one (1) Senior Administrative Clerk.

Within the FY 22/23 Adopted Budget, City Planning received:

- 1) Seven (7) positions within the Affordable Housing Services Unit, consisting of one (1) Senior City Planner, two (2) City Planners, and
- 2) Four (4) City Planning Associates and three (3) positions for the Department's Priority Housing Project (PHP) Processing.

Within the August 2022 supplemental report, City Planning modified its position recommendations considering the resources provided in the FY 22/23 Adopted Budget. In lieu of additional Planner positions, City Planning recommended that additional administrative and personnel assistance be provided to the department, including one (1) Senior Management Analyst, one (1) Management Analyst, and one (1) Senior Administrative Clerk to assist with filling of vacancy planner positions and reducing DCP's overall vacancy rate. While these positions were not ultimately approved by the City Council, the Council did adopt recommendations to authorize by resolution:

- 1) One (1) City Planner and
- 2) One (1) Senior Administrative Clerk to support Priority Housing Processing and reduce processing times.

Los Angeles Department of Building and Safety (LADBS)

The April 2022 report detailed LADBS' request for the following positions:

- 1) Authorize and increase staffing resources by twenty-two (22) positions as part of the effort to streamline permits and approvals for 100% affordable housing:
 - a) Funding and authorization for an additional Structural Plan Check ten (10) staffing positions as identified in the 2022-23 Budget Program Request,
 - b) Funding and authorization for a new Zoning Review Section of nine (9) staffing positions as identified in the 2022-23 Budget Program Request, and
 - c) Funding and authorization for the addition of three (3) Senior Building Inspectors for Inspection Case Management (ICM) to expand ICM services to 100% affordable housing projects regardless of project valuation.

All positions within this request were included in the FY 22/23 Adopted Budget. No additional positions were requested in the supplemental August 2022 report.

Los Angeles Fire Department (LAFD)

Within the April 2022 report, LAFD requested funding for seven (7) positions to increase case management capacity and plan review of affordable housing projects in order to provide dedicated staff to assist developers of 100 percent affordable housing projects. The positions included:

- 1) Three (3) Inspector II's assigned to Hydrants & Access,
- 2) One (1) Fire Protection Engineering Associate (FPEA) IV,
- 3) Two (2) FPEA II's, and
- 4) One (1) Management Analyst

The FY 22/23 Adopted Budget provided funding for six (6) positions to support the review of 100 percent affordable housing projects, comprising three (3) Inspector II's, one (1) FPEA IV, one (1) FPEA II, and one (1) Management Analyst position. One (1) Fire Protection Engineering Associate II position was not budgeted.

Los Angeles Housing Department (LAHD)

Within the April 2021 report, LAHD requested to increase staffing resources by a total of ten (10) positions. Eight (8) positions would be funded by Land Use fees and two (2) positions would be funded by the General Fund to reduce determination backlogs and expedite affordable developments. These requested positions were comprised of:

- 1) One (1) new Senior Management Analyst position, and five (5) Management Analyst positions, and two (2) new Management Assistant positions for the Land Use Unit, funded by Land Use fees, to reduce processing times for replacement unit determinations and covenant recording and
- 2) One (1) new Finance Development Officer and one (1) new Management Analyst (MA) position for the Affordable Housing Managed Pipeline (AHMP), funded by the General Fund, to facilitate an expedited underwriting and pre-development process.

The FY 22/23 Adopted Budget did not provide funding for these requested positions. LAHD reiterated staffing recommendations in the August 2022 City Planning supplemental report and subsequently received authorization by resolution:

- 1) One (1) Senior Management Analyst,
- 2) Five (5) Management Analysts, and
- 3) Two (2) Management Assistants to support the Land Use Unit and reduce processing times.

III. REVISED RECOMMENDATIONS

Department of City Planning (DCP):

Given the success of ED1 and the additional number of preliminary and administrative applications cases filed for 100 percent affordable housing developments to date, as well as the expectation that the City will continue to see these applications filed under the permanent Affordable Housing Streamlining Ordinance, DCP is recommending the position authority and funding of four (4) additional City Planning Associates to support the Priority Housing Project administrative review and processing of 100 percent affordable housing projects.

Los Angeles Department of Building and Safety:

To support the continued implementation of the Executive Directive 1, LADBS recommends the position authority and funding of four (4) positions comprised of:

- a. One (1) Electrical Inspector,
- b. One (1) Plumbing Inspector,
- c. One (1) HVAC Inspector, and
- d. One (1) Fire Sprinkler Inspector.

These positions have been included in LADBS' FY 24/25 budget request.

Los Angeles Fire Department:

The Los Angeles Fire Department has noted that the success of ED1 projects has led to an increased inventory of projects with quick turnaround times. While LAFD does have vacancies, delays in the hiring process have resulted in staffing shortfalls. The current staff levels are proving insufficient, making it challenging for the existing team of two (2) FPEA II's to maintain the elevated performance. Identifying opportunities to streamline and expedite the hiring process could assist with improving the ED 1 permitting process. To support the continued implementation of Executive Directive 1, LAFD recommends the position authority and funding of one (1) Fire Protection Engineering Associate II position.

