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- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
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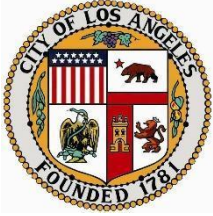
\*\*If you are using Explorer, you need will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

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If you have any questions, please contact the Commission Office at (213) 978-1300.

# **SECONDARY SUBMISSIONS**





## Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

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September 24, 2024

TO: City Planning Commission

FROM: Theadora Trindle, City Planner

### **TECHNICAL MODIFICATIONS TO THE PROPOSED ORDINANCE (EXHIBIT A.1) FOR CASE NO. CPC-2023-7068; (Item No. 7)**

#### TECHNICAL MODIFICATIONS TO EXHIBIT A.1

The following technical corrections and additions are to be incorporated into Exhibit A.1 (Proposed Citywide Housing Incentive Program Ordinance) of the staff recommendation report to be considered at the City Planning Commission meeting on September 26, 2024 related to Item No. 7 on the meeting agenda.

**INSTRUCTIONS:** Revise Section 2 on page 3 in Exhibit A.1 to add a definition for “Non-Contributor” to LAMC Section 12.03 as follows:

**Non-Contributor.** Any building, structure, natural feature, lot, or landscaping that is identified in an Historic Resources Survey or nomination form for a designated federal, state, or local historic district as a Non-Contributing Element, or not listed in the Historic Resources Survey or nomination form.

**INSTRUCTIONS:** Revise Section 2 on page 4 in Exhibit A.1 to update the definition for Major Transit Stop in LAMC 12.03, in alignment with recent amendments to California Public Resources Code Section 21064.3, as follows:

**Major Transit Stop.** In addition to California Public Resources Code Section 21064.3, a site containing a rail or bus rapid transit station or the intersection of two or more bus routes with a service interval of 20 ~~15~~ minutes or less during the morning and afternoon peak commute periods in either direction. The stations or bus routes may be existing, under construction or included in the most recent Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP). A bus route may include a combination of overlapping buses and may be considered as one service route for service interval frequency, when part of a “colinear”, “family”, or augmented line as determined in coordination with SCAG and transit agencies).

**INSTRUCTIONS:** Revise Sections 12.22 A.37(f)(2)(ii)a on page 41, 12.22 A.37(f)(2)(xiii)a on page 45, 12.22 A.38(e)(2)(ii)b on page 64, A.38(f)(2)(ii)a on page 67, 12.22 A.38(g)(1)(ii)a on page 68, 12.22 A.38(h)(2)(xi)a on page 79, and 12.22 A.39(f)(2)(xii)a on page 104 in Exhibit A.1 to replace text to integrate the proposed definition as follows:

~~Non-Contributor(s)ing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code~~

**INSTRUCTIONS:** Revise Section 12.22 A.37(g) on page 46 in Exhibit A.1 to correct citations and clarify that Housing Developments proposed in Sea Level Rise Areas, Very High Fire Hazard Severity Zones, and Coastal Zones are not eligible for the “Multi-Bedroom Units” or “Surveyed Historic Resource Facade Rehabilitation” Public Benefit Options as follows:

**Public Benefit Options.** A Housing Development shall be granted any number of Public Benefit Options pursuant to the provisions described below in addition to the Base Incentives established in LAMC Section 12.22 A.37(e) and the Additional Incentives described in LAMC Section 12.22 A.37(f). Housing Developments located in Sea Level Rise Areas, Very High Fire Hazard Severity Zones, or the Coastal Zone shall not be eligible for the Public Benefit Option described in LAMC Section 12.22 A.37(g)(2)(3) or LAMC Section 12.22 A.37(g)(3)(4).

**INSTRUCTIONS:** Revise Section 12.22 A.39 (c)(2)(i) footnotes (2), (3) and (4) on page 90 in Exhibit A.1 for technical clarity as follows:

Footnotes:

2 ~~Provided a portion of Residential Units (excluding Residential Units added by a Density Bonus) as follows either 16 percent Very Low Income, 25 percent Low Income, or 45 percent Moderate Income for sale as defined in at least one affordability income category is consistent with the minimum affordability requirements pursuant to California Government Code Section 65915.~~

3 ~~A Faith Based Organization Project must shall reserve a portion of Residential Units (excluding Residential Units added by a Density Bonus) as follows either 16 percent Very Low Income, 25 percent Low Income, or 45 percent Moderate Income for sale as defined in California Government Code Section 65915 up to 20 percent of Total Units (including units provided as a result of a Density Bonus), excluding a manager's unit or units, for households earning up to 120 percent of the area median income, as defined in Section 50053 of the California Health and Safety Code Section, or as amended. Remaining Restricted Affordable Units may use rents or housing costs shall be reserved for households earning up to 80 percent of the area median income, except that up to 20 percent of remaining Restricted Affordable Units may be affordable to Moderate Income households, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD), rents or housing costs so the occupying residents do shall not exceed 30 percent of the maximum gross income of the occupying residents as those income ranges are defined by the United States Department of Housing and Urban Development (HUD). 20 percent of Total Units may be unrestricted.~~

4 ~~A Shared Equity Project must shall reserve a portion of Residential Units (excluding Residential Units added by a Density Bonus) as follows either 16 percent Very Low~~

Income, 25 percent Low Income, or 45 percent Moderate Income for sale as defined in California Government Code Section 65915~~20 percent of Total Units (including units provided as a result of a Density Bonus), excluding a manager's unit or units, for households earning up to 120 percent of the area median income as defined in California Health and Safety Code Section 50053, or as amended. Remaining Restricted Affordable Units may use rents or housing costs shall be reserved for households earning up to 120 percent of the area median income, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD), rents or housing costs so the occupying residents do shall~~ not exceed 30 percent of the maximum gross income of the occupying residents, ~~as those income ranges are defined by the United States Department of Housing and Urban Development (HUD).~~ 20 percent of Total Units may be unrestricted.

**INSTRUCTIONS:** Revise Section 12.22 A.39(c)(5) on page 90 in Exhibit A.1 for grammatical clarity as follows:

- (5) The Faith-Based Organization Project, Shared Equity Project, or a One Hundred Percent Affordable Project with Maximum Allowable Residential Density of less than 5 units, ~~site~~ shall not include any lots located in a manufacturing zone that does not allow multi-family residential uses (M1, M2, M3), including sites zoned CM, MR1, and MR2 with no residential uses permitted from an applicable planning overlay.

**INSTRUCTIONS:** Revise Section 12.22 A.39(d)(2)(iii) on page 92 in Exhibit A.1 to clarify projects can access Expanded Administrative Review if requesting up to one waiver as follows:

- (iii) Projects that request up to one ~~waivers~~ or reductions of any Development Standards not listed on the Menu of Incentives described in LAMC Section 12.22 A.39(f)(2). Waivers or reductions of any Development Standard shall be reviewed pursuant to the Findings described in LAMC Section 12.22 A.39(d)(5).

**INSTRUCTIONS:** Revise Section 12.22 A.39(g) on page 105 in Exhibit A.1 to reference correct paragraph for Additional Incentives as follows:

- (g) **Public Benefits Options.** A Project that qualifies for the Base Incentives contained in this Subdivision shall be eligible for one or more of the following Public Benefit Options. Projects may utilize more than one Public Benefit Option if eligible, and bonuses granted in exchange for Public Benefits may be stacked. These Public Benefit Options may be combined with the Additional Incentives granted pursuant to Paragraph (f) ~~(h)~~. If a Project includes 5 of the following Public Benefit Options, they shall receive an additional 11 feet in height. Projects located in Very High Fire Hazard Severity Zones, Coastal Zones or Sea Level Rise Areas shall only be eligible for Public Benefit Options listed in 12.22 A.39(g)(1) or 12.22 A.39(g)(4).

If a Housing Development Project is proposed on a Prior Housing Element Site that is identified in the most recent Housing Element as accommodating a portion of the housing need for low and very low income households and at least twenty percent of the project's units will be made affordable and available to Lower Income Households, the project shall be subject to Ministerial Approval pursuant to California Government Code section 65583.2(i). If an eligible project would have otherwise required a discretionary entitlement from the Department of City Planning it shall be processed through an Expanded Administrative Review process, as set forth by the provisions of Sec. 13B.3.2. of Chapter 1A of this Code.



## Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

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September 24, 2024

TO: City Planning Commission

FROM: Julia HeideIman, City Planner  
Theadora Trindle, City Planner  
Jeanalee Obergfell, City Planner

### **TECHNICAL MODIFICATIONS TO STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2024-388-CA, CPC-2023-7068-CA, and CPC-2024-387-CA**

#### CORRECTIONS AND ADDITIONS TO STAFF RECOMMENDATION REPORT

The following corrections and additions are to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of September 26, 2024 related to Item No. 6, 7 and 8 on the meeting agenda.

**INSTRUCTIONS:** Revise the section on “Amendments to Findings Associated with the Density Bonus for a Housing Development in which the Density Increase is Greater than the Maximum Permitted (LAMC Section 12.24 U.26)” on page A-9 to clarify that staff recommend a revision to allow a discretionary approval pursuant to 12.24 U.26 for projects seeking a greater than 50% or 88.75% Density Bonus.

The CHIP Ordinance proposes an amendment to LAMC Section 12.24 U.26 which contains required findings for Class 3 Conditional Use Permit Density Bonus projects requesting a density increase that exceeds what is permitted under the existing Density Bonus Ordinance (described in Section 12.22 A.25 which are to be replaced by the CHIP Ordinance). The proposed amendments to this section would update the threshold which triggers discretionary review for projects requesting a density bonus beyond 50% or 88.75% or 100% in alignment with state law (Government Code Section 65915 (v) added by AB 1287). The maximum density bonus permitted by state law may be 88.75% or 100%, and is determined by the income category of the restricted affordable units a project provides. Prior to AB 1287, State Density Bonus Law projects providing the requisite number of affordable units were able to receive up to a 50% density bonus under certain circumstances (AB 2345). AB 1287, which became effective in 2024, builds upon the 50% bonus and allows a project to receive an additional density bonus beyond 50% in exchange for a greater set aside of restricted affordable units. Projects providing additional restricted affordable units for Very Low Income households may receive an additional bonus of 38.75%, resulting in a total bonus of 88.75%, and projects providing restricted affordable units for Moderate Income households may receive an additional bonus of 50%, resulting in a total bonus of 100%. Staff recommend maintaining a discretionary approval process for

projects seeking a density bonus of 50% or more so that applicants can opt to propose a project providing affordability in a single category rather than necessarily opting to use the mixed affordability option now available under State Density Bonus Law. Additionally, the proposed amendment replaces a reference to “base density” with “Maximum Allowable Residential Density” per Government Code Section 65915 (o)(6). Other updates to this section include adding references to affordable housing requirements added under the Resident Protections Ordinance pursuant to LAMC Section 16.60 and Section 16.61. More information about the Resident Protections Ordinance can be found beginning on page A-39.

**INSTRUCTIONS:** Revise “Table 2. Summary of CHIP Ordinance Eligibility Requirements” on page A-14 to clarify limitations on project and incentive eligibility within the AHIP as follows:

**Table 2. Summary of CHIP Ordinance Eligibility Requirements**

*\*NOTE: All programs shall be required to provide the requisite number of restricted affordable units per the provisions of the applicable code section.*

Program	Geographic Eligibility	Unit Thresholds	Limitations
<b>State Density Bonus Program</b>	- Citywide	- Be located on a site that allows at least 5 residential units, including mixed-use developments	- Lots in Very High Fire Hazard Severity Zones, Coastal Zones, and Sea Level Rise Areas not eligible for Menu of Incentives or certain Public Benefit Options  - No demolition of Designated Historic Resources and limited Menu of Incentives for sites with Designated Historic Resources
<b>Mixed Income Incentive Program</b>			
<b>Transit Oriented Incentive Areas</b>	- Be located within a ½ mile of a major transit stop	- Project must contain at least 5 units	- No demolition of Designated Historic Resources and limited Menu of Incentives for sites with Designated Historic Resources
<b>Opportunity Corridors</b>	- Be located on a designated corridor with frequent bus service, high quality transit service, or within ½ mile of a Metro Rail Station in a Higher Opportunity Area		- Very High Fire Hazard Severity Zones (except for limited exceptions), Areas Vulnerable to Sea Level Rise, and Coastal Zones excluded  - No projects in single-family zones (RW or more restrictive zones), and no projects in manufacturing zones (M1, M2, or M3), including sites zoned CM, MR1, MR2 if no residential uses are permitted through an applicable planning overlay
<b>Opportunity Corridor Transitional Area</b>	- Be located within 750 ft from the rear property line of an Opportunity Corridor Incentive Area	- Project must contain at least 4 units and are limited by FAR schedule	

Program	Geographic Eligibility	Unit Thresholds	Limitations
<b>Affordable Housing Incentive Program</b>			
<b>100% Affordable Housing Project</b>	<ul style="list-style-type: none"> <li>- Be a project where all units are covenanted affordable, exclusive of manager's units (up to 20% may be for moderate income and the remaining 80% must be restricted to lower income categories)</li> <li>- In any zone/land use permitting multi-family or zoned for Parking (P/PB)</li> </ul>	<ul style="list-style-type: none"> <li>- Project must contain at least 5 units</li> </ul>	<ul style="list-style-type: none"> <li>- Lots in Very High Fire Hazard Severity Zones, Coastal Zones, and Sea Level Rise Areas <u>limited eligibility for Base Incentives</u>, not eligible for Menu of Incentives or certain Public Benefit Options and not eligible for the program if a Project's Maximum Allowable Residential Density is less than 5 units.</li> <li>- No projects in single-family zones and no projects in manufacturing zones (M1, M2, or M3), including sites zoned CM, MR1, MR2 if no residential uses are permitted through an applicable planning overlay if a Project's Maximum Allowable Residential Density is less than 5 units.</li> <li>- <u>No demolition of Designated Historic Resources and limited Menu of Incentives for sites with Designated Historic Resources.</u></li> </ul>
<b>Faith-Based Organization (FBO) Project</b>	<ul style="list-style-type: none"> <li>- Be a project where at least 80% of units are covenanted affordable on land owned by a FBO (<del>Of which, up to 20% of units may be for moderate income with remaining restricted units covenanted for lower income categories</del>)</li> </ul>		<ul style="list-style-type: none"> <li>- No projects in Very High Fire Hazard Severity Zones, the Coastal Zone, Sea Level Rise Areas, manufacturing zones, or hybrid industrial zones with residential use restrictions</li> <li>- Single-family sites acquired after 1/1/24 must be located within 528 ft from parcel owned by filing Religious Institution with existing Church or House of Worship</li> <li>- Additional standards and no demolition permitted for projects with Designated Historic Resources or Surveyed Historic Resources</li> <li>- <u>No projects in manufacturing zones (M1, M2, or M3), including sites zoned CM, MR1, MR2 if no residential uses are permitted through an applicable planning overlay</u></li> </ul>

Program	Geographic Eligibility	Unit Thresholds	Limitations
Public Land Project	<ul style="list-style-type: none"> <li>- Be a project where all units are covenanted affordable, exclusive of manager's units (any mix of moderate and lower income units permitted) on land owned by a public agency or zoned for Public Facilities (PF)</li> </ul>		<ul style="list-style-type: none"> <li><del>— No projects in Very High Fire Hazard Severity Zones, the Coastal Zone, Sea Level Rise Areas.</del></li> <li>- <u>No demolition of Designated Historic Resources and limited Menu of Incentives for sites with Designated Historic Resources</u></li> </ul>
Shared Equity Project	<ul style="list-style-type: none"> <li>- Be a project where 80% of units are covenanted affordable on land owned by a Community Land Trust or Limited-equity Housing Cooperative</li> </ul>		<ul style="list-style-type: none"> <li>- No projects in Very High Fire Hazard Severity Zones, the Coastal Zone, or Sea Level Rise Areas.</li> <li>- No projects in single-family zones and no projects in manufacturing zones (M1, M2, or M3), including sites zoned CM, MR1, MR2 if no residential uses are permitted through an applicable planning overlay</li> <li>- Additional standards and no demolition permitted for projects with Designated Historic Resources or Surveyed Historic Resources</li> </ul>

**INSTRUCTIONS:** Revise paragraph on page A-16 in the Key Provisions section to clarify that projects proposed in Very High Fire Hazard Severity Zones, the Coastal Zone or Sea Level Rise Areas are not eligible for the Menus of Incentives and certain Public Benefit Options:

Environmental criteria for the CHIP Ordinance were carefully crafted to protect public safety, promote sustainability, and enact environmental justice. The MIIP is not available in Very High Fire Hazard Severity Zones, the Coastal Zone or Sea Level Rise Areas. State Density Bonus and AHIP do not allow ~~match state incentives to projects meeting density bonus affordability requirements in these areas and trigger Expanded Administrative Review procedures~~ for projects proposed in Very High Fire Severity Zones, and ~~One Hundred Percent Affordable projects proposed in Sea Level Rise Areas, or Coastal Zones~~ to access each program's respective Menu of Incentives and certain Public Benefit Options.



**INSTRUCTIONS:** Revise “Table 3. Summary of CHIP Ordinance Project Review Procedures” on page A-19 to more clearly state that projects requesting incentives not on the Menu of Incentives are subject to a ministerial, administrative review:

**Table 3: Summary of CHIP Ordinance Project Review Procedures**

Program	Allowed Incentives	Ministerial		Discretionary	
		LADBS	ADM	DIR (appeal to CPC)	CPC (CPC Final Decision Maker)
<b>State Density Bonus Program</b>	Up to 4*	-Base Incentives - Menu of Incentives	-Public Benefit Options  - <u>Incentives</u> Not on Menu of Incentives*	N/A	-Waivers  -Projects Exceeding <del>100%</del> 50% or 88.75% Density Bonus
<b>Mixed Income Incentive Program</b>	Up to 4*	-Base Incentives -On Menu Incentives	-Public Benefit Options  - <u>Incentives</u> Not on Menu of Incentives	-Up to 1 Waiver	-Over 1 Waiver
<b>Affordable Housing Incentive Program</b>	Up to 5*	- Base Incentives - On Menu Incentives	-Public Benefit Options  - <u>Incentives</u> Not on Menu of Incentives  -Up to 1 Waiver	-Up to 3 Waivers	-Over 3 Waivers
* Per GCS 65915, an applicant may request up to 4 incentives (5 for One Hundred Percent Affordable Housing Projects) on or not on Menu of Incentives. An applicant can mix and match incentives on or not on the Menu of Incentives.					

**INSTRUCTIONS:** Revise paragraph in the Menu of Incentives section starting on page A-21 to further clarify that projects seeking incentives not on the menus of incentives will not be subject to discretionary procedures as follows:

The CHIP Ordinance offers Menus of Incentives that developers may elect to utilize to achieve a project's desired building envelope and access streamlined procedures. Though State Density Bonus Law entitles a project to a specific number of incentives contingent on the amount of affordable housing provided, state law does not specify the types of incentives that can be requested. For this reason, City Planning has, since the adoption of the State Density Bonus Ordinance in 2008, offered projects the ability to select incentives from a predetermined menu of relief options informed by commonly requested deviations. The CHIP Ordinance proposes to maintain this tool to standardize the deviations available to proposed projects. Furthermore, the CHIP Ordinance proposes to go further than the incentive programs offered by the City of Los Angeles today by offering projects that use incentives from these menus ministerial review by the Los Angeles Department of Building and Safety. Projects seeking incentives not on the Menus of Incentives will be subject to the proposed new Expanded Administrative Review process. If projects seek ~~additional incentives not on the Menu of Incentives or waivers~~, they will be subject to administrative or discretionary review processes depending on the number of waivers and ~~and type of request and incentive~~ program being utilized. A summary of the incentives available in each of the CHIP Ordinance's three programs is provided in Table 2 below. Please refer to LAMC 12.22 A.37(f)(2) for the State Density Bonus Program Menu of Incentives; to LAMC 12.22 A.38 (h)(2) for the MIIP Menu of Incentives; and LAMC 12.22 A.39(f)(2) for the AHIP Menu of Incentives. The table below displays the program eligibility of each additional incentive in the ordinance.

**INSTRUCTIONS:** Revise “Table 6. Public Benefit Options Eligibility” on page A-23 to remove “Commercial Off-Site” from the list of Public Benefit Options consistent with - Citywide Housing Incentive Program Ordinance:

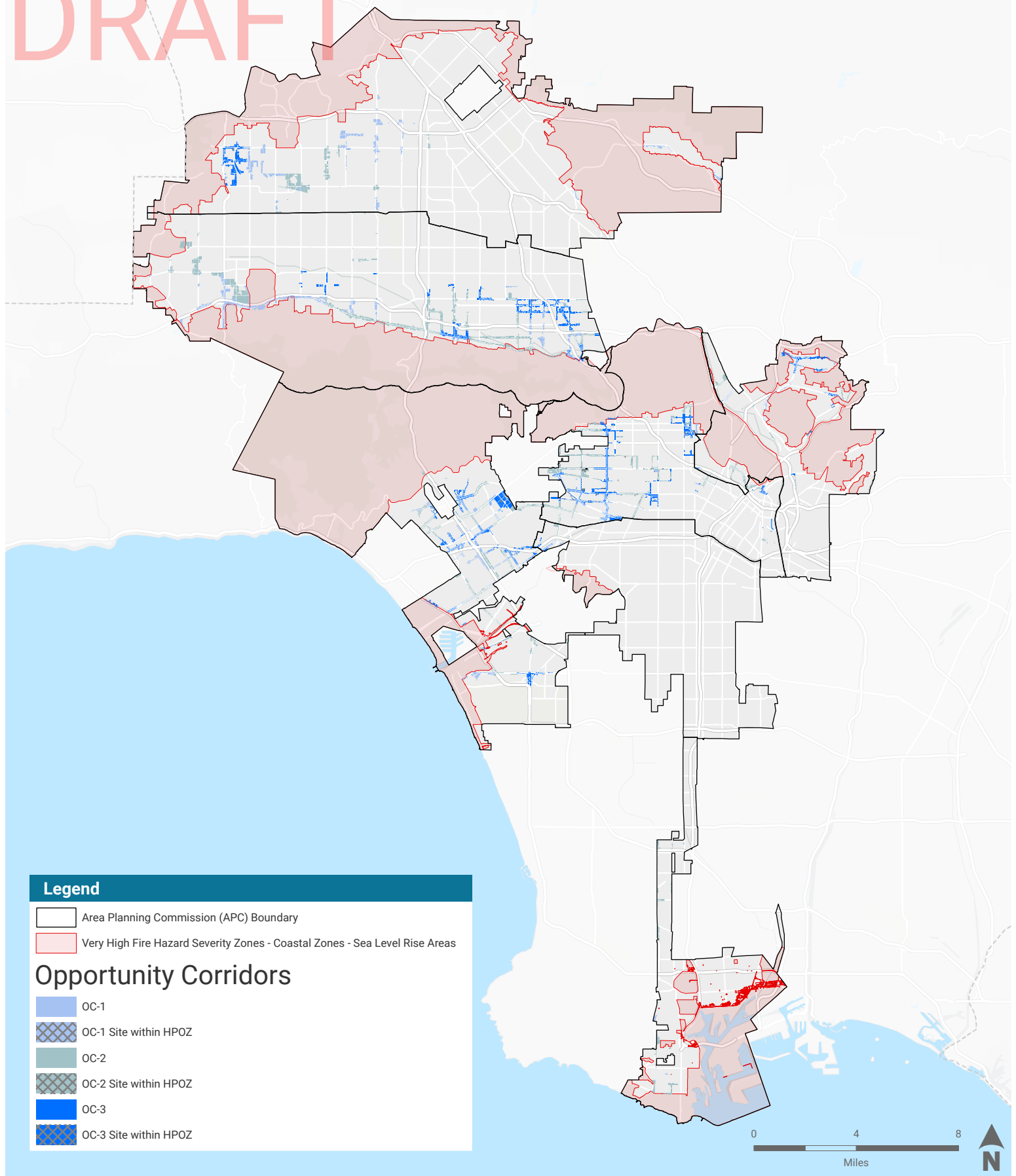
**Table 6: Public Benefit Options Eligibility**

Incentive	DB	MIIP	AHIP
Child Care Facility	✓	✓	✓
Multi-Bedroom Units	✓	✓	✓
Preservation of Trees		✓	✓
Active Ground Floor Exemption from Calculation of Floor Area		✓	✓
Privately Owned Public Space		✓	✓
Land Donation		✓	✓
<del>Commercial Off-Site</del>	<del>✓</del>		
Surveyed Historic Resource Facade Rehabilitation	✓	✓	✓

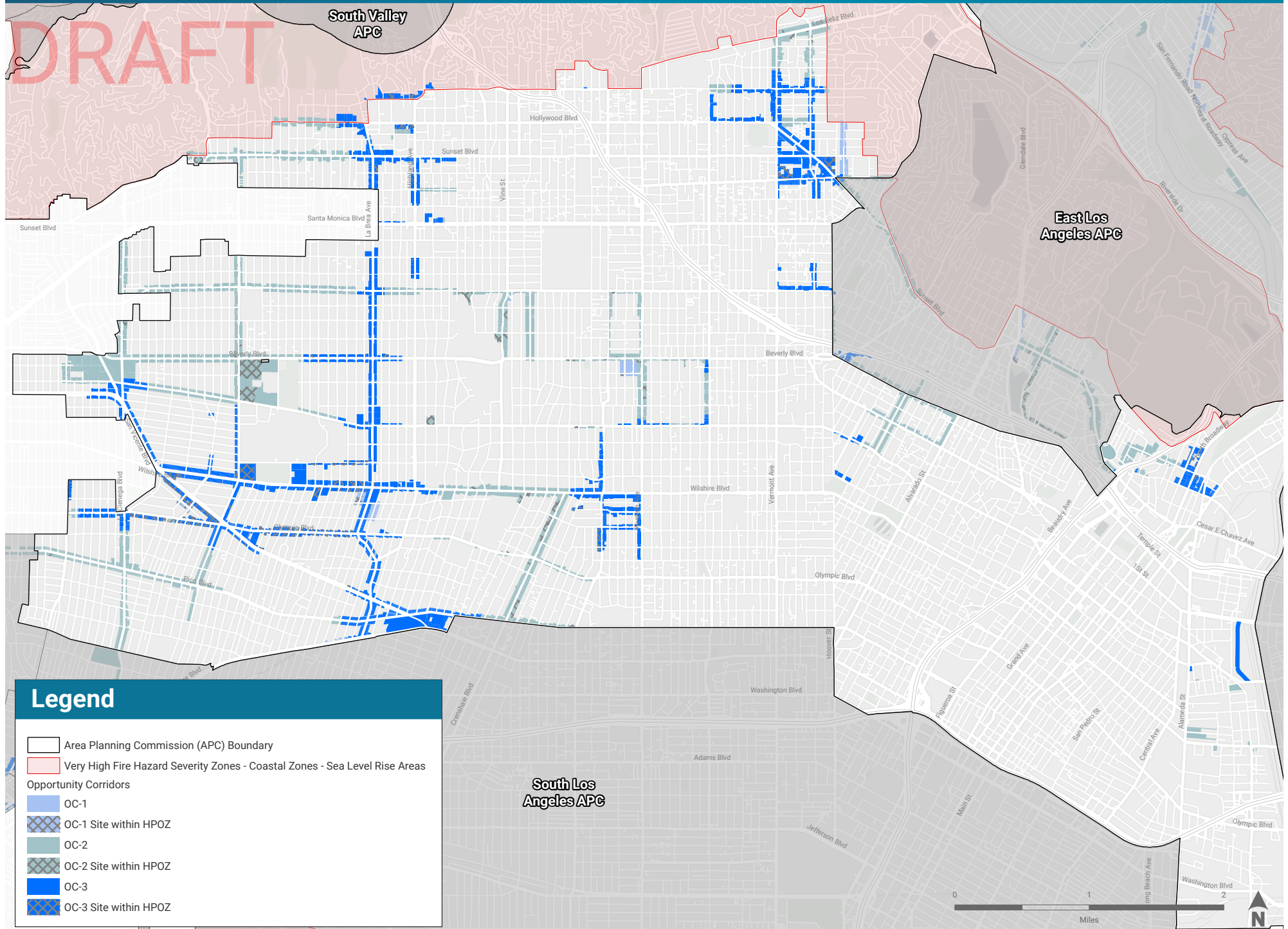
**INSTRUCTIONS:** Insert “Opportunity Corridors Incentive Area” APC Maps, and “Corridor Transition Incentive Area” APC Maps after Mixed Income Program Overview following Page A-27.

