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DISCLAIMER

This report was prepared in partial fulfillment of the requirements for the Master in Urban and Regional Planning degree in the Department of Urban Planning at the University of California, Los Angeles. It was prepared with the direction of the Department and Pacoima Beautiful as a planning client. The views expressed herein are those of the authors and not necessarily those of the Department, the UCLA Luskin School of Public Affairs, UCLA as a whole, or the client.

Cover: "Forgotten Roots" painted by Juan Pablo Reyes. Photo by Talia Coutin. Back cover: "A Womyn's Place is in the Struggle" painted by Kristy Sandoval. Photo by Joshua Jones.



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EXECUTIVE SUMMARY

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PROJECT AREA AND BACKGROUND

Pacoima and Sun Valley are working-class communities in the northeast San Fernando Valley region of Los Angeles facing multiple planning-related challenges. The area grew as postwar neighborhoods typically did: with wide boulevards and swaths of single-family homes. Since the 1980s, high-polluting industries have been detrimental to the human and environmental health of Pacoima and Sun Valley. Its suburban development patterns have led to overcrowding as greater Los Angeles faces rising rents, stagnating wages, and a growing population. In response, Pacoima Beautiful, a grassroots environmental justice organization, has been providing education to residents, organizing community members to shape public policy, and promoting local arts to empower a healthy and sustainable San Fernando Valley.

Due to climate change, Pacoima and Sun Valley face multiple environmental challenges such as extreme heat and sporadic rainfall. Residents who lack access to resilient or secure housing are most impacted by climate change events. In addition to the climate crisis, Pacoima and Sun Valley like most of Los Angeles are battling a housing crisis. Residents have responded to the housing needs with the construction of Accessory-Dwelling Units (ADUs), unpermitted housing units, on single-family flats. Amidst climate change vulnerabilities and the housing crisis, Pacoima is anticipating major light rail transit development. The Los Angeles County Metropolitan Transportation Authority (LA Metro) plans to build a 9.2-mile atgrade light rail transit line through the San Fernando Valley, cutting through Pacoima. While transit expansion promises increased access and mobility, the light rail project may accelerate displacement, gentrification, and cultural erasure in Pacoima. These issues pose various diverse challenges for the residents of Pacoima.

Given environmental vulnerabilities in these communities, the Green Together Collaborative which includes Pacoima Beautiful and partnering organizations received a \$23 million Transformative Climate Communities (TCC) grant in 2018 to implement urban greening and streetscape improvement projects in Pacoima and Sun Valley. While green infrastructure investments could benefit residents, there is hesitation to implement climate-resilience projects due to the potential for green infrastructure to increase property values and cause displacement. To address risks of gentrification and displacement, the California Strategic Growth Council requires TCC awardees to develop and implement a Displacement Avoidance Plan (DAP). Our client, Pacoima Beautiful, is responsible for the management of the DAP. This research project aims to support Pacoima Beautiful in its green infrastructure project, DAP, and overall mission to promote environmental justice, and healthy, safe, and sustainable community development.

PROJECT VISION

In 2019, students from the Department of Urban Planning at the University of California, Los Angeles, developed A Community of Casitas: Fighting Displacement in Pacoima with ADUs and CLTs for Pacoima Beautiful as their client. That report explored how Pacoima Beautiful can design and implement ADUs and Community Land Trusts to mitigate gentrification and displacement in Pacoima. This project aims to augment the 2019 report to reflect the diverse set of challenges that Pacoima and Sun Valley face and develop a more holistic approach to combat displacement.

The goal of this research is to help Pacoima Beautiful identify effective community organizing strategies for small businesses in response to transit-induced displacement, design interventions to make residential land more resilient to climate change, and mechanisms to formalize unpermitted housing stock in Pacoima and Sun Valley.