Los Angeles Housing Department:

Meeting the ED1 target timeframes requires sufficient staffing in the parts of the Department tasked with expediting the ED1 processes. These including the Land Use Section, which is responsible for the processing of affordability covenants and the issuance of Replacement Unit Determinations (RUDs), the Prevailing Wage Unit (PWU) and Construction Services Unit (CSU), which are responsible for construction monitoring, compliance, and issuance of payments, and the Accessible Housing Program (AChP), which is responsible for the approval of accessibility plans and the clearance of TCOs and COOs for accessibility purposes. Additionally, other parts of the Department are responsible for tracking and expediting payments for all affordable housing projects, and for ensuring that affordable units are leased up quickly with qualified tenants. While LAHD did receive additional staffing as a result of the previous streamlining efforts, the parts of LAHD implementing the expedited ED1 timelines remain in need of additional staffing in order to ensure that we meet ED1 target timelines without delaying other housing projects.

Land Use Analysts

Eight (8) of the 10 positions that were requested in the previous streamlining report were approved for LAHD's Land Use Section. In that section, eight (8) additional staff (including Management Assistants, Management Analysts, and a Senior Management Analyst) were approved by City Council in December 2022 as part of a strategic plan to streamline 100 percent deed-restricted affordable housing projects (CF 21-0658). These positions were filled in May 2023 and training was completed in August 2023. As a result, processing time for ED 1 projects has significantly improved with these new staff. However, processing time for non-ED1 projects has concurrently been extended as ED1 projects are prioritized. Non-ED1 projects are currently processed in 8-12 calendar weeks for Replacement Unit Determinations, and in 12-16 weeks for affordability covenants, for a total of 20-28 weeks. As such, LAHD would request two (2) additional Management Analyst positions to stabilize and improve processing timelines for all projects so that non-ED 1 projects producing housing are not unnecessarily delayed.

City Attorney Support for Land Use

To ensure the full implementation of the provisions outlined within ED 1, one (1) additional City Attorney assigned to Land Use is needed. The legal review of affordability covenants and Replacement Unit Determinations is currently the responsibility of one Deputy City Attorney III, while the workload exceeds the capacity of one person, resulting in extended review times after documents are submitted to that office. LAHD would request that a second Deputy City Attorney be assigned to Land Use work.

Lease-Up Analyst in Occupancy Monitoring

As the portfolio of covenanted affordable housing projects grows, the work of LAHD's Occupancy Monitoring (OM) Section expands concurrently. In addition to its traditional tenant certification and annual compliance workload, OM is now responsible for coordinating efficient lease-ups in new projects. This work is rapidly growing and LAHD would request one (1) Management Analyst in OM to act as a Lease-Up Coordinator for Permanent Supportive Housing (PSH) projects, including Proposition HHH and Project Homekey properties. This position is included in LAHD's FY 24/25 budget request.

Processing Construction Draw Payments

The Technical Services Division's Construction Services Unit (CSU) and Prevailing Wage Unit (PWU) manage the Los Angeles Housing Department's active construction projects. This includes monitoring construction work, processing payment draws, and enforcing Prevailing Wage and Davis-Bacon rules and regulations. There are currently 103 active projects, which translates to an average of 88 draws to be processed per month. In order to meet ED1 target timelines of completing all construction draw payments within 30 days, the CSU and the PWU require additional staff.

The CSU requests two Accounting Clerk Trainee positions from the Bridges to Jobs program to provide technical operational support to the Rehabilitation Construction Specialist (RCS) staff responsible for review of draw payment applications. This will allow for the necessary detailed review of applications at the time they are submitted to ensure that any issues are identified and resolved early in the process to reduce processing time. Ensuring compliance with prevailing wage requirements and processing payment drawdowns are the core work of the PWU. With 103 currently active projects, the turnaround time for each PWU labor analyst to process a payment drawdown request currently takes approximately 64 days, or 9 weeks. In order to meet ED 1 goals of reducing processing time to 30 days, LAHD requests the addition of two Management Analyst positions. These four positions are included in LAHD's FY25 budget request.

LAHD also requests a Principal Accountant II to track and expedite payment processes for all affordable housing projects to meet ED1 timelines. The position helps the department process payments for affordable housing projects funded by our department and provides important information to the Mayor as to payment approval date, reasons for rejection, and check issuance date.

Accessible Housing Program (AcHP)

The AcHP Construction/Retrofit team is responsible for reviewing and approving construction plans to ensure that they meet all accessibility requirements as well as issuance clearances after inspections to confirm that projects were constructed to the applicable accessibility standards. To continue to meet ED1 target timeframes, the Construction/Retrofit team could use an additional Rehabilitation Construction Specialist (RSC) 111, Rehabilitation Construction Specialist (RCS) 11, and two Management Analysts to help support the RCS teams responsible for approving plans and conducting inspections. The RCS 111, RCS II, and one MA are included in LAHD's FY25 budget request. The second MA would be an additional request and would provide additional support for the Construction team to enable reviews and inspections to be expeditiously conducted.

IV. CONCLUSION

The Department appreciates the opportunity to provide a summary of additional City staffing resources that would support the continued implementation of Executive Directive 1, as well as implementation of the proposed Affordable Housing Streamlining Ordinance. Should you have any questions regarding this report, please contact Matt Glesne with the Department of City Planning at Matthew.Glesne@lacity.org.

Sincerely,



VINCENT P. BERTONI, AICP
Director of Planning

VPB:AV:JM:mg:ch:jo:og

Attachment: [Department of City Planning Report August 11, 2022](#)

cc: Osama Younan, General Manager, Department of Building and Safety
Ann Sewill, General Manager, Housing Department
Kristen M. Crowley, Fire Chief, Fire Department
Martin L. Adams, General Manager and Chief Engineer, Department of Water and Power