# Corridors In Higher Resource Areas Citywide APCs

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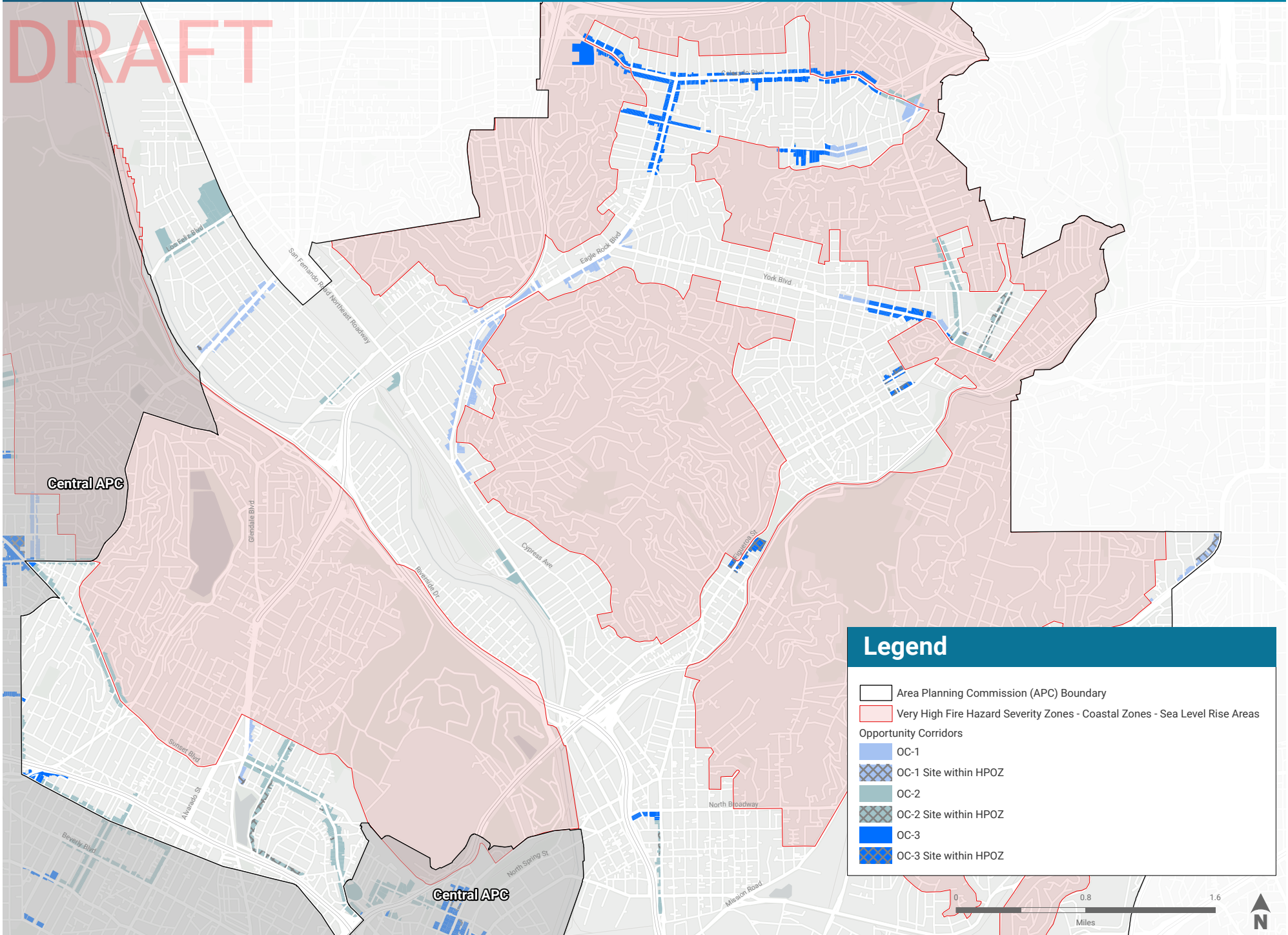


# Corridors In Higher Resource Areas Central APC





# Corridors In Higher Resource Areas East Los Angeles APC



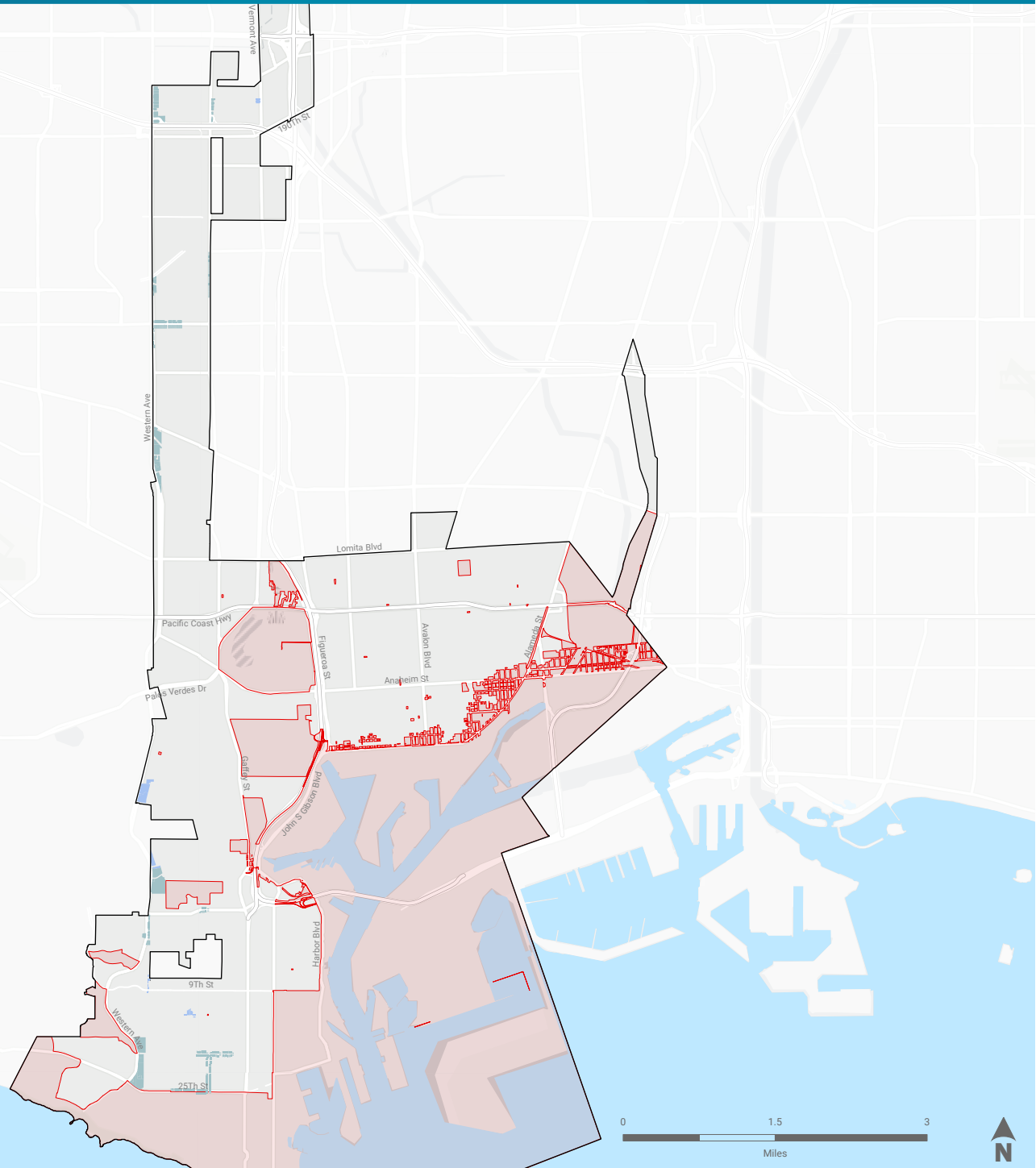
# Corridors In Higher Resource Areas Harbor APC



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### Legend

- Area Planning Commission (APC) Boundary
- Very High Fire Hazard Severity Zones - Coastal Zones - Sea Level Rise Areas
- Opportunity Corridors
  - OC-1
  - OC-1 Site within HPOZ
  - OC-2



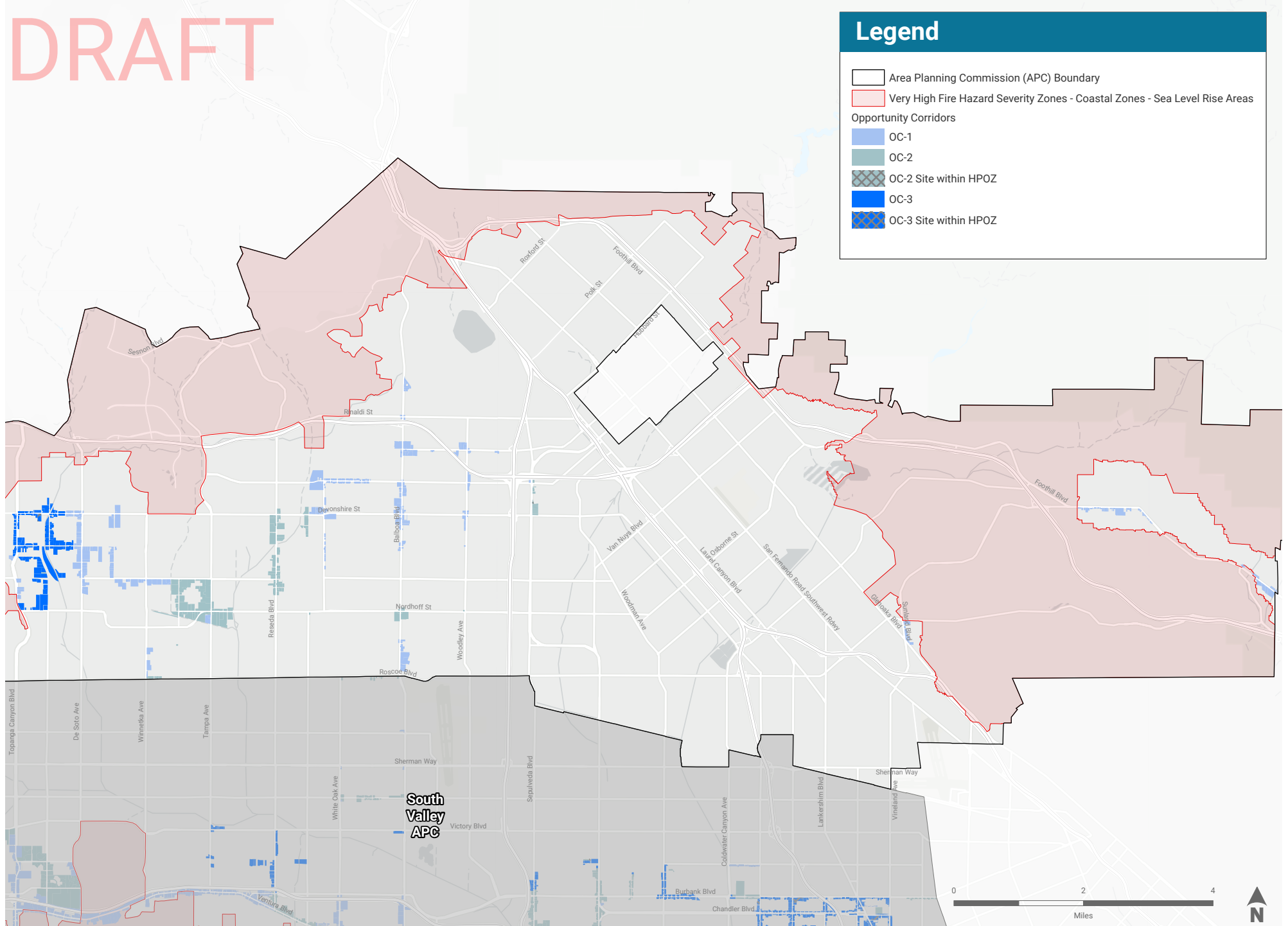
# Corridors In Higher Resource Areas North Valley APC



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## Legend

- Area Planning Commission (APC) Boundary
- Very High Fire Hazard Severity Zones - Coastal Zones - Sea Level Rise Areas
- Opportunity Corridors
  - OC-1
  - OC-2
  - OC-2 Site within HPOZ
  - OC-3
  - OC-3 Site within HPOZ

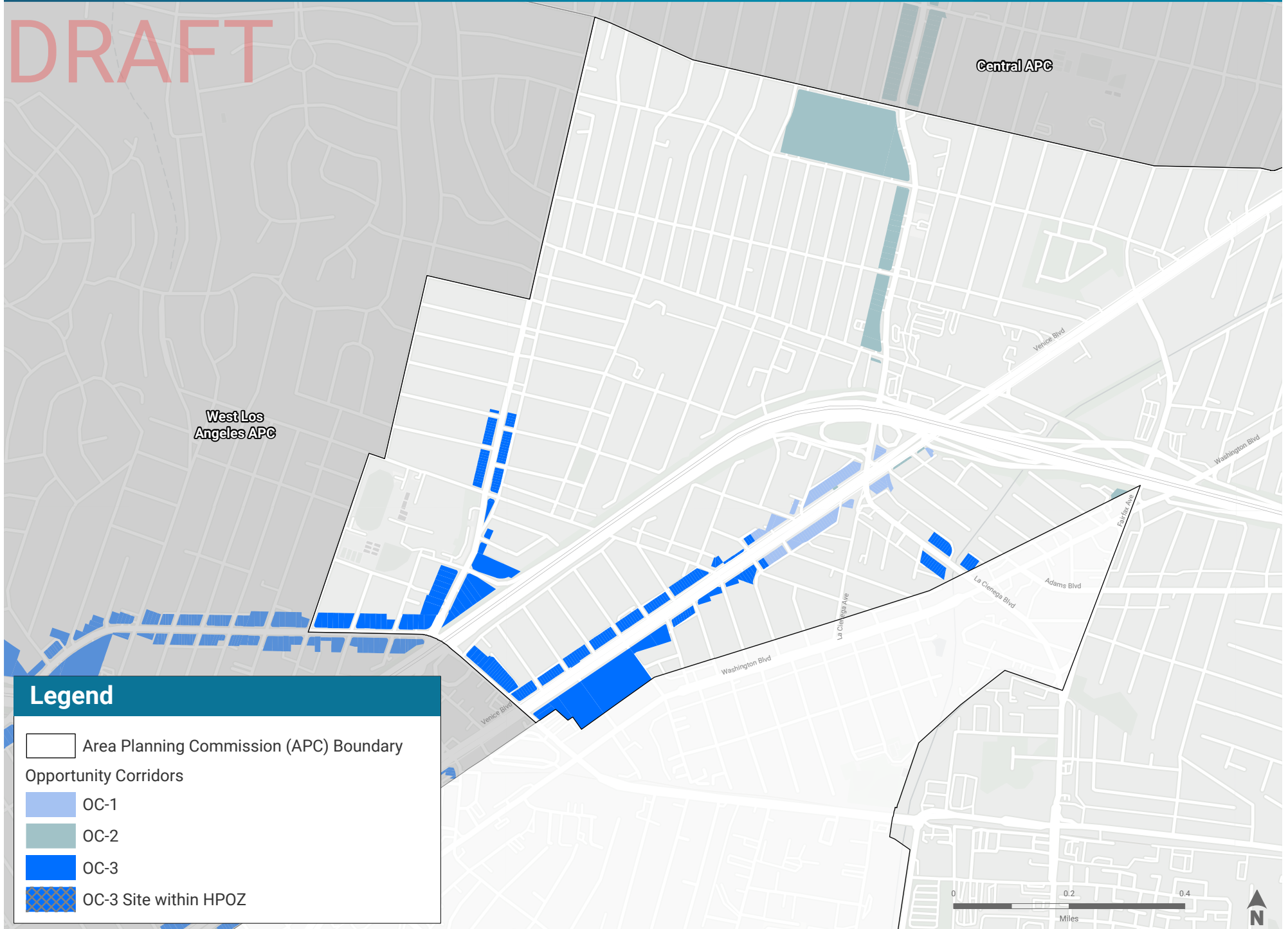




# Corridors In Higher Resource Areas South Los Angeles APC



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# Corridors In Higher Resource Areas South Valley APC



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## Legend

- Area Planning Commission (APC) Boundary
- Very High Fire Hazard Severity Zones - Coastal Zones - Sea Level Rise Areas
- Opportunity Corridors
  - OC-1
  - OC-1 Site within HPOZ
  - OC-2
  - OC-2 Site within HPOZ
  - OC-3
  - OC-3 Site within HPOZ

North Valley

West Los Angeles APC

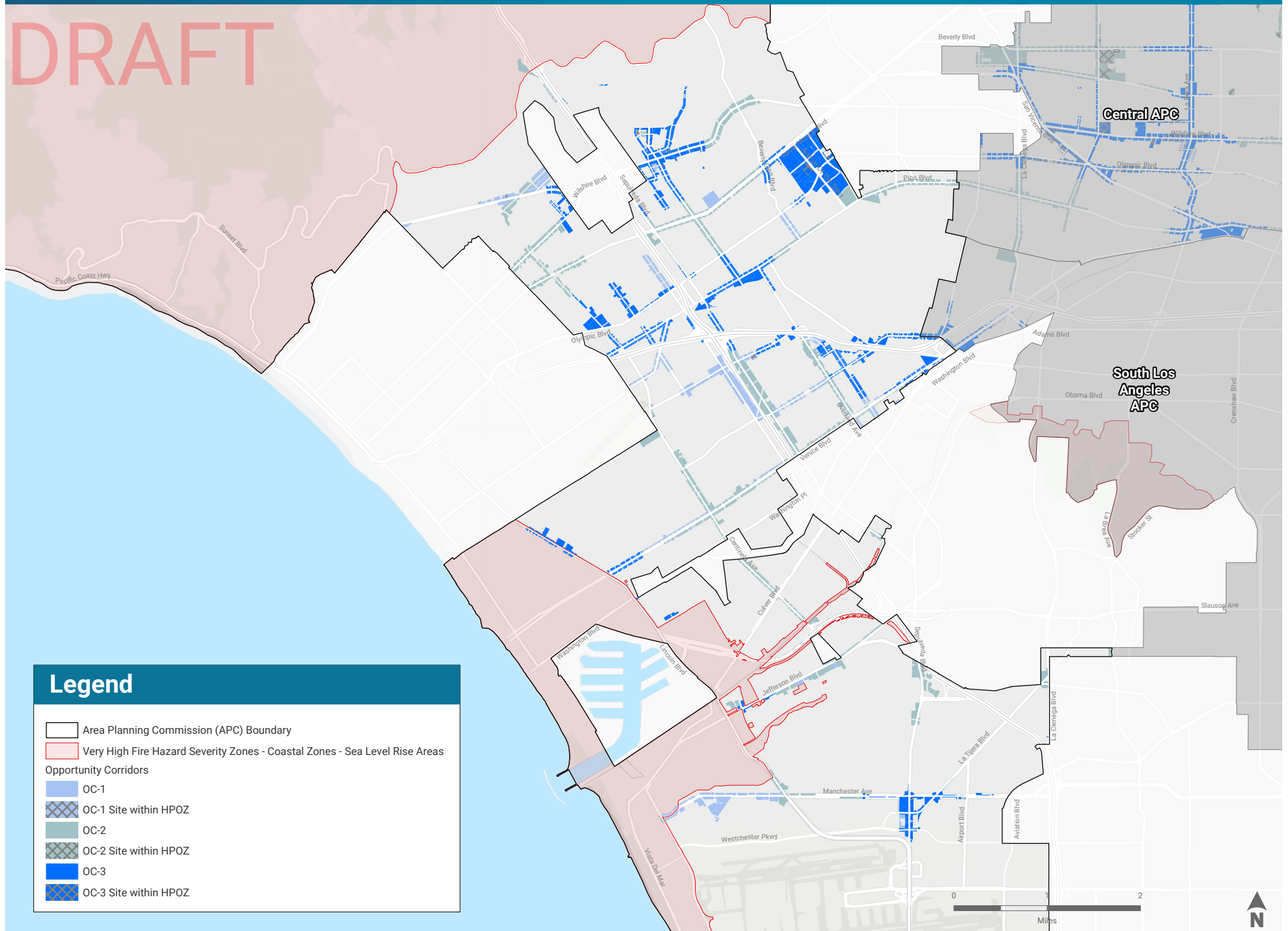
Central APC



# Corridors In Higher Resource Areas West Los Angeles APC



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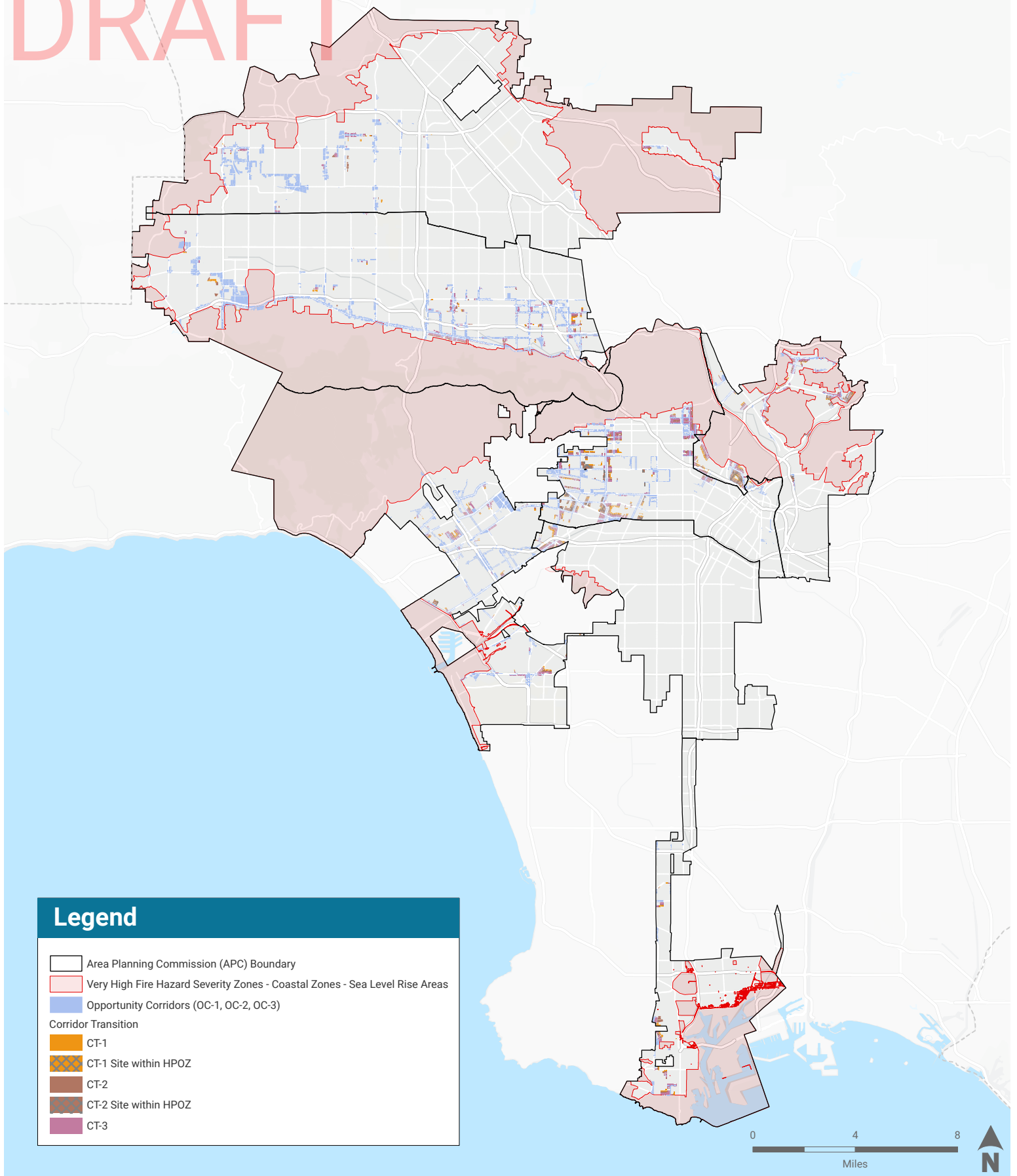
## Legend

- Area Planning Commission (APC) Boundary
- Very High Fire Hazard Severity Zones - Coastal Zones - Sea Level Rise Areas
- Opportunity Corridors
  - OC-1
  - OC-1 Site within HPOZ
  - OC-2
  - OC-2 Site within HPOZ
  - OC-3
  - OC-3 Site within HPOZ

# Corridors and Corridor Transitions In Higher Resource Areas Citywide APCs

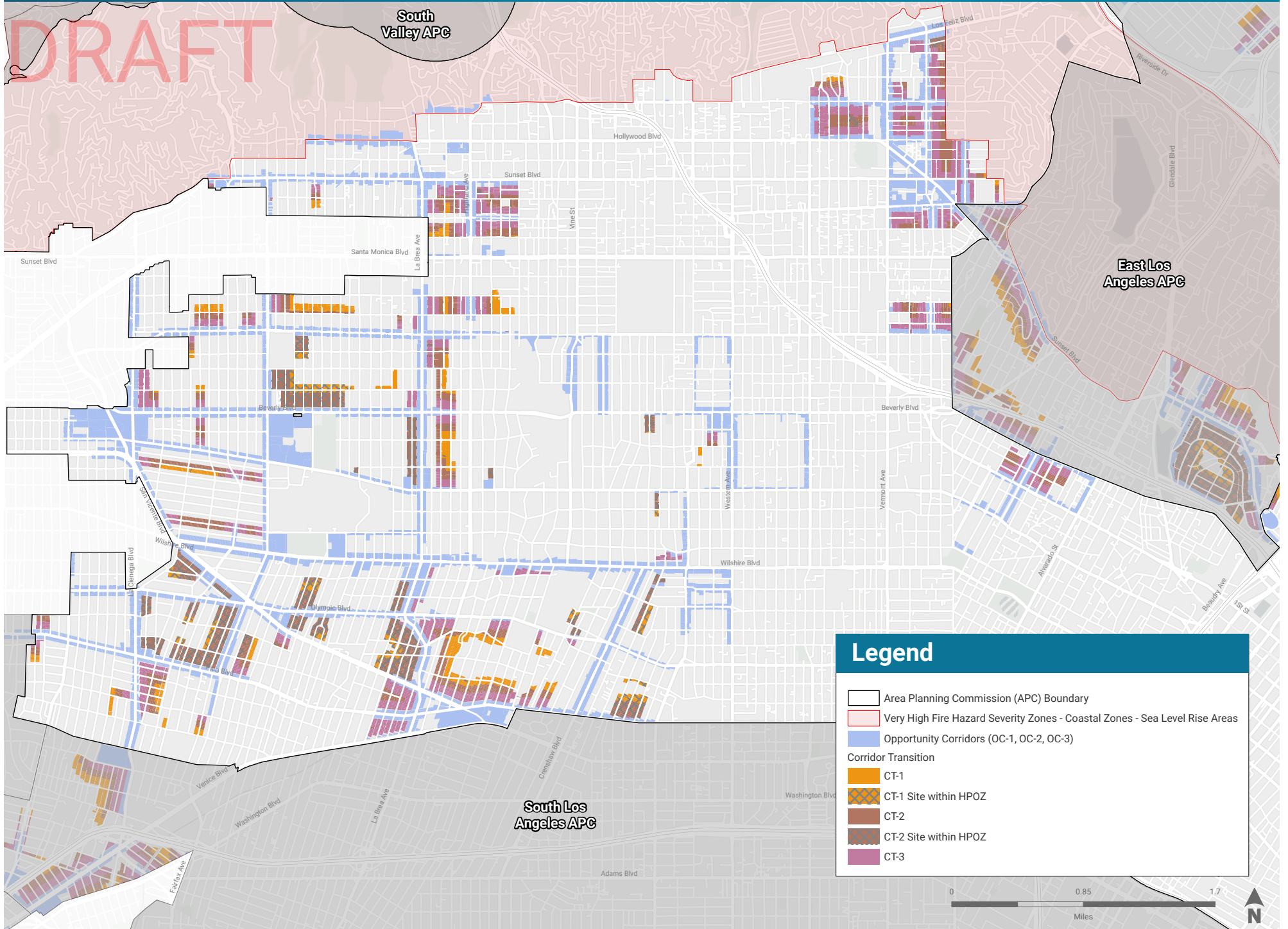


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# Corridors and Corridor Transitions In Higher Resource Areas Central APC