PROJECT OBJECTIVES

This research project has three primary objectives:

- 1. To identify climate-resilient infrastructure interventions at the residential level that will improve quality of life for lowincome communities of color while minimizing community displacement in Pacoima and Sun Valley
- 2.To understand other communities' responses to rail-related commercial displacement pressures and to examine concerns, experiences, and priorities of small businesses in Pacoima
- 3.To examine how existing, unpermitted ADUs in Pacoima can be made more livable and safe and to develop mechanisms that formalize the unpermitted ADU stock in Pacoima

PROJECT SCOPE

In the following chapters, we provide an extensive analysis of commercial anti-displacement strategies and concerns of small businesses, relevant climate-resilient infrastructure interventions, and city-level mechanisms to formalize ADUs in Pacoima and Sun Valley.

In chapter one, we investigate the potential for green infrastructure at the household level that targets heat and flooding-related concerns in the Pacoima-Sun Valley TCC study area. In doing this research, we also assess the relationship between urban greening and displacement through a literature review. This review exposes a gap in the literature on this topic: that climate-resilient design interventions often focus on the public realm, namely parks and streets, rather than private housing, which dominates the landscapes of Pacoima and Sun Valley. We then conduct a spatial analysis on the Pacoima section of the TCC project area to quantify the potential for household interventions. To ensure that our research and recommendations are centered on the community‰s interests and needs, our methodologies also include site surveys and a

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focus group composed of Pacoima community members. Findings from the first chapter culminate into a toolkit that offers six initial climate-resilient infrastructure interventions at the household level accessible and appropriate for low-income households in Pacoima and Sun Valley.

In chapter two, we examine community responses to rail-related commercial displacement pressures and specific concerns of Pacoima small businesses in view of the upcoming light rail transit line. For this chapter, we perform a literature review, draw on lessons learned through case studies of three transitoriented communities in Los Angeles, and develop and implement a small business survey along Pacoima's commercial corridor. From our literature review, we learn that extant scholarship on commercial anti-displacement is limited, but that several anti-displacement tools may be viable. Findings from our case studies illustrate that businesses benefit from a formal association, technical assistance, and community-owned land. Our survey finds that Pacoima small businesses are not formally organized, have limited information on the light rail project, and would like technical assistance and financial support. Based on our findings, we identify recommendations that fall into four categories: (1) areas for further research; (2) strategies for building community power; (3) strategies for preserving Pacoima's vibrant commercial community; and (4) opportunities for Metro to better support small businesses.

In chapter three, we examine how existing unpermitted ADUs in Pacoima can be made more livable and safer. Based on our findings, we develop recommendations to formalize the unpermitted ADU stock in Pacoima. We then conduct semistructured interviews with California City and County Planning Offices and analyze case studies of cities and counties that have adopted amnesty and/or legalization programs for unpermitted ADU's. Our research finds that while there is much support and advocacy for ADUs, the California Building Code serves as the ultimate governing entity in which there is little flexibility for unpermitted structures. Planning, Building, and Code Enforcement Divisions have the power to heavily reduce and waive development standards, plan checks, permitting fees, and penalties. Our research illustrates that inter-departmental collaboration and Embedded Planning efforts within city and county governments are essential to successful efforts aimed at preserving ADUs.

Whether induced by incoming transit infrastructure investments, climate change, or informal housing, residents and business owners in Pacoima and Sun Valley are vulnerable to displacement on various fronts. Our research illustrates how residents of these communities can be resilient to the continuously developing conditions of their community. As scholars, advocates, and policy professionals, we are responsible for collaborating to address climate challenges, housing crisis, and displacement risks faced by Pacoima and Sun Valley residents to accommodate their needs and support the community as it continues to thrive.

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BRINGING CLIMATE-RESILIENT INFRASTRUCTURE HOME

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Khristian Decastro, Sarah Diekroeger, Eleanor Hunts, Sasha Ragland and Tayler Ward

CONTEXT

Pacoima is a neighborhood in the San Fernando Valley of Los Angeles that faces imminent risks from climate change. Recognizing that Pacoima will experience intensified impacts from a warming climate, we researched climate-resilient infrastructure interventions that will improve quality of life for residents while minimizing community displacement. Specifically, we investigated the potential for infrastructure that targets heat- and flooding-related concerns in the Pacoima TCC study area at the household level. In doing this research, we also assessed the relationship between urban greening and displacement. While most of the climate response in Pacoima has been at the public realm level, such as in streets and parks, there are nearly no mentions of interventions for single-family parcels, which comprise a vast majority of zonable land in the district. Our research aims to redirect the dialogue of residential sustainable development to lowincome communities who carry unique sustainability needs, exacerbated by environmental racism.

"Decolonize" painted by Kristy Sandoval. Photo by Joshua Jones.



GOALS & OBJECTIVES

Our objective is to determine how Pacoima residents can best use their existing properties to mitigate heat and flooding impacts while also gaining personal economic benefits. We accomplished this by identifying climate-resilient interventions that lead to fewer opportunities for gentrification and displacement. These interventions are at the household level so property owners and residents can control the pace of their investments and their outcomes.

This investigation is founded upon our research questions, which guided and informed our methodologies. Through literature and case study research, we outlined the following questions to understand how to address climate resilience while being conscious of the various realities that make Pacoima unique. This includes an understanding of the needs of the community, the priorities of the community, and the diverse levels of interest in climate-resilient strategies. As such, the following questions shaped our investigations and allowed us to make our project relevant and impactful for Pacoima residents:

- What climate-resilient infrastructure investments are affordable, incremental, scalable over time, and are accessible for Pacoima?
- What programs exist to support Pacoima residents to make equitable climate-resilient infrastructure investments at the household level?

METHODOLOGY

We began with a literature review and case study analysis of residential heat- and flooding-related infrastructure enhancements in Los Angeles and beyond, which gave us insight into how communities have been impacted by climate change, as well as how communities have responded and how those responses can be applied in Pacoima. In order to situate the research in the context of Pacoima and understand how our project could be most beneficial to local residents, we then conducted a spatial analysis of Pacoima and quantified the potential for household interventions. To ensure that our research and recommendations centered the community's interests we then conducted multiple windshield surveys that allowed us to be physically present in the community and assess the current household-level interventions that are already in place. These activities led to a focus group that allowed us to interact directly with community members, learn what they are already doing to address climate change, and understand what resources and information would be most beneficial to them. Our efforts culminated in a toolkit which can help the community learn more about climate-resilient infrastructure interventions at the household level. Through our cost-benefit analysis and literature research, we identified six interventions as being accessible and appropriate for Pacoima residents: cool pavement, cool roofs, rain barrels, downspout planters, permeable pavement, and home weatherization.

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FINDINGS

From our focus group we learned that energy consumption is high in Pacoima, since fan and air conditioning use are crucial during the hot months. We learned that maintaining thermal comfort was a priority of the community, despite the corresponding energy cost increase. Despite their different capacities for adoption, renters and homeowners alike are highly receptive to new climate-resilient strategies.

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Heat Weatherization **Recommendations** from Climate-Resilient Infrastructure Toolkit

Description

Home weatherization is the practice of modifying a building to promote energy efficiency. Modifications such as insulating walls and roofs and sealing air leaks around windows and doors can protect a building from the elements, especially the sun. This can save residents money on their cooling bills and promote thermal comfort. Some practices are permanent and others are removable, making weatherization a solution for both renters and homeowners.



Weatherization practices can be installed room-by-room within a house or apartment. Weatherstripping around doors and windows ranges in a typical house can cost under \$50. However, larger weatherization projects can cost up to \$5,000.