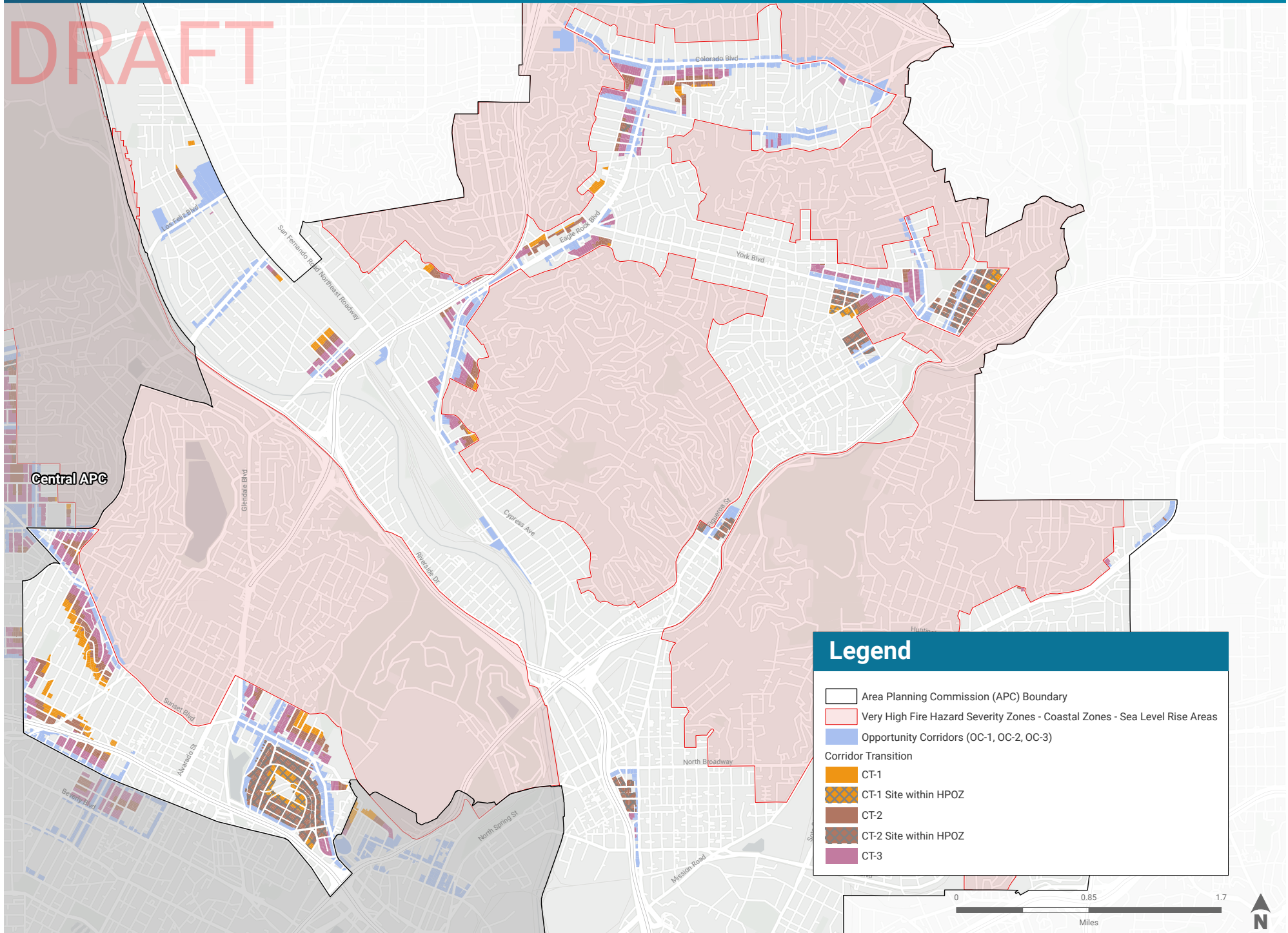




# Corridors and Corridor Transitions In Higher Resource Areas East Los Angeles APC



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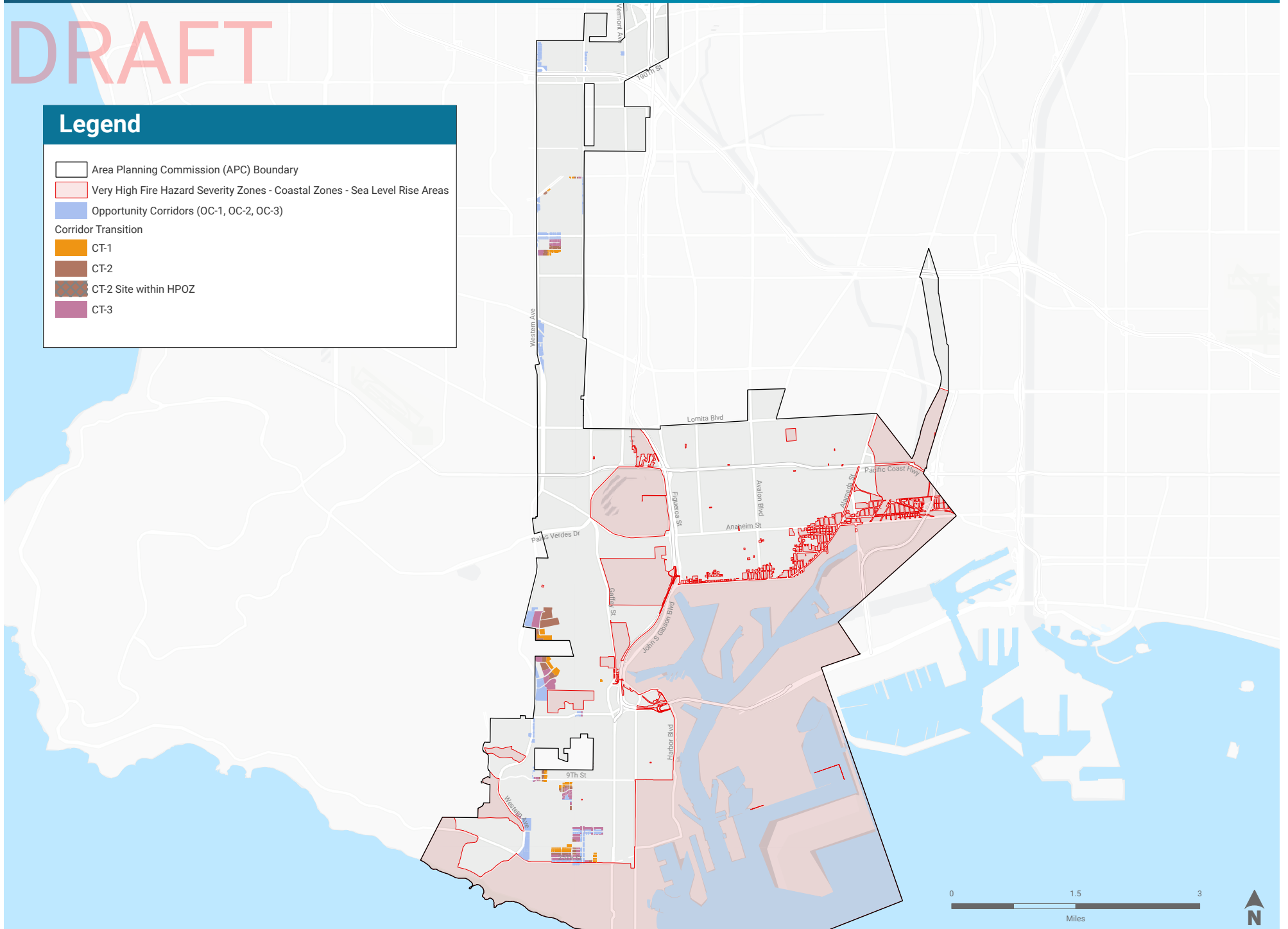
# Corridors and Corridor Transitions In Higher Resource Areas Harbor APC



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## Legend

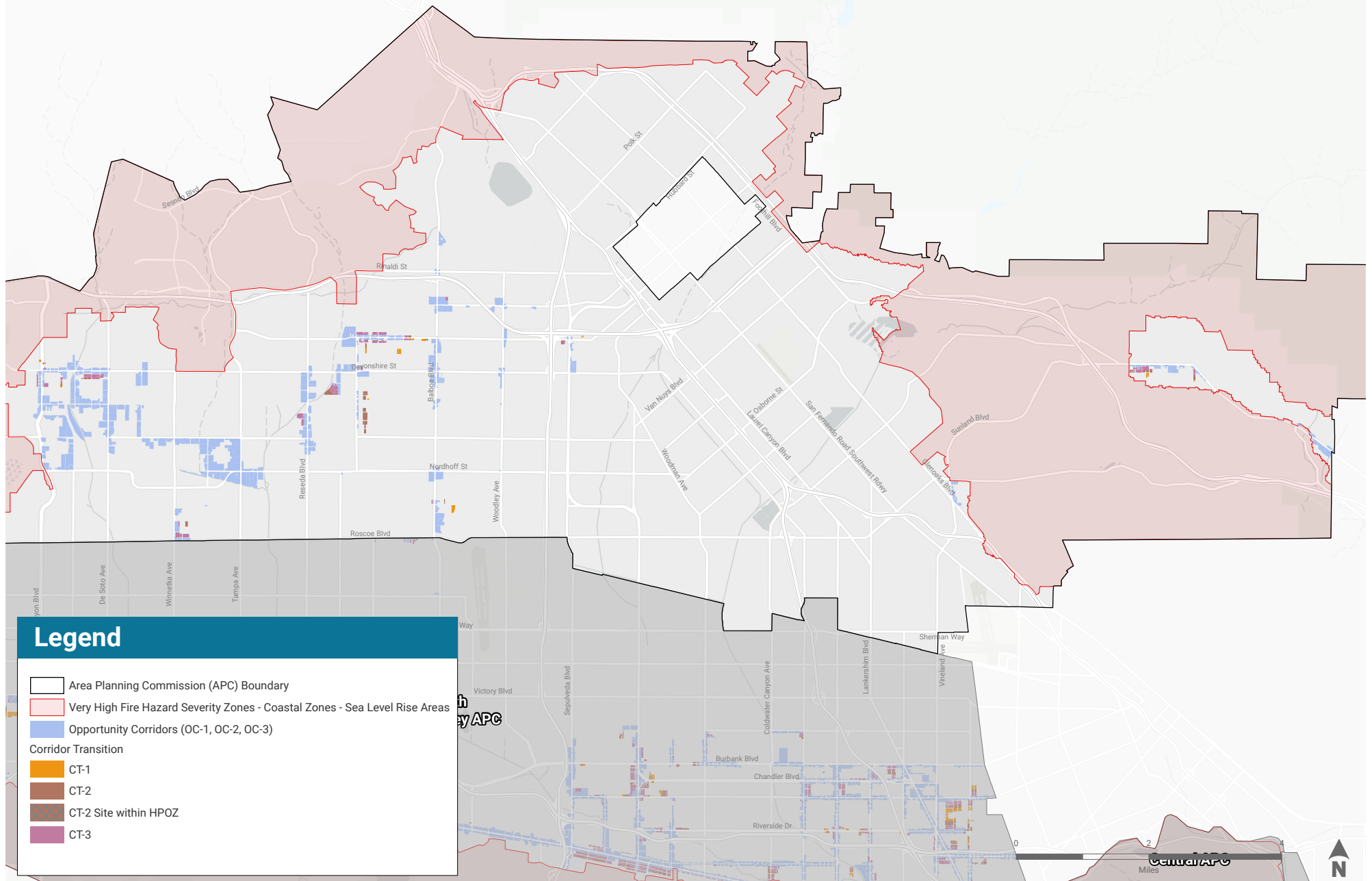
- Area Planning Commission (APC) Boundary
- Very High Fire Hazard Severity Zones - Coastal Zones - Sea Level Rise Areas
- Opportunity Corridors (OC-1, OC-2, OC-3)
- Corridor Transition
  - CT-1
  - CT-2
  - CT-2 Site within HPOZ
  - CT-3



# Corridors and Corridor Transitions In Higher Resource Areas North Valley APC



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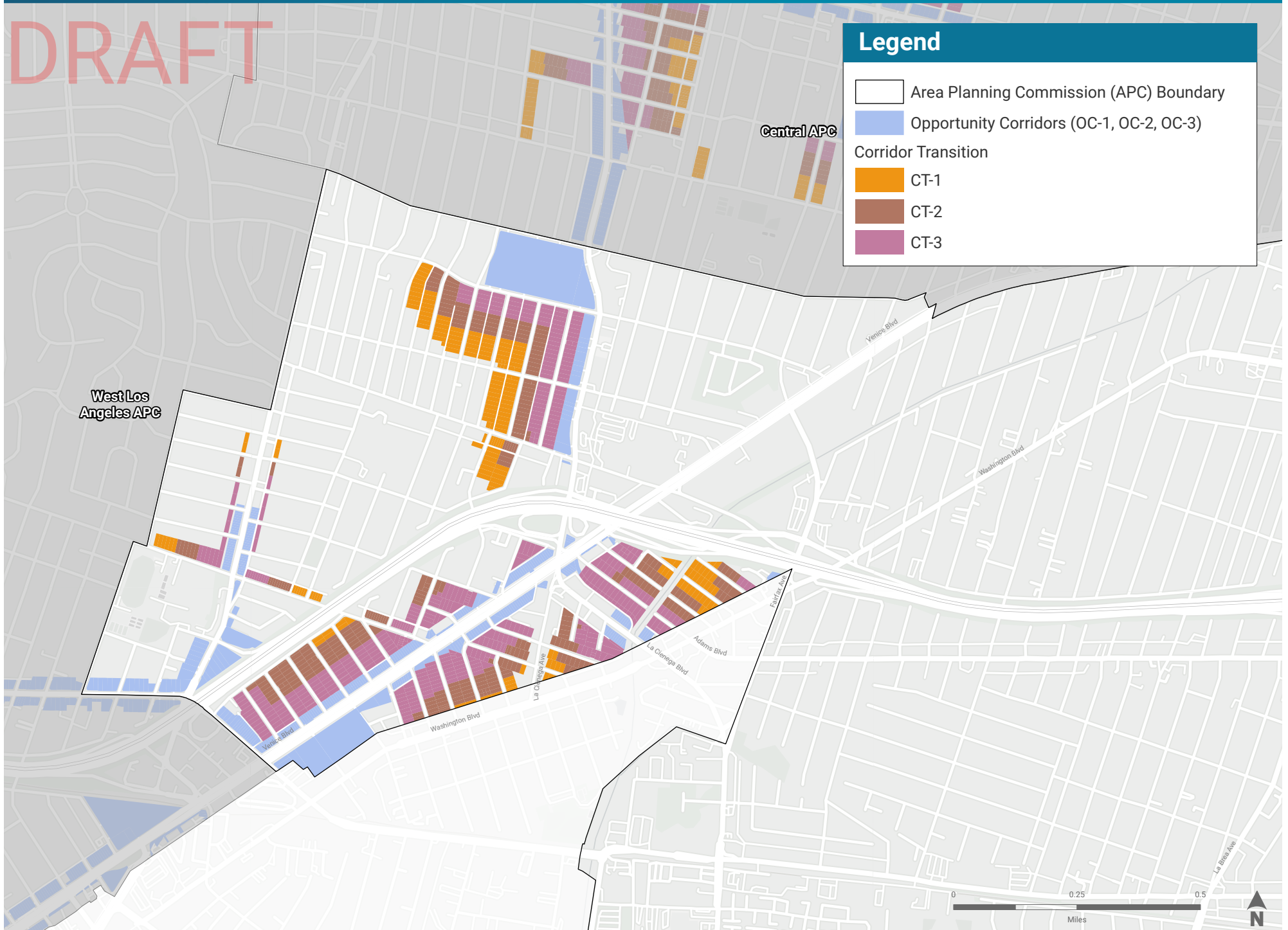
# Corridors and Corridor Transitions In Higher Resource Areas South Los Angeles APC



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## Legend

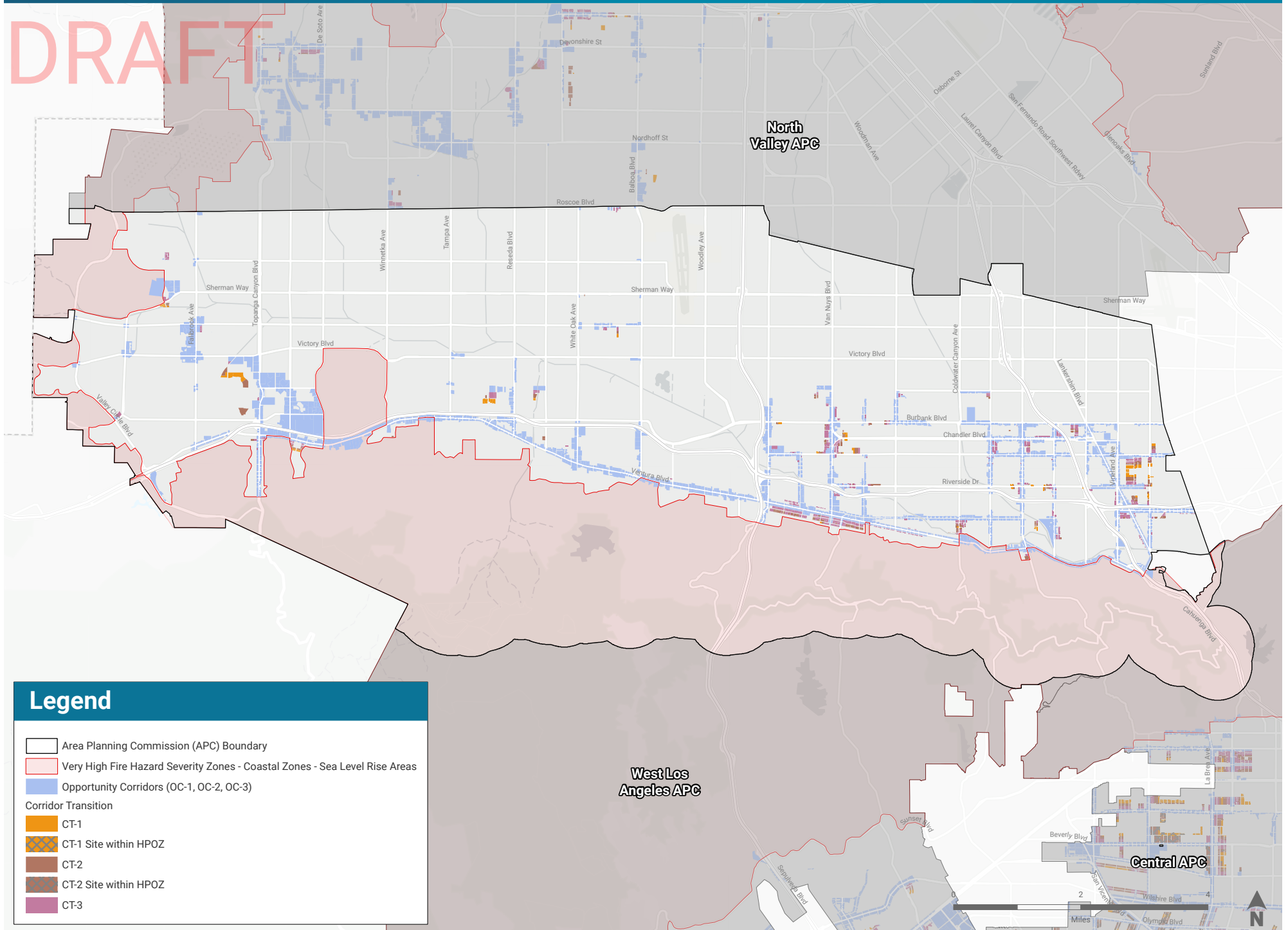
- Area Planning Commission (APC) Boundary
- Opportunity Corridors (OC-1, OC-2, OC-3)
- Corridor Transition
  - CT-1
  - CT-2
  - CT-3



# Corridors and Corridor Transitions In Higher Resource Areas South Valley APC



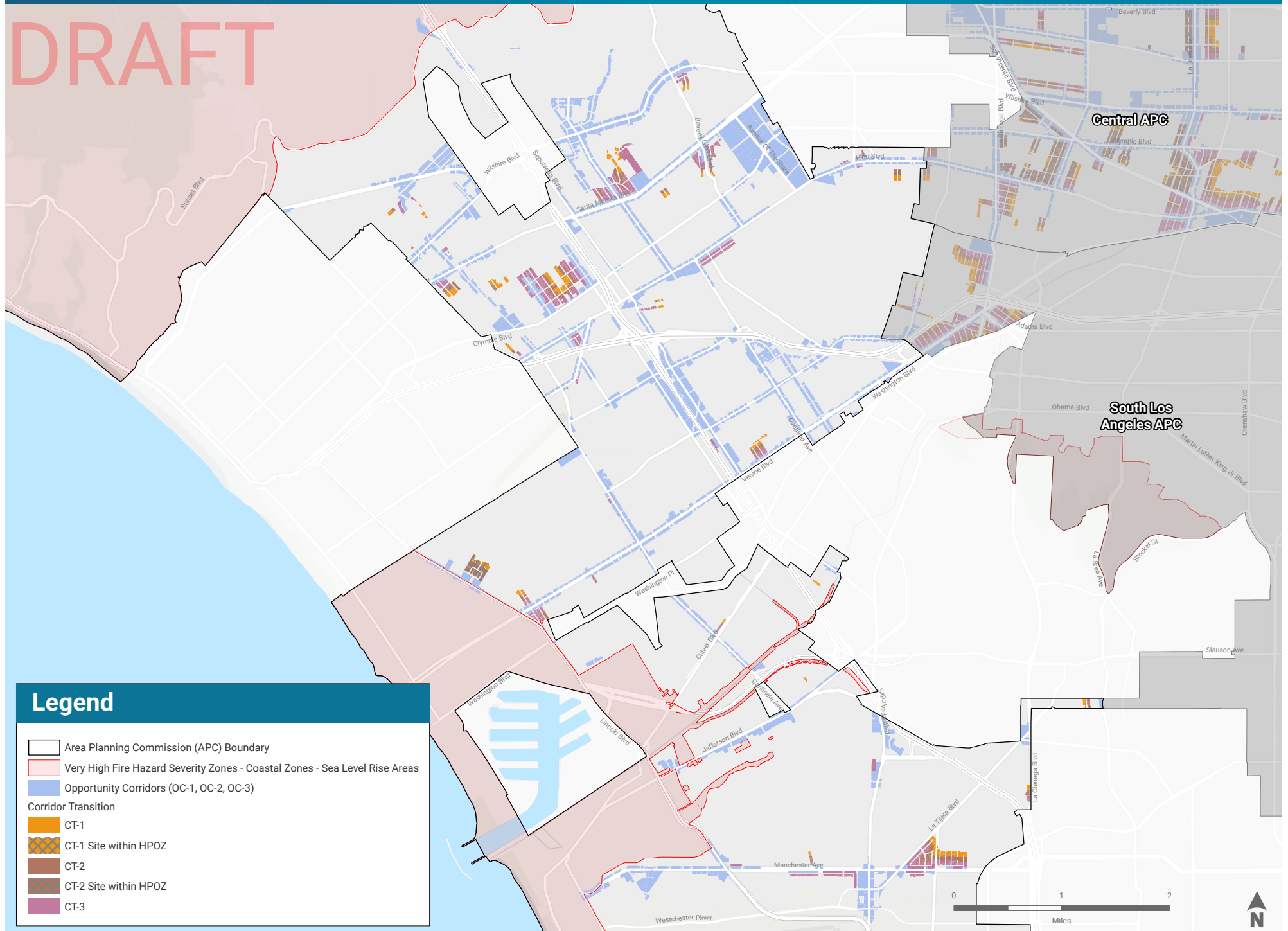
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# Corridors and Corridor Transitions In Higher Resource Areas West Los Angeles APC



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## Legend

- Area Planning Commission (APC) Boundary
- Very High Fire Hazard Severity Zones - Coastal Zones - Sea Level Rise Areas
- Opportunity Corridors (OC-1, OC-2, OC-3)
- Corridor Transition
  - CT-1
  - CT-1 Site within HPOZ
  - CT-2
  - CT-2 Site within HPOZ
  - CT-3

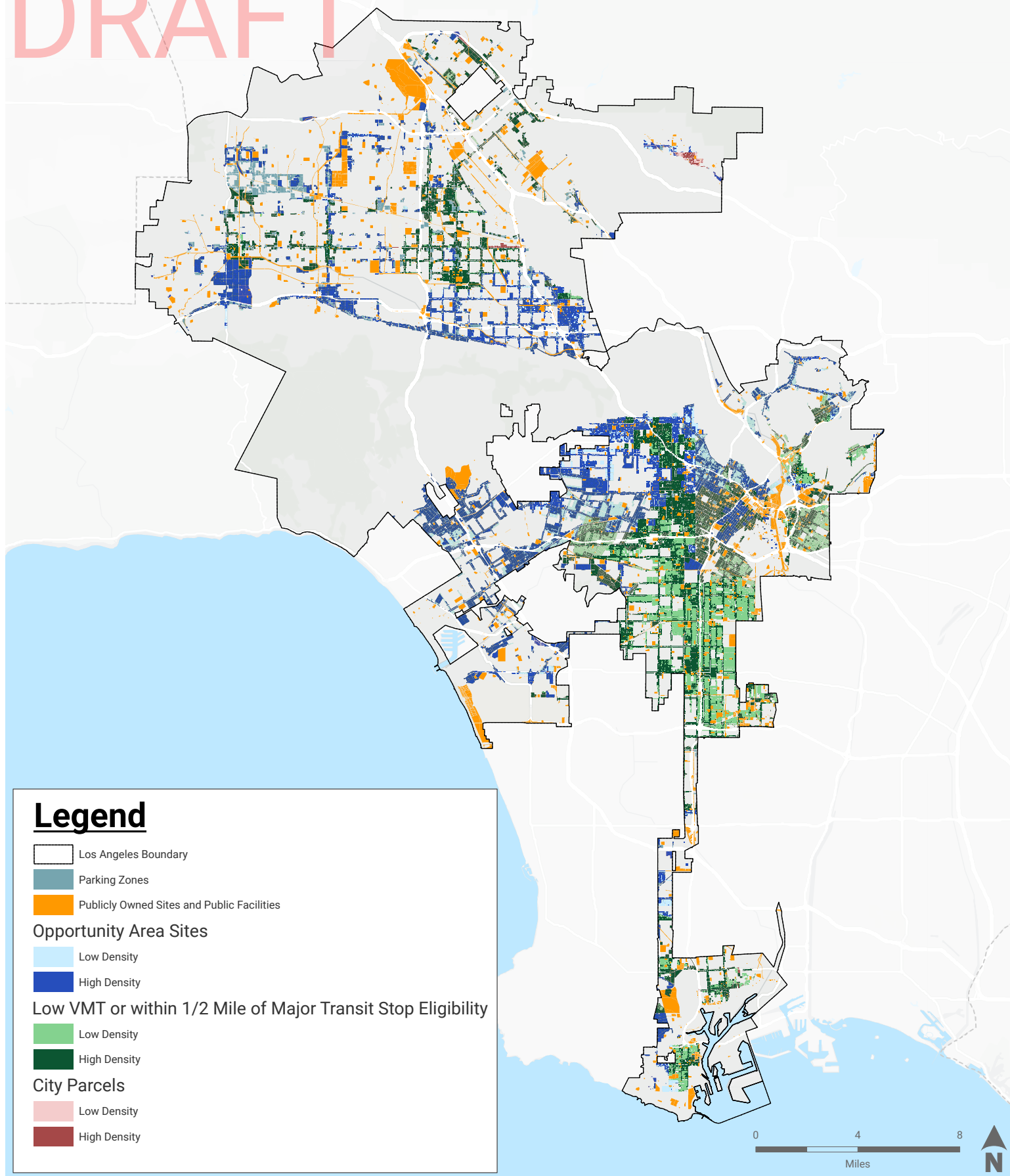
**INSTRUCTIONS:** Insert “Affordable Housing Programs Citywide” Map, “Faith Based Owned Housing Projects Map”, “Parking Zones” Map, and “Publicly Owned Land and Public Facility Zones: Map after Affordable Housing Incentive Program Overview following Page A-29.



# Draft: Affordable Housing Projects Citywide

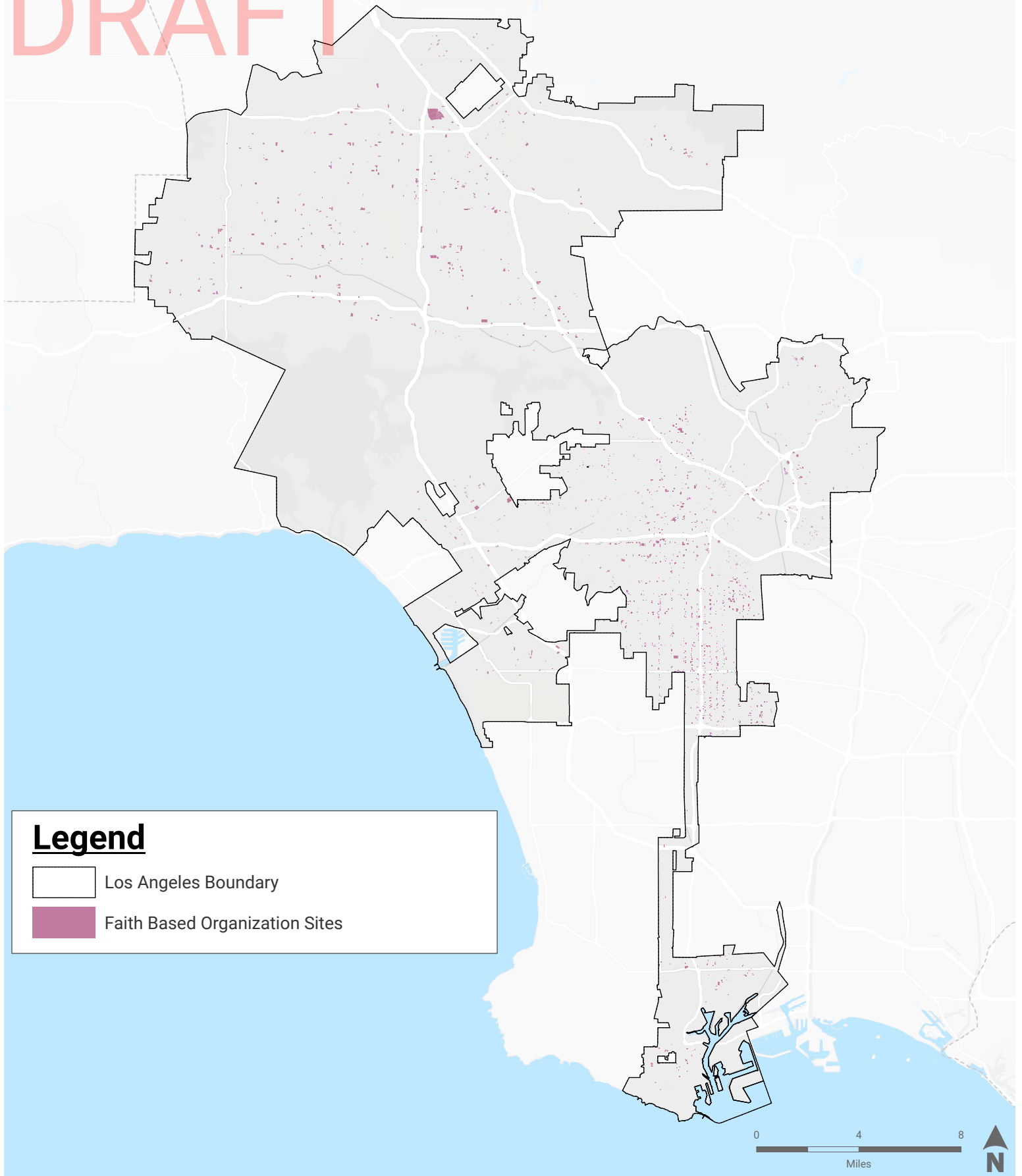


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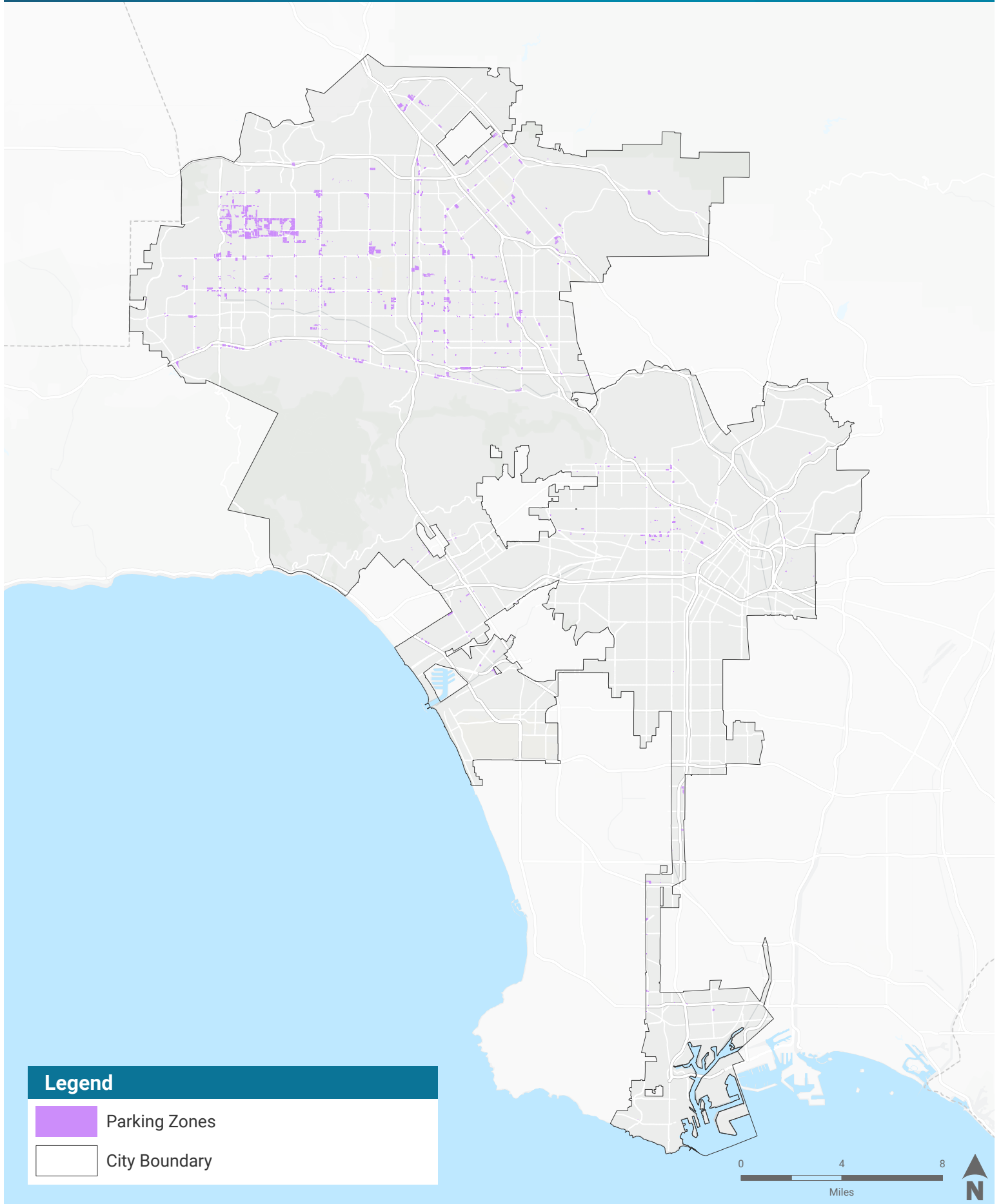