Apply for funding from the US Department of Energy's Weatherization Assistance Program. This program assists low-income residents with weatherization upgrades

- Apply for the Low-Income Home Energy Assistance Program (LIHEAP) federal benefit program. This provides eligible households with home energy cost assistance

- Apply for financing through the LADWP and SoCalGas partnership with California's Residential Energy Efficiency Loan program. This provides 100% financing for home upgrade projects

With the interests and limitations of Pacoima residents in mind, we developed our toolkit to be accessible and actionable within the community. Providing these resources to residents of Pacoima empowers them to learn more about how to implement interventions to benefit not only themselves, but also the community at large. While these interventions are at the household level, single-family zoning comprises the vast majority of land in Pacoima. As such, small interventions at each home contribute to a greater cumulative impact on the surrounding infrastructure network, whether through water, energy, or heat. The toolkit can help bridge the gap between public- and residential-realm infrastructure.



Model of Climate-Resilient Home from Climate-Resilient Infrastructure Tookit

We hope that our research initiates a dialogue on how residents of Pacoima can make their residential environments resilient not only to climate change, but also to gentrification and displacement. When residents have agency over the infrastructure they adopt, as well as the scale and timeframe over which they choose to adopt them, they also have greater agency over the pace of their investments as they relate to gentrification and displacement. With the opportunity for Pacoima residents to reap the benefits of their own investments, our research and toolkit aids Pacoima Beautiful's mission to achieve environmental justice and promote a healthy and sustainable San Fernando Valley.

Climate Resilient Infrastructure For Your Home Save Water · Save Energy · Save Money



A GUIDE FOR Pacoima, Los Angeles



Climate-Resilient Infrastructure Toolkit Cover

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TRANSIT-ORIENTED DEVELOPMENT WITHOUT DISPLACEMENT: STRATEGIES TO HELP PACOIMA BUSINESSES THRIVE

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Samikchhya Bhusal, Bertha Calderón Chiñas, Talia Coutin, Laura Daza Garcia, Lauren Hiller, & Charlotte Will

CONTEXT

Bounded by mountains and freeways, the culturally rich, working-class Los Angeles neighborhood of Pacoima faces a legacy of environmental degradation and historical injustice. Through the state's Transformative Climate Communities Program (TCC), the Green Together Collaborative secured a \$23 million grant in 2018 to implement urban greening and streetscape improvement projects in Pacoima and neighboring Sun Valley. Meanwhile, LA Metro is also building an at-grade light rail transit line through the East San Fernando Valley and down Van Nuys Boulevard, Pacoima's major commercial corridor.

Considering the risks of displacement, gentrification, and cultural erasure that are associated with transit expansion, this research focuses on commercial antidisplacement strategies that can support the predominantly immigrant-owned small business community on the corridor. The goal of this research is to support Pacoima Beautiful in developing a

"La Bamba" painted by Hector Ponce. Photo by Talia Coutin.



Displacement Avoidance Plan to mitigate the potential negative impacts of the TCC investments and the East San Fernando Light Rail Transit Project. This research answers two questions: (1) What are the concerns, experiences, and priorities of Pacoima small businesses facing transitrelated displacement pressures? (2) How can community groups respond to displacement pressures from rail transit expansion to ensure thriving community businesses?



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METHODOLOGY

The research team conducted a review of existing literature on commercial anti-displacement strategies, case studies of transit-oriented communities, and a small business survey. For case studies, the team reviewed news reports and interviewed community advocates from three communities Boyle Heights, Crenshaw, and Little Tokyo all of which had light rail investments, robust community responses, and household income and non-white population profiles similar to Pacoima. In addition, the research team interviewed representatives from LA Metro and a citywide organization that has a portfolio of commercial community land trust properties that serve small businesses. Case study interviews focused on four themes: business organizing strategies, business needs and support services, adequacy of metro's support programs, and displacement avoidance strategies.