# Draft: Faith Based Owned Housing Projects

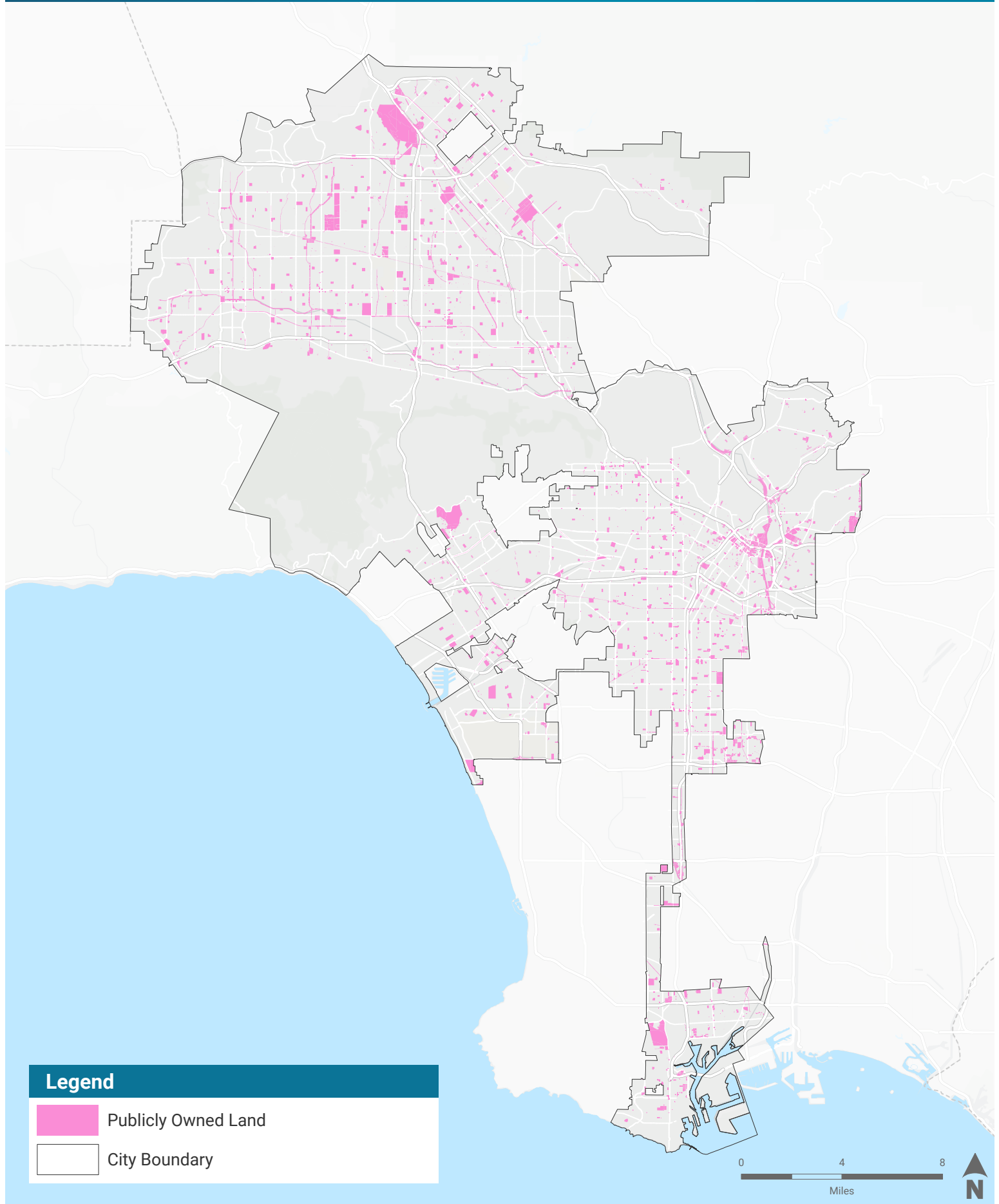
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# Parking Zones

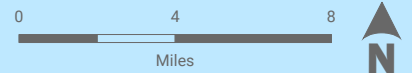


# Publicly Owned Land and Public Facility Zones



## Legend

-  Publicly Owned Land
-  City Boundary





**INSTRUCTIONS:** Revise the State Density Bonus Section of Summary of Changes and Revisions on page A-32 to clarify that the Senior Independent Housing incentive would enable projects that meet the definition of Senior Independent Housing to be permitted in any zone that would otherwise allow a Housing Development, as follows:

- Added a new incentive allowing a Housing Development or Senior Citizen Housing Development that also meets the definition of Senior Independent Housing to be permitted in any zone that would otherwise allow a Housing Development pursuant to LAMC 12.22 A.37.

The following corrections and additions are to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of September 26, 2024 related to Item No. 8 on the meeting agenda.

**INSTRUCTIONS:** Revise the definition of “Prior Housing Element Sites” beginning with the second sentence of page A-54 to clarify which Prior Housing Element Sites are eligible for ministerial approval, as follows:

These include sites identified in the Inventory of Adequate Sites for Housing, sites identified on prior Housing Element Site Inventories and identified in the most recent Housing Element as accommodating a portion of the housing need for low and very low income households as well as Lower Income Rezoning Sites that will be identified to meet the City’s Regional Housing Needs Assessment (RHNA) allocation.

**INSTRUCTIONS:** Revise the discussion on “By-right Development Review” beginning from the first sentence of page A-56 to more closely align with the state housing element law, as follows:

By-Right Development Review

The proposed ordinance will codify state housing element law provisions requiring by-right development review for designated Lower Income Rezoning Sites as well as sites listed in the Prior Housing Element Site Inventories that were identified in the most recent Housing Element as accommodating a portion of the housing need for low and very low income households. Eligible projects that meet objective zoning standards will not be subject to discretionary review procedures, including public hearings and review under the California Environmental Quality Act (CEQA) if at least 20 percent of the units are set aside for lower-income households.

**INSTRUCTIONS:** Revise the 1:1 vs. 2:1 Replacement of RSO Units section on page A-76 to page A-78, to provide additional information from a supplemental study designed to explore the impact of replacement ratios exceeding 1:1, as follows:

***1:1 vs. 2:1 Replacement of RSO Units***

The proposed citywide 1:1 replacement ratio for RSO units would significantly increase the required percentage of replacement units (about 45%) from the current default rate that applies when incomes are not known or are higher than lower income. Per state law, this default rate changes annually based on census data but is currently about 69% (i.e. a 0.69:1 ratio). Moving to a 1:1 ratio ensures affordable housing is never lost on a development site and is in line with the policy direction of 2021-2029 Housing Element and consistent with state law. It would require the addition of one affordable unit in 4-6 unit demolitions and two affordable units in 7-9 unit demolitions, thereby appropriately scaling up disincentives as higher numbers of RSO units are demolished. After a thorough study and consideration, staff believes a 1:1 policy strikes an appropriate balance between housing production and preservation.

Advocates have requested that the recommended 1:1 replacement ratio for RSO units be increased to a 2:1 ratio. They have noted that affordable replacement units are able to be counted towards affordability requirements provided through incentive programs and that further changes are needed to further disincentivize redevelopment of sites with existing RSO units and ensure net gains in affordable housing. While the Department shares these important objectives, there are several important considerations and trade-offs that warrant detailed discussion.

The policy challenge is how to appropriately balance critically important goals around housing production with equally important preservation and tenant protection goals. Groups advocating for a 2:1 ratio argue that significantly increasing replacement requirements is necessary to effectively discourage displacement. Unfortunately, in a built out city like Los Angeles, with most multi-family zoned sites occupied by RSO buildings, 2:1 replacement is a significant trade-off with the production of affordable housing, and housing in general. More than 650,000 of the City's 880,000 multi-family rental units are subject to the RSO and most multi-family zoned sites are occupied by RSO buildings.

Staff commissioned a consultant (AECOM) to analyze the impact of applying higher replacement ratios citywide, as well as a scenario where replacement units do not count towards affordability requirements~~the "no double dipping" proposal~~, to better understand their potential impacts (see Appendix 3). Housing development projects that resulted in RSO units being demolished during a three year period (2020-23) were examined, excluding 100% affordable housing projects and a few other minor project types.

The analysis that's been completed demonstrates that increasing ratios from the current default ratio (effectively 0.69:1) to 1:1 would not have affected the majority of projects that demolished RSO units in recent years. The majority of projects (61%) already met the 1:1 ratio either because of rounding requirements or because the project required more units of affordable housing to meet the affordable housing incentive requirements. The remaining projects have the potential to be

impacted as they would have been required to add restricted affordable units to achieve a 1:1 ratio. While it is not possible to ascertain exactly how many of these remaining projects would have been rendered infeasible, the study presumes that an affordability set aside exceeding 20% would likely inhibit feasibility. Using this threshold, it is estimated that 16% of all previously developed RSO redevelopment projects would have been negatively impacted by a 1:1 policy.

When compared to total housing production during this time, these potentially impacted projects only represent about 6% of all approved projects (and 3% of total units) in the covenant database.<sup>1</sup> Therefore, while potential impacts on RSO redevelopment projects may be considered significant, impact on overall housing production is less so. In addition, it is worth noting that the impact of this policy disproportionately benefits the preservation of RSO units, compared to the production of total and affordable units. Assuming these 16% of RSO replacement projects would be rendered infeasible and not occur, this would have resulted in the preservation of nearly 25% of RSO units removed (374), compared to a reduction of 10% of new housing units (1,306), and just 5% of new affordable housing units (231).

~~A citywide 2:1 ratio would have much more significant impacts. The same study found that only about 13% of RSO redevelopment projects would have already met a higher 2:1 ratio (compared to 61% at 1:1). Therefore the remainder (87%) of projects would be required to add more affordable housing and some or all of these would therefore potentially be impacted.~~

While examining past data on past projects can provide useful insights, it is difficult to make precise conclusions about the feasibility of future projects, especially given the significant change proposed to the densities and incentives through the CHIP program and state Density Bonus law. It also doesn't give much perspective on the total number of developable sites. As such, and given the importance of this topic, a second analysis that looked at the densities made available through the proposed CHIP program was subsequently commissioned (see Appendix 3). The study included sites with existing RSO units that are eligible for incentives under the proposed CHIP ordinance (specifically Density Bonus, Opportunity Corridor, Transit Oriented Incentive Areas (TOIA) and Corridor Transition). It focused only on 24% of RSO sites in higher tier market areas with high and medium density- which were the major set of sites found to be feasible under the CHIP Market Study. Under the proposed 1:1 replacement policy, 15.7% of incentive eligible RSO sites representing 18% of potential RSO site capacity could feasibly redevelop and fulfill replacement unit obligations. Under a 2:1 policy, that number drops to 2.8% of sites and 5.8% of units. While this study shows a clear impact on incentive eligible sites as replacement ratios increase, it is important to note that these RSO sites make up only a share of all incentive eligible sites. For example, the first AECOM study (Appendix 3) found that about 75% of mixed-income projects in the past three years were built on sites without existing or demolished RSO units. While the second analysis was unable to be finalized by the date of this staff report transmittal, initial results have been shared with staff. The second analysis appears to confirm the significant impacts of enacting a 2:1 replacement ratio, finding that the vast majority of RSO properties considered feasible for mixed income housing development under a 1:1 policy would become infeasible under a 2:1 policy. Of note, this analysis was in the top market areas of the City, where economic feasibility is generally higher. Should the report be finalized in time, a summary of the

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<sup>6</sup> Note that this estimate does not incorporate any site specific economic or physical feasibility analysis.

~~analysis is anticipated to be made available prior to the City Planning Commission meeting. The full report will be available for the City Council.~~

While enacting a 2:1 ratio would likely reduce direct displacement due to fewer demolitions of RSO units, it would also significantly reduce the production of new housing and affordable housing based on the number of projects anticipated to be affected. This could also have negative impacts on displacement and housing instability as we know that unaffordable rents and lack of affordable housing are major drivers of displacement. Of particular concern is that the creation of new deed-restricted affordable housing affordable for 99 years in mixed-income buildings will be significantly impacted. While RSO units offer important affordability benefits by regulating annual rent increase, they typically reset to market rents once vacated and are not restricted to be affordable for 99 years like restricted affordable units. Due to the Just Cause Ordinance, important RSO benefits (e.g. just cause eviction and limits on rent increases) are now available to most non-RSO tenants. In addition, many new developments result in a net gain of RSO units due to the replacement provisions of LAMC 151.28. As the replacement ratios increase, the proportionate preservation benefits of the policy described in the prior paragraph above dissipate, with increasing impacts on affordable housing production. A blanket policy would also not differentiate between small and large RSO sites/buildings, nor whether any tenants are actually being impacted.

To facilitate additional options for decision makers, the Department has provided two additional options for the City Planning Commission to consider. The options described below would enact higher replacement ratios in more limited scenarios to better right-size impacts.

One potential policy option could be to subject demolitions of larger buildings to higher replacement ratios. For example, as more units are demolished, the ratios could increase incrementally. This would disincentivize demolition as the number of existing units was increased. To facilitate deliberations, one potential iteration of this concept could retain 1:1 replacement ratios when there are 1-2 existing RSO units, but apply higher ratios as RSO units increase (e.g. 1.25:1 for 3-4 units, 1.5:1 for 5-9 units, 1.75:1 for 10-14 units and 2:1 for 15 or more RSO units).

While these impacts would be shouldered more on projects requiring larger demolitions (not affecting two unit demolitions, for example) the potential loss of covenanted deed restricted affordable housing in the City's multi-family neighborhoods would be significant, compared to a citywide 1:1 policy.

Alternatively, as a way to further limit and target impacts, only demolition of occupied units could be subject to higher replacement ratios. This approach could be combined with the option above or as a standalone policy with a citywide ratio (e.g. 1.25:1, 1.5:1 or 2:1:). Either way, it would further disincentivize redevelopment of sites with tenants currently in occupancy compared to vacant sites. To address concerns that this policy may further incentivize removal of tenants prior to determining a project's replacement obligation, this policy could be complemented by also adding the higher ratios described above to projects on sites where a no-fault eviction occurred in the prior 5 years including pursuant to the Ellis Act or the recently adopted Just Cause Eviction Ordinance. In addition, the proposed ordinance includes provisions to disqualify sites and developers that have committed violations of the Tenant Anti-Harassment Ordinance.

**INSTRUCTIONS:** Revise the Counting Replacement Units towards Affordability Requirements section on page A-78 to page A-79, to provide additional information from a supplemental study designed to explore the impact of replacement ratios exceeding 1:1, as follows:

**Counting Replacement Units towards Affordability Requirements**

In addition to a 2:1 replacement ratio, advocates have also requested that replacement units not be permitted to count towards meeting local affordable housing set aside requirements. However, this is a practice that state and local law currently requires to be permitted when implementing the Housing Crisis Act, Density Bonus law, and the TOC Program (see Health and Safety Code Sec. 66300.6(b)(1)(B), Government Code Sec. 65915(C)(3)(a)(i)) and LAMC 12.22 A.31(b)(1). Because the CHIP Ordinance is an implementation ordinance of state Density Bonus law, the Department understands that it must comply with these provisions. The same is true for the TOC Program, which will remain on the books until it sunsets in 2026. Setting a stricter policy for other (non-CHIP/TOC) types of projects may be permitted, but would have marginal effect because the vast majority of projects are anticipated to use the incentive programs.

This policy change would also significantly impact project feasibility for these remaining projects. The second AECOM analysis described above (See Appendix 3) has yielded initial results showing that nearly all evaluated RSO sites would become infeasible for the development of mixed-income housing. Under a 1:1 policy that does not allow replacement units to count towards set-aside requirements, only 0.3% of sites, representing 3.2% of capacity, could feasibly redevelop. When increasing to 2:1, this drops to 0.1% of sites and 0.2% of capacity. For the legal reasons described above, this change may also cause additional confusion for staff, tenants and the public by setting divergent policies based on a narrow range of entitlement types. If the CPC would like to strengthen replacement policies, changing the ratio is more advisable than misaligning with state law and local programs on this provision.

**INSTRUCTIONS:** Revise the discussion on “Program 124” beginning with the second sentence on Page F-11, as follows:

Of the Program’s proposed housing capacity, approximately ~~56~~54% of the overall capacity is located in Higher Opportunity Areas, with ~~63~~64% and ~~50~~54% of capacity located in Lower Income Category and Moderate Income Category in Higher Opportunity Areas, respectively. Of the proposed housing capacity from the MIIP and AHIP FBO, Parking, and Public Land Projects, approximately 59% of the overall capacity is located in Higher Opportunity Areas, with 64% and 50% of capacity in Lower Income Category and Moderate Income Category in Higher Opportunity Areas, respectively.

**INSTRUCTIONS:** Revise the discussion on “State Housing Element Law” beginning with the fourth sentence of the first full paragraph on Page F-35 , as follows:

Approximately ~~56~~54% of the rezoning efforts of the CHIP Ordinance and the Downtown Los Angeles Community Plan Update are located in Higher Opportunity Areas of the City, with ~~63~~64% and ~~50~~54% of capacity located in Lower Income Category Capacity and Moderate Income Category Capacity in Higher Opportunity Areas, respectively. Of the proposed housing capacity from the MIIP and AHIP FBO, Parking, and Public Land Projects, approximately 59% of the overall capacity is located in Higher Opportunity Areas, with 64% and 50% of capacity in Lower Income Category and Moderate Income Category in Higher Opportunity Areas, respectively.

**INSTRUCTIONS:** Revise Exhibit D: Single Family Considerations to include revision of discussion on “Option 1: Capacity” beginning on the second sentence of the fourth paragraph on Page 4, as follows:

This would increase the proportion of housing opportunities located in Higher Opportunity Areas from approximately 5654% to 67%.

**INSTRUCTIONS:** Revise Exhibit D: Single Family Considerations to include revision of discussion on “Option 2: Capacity” beginning on the third sentence of the fourth paragraph on Page 10, as follows:

This would increase the proportion of housing opportunities located in Higher Opportunity Areas from approximately 5654% to 5958% (~~see Figure 2~~).

**INSTRUCTIONS:** Revise Exhibit D: Single Family Considerations to include revision of discussion on “Option 3: Capacity” beginning on the second sentence of the second paragraph on Page 13, as follows:

This would increase the proportion of housing opportunities located in Higher Opportunity Areas from approximately 5654% to 5856% (~~see Figure 3~~).

**INSTRUCTIONS:** Revise Exhibit D: Single Family Considerations to include revision of discussion on “Option 4: Capacity” beginning on the second sentence of the second paragraph on Page 13, as follows:

This would increase the proportion of housing opportunities located in Higher Opportunity Areas from approximately 5654% to 58% (~~see Figure 4~~).

**INSTRUCTIONS:** Revise Exhibit D: Single Family Considerations to include revision of discussion on “Option 5: Capacity” beginning on the second sentence of the third paragraph on Page 18, as follows:

As a result of the removal of R2 and RD zones from Opportunity Corridor Incentive program eligibility, the overall proportion of housing opportunities located in Higher Opportunity Areas as part of the Program would decrease from approximately 5654% to 53% (see Figure 5). The distribution of these sites are visible below in Map 5A at a Citywide level. It is important to note that additional analysis would be required to determine the impact of removing R2 and RD sites from the Opportunity Corridors Incentive Area. This would remove eligible sites from the Corridor Transition Incentive Area Program, and additional analysis would be required to determine the impact on Affirmatively Furthering Fair Housing.

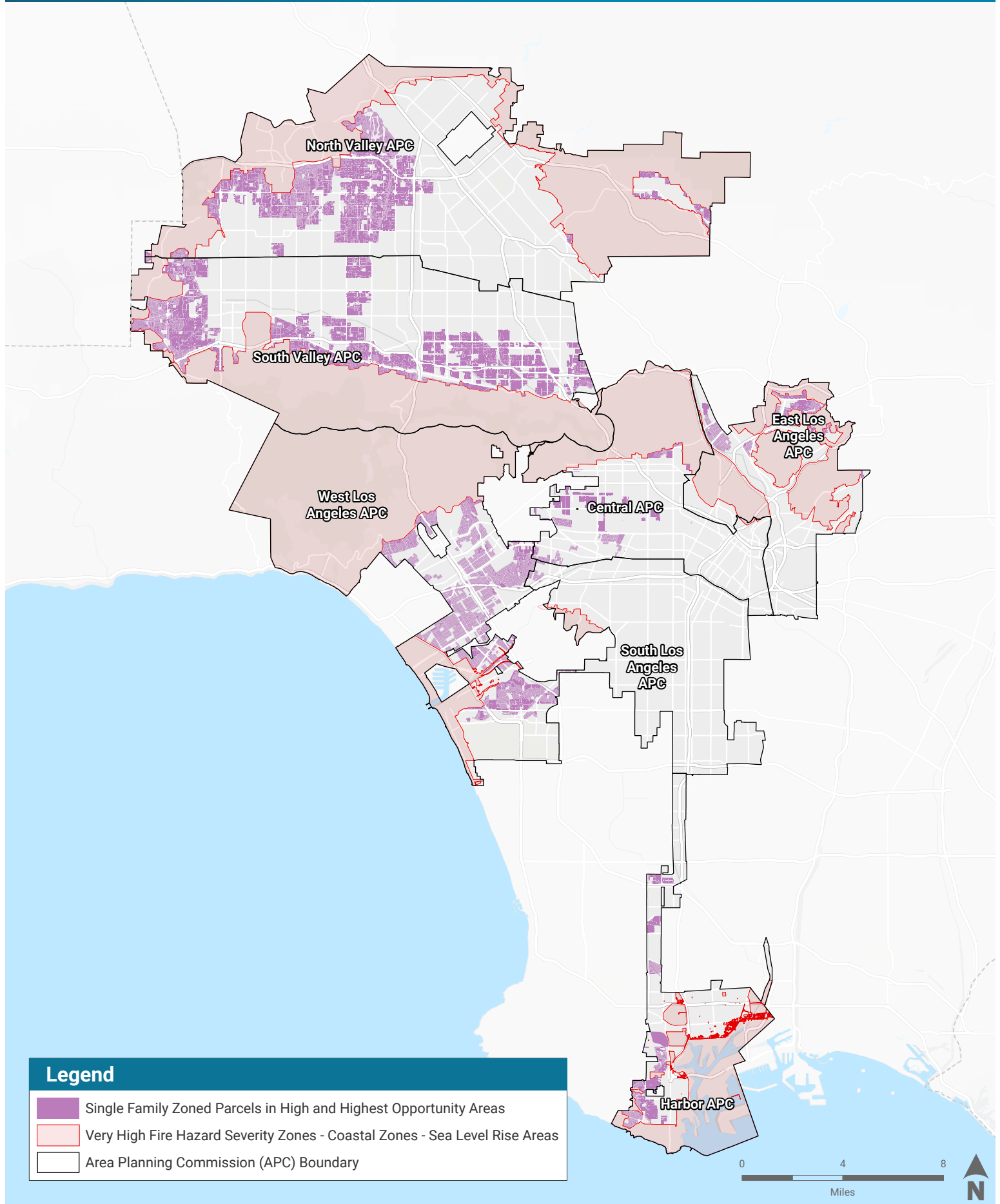
**INSTRUCTIONS:** Revise Exhibit D: Single Family Considerations to include revision of discussion on “Option 6: High Opportunity Transit Areas in AHIP” beginning on the last sentence of the first paragraph on Page 20, as follows:

Option 6 proposes single-family eligibility for One Hundred Percent Affordable Projects, Faith-Based Organization Projects, and Shared Equity Projects on parcels located within 0.5 miles of a Major Transit Stop and in Higher and Moderate Opportunity Areas. These parcels would be eligible for the low density option (sites with a maximum allowable residential density of less than 5 units) of

Moderate and Higher Opportunity Area base incentives already available in AHIP as displayed in the chart below, ~~provided that the proposed projects contain 100% covenanted Affordable units.~~

**INSTRUCTIONS:** Insert “Option 1: Comprehensive CHIP Applicability in AHIP” map in Exhibit D: Single Family Considerations on Page 8.

# Option 1 - AHIP Applicability on all Single Family Parcels in High and Highest Opportunity Areas Citywide APCs





**INSTRUCTIONS:** Insert “AHIP APC level maps” list in Appendix of Maps on page 25 and insert maps in Exhibit D: Single Family Considerations and insert Option 1 maps after Page 40 and Option 6 and 7 maps after Page 66.

Option 1

Map 1: Option 1: Central Los Angeles APC  
Map 2: Option 1: East Los Angeles APC  
Map 3: Option 1: Harbor APC  
Map 4: Option 1: North Valley APC  
Map 5: Option 1: South Valley APC  
Map 6: Option 1: South Los Angeles APC  
Map 7: Option 1: West Los Angeles APC

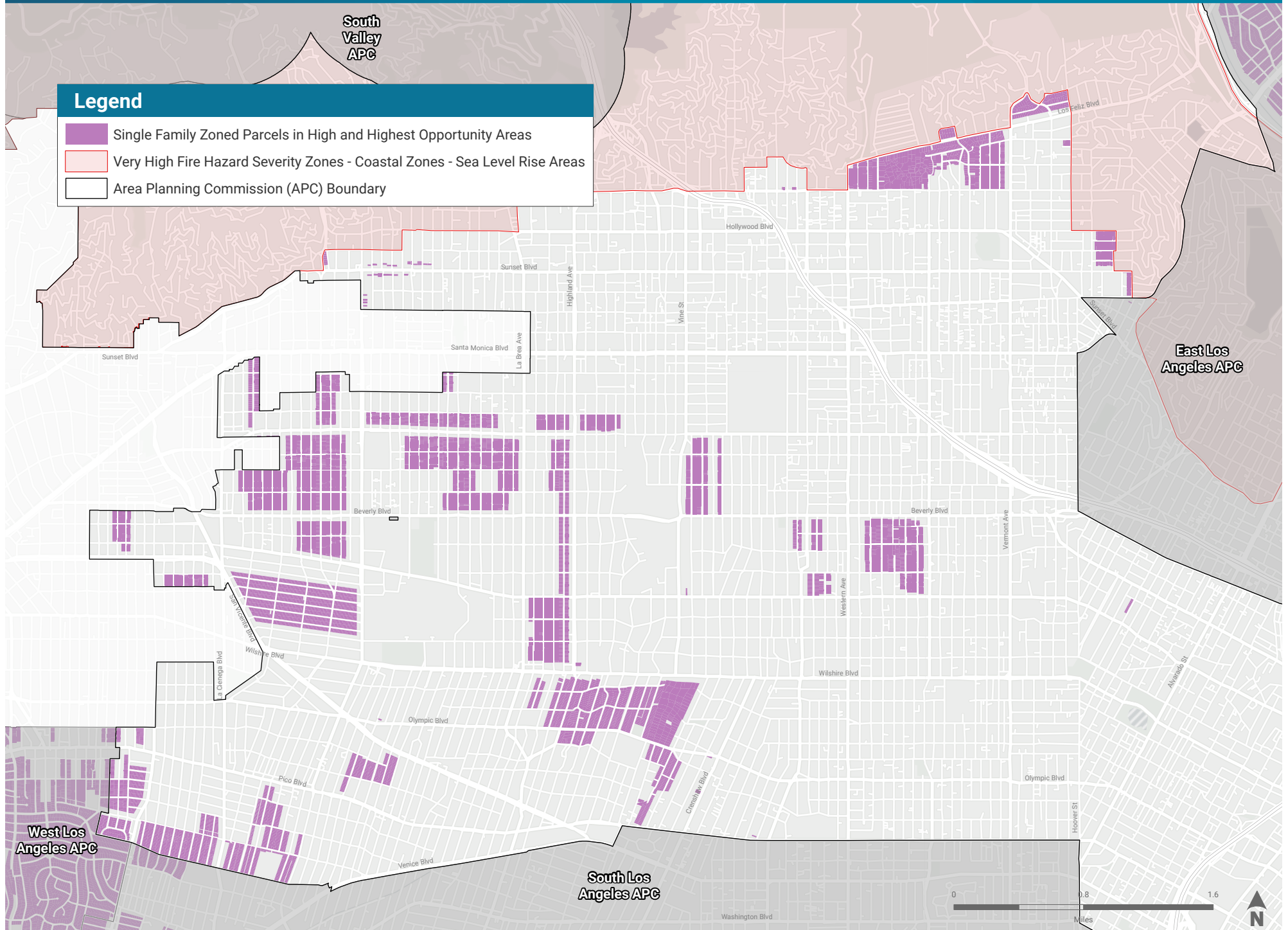
Option 6

Map 1: Option 6: Central Los Angeles APC  
Map 2: Option 6: East Los Angeles APC  
Map 3: Option 6: Harbor APC  
Map 4: Option 6: North Valley APC  
Map 5: Option 6: South Valley APC  
Map 6: Option 6: South Los Angeles APC  
Map 7: Option 6: West Los Angeles APC

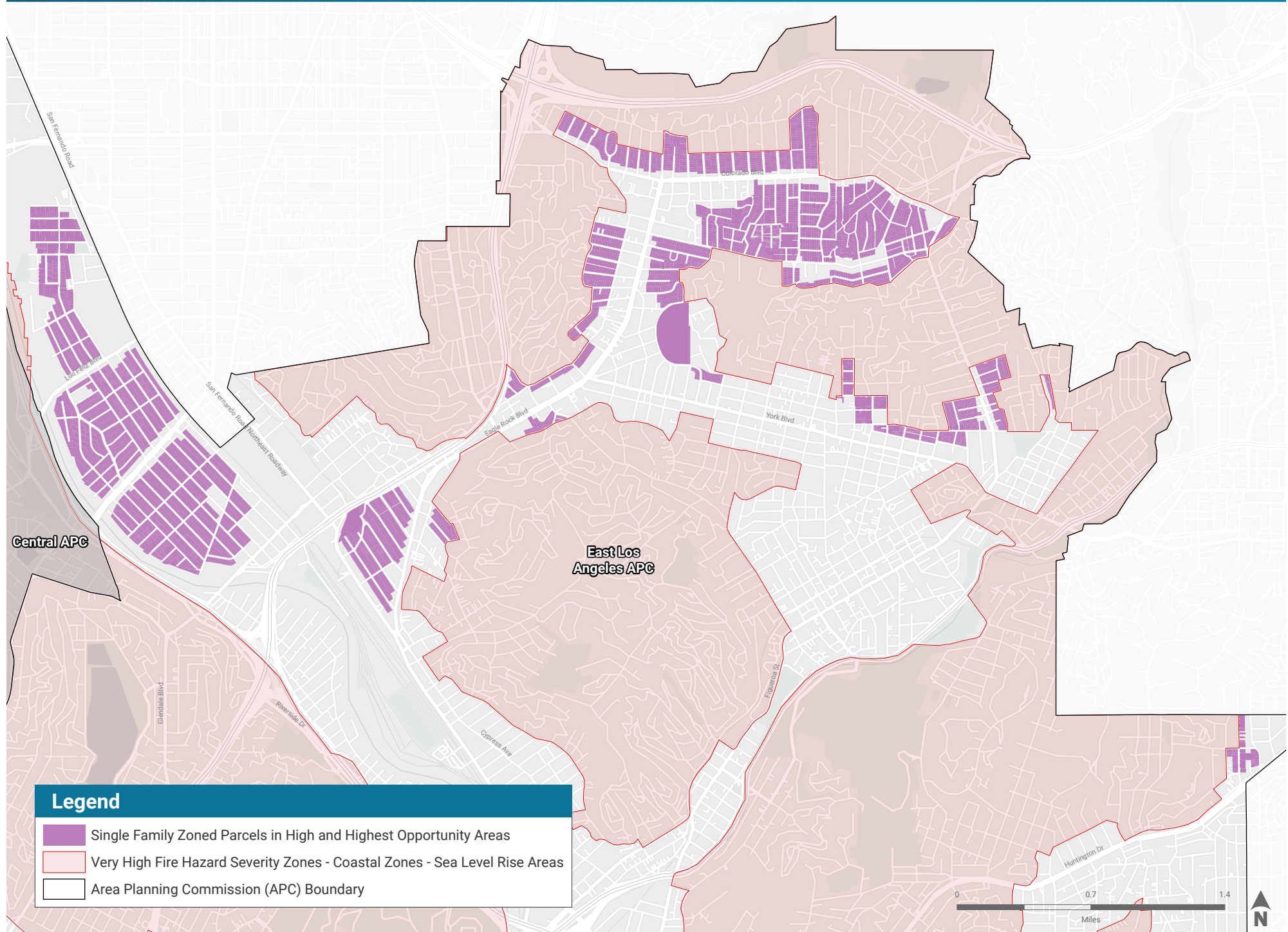
Option 7

Map 1: Option 7: Central Los Angeles APC  
Map 2: Option 7: East Los Angeles APC  
Map 3: Option 7: Harbor APC  
Map 4: Option 7: North Valley APC  
Map 5: Option 7: South Valley APC  
Map 6: Option 7: South Los Angeles APC  
Map 7: Option 7: West Los Angeles APC

# Option 1 - AHIP Applicability on all Single Family Parcels in High and Highest Opportunity Areas Central APC

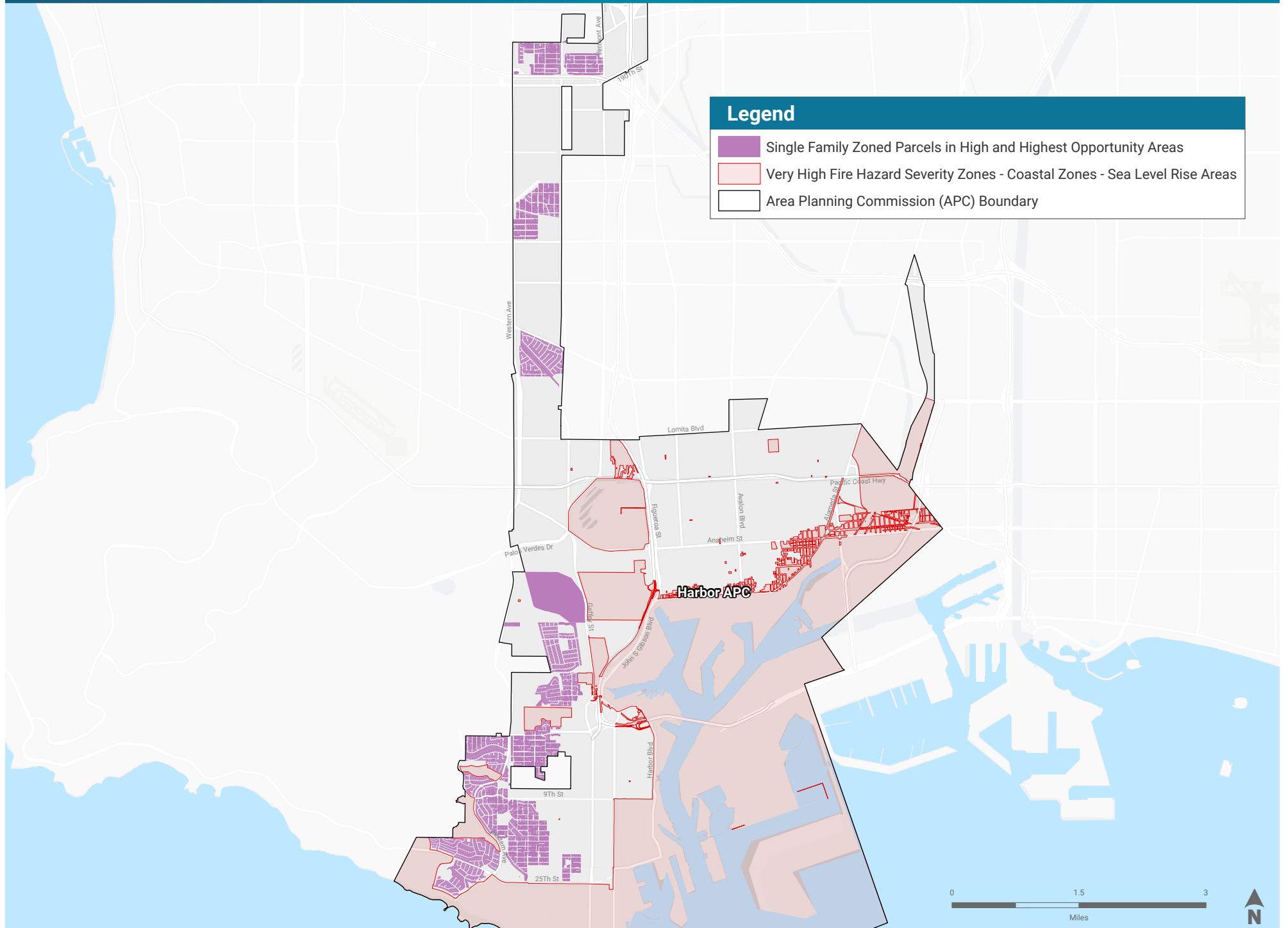


# Option 1 - AHIP Applicability on all Single Family Parcels in High and Highest Opportunity Areas East Los Angeles APC





# Option 1 - AHIP Applicability on all Single Family Parcels in High and Highest Opportunity Areas Harbor APC

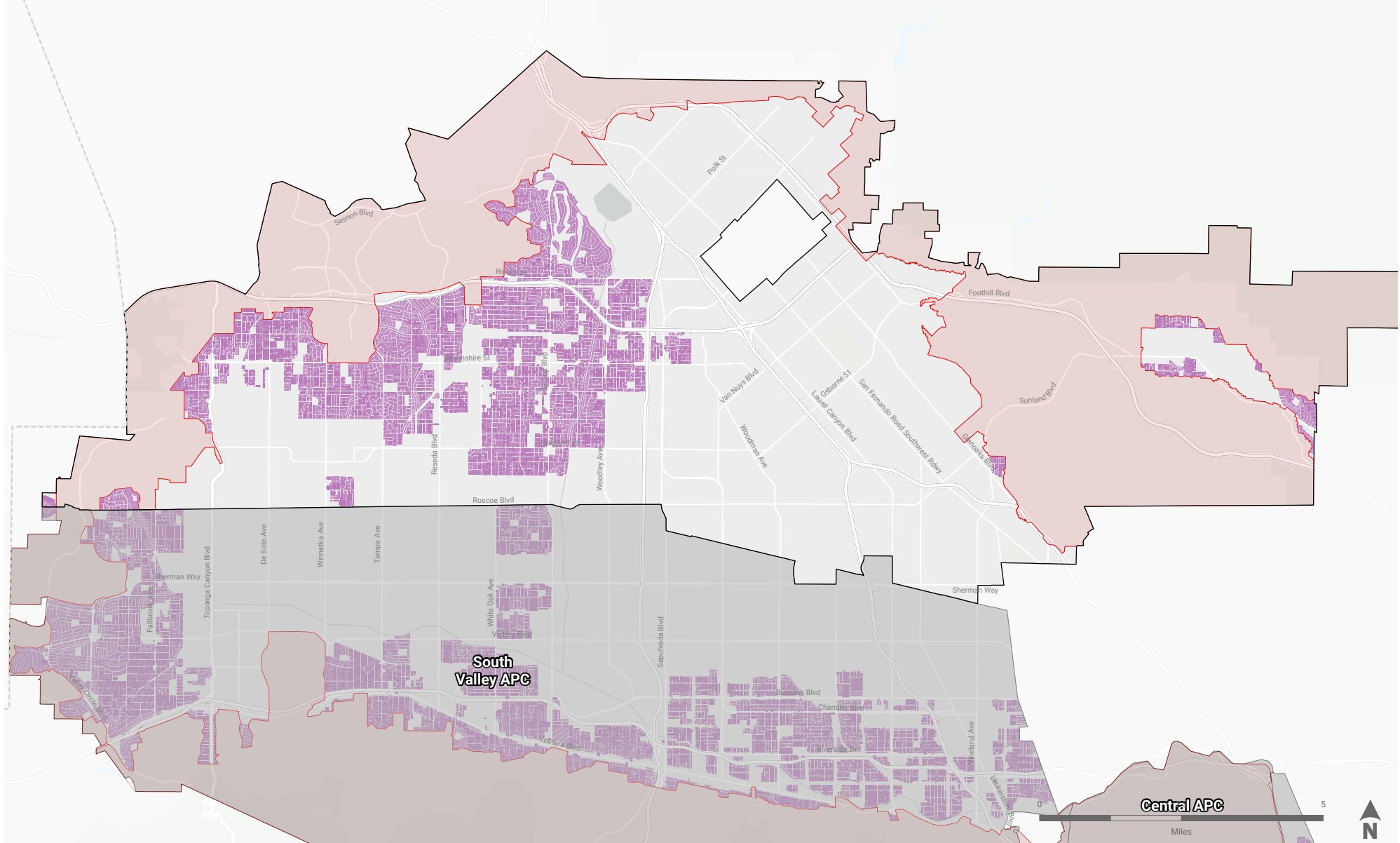


# Option 1 - AHIP Applicability on all Single Family Parcels in High and Highest Opportunity Areas North Valley APC

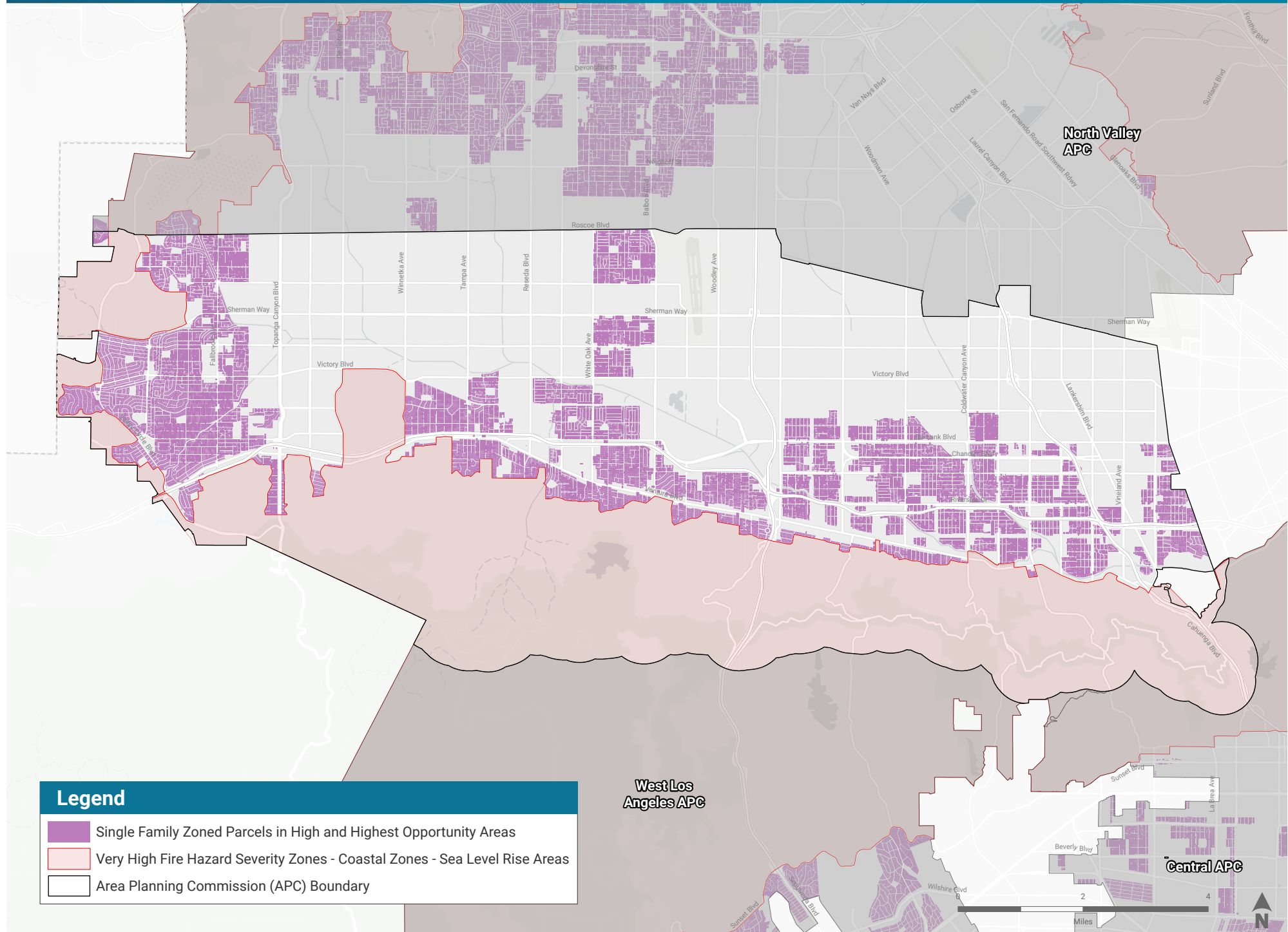


## Legend

- Single Family Zoned Parcels in High and Highest Opportunity Areas
- Very High Fire Hazard Severity Zones - Coastal Zones - Sea Level Rise Areas
- Area Planning Commission (APC) Boundary

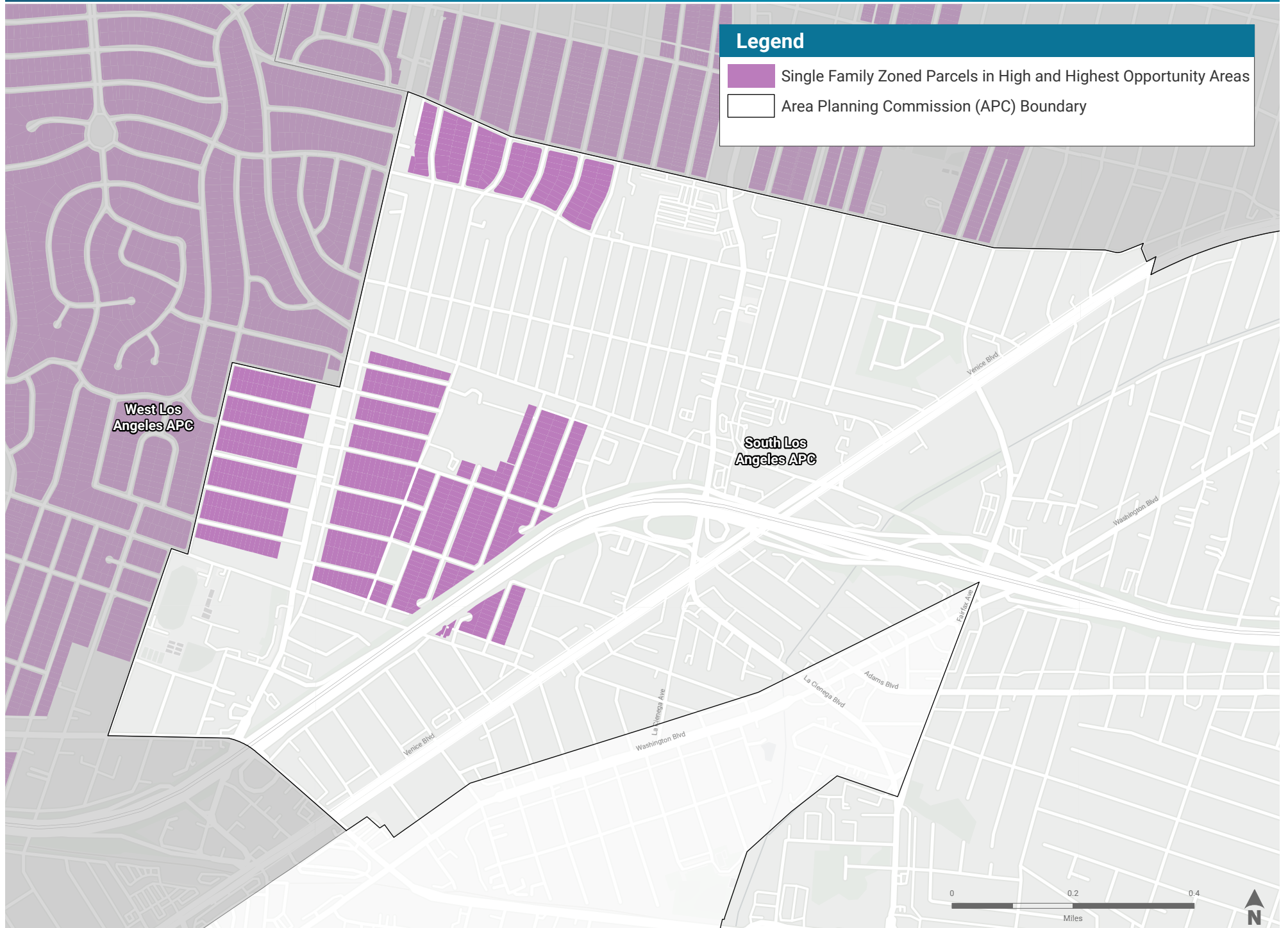


# Option 1 - AHIP Applicability on all Single Family Parcels in High and Highest Opportunity Areas South Valley APC



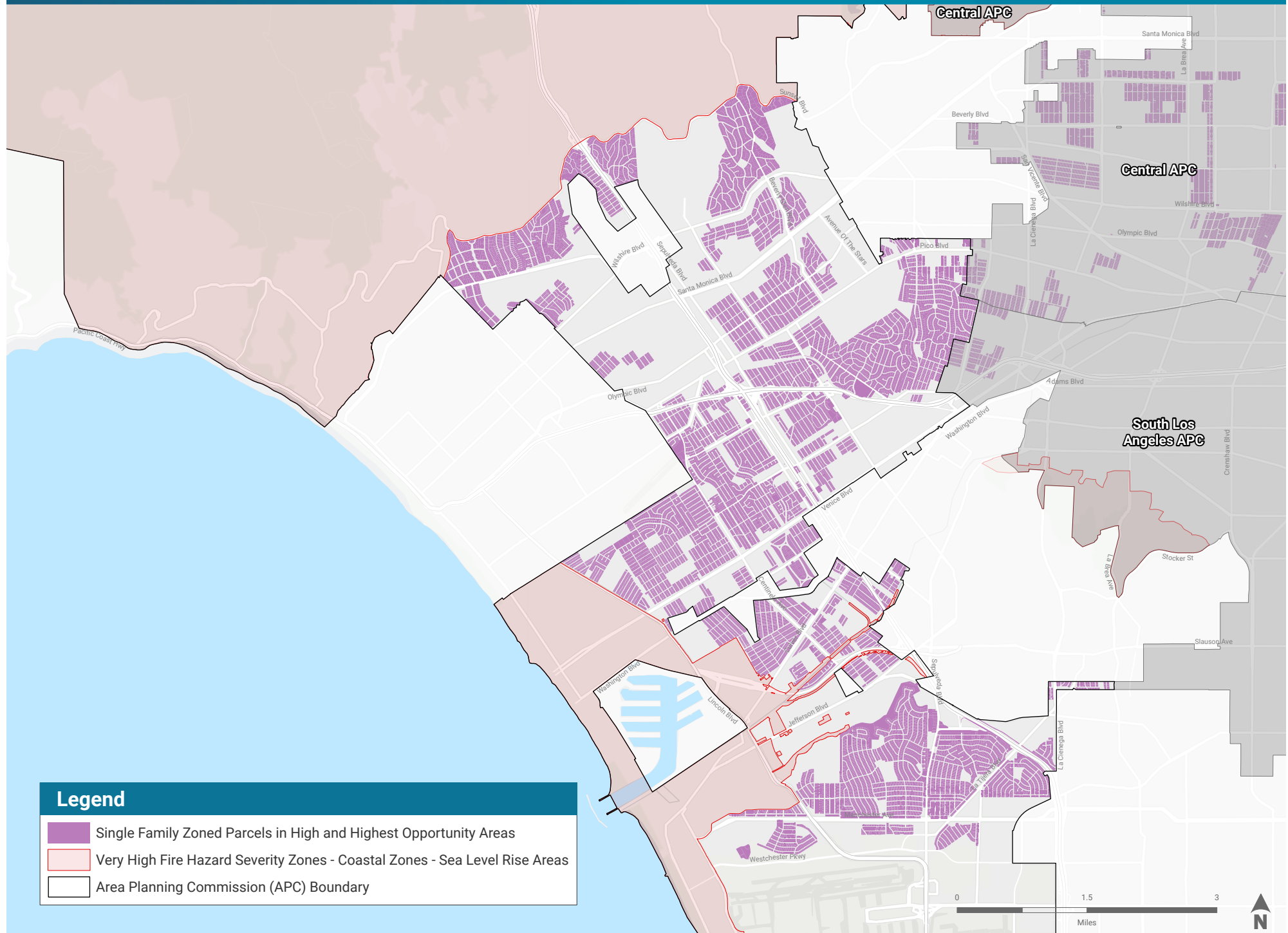


# Option 1 - AHIP Applicability on all Single Family Parcels in High and Highest Opportunity Areas South Los Angeles APC

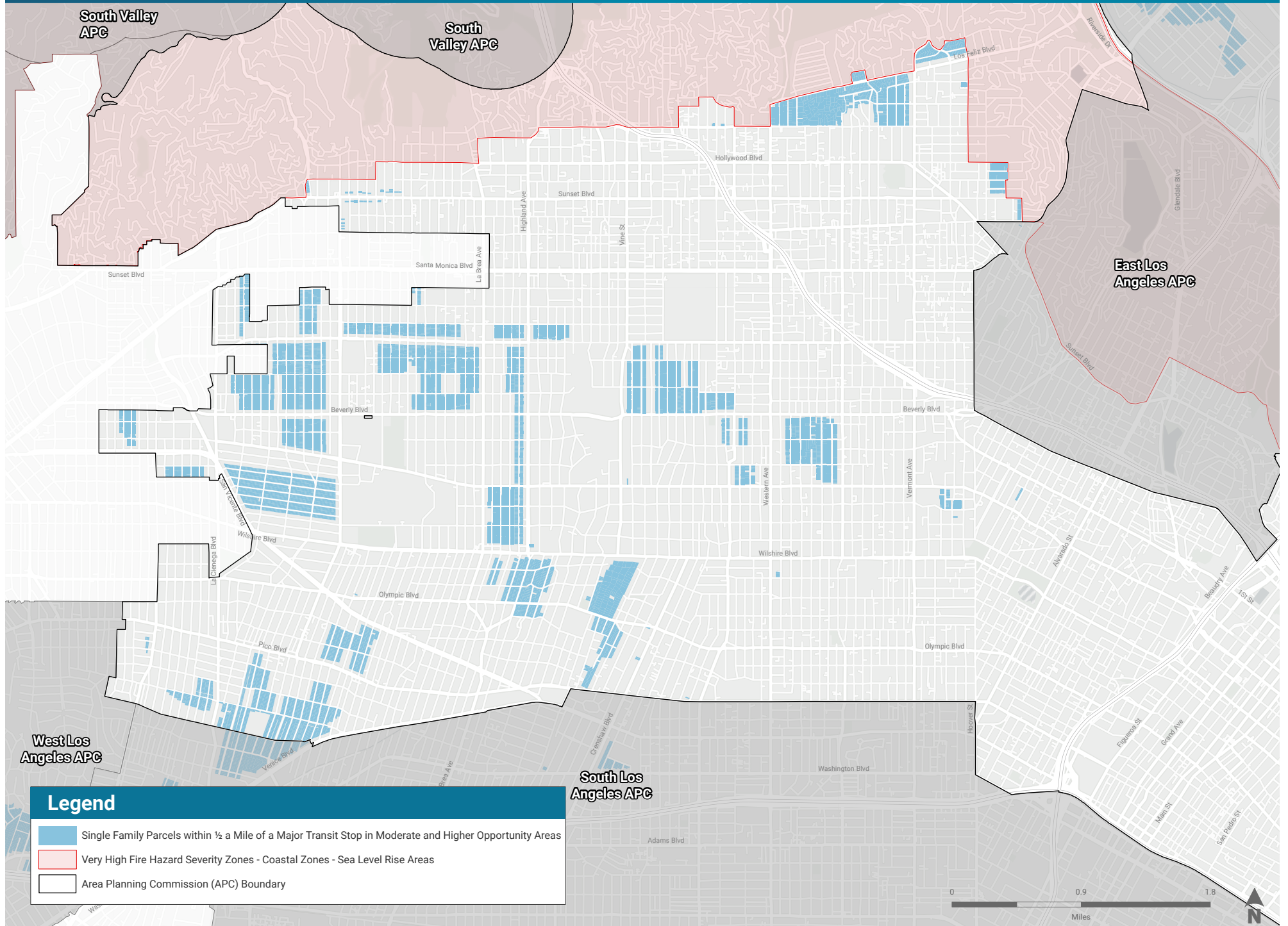




# Option 1 - AHIP Applicability on all Single Family Parcels in High and Highest Opportunity Areas West Los Angeles APC

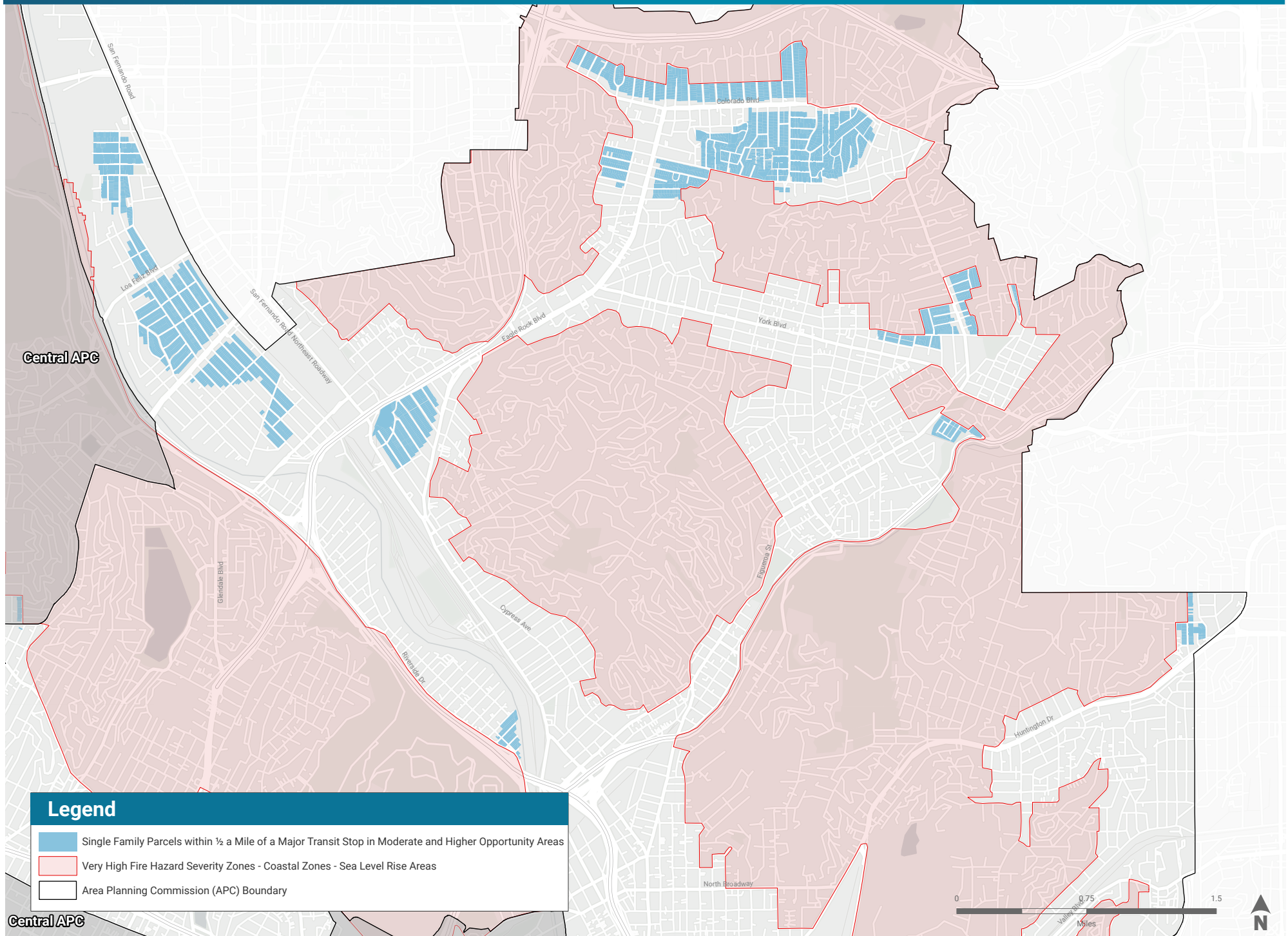


# Option 6 - AHIP Applicability within a ½ Mile of a Major Transit Stop in Moderate and Higher Opportunity Areas Central APC