For the survey, the research team employed a multipronged outreach strategy including flyers, phone calls, texts, partnership with community organizations, and social media outreach to gather survey responses from 20 small businesses along Van Nuys Boulevard in Pacoima. Questions surveyed respondents on the length and type of tenure of their business, concerns about the light rail, services needed to mitigate potential impacts, and overall opinion on the light rail project.



The research team posted flyers inviting Pacoima businesses to participate in the survey.

FINDINGS

- The extant scholarship on commercial anti-displacement is limited and does not evaluate the impacts of anti-displacement strategies.
- Key representatives from the business community help unite businesses. Identifying a few key business representatives to advocate for the community has proven useful for building community power in our case study communities.
- Case studies showed that business owners require technical assistance and funding support. Common forms of technical assistance included social media and Yelp.com training, grant application support, website development, and digital payment services. This need was echoed by Pacoima survey respondents, who expressed interest in similar support services.
- Advocates stressed that funding from LA Metro's Business Interruption Fund was insufficient to offset the impacts of construction and that the fund‰s eligibility requirements were too narrow.
- In one case study, community ownership of land helped stabilize businesses. An organization interviewed as part of this study reported no cases of displacement of existing businesses across their communitycontrolled commercial properties.
- Pacoima has a diverse small business community. Survey respondents represented both English- and Spanish-speaking businesses, new and legacy businesses, and businesses providing a wide range of services and products.
- The Pacoima small business community is not formally organized. The majority of respondents were not part of a formal business association.
- Respondents are largely unaware of details regarding the light rail line, and they largely hold negative opinions about the project and its potential impact on their businesses.

RECOMMENDATIONS

• Further research

 Conduct comprehensive studies in transit neighborhoods that evaluate the impact of anti-displacement interventions on the vitality of local community businesses.

• Community power

- Facilitate the creation of an association of small businesses to develop people power and unite the Pacoima small business community.
- Provide holistic support services to the small business community, with a focus on legal, marketing, and digital services.

Preserving Pacoima's vibrant commercial community

- Establish a cultural commercial district to recognize and uplift the importance of ethnic small businesses as assets to cultural wealth and community capital in Pacoima.
- Model commercial anti-displacement strategies after existing residential anti-displacement strategies that have demonstrated success, including rent control, right to counsel, and commercial community land trusts (CCLTs).

Metro's opportunity

- Metro has an opportunity to fulfill its TOC vision by engaging & supporting the Pacoima small business community now, before construction begins.
- Ensure equitable resource distribution for communities that will be impacted through extensive outreach and funding from LA Metro. LA Metro can expand eligibility requirements for the Business Interruption Fund to include all businesses along the affected corridor to allow more businesses to benefit from the program. Additionally, Metro can increase funding for commercial displacement avoidance strategies in proportion to the impact that its light rail projects will have on local businesses.

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FORMALIZING UNPERMITTED ADUS IN PACOIMA

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Jorge Gamboa, Alejandro González, Cindy Reyes

CONTEXT

Pacoima is a primarily low-income single family neighborhood situated in the Northeast San Fernando Valley in the City of Los Angeles. As Los Angeles continues to battle a housing crisis with increasing housing costs and a shortage of housing options, communities like Pacoima have responded to housing needs with the construction of unpermitted housing units on single-family flats. These unpermitted housing units are also known as secondary units, accessory dwelling units (ADUs), or granny flats. ADU State legislation has since made it possible for these unpermitted structures to become permitted through recent laws from 2017, with further amendments made as recently as early 2021. The recent State legislations do not explicitly provide a pathway for unpermitted ADUs to become permitted, as unpermitted units are still subject to current planning standards to gain formalization in Los Angeles. Attempts to permit existing unpermitted ADUs ultimately results in the demolition of the housing unit and displacement of the

"Save a life, wear a mask!" painted by Erica Friend and Carol Friend. Photo by Talia Coutin. tenants as they do not meet the restrictive codes required by the Los Angeles Department of Building and Safety. Thus, we look to answer how can existing unpermitted ADUs in Pacoima be made more livable and safe?