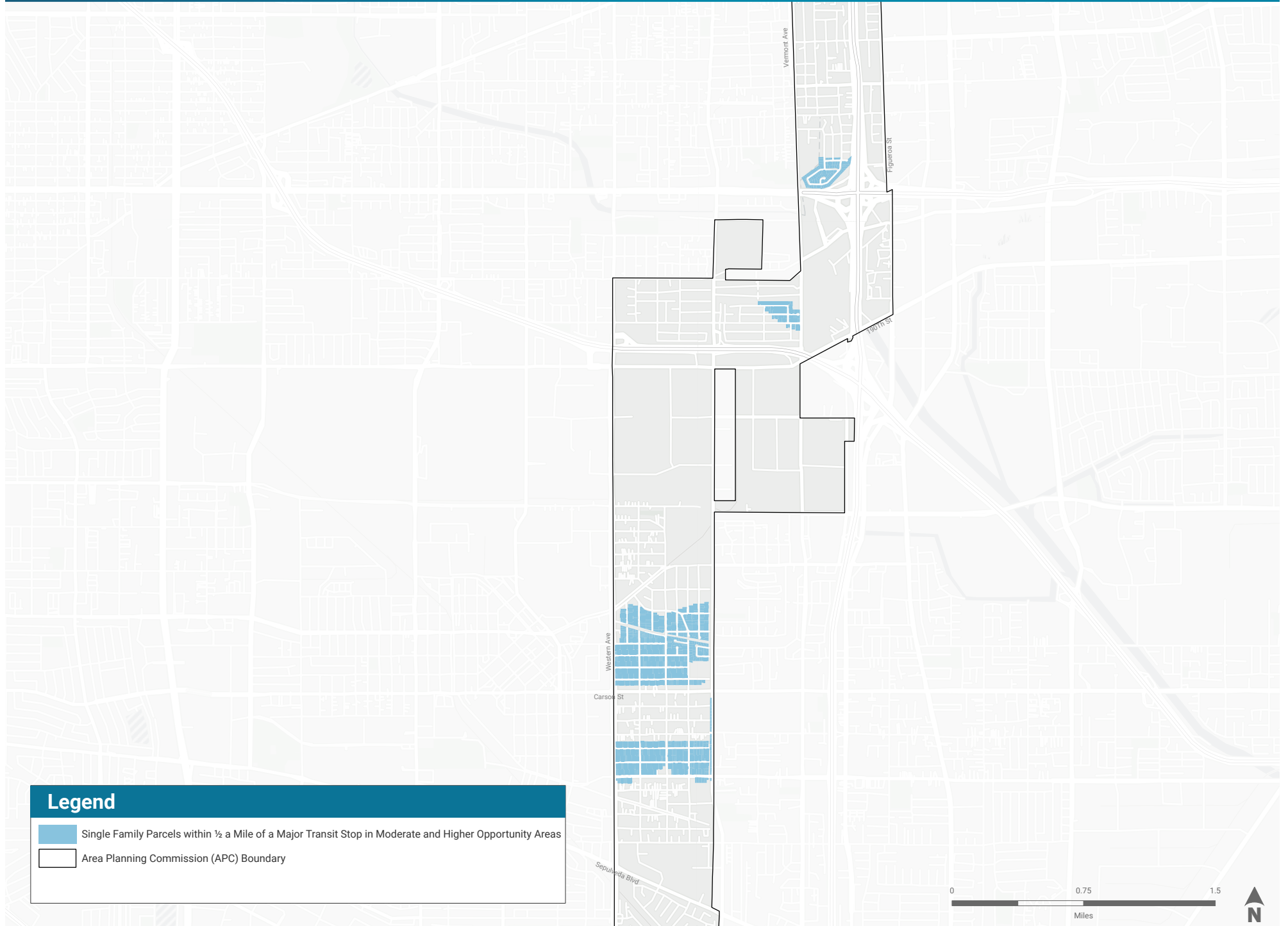




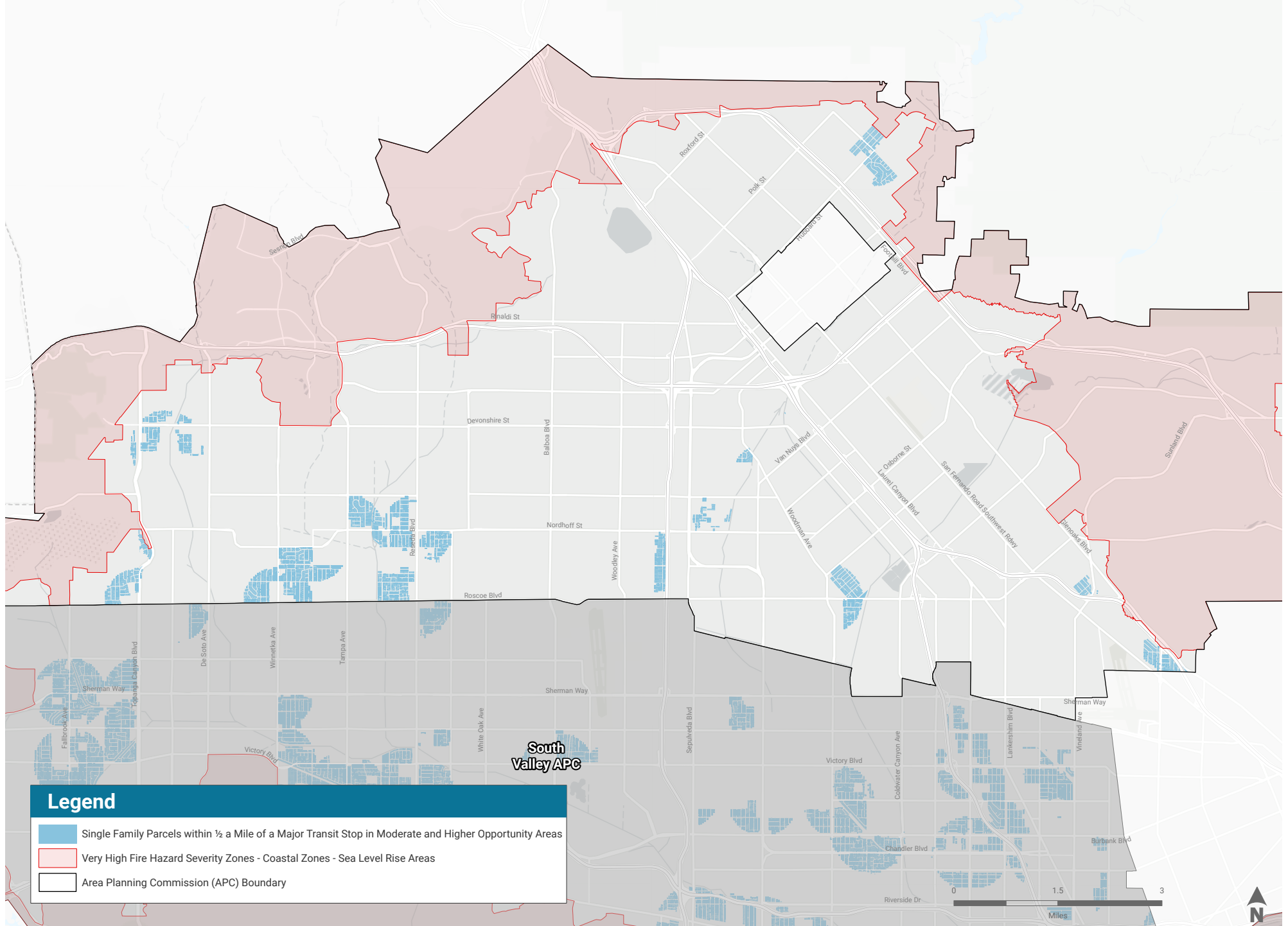
# Option 6 - AHIP Applicability within a ½ Mile of a Major Transit Stop in Moderate and Higher Opportunity Areas East Los Angeles APC



# Option 6 - AHIP Applicability within a ½ Mile of a Major Transit Stop in Moderate and Higher Opportunity Areas Harbor APC

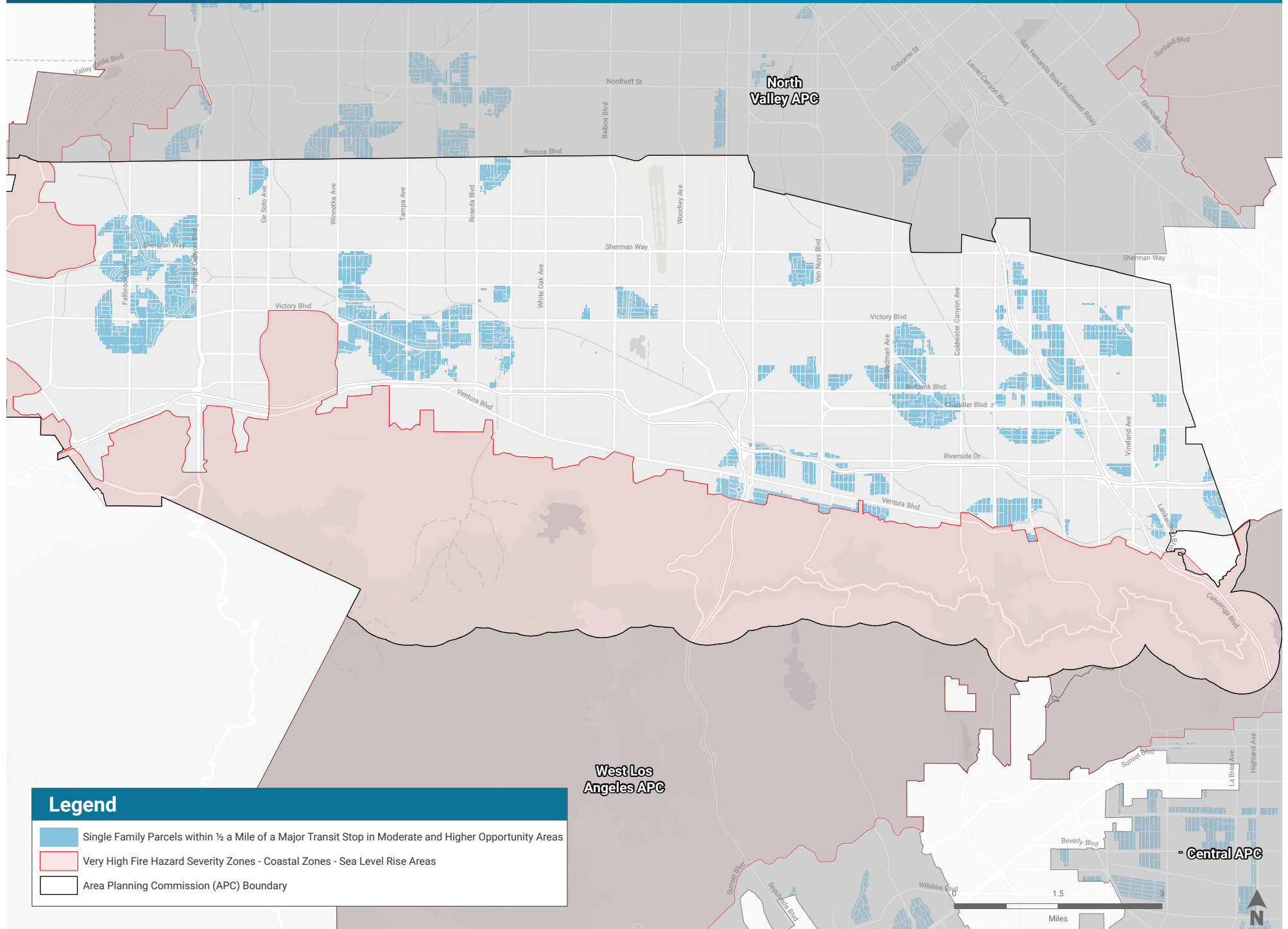


# Option 6 - AHIP Applicability within a ½ Mile of a Major Transit Stop in Moderate and Higher Opportunity Areas North Valley APC





# Option 6 - AHIP Applicability within a ½ Mile of a Major Transit Stop in Moderate and Higher Opportunity Areas South Valley APC

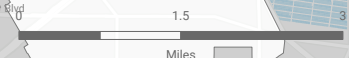


## Legend

- Single Family Parcels within ½ a Mile of a Major Transit Stop in Moderate and Higher Opportunity Areas
- Very High Fire Hazard Severity Zones - Coastal Zones - Sea Level Rise Areas
- Area Planning Commission (APC) Boundary

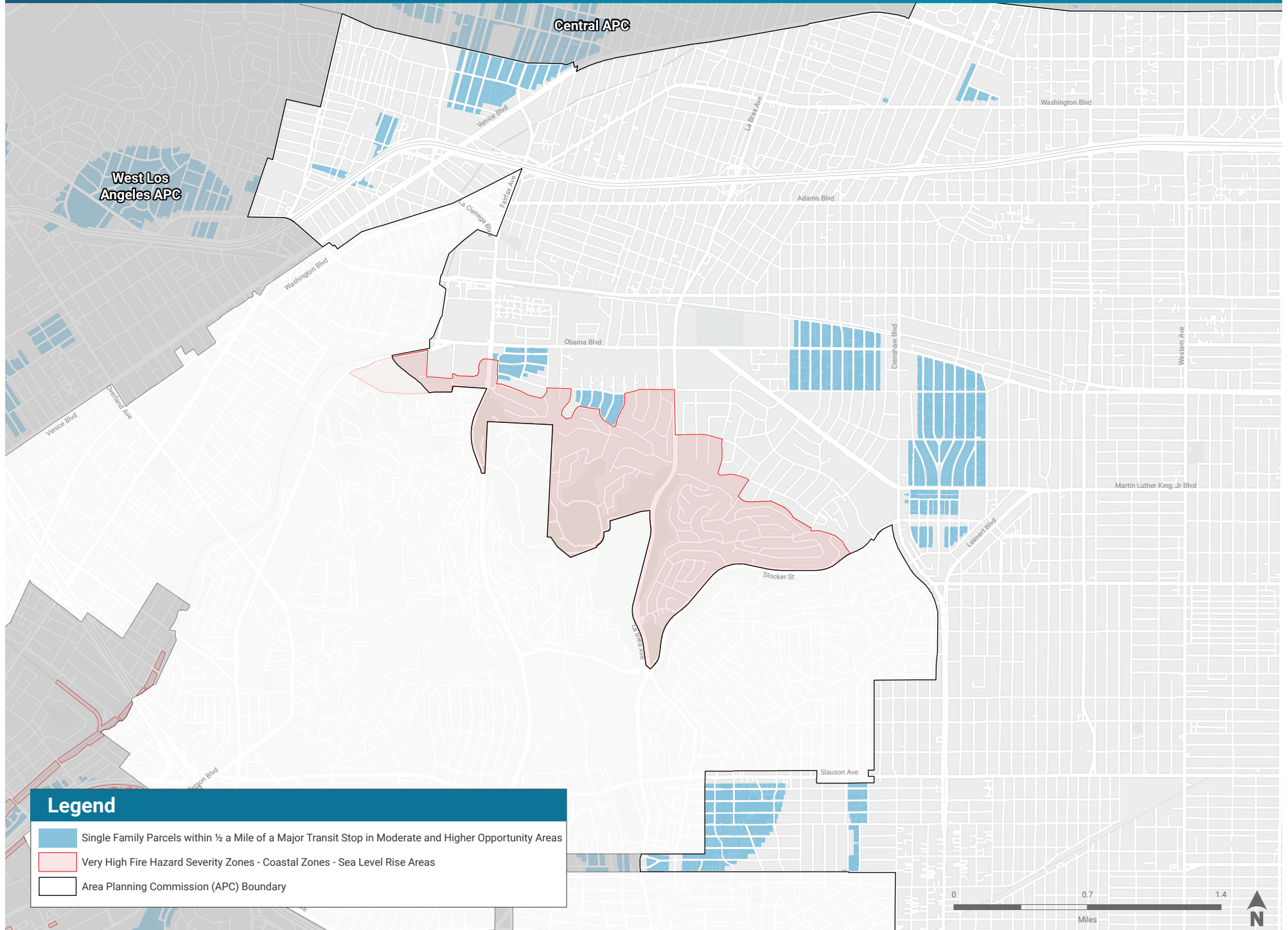
West Los  
Angeles APC

Central APC








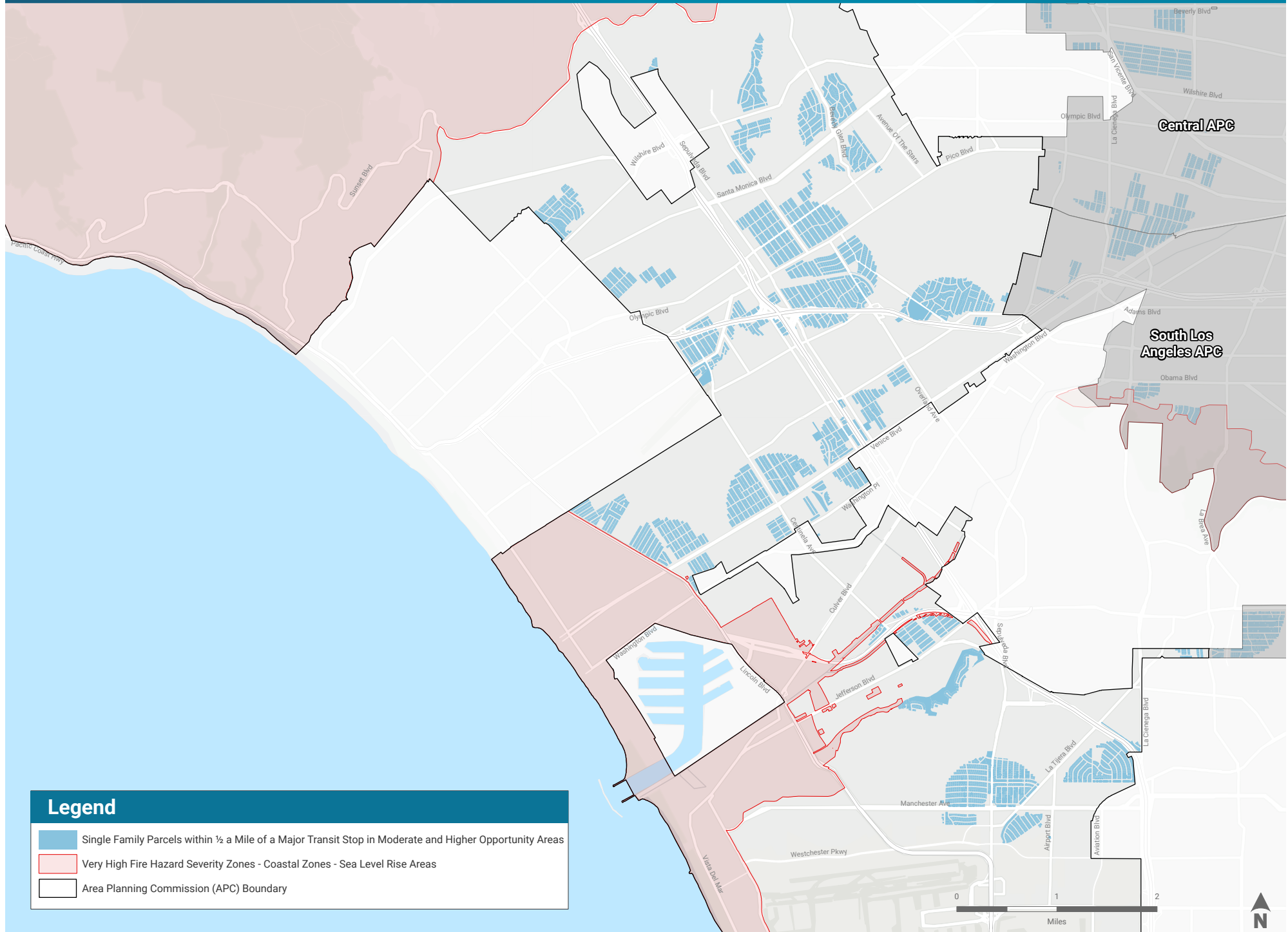
# Option 6 - AHIP Applicability within a ½ Mile of a Major Transit Stop in Moderate and Higher Opportunity Areas South Los Angeles APC






## Legend

-  Single Family Parcels within ½ a Mile of a Major Transit Stop in Moderate and Higher Opportunity Areas
-  Very High Fire Hazard Severity Zones - Coastal Zones - Sea Level Rise Areas
-  Area Planning Commission (APC) Boundary

# Option 6 - AHIP Applicability within a ½ Mile of a Major Transit Stop in Moderate and Higher Opportunity Areas West Los Angeles APC

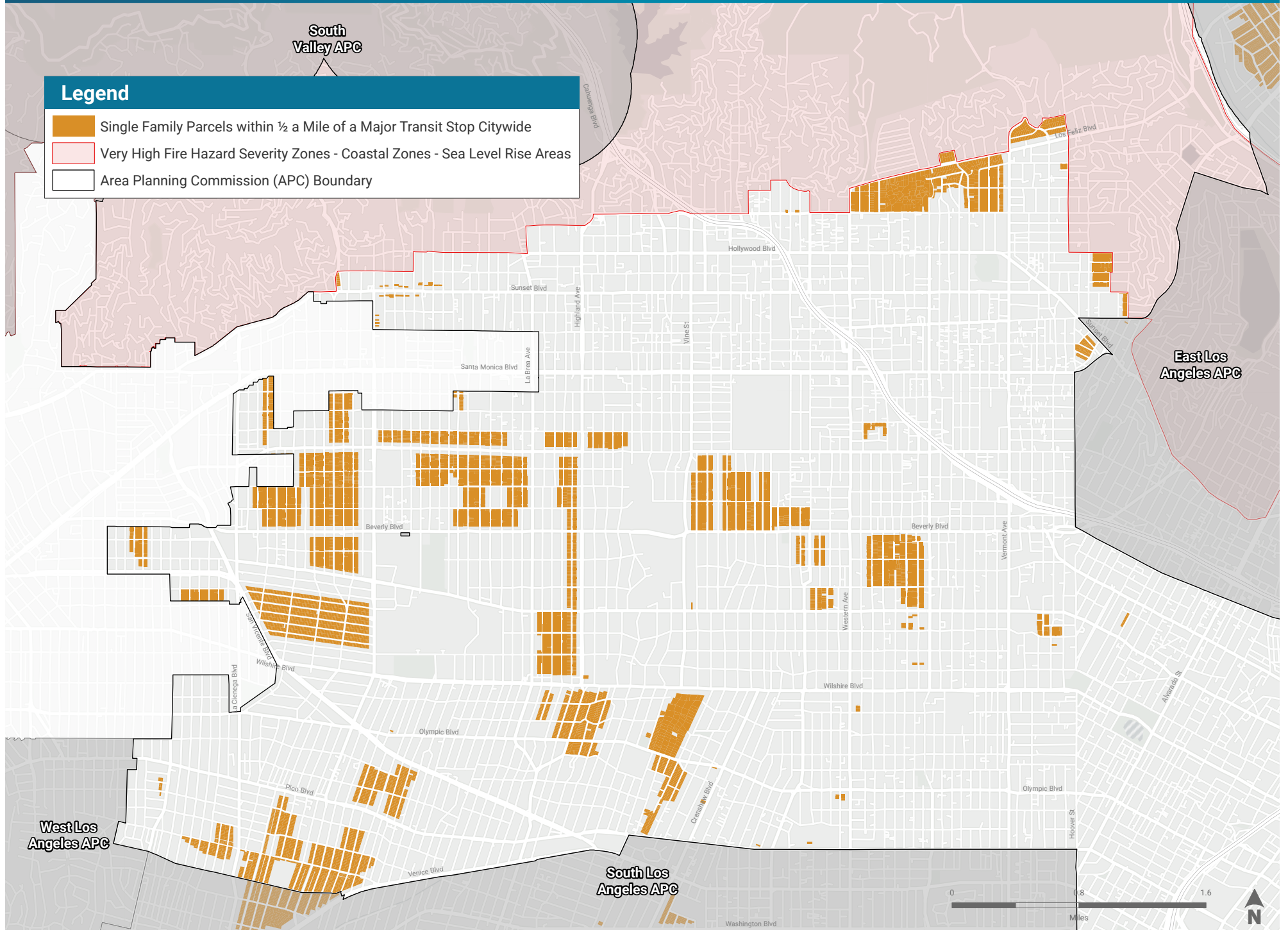


## Legend

-  Single Family Parcels within ½ a Mile of a Major Transit Stop in Moderate and Higher Opportunity Areas
-  Very High Fire Hazard Severity Zones - Coastal Zones - Sea Level Rise Areas
-  Area Planning Commission (APC) Boundary