GOALS & OBJECTIVES

The purpose of this research is to develop mechanisms that formalize the unpermitted ADU stock in Pacoima. Throughout our research, we were cognizant of the terminology we applied to our findings and recommendations. To recommend a formalization program for unpermitted ADUs in Pacoima, underlines an effort to destigmatize these living structures. It is evident that these units are essential to the community to preserve much needed housing and protect tenants from displacement. Pacoima residents can not afford to demolish such structures or make the necessary costly modifications to bring them into compliance. The ongoing construction of these units exemplifies a need that the City is not adequately addressing. Thus, how can we preserve as many of these units without risking the need to demolish or displace? Our goal is to produce recommendations for a formalization program for the City of Los Angeles to adopt so as to reduce barriers in permitting, in order to ensure that these housing units can be preserved and are livable and safe for tenants.

METHODOLOGY

This research relies on both primary sources via interviews, and secondary sources with a policy and literature review. Case studies of cities and counties throughout the region that have adopted amnesty and/or legalization programs for unpermitted ADUs were used to assess ongoing efforts to preserve ADUs. Specifically, in the state of California, the following programs were analyzed: City of Los Angeles' Unpermitted Dwelling Unit (UDU) Program, City of San Jose's ADU Amnesty Program, County of San Mateo's Second Unit Amnesty Program, County of Santa Cruz's Safe Structures Program, City of Sausalito's Amnesty Program for Unpermitted Accessory Dwelling Units, City and County of San Francisco's Legalization of Unauthorized Unit Program, and the City of West Hollywood's Legalization of

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Illegal Units. Finally, we conducted primary research via semi-structured interviews with Pacoima Community, California city and county planning offices and various practitioners that engage in ADU development efforts. This includes private, public and nonprofit organizations such as City of Los Angeles Planning and Building Department, Mayor's Office of the City of LA, LA Council District 7 Office of Councilmember Monica Rodriguez, California Housing and Community Development (HCD), GridLA, Embedded Planning leader Jonathan Pacheco, and non-profit Environmental Justice organization and project partner, Pacoima Beautiful.

FINDINGS

POLICY REVIEW

From our policy analysis of existing ADU Amnesty programs in California we have identified the most, moderate, and least favorable programs based on the following:

- Low Cost and Easy Process -- programs removed barriers upfront and did not have financial constraints for applicants;
- Health and Safety -- programs that shifted their emphasis to health and safety and NOT zoning as to support the preservation of housing;
- Tenant Protections -- measures in place to support residents of these unpermitted structures through affordability or tenant protection component, their housing preservation approach allowed tenants to remain in their units while still ensuring their safety
- Collaboration -- programs that were composed of inter-governmental departments including Planning, Code Enforcement, and Building and Safety.

Our findings from this policy analysis are summarized in our State ADU Amnesty Program Matrix/

STATE ADU AMNESTY PROGRAM MATRIX

		Program Components							
Name	Location	Program Entry Fees	Unit Eligibility	Enforcement Suspension	Status of Existing Penalties and Fees	Relaxed Compliance Standards	Non Committment Window	Financing Available	Affordability Component
Unpermitted Dwelling Unit (UDU) Public Benefits Project	City of Los Angeles	Yes	On Multi-Family lot Built / occupied between 2010-2015 Affordability covenant	N/A	N/A	N⁄\A	N/A	N/A	Yes, with a covenant processing fee of \$5,813
ADU Amnesty Program	City of San Jose	Waiver Possible	Built before January 2020. Proof of occupancy. No existing permit application on record.	Yes	\$1,435-\$2,088 waived depending on unit size	Yes	Yes	Hardship Exemption available	No
Second Unit Amnesty Program	County of San Mateo	Reduced	Built before 2017. Proof of occupancy On residential lot	Yes	Suspended	Yes	Yes	Loan program	No
Safe Structures Program	County of Santa Cruz	Yes	Built before 2014. Cannot be legalized through standard process	Yes	Yes	N/A	No	No	No
Amnesty Program for Unpermitted Accessory Dwelling Units	City of Sausalito	No / Reduced	Two forms of evidence that the unit was created prior to January 1, 2012	Only during amnesty period.	Suspended during amnesty period.	Yes	Yes	Yes	Optional
Legalization of Unauthorized Unit Program	City and County of San Francisco	No	Built and occupied prior to January 2000.	No	N/A	Yes	No	No	Yes