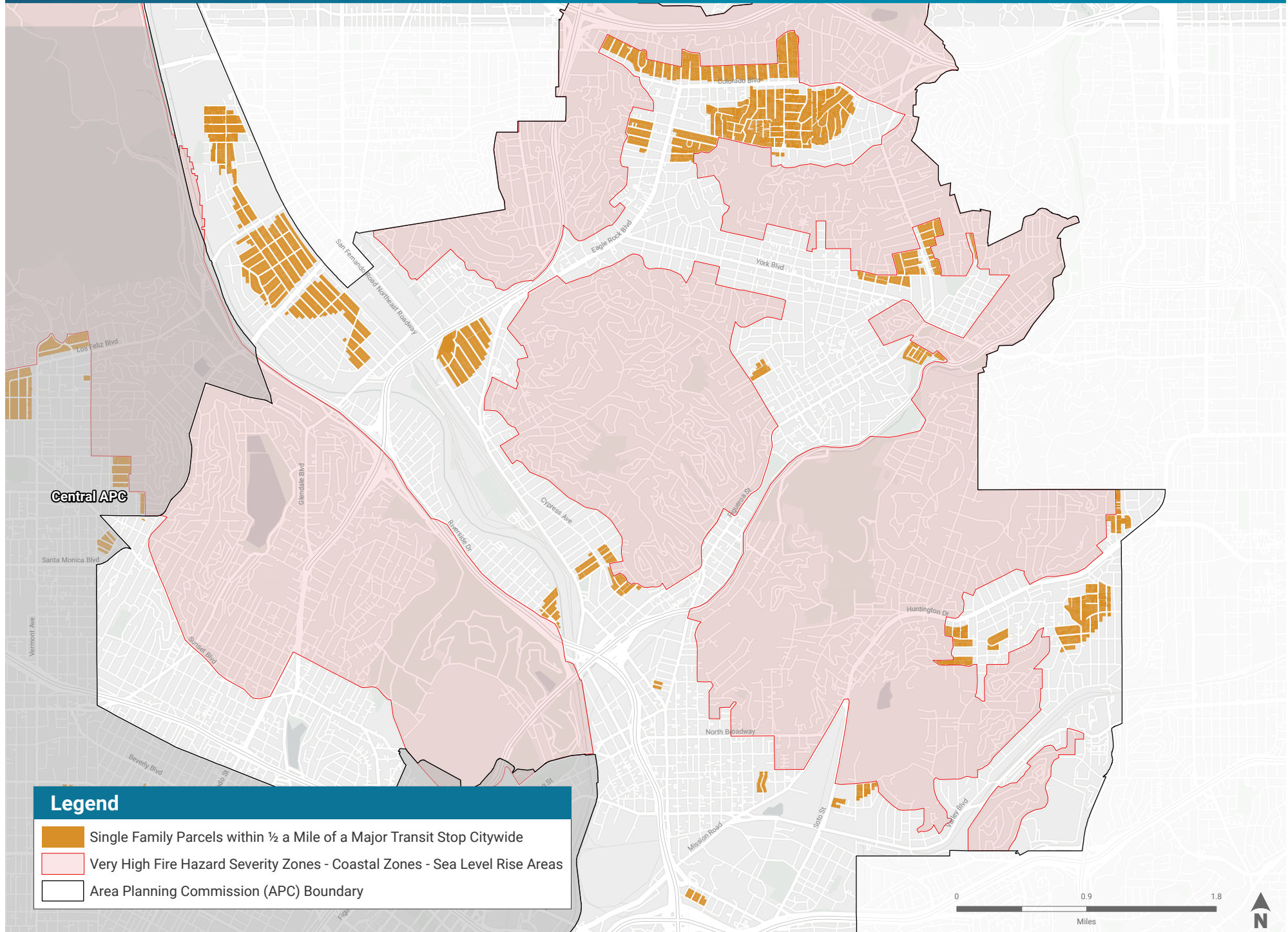


# Option 7 - AHIP Applicability for Shared Equity Projects within a ½ Mile of a Major Transit Stop Central APC



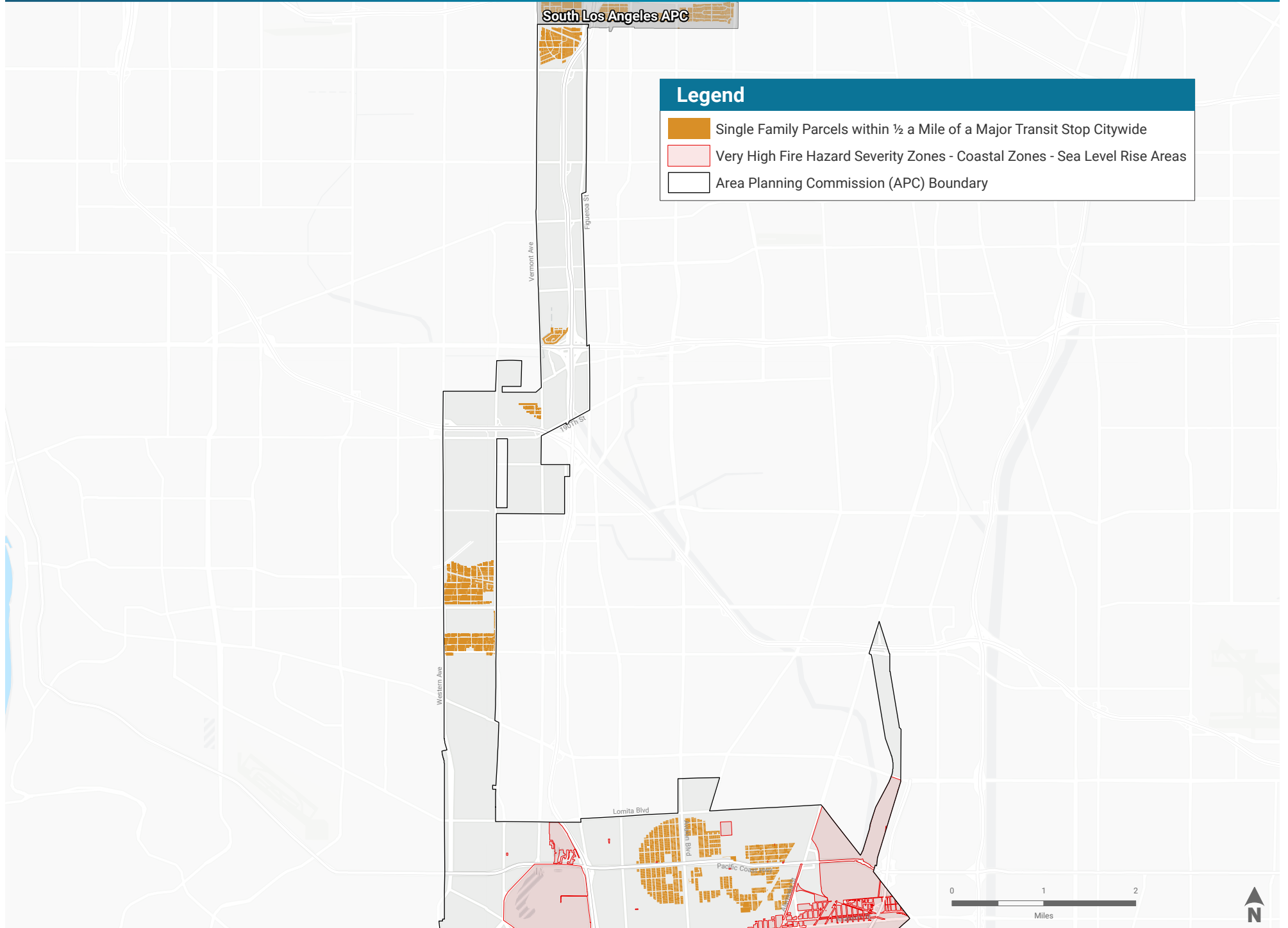
# Option 7 - AHIP Applicability for Shared Equity Projects within a ½ Mile of a Major Transit Stop

## East Los Angeles APC

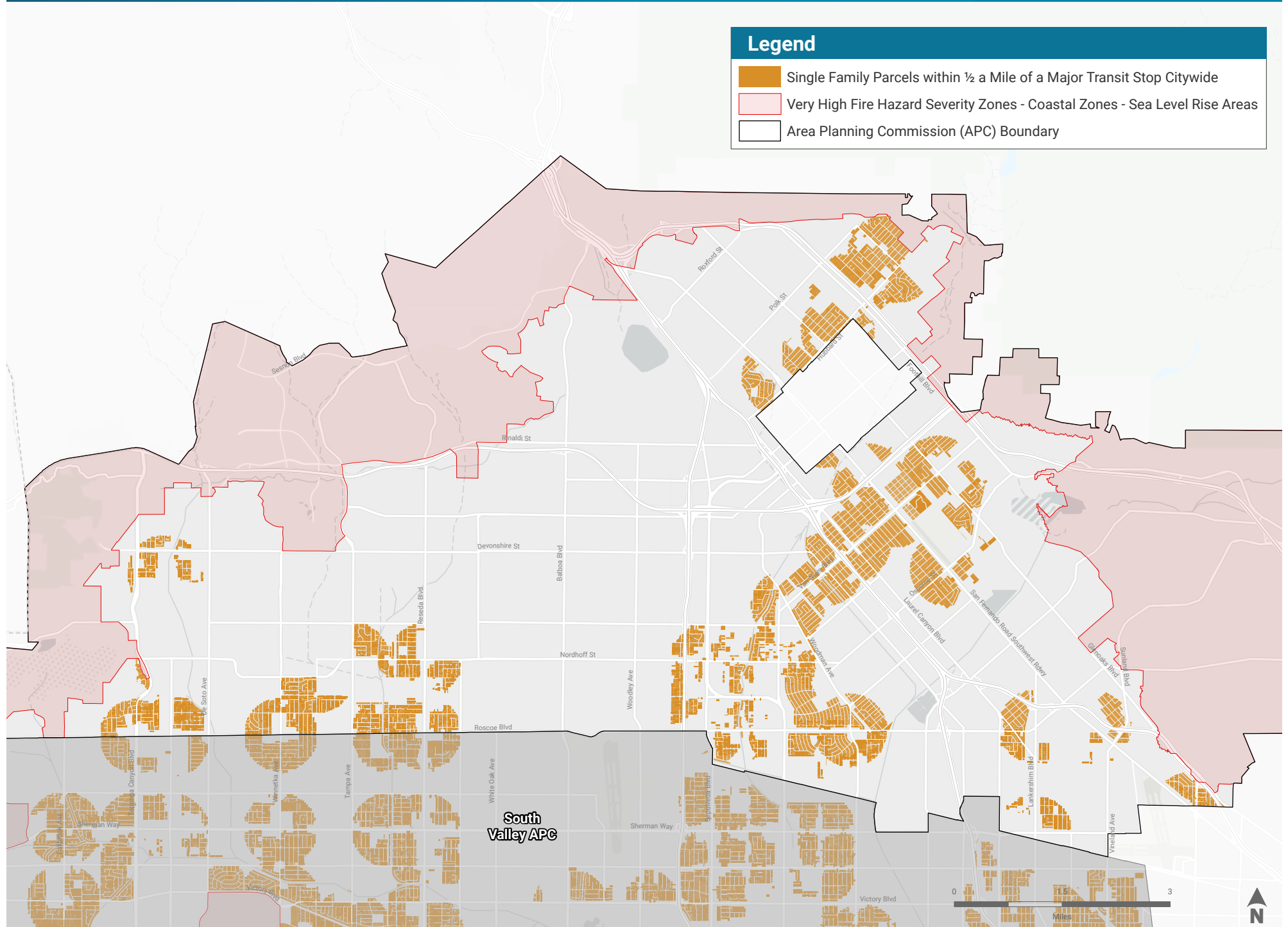




# Option 7 - AHIP Applicability for Shared Equity Projects within a ½ Mile of a Major Transit Stop Harbor APC

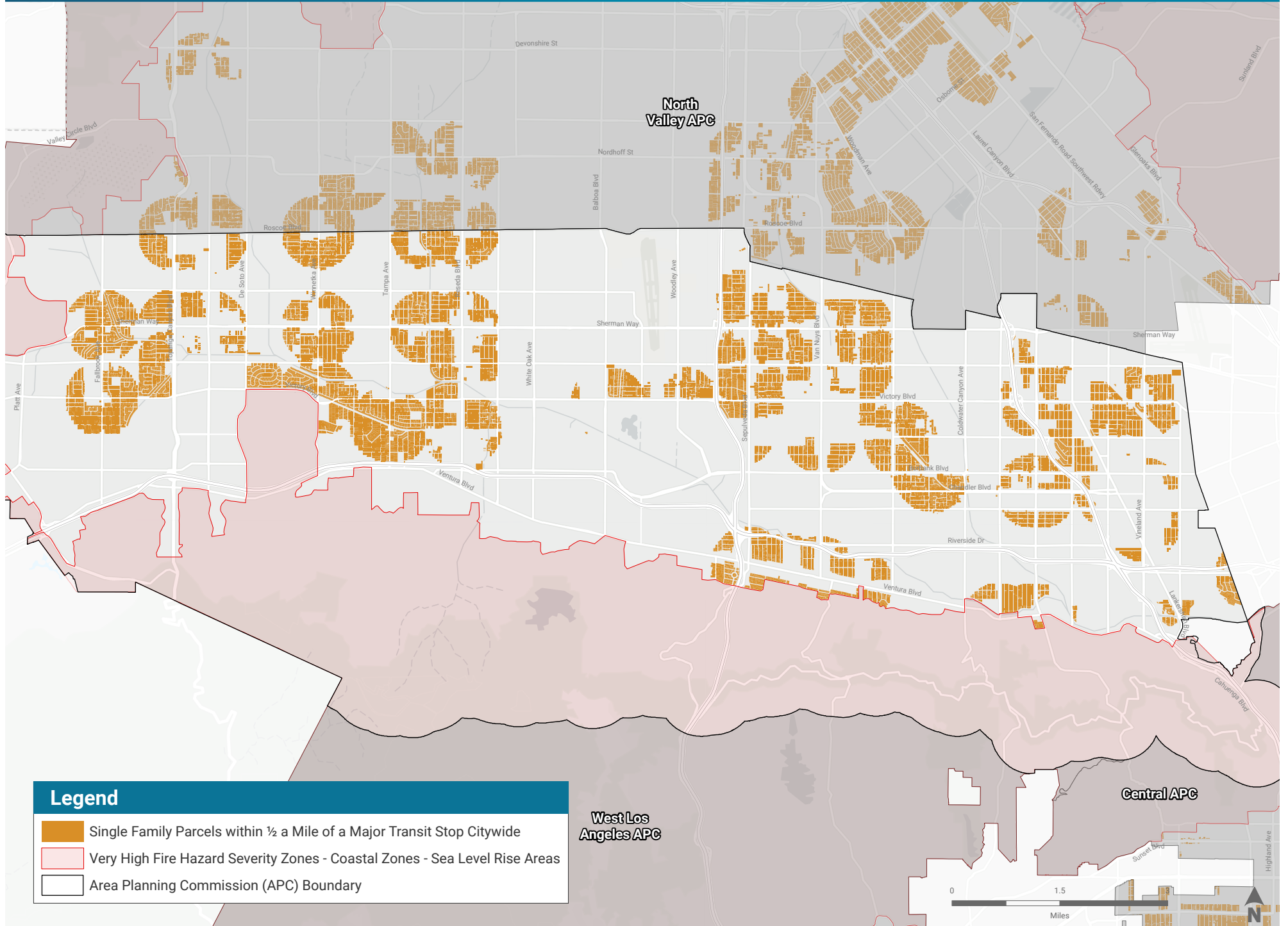


# Option 7 - AHIP Applicability for Shared Equity Projects within a ½ Mile of a Major Transit Stop North Valley APC



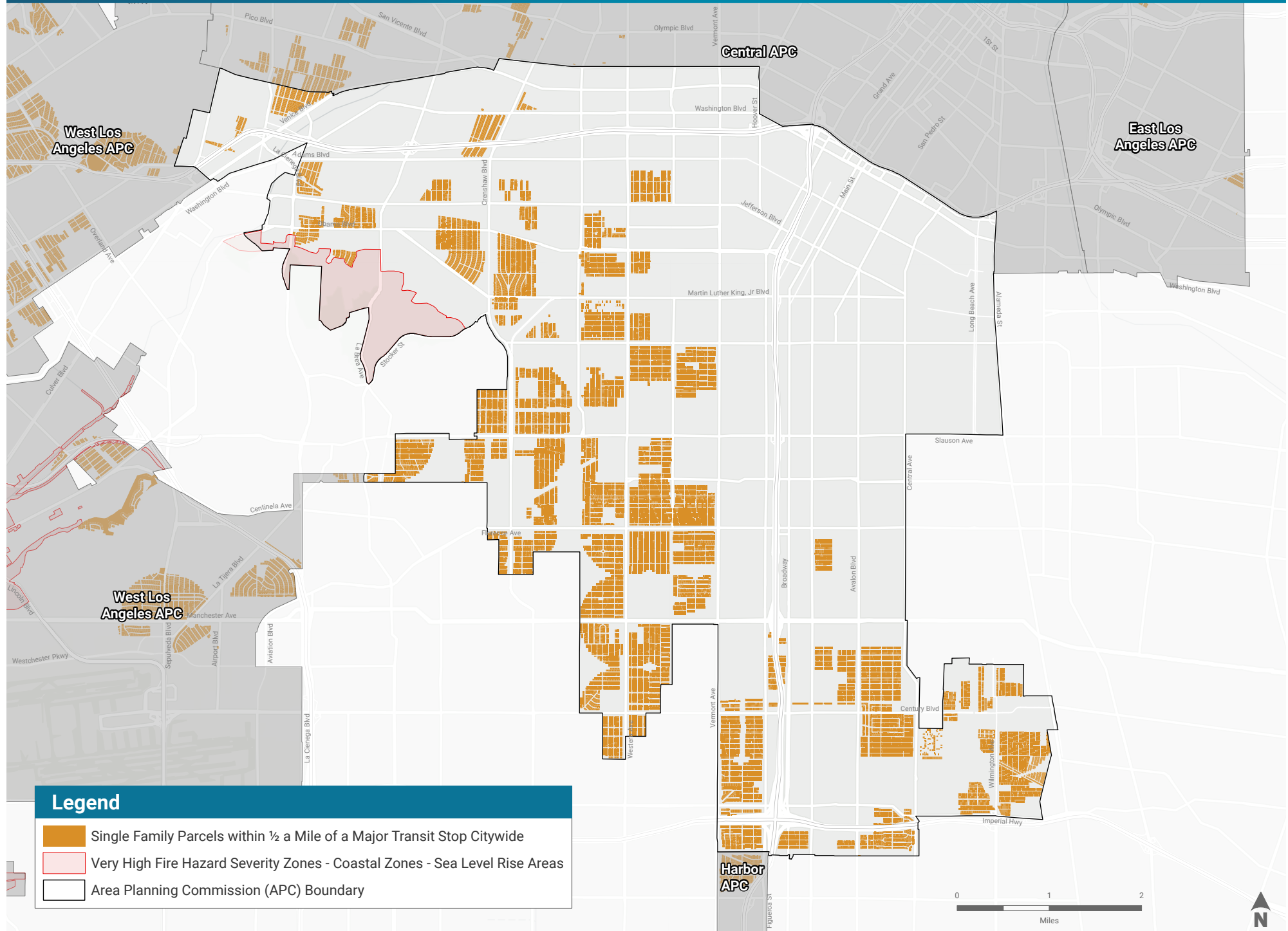


# Option 7 - AHIP Applicability for Shared Equity Projects within a ½ Mile of a Major Transit Stop South Valley APC



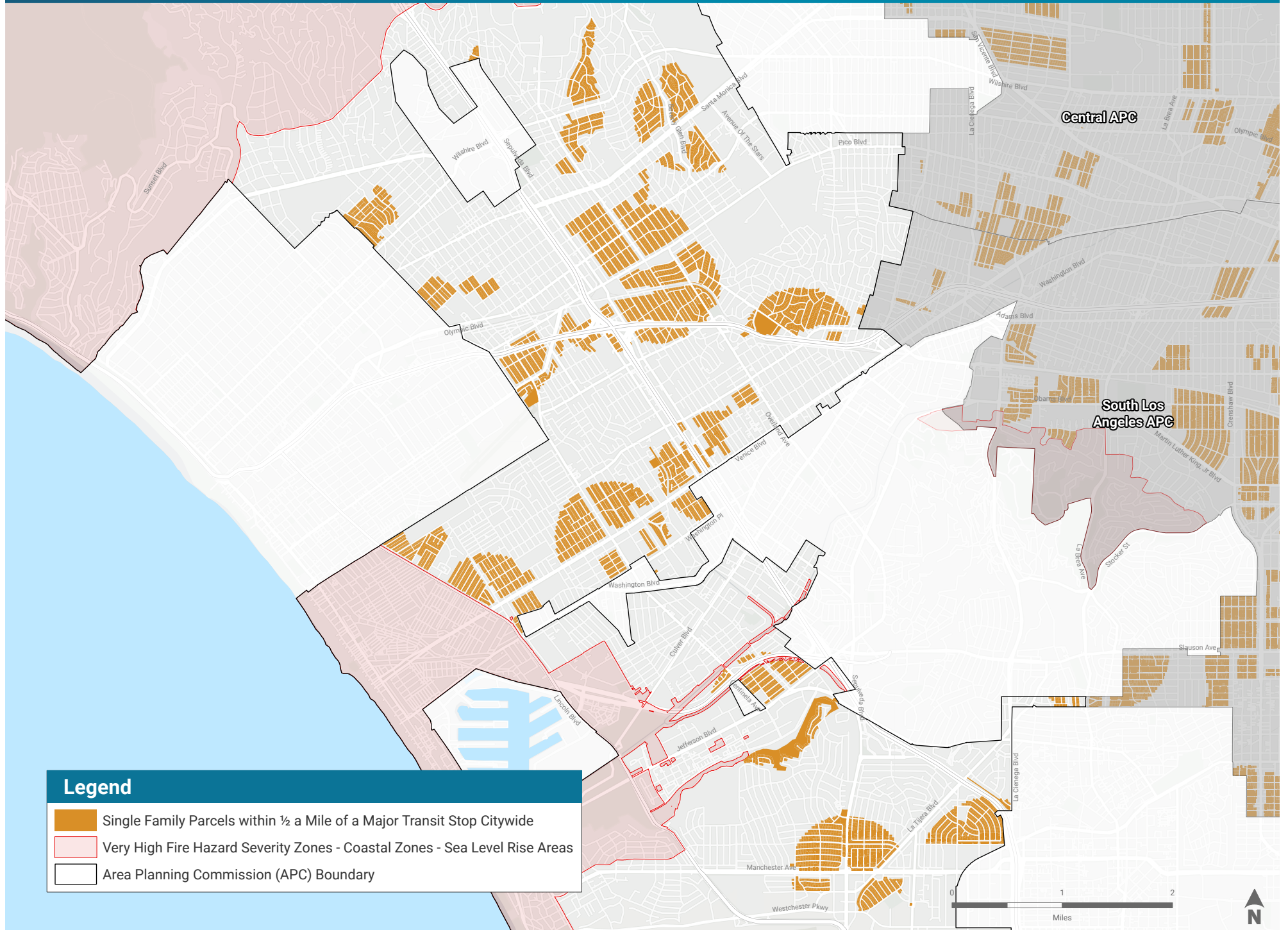
# Option 7 - AHIP Applicability for Shared Equity Projects within a ½ Mile of a Major Transit Stop

## South Los Angeles APC






# Option 7 - AHIP Applicability for Shared Equity Projects within a ½ Mile of a Major Transit Stop West Los Angeles APC



**INSTRUCTIONS:** Revise Appendix 3: Economic and Market Analysis to include Economic and Feasibility Analysis for the Citywide Housing Incentive Program (CHIP): DBO, TOIA, OC, and CT Strategies after PDF Page 84.

**INSTRUCTIONS:** Revise Appendix 3: Economic and Market Analysis to include a new RSO Analysis, a supplemental study designed to explore the impact of replacement ratios exceeding 1:1, after PDF Page 219.



# Economic and Feasibility Analysis for the Citywide Housing Incentive Program (CHIP): DBO, TOIA, OC, and CT Strategies

## **Final Report**

August 19, 2024

Los Angeles City Planning  
City of Los Angeles

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# 1. Introduction and Summary of Findings

The City of Los Angeles Department of City Planning (LACP) engaged AECOM to prepare economic analysis to inform policy development for the City's Regional Housing Needs Allocation (RHNA) Rezoning Program. This report explores the economic feasibility of four proposed program and policy options, which are intended to support the larger effort to expand housing production to meet RHNA goals.

## 1.1 Background

The State of California requires local jurisdictions to demonstrate through the Housing Element process that they maintain sufficient zoned capacity to accommodate their RHNA allocation for the eight-year Housing Element period.

The City of Los Angeles's 2021-2029 Housing Element, which was adopted in November 2021, includes an Adequate Sites Inventory for which the City has identified a development potential of 230,947 units over the 8-year RHNA planning period. However, the 2021-2029 RHNA allocation for the City of Los Angeles includes a target production of 486,379 units (including buffer). Comparing the RHNA allocation and Housing Element site inventory results in a shortfall of 255,432 units.

As part of the Housing Element update process, the City must provide a RHNA Rezoning Program that outlines strategies and policies expected to close the housing production gap by creating additional housing capacity. The City's proposed RHNA Rezoning Program, introduced in Program 121 of the Housing Element, is intended to help fill the expected housing production gap by creating additional housing capacity. Stated broadly, the program's goals are to:

- Prioritize development in Higher Opportunity Areas as defined by the California Tax Credit Allocation Committee (CTCAC) and California Department of Housing and Community Development (HCD).
- Maximize affordability and community benefits.
- Protect communities vulnerable to displacement and housing pressures.
- Exclude hazard areas such as areas at risk of sea level rise and Very High Fire Hazard Severity Zones (VHFHSZ).

The Rezoning Program proposes a range of strategies to meet its goals, including the following:

1. **State Density Bonus Program.** The Rezoning Program encompasses revisions to the City's local **Density Bonus Ordinance (DBO)** which serves as the City's primary mechanism for implementing State Density Bonus Law (SDBL). Proposed changes to the City's local Density Bonus Ordinance include procedural updates as well as revisions that will affirm consistency between the Los Angeles Municipal Code and State Density Bonus Law.
2. **Mixed Income Incentive Program.** The Mixed Income Incentive Program would introduce the **Opportunity Corridors (OC) Incentive Program** and the **Opportunity Corridors Transition (CT) Area Incentive Program** – two of the core concepts proposed as part of the Rezoning Program. Additionally, the Mixed Income Incentive Program includes the proposed **Transit Oriented Incentive Area (TOIA) Program**, which will enshrine key elements of the Transit Oriented Communities Affordable Housing Incentive Guidelines in the Los Angeles Municipal Code. OC and CT incentives will be reserved for project sites in High and Highest Resource Areas as defined by the



CTCAC/HCD Housing Opportunity Area Maps, while TOIA incentives will be available citywide.

3. **Affordable Housing Incentive Program.** The Affordable Housing Incentive Program will provide tailored land use incentives for One Hundred Percent Affordable Housing Projects and affordable housing projects constructed by Faith Based Organizations in Moderate, High and Highest Resource areas of the City, as defined by the CTCAC/HCD Opportunity Area Maps. Additionally, the ordinance will expand the types of zones eligible for One Hundred Percent Affordable Housing projects to “P” Parking zones and “PF” Public Facilities zones.

## 1.1.1 Programs Analyzed

This study analyzes four proposed incentive programs, including the **DBO** and three programs incorporated as part of the **Mixed Income Incentive Program**: the **TOIA**, **OC**, and **CT** programs.

These programs are proposed as incentive-based programs that require applicants proposing multi-family residential development to provide a certain percentage of set-aside affordable units. In return for providing affordable units, applicants receive development bonuses that allow greater densities, floor area ratio (FAR), and heights than are otherwise allowed by base zoning.

Within each program, different levels of incentives are available depending on the percentage of housing units dedicated to affordable housing for low income (LI), very low income (VLI), extremely low income (ELI), and moderate income (MI) households. In addition to the density, FAR, and height bonuses that are the focus of this analysis, projects can also receive other incentives related to setbacks, lot width, open space, lot coverage, and other zoning requirements. Proposed projects that remain within the pre-vetted menu of incentives would also be eligible for streamlined ministerial permit processing. All proposed programs will count above-ground parking as part of floor area ratio (FAR).

Table 1 below summarizes key elements of the DBO, TOIA, OC, and CT programs including policy goal/description; program tiers; maximum density, FAR, and height incentives; and affordable set-aside income levels and calculation methods. **The table shows incentive levels as tested for the purposes of this analysis. Note that the programs are still under development and the table below may not reflect the City’s final policy decisions.**

**Table 1. Key Elements of DBO, TOIA, OC, and CT Incentive Programs (as Tested)**

Program	Policy Goal/ Description	Program Tiers	Max Density Incentive	Max FAR Incentive*	Max Height Incentive	Affordable Set-Aside Income Levels & Calculation Methods
Density Bonus Ordinance Update (DBO)	Procedural updates and revisions to affirm consistency between the Los Angeles Municipal Code and State Density Bonus Law	N/A	100%	50% over base	Increase over base equal to density bonus percentage	VLI, LI, MI Set-asides determined by state law and may be provided through single-affordability pathways (VLI, LI, or MI only), or mixed-affordability pathways (a combination of VLI, LI, and/or MI). Set-asides calculated as share of base units.
Transit Oriented Incentive Areas (TOIA)	Encourage construction of affordable housing near bus and train stations. Set-aside requirements and available bonuses increase by incentive tier (T1-T4), where T1 represents the lowest level of transit service and T4 the highest.	TOIA-1	100%	3.00 FAR or 40% over base	1 story/11 feet	ELI, VLI, LI Set-aside requirements to be determined; may vary by Market Tier. Set-asides calculated as share of total dwelling units.
		TOIA-2	120%	3.50 FAR or 45% over base	1 story/11 feet	
		TOIA-3	Unlimited	4.00 FAR or 50% over base	2 stories/22 feet	
		TOIA-4	Unlimited	4.50 FAR or 55% over base	3 stories/33 feet	
Opportunity Corridors Incentive Program (OC)	Encourage residential development along selected commercial and residential corridors. Set-aside and incentive tiers mirror TOIA tiers, with increasing incentives available in tiers with better transit access.	OC-1	Unlimited Density within FAR and Height Allowances	3.00 FAR (R zones) 3.50 FAR (C zones)	45' (R zones) 1 story/11 feet up to 5 total stories (C zones)	ELI, VLI, LI Set-aside requirements to be determined; may vary by Market Tier. Set-asides calculated as share of total dwelling units.
		OC-2		3.50 FAR (R zones) 4.00 FAR or 45% over base (C zones)	56' (R zones) 2 story/11 feet up to 6 total stories (C zones)	
		OC-3		4.50 FAR or 50% over base (R and C zones)	3 stories/33 feet up to 7 total stories (R and C zones)	
Opportunity Corridors Transition Area Incentive Program** (CT)	Complement OC with adjacent lower-scale infill (or "missing middle") development. Tiers reflect proximity to OC corridor incentive areas, with increasing incentives available in tiers closer to OC areas.	CT-1	Up to 6 Units per Lot	1.30 FAR for 5 units per lot + 0.15 FAR for each additional unit	2 stories	ELI, VLI, LI, MI Set-aside requirements to be determined; tested 1- or 2-affordable units per lot.
		CT-2	Up to 10 Units Per Lot	1.30 FAR for 5 units per lot + 0.15 FAR for each additional unit	3 stories	

\*Maximum FAR incentive calculated as greatest of the options shown.

\*\* A CT project that includes a minimum of 40% of total Residential Units as 2-bedrooms or larger, shall be granted either additional Floor Area up to 0.5 FAR or an additional 11 feet in height.

Note: The table shows incentive levels as tested for the purposes of this analysis. Note that the programs are still under development and the incentive levels tested may not reflect the City's final policy decisions.

Source: AECOM

## 1.2 Overview of the Approach

This section provides a brief overview of the approach used in this analysis. Additional details on the framework for the analysis and the methodology are provided in Chapters 2 and 3.

### 1.2.1 Analytical Framework

AECOM's Market Analysis, which was prepared and submitted in a separate report in May 2024,<sup>1</sup> created a framework for the CHIP Program Economic Analysis by establishing the following three structures:

- **Market Tiers:** AECOM classified the City's local housing markets into 'Market Tiers' that are used to organize and apply various underlying market factors (e.g., rents, sales prices, land costs) that contribute to development potential on residential opportunity sites throughout Los Angeles. The following four Market Tiers were defined, each characterized by their relative market strength:
  - Market Tier 1 (Low)
  - Market Tier 2 (Medium/Low)
  - Market Tier 3 (Medium/High)
  - Market Tier 4 (High)
- **Density Cohorts:** Density cohorts are logical groupings of maximum allowed density levels that represent the wide variety of general zone classes, specific zoning limitations, height districts, and other site-specific regulations and requirements that allow a great diversity of form, scale, and density of housing across Los Angeles.
- **Development Prototypes:** Development prototypes are representative real estate projects that were tested for financial feasibility in the analysis. Prototypes were generally tested under the base condition (i.e., 100%-market-rate, by-right project that does not use CHIP program incentives) and various incentive program scenarios (i.e., projects that provide affordable housing set-asides in return for corresponding density bonuses or other incentives).

### 1.2.2 Financial Analysis Methodology

The analysis of CHIP program economics uses a pro forma model to evaluate the impacts of proposed program parameters on project returns. The model is designed to consider programming parameters including density bonuses, height and FAR maximums, and affordable set-asides. AECOM worked closely with City Staff to develop various combinations of affordable housing set-asides and corresponding incentives for all four CHIP programs. These combinations are referred to as **incentive program scenarios** throughout this analysis and represent some of the zoning levers that can impact development feasibility.