Most favorable
Moderately favorable
Least favorable

INTERVIEWS

Pacoima community members highlighted various concerns during our interviews, including the lack of knowledge of City permitting processes, challenges with tenant protections, and the limited understanding of existing support systems in the community. When asked about their respective knowledge of ADUs, interviewees were extremely familiar with these structures, but did not know that recent legislations have been passed to allow them to be built over the counter. This resulted in their own confusion of existing ADU programs offered from the City and how to access them, along with confusion between what is the law and what is a program that leverages that law. For example, one interviewee believed that one of the ADU programs offered by the City was a requirement to build an ADU and not just a program being offered. Education is a necessary component that a community based organization can play to serve as an intermediary between the community and formal bureaucratic offices like the Housing and Community Investment Department (HCID) or the Department of Building and Safety to understand planning processes and the process to build an ADU. Further, community members expressed a need for a broader education campaign around ADUs and tenant rights to better understand what is or isn't allowed.

In our interviews with California Planning Offices and Practitioners, we found the following four areas to be consistent across our research that can define and inform a successful program in Pacoima: Health and Safety, Tenant Protections, Collaboration, and Liability. First, health and safety provides the ability for unpermitted housing units to be preserved while still ensuring that housing is meeting a minimum habitability threshold and protecting tenants from displacement. Second, tenant protections have not been explicitly outlined in most programs and community residents do not understand their rights but should be prioritized. Third, collaboration between Planning, Code Enforcement, and Building and Safety has provided for innovation within these programs. Lastly, liability concerns are taking away focus from creating a more accessible process for communities that can reduce penalties. While ADUs have been used as strategies for increasing housing production goals, including to reach Regional Housing Needs Assessment (RHNA) goals, unpermitted units also provide an opportunity to meet these goals.

RECOMMENDATIONS

PLANNING DEPARTMENT

- Waive All Development Standards
 - These standards are not necessary to determine if a unit is habitable.
- Allow Applicants to Withdraw Without Penalty
 - Applicants should be allowed to participate in preliminary consultations and inspections while not having to fully submit plans or complete the process.
- Embedded Planning
 - Planners need to emerge themselves with the community and work collaboratively to solve the major issues that they face.
- Facilitate Inter-Departmental Teams
 - Planners need to facilitate collaboration between Building and Code Enforcement to ensure that the goal is to preserve these units.

BUILDING DEPARTMENT

- Waive Title 24 and Adopt Minimum Baseline Standards
 - Title 24 standards are very costly and in-practical for unpermitted structures that have been built years ago; minimum baseline standards that ensure units are safe and habitable are more efficient and practical
- Leverage Health and Safety Code 179.8012
 - Granting individuals a 5-year period will allow residents to pursue formalization programs without the pressure of having to comply immediately.
- Guide Applicants!
 - Rather than telling applicants what they need to submit, staff should collaborate with residents, inform of the codes and direct them to licensed architects/designers

CODE ENFORCEMENT DEPARTMENT

- Eliminate Connection to Criminal Charges and Court System
 - Notice of Violations are misdemeanors; residents shouldn't have to fear CE Officials but rather view them as sources of help and guidance.

• Planners Within Code Enforcement

 Planners need to embed themselves within Code Enforcement roles and duties as they have a more comprehensive understanding of the issues that are happening and the reasons why they are happening

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