The measure of financial return used in the analysis is **residual land value (RLV)**. RLV analysis is a common approach used in planning exercises to explore and compare financial outcomes of policy proposals. RLV is the amount that remains after estimated project cost is deducted from estimated project value and represents the amount a developer should be willing to pay for land.

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<sup>1</sup> "Task 3: Market Analysis: Market & Economic Study for the Density Bonus Ordinance Update and RHNA Rezoning Program," developed by AECOM for LACP, May 2024.

There are two RLV standards used to gauge the expected financial outcomes of the incentive program scenarios tested in this analysis: “feasibility” and “preferability.”

- **Feasibility.** For the purposes of this analysis, feasibility is a determination of whether the incentive program scenario generates estimated **RLV that is consistent with market land value**. If a scenario generates RLV that is equivalent to or greater than the market standard, it is considered feasible.
- **Preferability.** For the purposes of this analysis, preferability tests whether the incentive program scenario generates **RLV that is greater than a base case scenario**, where the base case scenario is a 100%-market-rate, by-right project that does not use CHIP program incentives. If the incentive program scenario generates an RLV that is equivalent to or greater than the base case, it is considered preferable.

## 1.2.3 Limitations of the Analysis

This study aims to provide policy makers with insights into the potential economic dynamics of proposed programs and program elements, the trade-offs that may be inherent in different options, and the options that may be available to enhance them. The study is based on estimates, assumptions, and other information developed by AECOM from its independent research effort, general knowledge of the industry, and information provided by and consultations with the Client and the Client’s representatives. Every attempt has been made to broadly reflect the variety of future residential development activity that will be impacted by these programs.

Because of the wide range of development options available to residential developers (both proven options and options yet to be developed), the size and diversity of the City of Los Angeles, its submarkets, and its development opportunity sites, the findings herein represent at best a snapshot of a dynamic and changing market. Actual and future results and trends could differ materially from those set forth here due to various factors, including, without limitation, those discussed in the report. These factors are beyond AECOM’s ability to control or predict. Accordingly, AECOM makes no warranty or representation that any of the projected values or results contained in this study will be achieved.

Note that this report does not include analysis of replacement unit requirements or associated costs. The analysis assumes that development sites are acquired based on their land value, with minimal to no acquisition costs for any existing buildings, and that the scenarios would provide enough affordable housing to meet any requirements for replacement units. Actual costs to replace existing units may vary depending on lot conditions and locations, they could further impact the feasibility and attractiveness of the programs.

The findings in this report are specific to the incentive program parameters tested, as well as to the specific prototypes and site conditions tested. While the report suggests implications for policy, ultimately the appropriate tradeoff between affordability requirements and development feasibility is a policy decision for the City rather than an analytical decision.

## 1.3 Summary of Findings

This section describes key findings from the analysis, organized by incentive program. As general context, it is important to note the following findings:

- Incentive program scenarios tested are generally most feasible in **Market Tier 4** (high market strength)
- There is more limited feasibility for certain incentive program scenarios in **Market Tier 2** (medium/low market strength) and **Market Tier 3** (medium/high market strength).

- None of the incentive program scenarios tested were feasible in **Market Tier 1** (low market strength).

These findings are broadly consistent with current observed market activity, which indicates that under today's market conditions, development projects are generally only feasible in stronger markets. Current market conditions are particularly challenging for development, given extreme inflationary pressure on construction materials since 2020 and mortgage rates that remain above recent averages.<sup>2</sup>

While market conditions will change over time, as a general observation, the higher density levels associated with incentive zoning programs are more valuable in stronger residential submarkets such as those represented in Market Tiers 2, 3 and especially 4. In other words, in stronger submarkets, the additional units allowed through incentive programs can more easily generate value that exceeds the cost of setting aside additional affordable units. In weaker submarkets, the value generated by the additional units is less likely to overcome market rental or sale conditions and the cost of the affordable housing set-asides.

### 1.3.1 DBO Update

The City's Density Bonus Ordinance (DBO), an implementation of the State Density Bonus Law (SDBL), has been effective since 2008. Since 2008, more than a dozen state bills have significantly amended State Density Bonus Law (CA Govt. Code Sections 65915-65918). To date, these changes have been implemented in the City through a range of administrative Implementation Memorandums. The proposed update to DBO will bring the City into alignment with revisions to State Density Bonus Law. The update also incorporates density bonuses and affordability requirements available through State Assembly Bill 1287 (AB1287).

A key distinction between DBO and the three programs that comprise the Mixed Income Incentive Program is that affordability set-aside percentages required in DBO are calculated on the base number of units allowed by-right, whereas Mixed Income Incentive Program projects are calculated on the total units, including units granted by the development incentives.

Key findings about the DBO program include:

- **In Market Tiers 3 and 4, many for-rent incentive program scenarios are not only feasible, but preferable to the base case 100% market-rate scenario.** In most for-sale scenarios, the added density does not provide sufficient value to outweigh the additional costs associated with providing additional affordable set-aside units given current market conditions. However, one for-sale scenario (100% density bonus with a 15% VLI/15% MI set aside) was preferable to the base case across multiple prototypes in Market Tier 4.
- **Developers that take advantage of the DBO program in stronger markets are likely to choose set-aside pathways that provide VLI units.** VLI units generate less revenue *per unit* than LI. However, projects that provide VLI units can set aside fewer total affordable units compared to projects that include LI units. In Market Tier 4, the per unit effect of VLI units is offset by the revenue generated by additional market-rate units, compared to projects that provide LI units.<sup>3</sup>

<sup>2</sup> The ULA tax, effective since April 2023, also has an impact on returns for larger (>\$5 million in value) projects, although its effect was moderated in the model by assuming that a variety of adjustments in the market would result in a 5% reduction in total costs for projects subject to the ULA.

<sup>3</sup> In Market Tier 1, at the other end of the spectrum, LI unit pathways generate higher residual land values compared to VLI pathways because there is a smaller gap in rents between market-rate and LI units.



## 1.3.2 Mixed-Income Incentive Program

The Mixed Income Incentive Program focuses on establishing mixed income housing incentives along certain major street corridors, including tools to encourage the construction of various types of “low scale/low rise” housing to create transitions between single-family homes and mid-rise apartment buildings. These “Opportunity Corridor” and “Corridor Transition” incentives will be available for projects located in the City’s High and Highest Resource Areas as defined by the CTCAC/HCD Opportunity Area Maps. Additionally, the Mixed Income Incentive Program includes the proposed TOIA program, which will codify key elements of the Transit Oriented Communities Affordable Housing Incentive Guidelines for sites near transit citywide.

### Transit Oriented Incentive Area Program

TOIA provides density bonus incentives in exchange for affordable housing set-asides in mixed-income residential projects near transit nodes. Both the set-aside requirements and available bonuses increase by TOIA Tiers, where TOIA Tier 1 represents the furthest distance from a Major Transit Stop and Tier 4 the shortest distance from a Major Transit Stop.

The City is proposing to integrate this program as a local implementation of Density Bonus law, and the TOIA program aims to increase available density bonuses beyond current standards, building off recent changes to state law (AB 1287) which expanded density bonuses in the state density bonus program to up to 100 percent. The proposed TOIA also includes expanding procedures for applicants to request off-menu incentives, which is an option that is not available through the existing Transit Oriented Communities (TOC) program.

Key findings about the TOIA include:

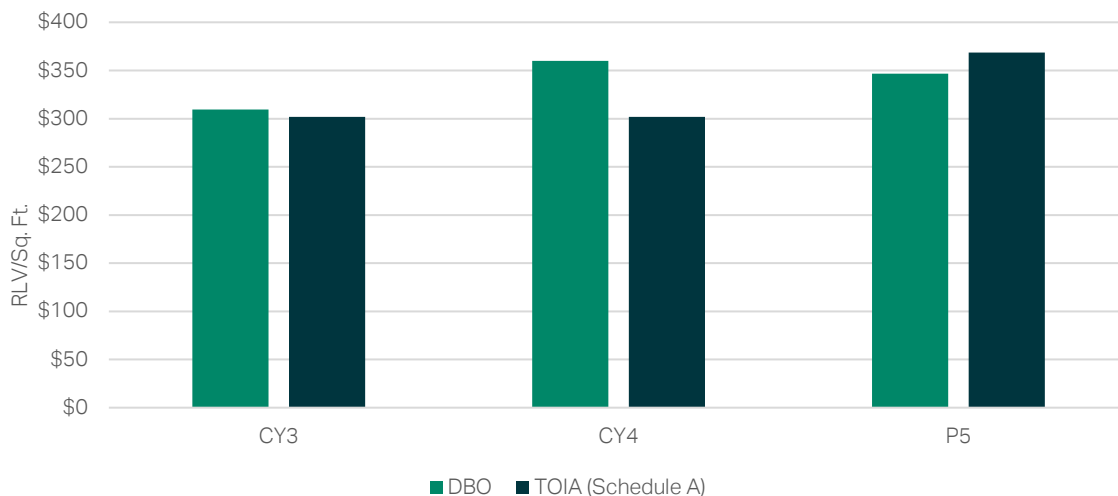
- Overall, the TOIA incentives and associated set-aside requirements should help produce more market-rate and affordable units than would otherwise be feasible.** The analysis of proposed density bonus and affordability parameters for the City’s TOIA program show that the scheduled incentives should provide developer applicants with preferred returns in Market 4 and, to a lesser extent, Market Tier 3 areas.
- However, the ultimate impact of the program will depend on the set-aside schedule selected.** The City is considering a variety of potential set-aside schedules, which could take the form of a single-tier program structure applied consistently across the City, or a multi-tier program structure with different set-aside requirements applied in each Market Tier. The analysis found that scenario feasibility is very sensitive to increased affordable set-asides.
- TOIA scenarios in Market Tier 4 result in feasible prototypes across density cohorts, even with increased affordability set-aside requirements.** Under the market conditions modeled, this is the only market tier that clearly supports the higher levels of set-asides tested. Increasing set-aside requirements could result in fewer projects being built, particularly in places with weaker market conditions, offsetting some of the potential affordable housing production gains that the proposed TOIA enhancements seek to provide.
- TOIA Schedule A – the schedule with the lowest set-asides tested – produces similar development returns compared to DBO in residential zoned areas.**<sup>4</sup> Figure 1 shows the highest residual land values achieved by prototype on residential zoned land in Market Tier 4 under TOIA Schedule A, compared to the DBO program. As tested, DBO projects generate higher RLVs for courtyard projects – suggesting that a profit-

<sup>4</sup> Note that DBO was only tested on residential zoned sites, based on an analysis of recently completed projects that showed that the majority of DBO projects occurred in residential zones (whereas projects in commercial zones were more likely to take advantage of the TOC program, the predecessor to the proposed TOIA program).

seeking developer may be more likely to take advantage of the DBO program where both are available. However, TOIA Schedule A generates higher returns for the P5 prototype.

- **While TOIA offers higher density bonuses than DBO, the financial benefit for applicants is in part offset by the method of calculating affordable set-aside units for TOIA.** The TOIA program calculates affordability set-aside requirements on the total number of units per project. This is a shift from DBO which calculates set-aside requirements as a percentage of units allowed under density limits tied to a site's base zoning condition. In other words, whereas all bonus units are market-rate under DBO, some of the bonus units are required to be set-aside as affordable under TOIA.
- **In some cases, TOIA project feasibility may also be affected by counting above-ground parking against FAR, although developers may partially offset the impact by reducing parking ratios.** TOIA projects are generally limited by FAR rather than density, so counting above-ground parking as part of FAR has a more significant impact on TOIA projects compared to the DBO program, where density is generally the limiting factor. However, reducing FAR incentives for the DBO program could affect this relationship and the relative feasibility of the two programs.

**Figure 1. Highest RLV Achieved by Prototype: DBO v. TOIA Schedule A in Market Tier 4**



Comparison shows rental prototypes in residential zones.  
Source: AECOM

- **Developers who take advantage of the TOIA program in stronger markets are likely to build ELI units.** ELI units generate less revenue *per unit* than LI or VLI. However, ELI projects still generate higher overall returns because projects that provide ELI units are required to provide fewer affordable units, compared to projects that provide LI or VLI units. This is consistent with the City's experience that most projects that have utilized the existing TOC program have built ELI units.<sup>5</sup>

## Opportunity Corridors Incentive Program

The City's proposed OC program advances a holistic vision for livable and sustainable communities by increasing housing capacity along major streets located in Higher Opportunity Areas. This strategy will focus new housing opportunities on major corridors, particularly those with transit access, to provide affordable housing options near transit and amenities. Incentives

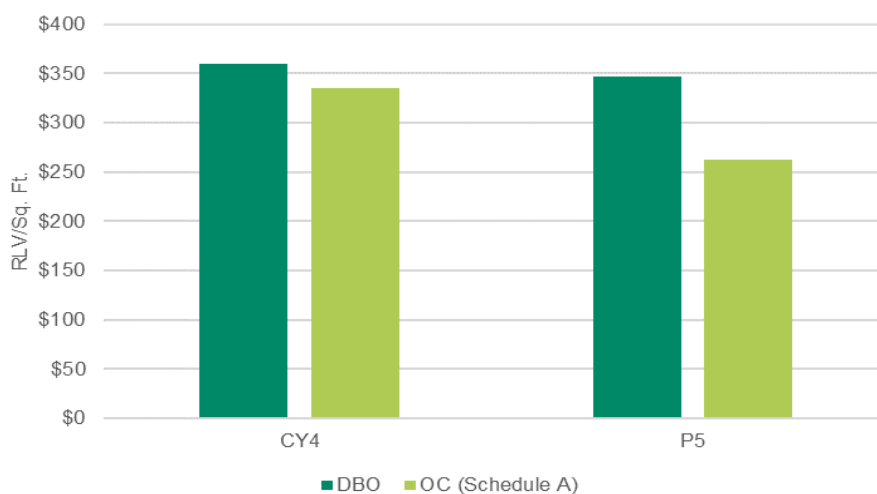
<sup>5</sup> In Market Tier 1, at the other end of the spectrum, ELI unit pathways generate higher residual land values compared to LI/VLI pathways because there is a smaller gap between market-rate and VLI/LI units.

available in the OC program would be provided generally in excess of incentives available in the DBO and TOIA programs.

Key findings about the OC program are described below:

- The OC incentives and associated set-aside requirements may help produce more market-rate and affordable units than would otherwise be feasible under current market conditions.** The analysis of the proposed OC program indicates the proposed incentives create sufficient value for developer applicants to acquire and redevelop land in Market Tier 4 across OC areas – and, to a lesser extent, in Market Tier 3.
- Similar to TOIA, the ultimate impact of the OC program will depend on the set-aside schedule selected.** For OC, the City is considering a multi-tier program structure with different set-aside requirements applied in each Market Tier. The analysis tested a variety of set-aside schedules. Similar to TOIA, scenario feasibility is sensitive to increased affordable set-asides, suggesting that increased set-aside requirements could reduce the number of projects built in lower Market Tiers, and offset the affordable housing production gains from the proposed OC enhancements. Under the scenarios and market conditions modeled, only Market Tier 4 clearly supports the higher set-aside levels tested.
- However, in areas zoned for residential, developers may elect to pursue DBO rather than OC as currently proposed, although the decision will ultimately depend on the underlying zoning and other project specifics.** Figure 2 shows the highest residual land values achieved by prototype on residential zoned land in Market Tier 4 under OC Schedule A, compared to the DBO program. As tested, DBO projects generate slightly higher RLVs for across prototypes—suggesting that a profit-seeking developer may be more likely to take advantage of the DBO program in some cases. Similar to TOIA, while OC offers higher density bonuses than DBO, the financial benefit for applicants is in part offset by the method of calculating affordable set-aside units for OC. In addition, the FAR limits associated with OC limit the total building footprint that the prototypes can achieve, whereas the sites tested for DBO on residential parcels could generally achieve higher densities within the density and FAR bonuses allowed. Ultimately, however, the comparison between programs will depend in part on the specific zoning district where the parcel is located. For example, reducing FAR incentives for the DBO program could affect this relationship and the relative feasibility of the two programs.

**Figure 2. Highest RLV Achieved by Prototype: DBO v. OC (Schedule A) in Market Tier 4**



Comparison shows rental prototypes in residential zones. CY4 and P5 were tested with OC-1 and OC-2 Tiers, respectively.

Source: AECOM

- **Developers who take advantage of the OC program in stronger market areas are likely to build ELI units.** ELI units generate less revenue *per unit* than LI or VLI. However, ELI projects still generate higher overall returns in Market Tier 4 because projects that provide ELI units are required to provide fewer affordable units, compared to projects that provide LI or VLI units. This is consistent with the City's experience that most projects that have utilized the existing TOC program have built ELI units.<sup>6</sup>

## Opportunity Corridor Transition Incentive Program

The City's proposed CT program builds on the proposed OC program's vision for livable and sustainable communities with increased housing capacity along major streets located in Higher Opportunity Areas. The proposed CT is the City's strategy for promoting a diversity of lower-scale housing typologies.

CT is an incentive-based program designed to fill the gap in housing options that exists between detached single-family homes and the type of mid-rise apartment buildings expected to be developed behind Opportunity Corridors. CT tiers generally reflect proximity to OC corridor incentive areas. CT-2 is located closer to the corridors and provides density bonuses up to 10 units per parcel. CT-1 is located farther from the corridors and provides density incentives up to 6 units per parcel.

Key findings about the CT program include:

- **The CT incentive program may produce housing products that are not commonly built in LA under current conditions.** This includes rental rowhouses and courtyard apartments—two housing typologies that have historical precedent in LA but have not been commonly built since at least 2000.<sup>7</sup> Analysis of the proposed Corridor Transition program indicates the proposed incentives create sufficient value for developer applicants to acquire and redevelop land in Market Tiers 3 and 4 in the CT-2 incentive area, and to a more limited extent in the CT-1 area.
- **Affordable set-asides have a bigger impact on feasibility for smaller-scale CT-1 typologies than for larger-scale CT-2 projects.** In this analysis, The CT-2 typologies (courtyard projects) typically generated higher RLVs than the CT-1 typologies (fourplexes, row houses, and townhomes). Townhomes have long been validated by the market and can be constructed efficiently without the use of structured or subterranean parking. However, it is more challenging for smaller-scale CT-1 projects to bear the cost of set-aside units. Even in Market Tier 4, CT-1 feasibility is generally limited to projects that set-aside just one MI unit.
- **To enable a relatively broad range of projects to take advantage of the CT program, the City could consider requiring set asides as follows:**
  - CT-1: 1 MI unit per lot (rental projects), or 2 MI units per lot (for-sale projects).
  - CT-2: 1 ELI unit or 2 VLI units per lot (rental projects), or 2 MI units per lot (for-sale projects)

At these set-aside levels, prototypes are generally feasible in Market Tier 4 under current market conditions, and a more limited set of prototypes are feasible in Market Tier 2 and 3.

Note that the CT results are not directly comparable with the DBO results, because the CT prototypes are assumed to occur on different size lots (that reflect conditions on CT-eligible

<sup>6</sup> In Market Tier 1, at the other end of the spectrum, ELI unit pathways generate higher residual land values compared to LI/VLI pathways because there is a smaller gap between market-rate and VLI/LI units.

<sup>7</sup> See analysis of housing typologies in "Task 3: Market Analysis: Market & Economic Study for the Density Bonus Ordinance Update and RHNA Rezoning Program," developed by AECOM for LACP, May 2024.

parcels, rather than citywide averages) and, in the case of townhomes and rowhomes, have reduced parking ratios as a result of FAR limitations. In addition, parcels that are eligible for CT may not be eligible for DBO.

## 1.4 Report Organization

Following this introduction, the remainder of this report is organized as follows:

- **Chapter 2** summarizes key outcomes from the Market Analysis, which created a framework for the CHIP Program Economic Analysis by establishing Market Tiers, Density Cohorts, and Development Prototypes.
- **Chapter 3** describes the methodology used to test the expected financial outcomes of the programs.
- **Chapters 4 through 7** analyze the feasibility of a proposed update to the DBO, TOIA, OC, and CT programs, respectively.
- **Chapter 8** concludes with a discussion of key findings and policy implications.



## 2. Analytical Framework

Chapter 2 summarizes the methodology of AECOM's Market Analysis, which was prepared and submitted in a separate report in May 2024.<sup>8</sup> The Market Analysis created a framework for the CHIP Program Economic Analysis by establishing the following three structures:

- **Market Tiers:** AECOM classified the City's local housing markets into 'Market Tiers' characterized by their relative market strength. These Market Tiers are used to organize and apply various underlying market factors (e.g., rents, sales prices, land costs) that contribute to development potential on residential opportunity sites throughout Los Angeles.
- **Density Cohorts:** Density cohorts are logical groupings of maximum allowed density levels that represent the wide variety of general zone classes, specific zoning limitations, height districts, and other site-specific regulations and requirements that allow a great diversity of form, scale, and density of housing across Los Angeles.
- **Development Prototypes:** Development prototypes are representative real estate projects that were tested for financial feasibility in the analysis. Prototypes were tested under a base condition (i.e., 100%-market-rate, by-right project that does not use CHIP program incentives) and various incentive program scenarios (i.e., projects that provide affordable housing set-asides in return for corresponding density bonuses or other incentives).

Each of these frameworks is described in detail below. The categories defined within each structure are specific to this study and do not reflect categories currently defined by City regulations. The three frameworks are used throughout the report to define representative properties and streamline the analysis, to help the City understand the potential impact of the proposed incentive programs on as many property types as possible.

### 2.1 Market Tiers

The market tier map used in the feasibility analyses is shown below, as defined in the Market Analysis produced for LACP in May 2024. The Market Analysis report defines and analyzes the following four market tiers, which range from low to high and are intended to represent the relative strength of the residential market in different geographies across the City. As described in the Market Analysis report, the market tiers are based on an index that accounts for rents and for-sale prices of recently built housing, as well as the relative production of rental and for-sale housing over the past 10 years.

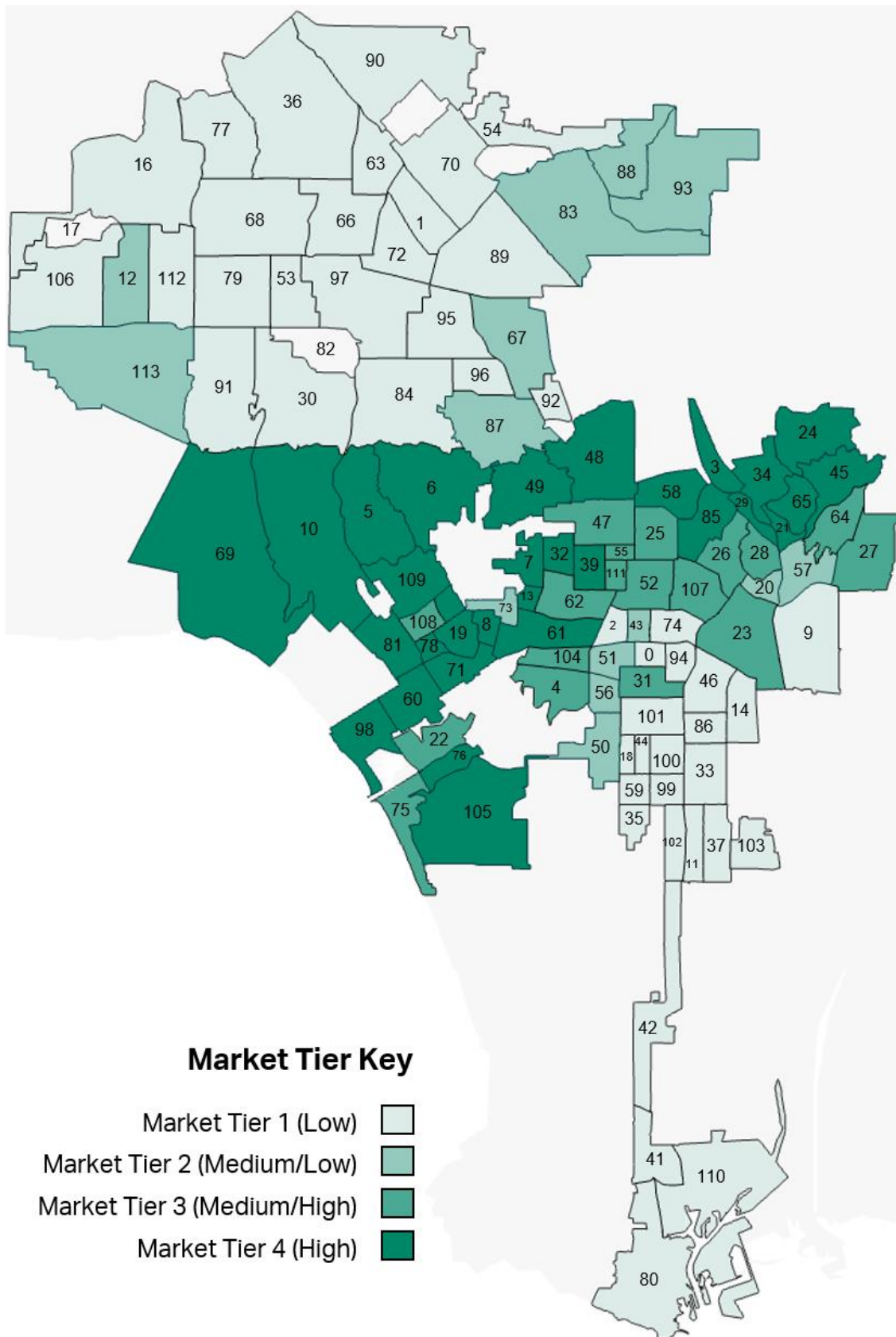
- Market Tier 1 (Low)
- Market Tier 2 (Medium/Low)
- Market Tier 3 (Medium/High)
- Market Tier 4 (High)

The legend below the map shows the name of each neighborhood that corresponds to the number labels used in the map, as well as the Community Planning Area (CPA) that each neighborhood falls primarily within. Additional information about the market tier analysis including the geographic unit of analysis, underlying methodology used to define the market tiers, and key findings can be found in the Market Analysis report<sup>9</sup>.

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<sup>8</sup> "Task 3: Market Analysis: Market & Economic Study for the Density Bonus Ordinance Update and RHNA Rezoning Program," developed by AECOM for LACP, May 2024.

### Figure 3. Market Tiers by Neighborhood Area Map



Source: Los Angeles Times, AECOM

**Figure 4. Market Tiers by Neighborhood Area Key**

#	Neighborhood	Primary CPA	#	Neighborhood	Primary CPA
0	Adams-Normandie	South Los Angeles	58	Los Feliz	Hollywood
1	Arleta	Arleta - Pacoima	59	Manchester Square	South Los Angeles
2	Arlington Heights	West Adams - Baldwin Hills - Leimert	60	Mar Vista	Palms - Mar Vista - Del Rey
3	Atwater Village	Northeast Los Angeles	61	Mid-City	West Adams - Baldwin Hills - Leimert
4	Baldwin Hills/Crenshaw	West Adams - Baldwin Hills - Leimert	62	Mid-Wilshire	Wilshire
5	Bel-Air	Bel Air - Beverly Crest	63	Mission Hills	Mission Hills - Panorama City - North Hills
6	Beverly Crest	Bel Air - Beverly Crest	64	Montecito Heights	Northeast Los Angeles
7	Beverly Grove	Wilshire	65	Mount Washington	Northeast Los Angeles
8	Beverlywood	West Los Angeles	66	North Hills	Mission Hills - Panorama City - North Hills
9	Boyle Heights	Boyle Heights	67	North Hollywood	North Hollywood - Valley Village
10	Brentwood	Brentwood - Pacific Palisades	68	Northridge	Northridge
11	Broadway-Manchester	Southeast Los Angeles	69	Pacific Palisades	Brentwood - Pacific Palisades
12	Canoga Park	Canoga Park - Winnetka - Woodland Hills - West Hills	70	Pacoima	Arleta - Pacoima
13	Carthay	Wilshire	71	Palms	Palms - Mar Vista - Del Rey
14	Central-Alameda	Southeast Los Angeles	72	Panorama City	Mission Hills - Panorama City - North Hills
15	Century City	West Los Angeles	73	Pico-Robertson	Wilshire
16	Chatsworth	Chatsworth - Porter Ranch	74	Pico-Union	South Los Angeles
17	Chatsworth Reservoir	Chatsworth - Porter Ranch	75	Playa del Rey	Westchester - Playa del Rey
18	Chesterfield Square	South Los Angeles	76	Playa Vista	Westchester - Playa del Rey
19	Cheviot Hills	West Los Angeles	77	Porter Ranch	Chatsworth - Porter Ranch
20	Chinatown	Central City North	78	Rancho Park	West Los Angeles
21	Cypress Park	Northeast Los Angeles	79	Reseda	Reseda - West Van Nuys
22	Del Rey	Palms - Mar Vista - Del Rey	80	San Pedro	San Pedro
23	Downtown	Central City	81	Sawtelle	West Los Angeles
24	Eagle Rock	Northeast Los Angeles	82	Sepulveda Basin	Encino - Tarzana
25	East Hollywood	Hollywood	83	Shadow Hills	Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon
26	Echo Park	Silver Lake - Echo Park - Elysian Valley	84	Sherman Oaks	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass
27	El Sereno	Northeast Los Angeles	85	Silver Lake	Silver Lake - Echo Park - Elysian Valley
28	Elysian Park	Silver Lake - Echo Park - Elysian Valley	86	South Park	Southeast Los Angeles
29	Elysian Valley	Silver Lake - Echo Park - Elysian Valley	87	Studio City	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass
30	Encino	Encino - Tarzana	88	Sunland	Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon
31	Exposition Park	South Los Angeles	89	Sun Valley	Sun Valley - La Tuna Canyon
32	Fairfax	Wilshire	90	Sylmar	Sylmar
33	Florence	Southeast Los Angeles	91	Tarzana	Encino - Tarzana
34	Glassell Park	Northeast Los Angeles	92	Toluca Lake	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass
35	Gramercy Park	South Los Angeles	93	Tujunga	Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon
36	Granada Hills	Granada Hills - Knollwood	94	University Park	South Los Angeles
37	Green Meadows	Southeast Los Angeles	95	Valley Glen	Van Nuys - North Sherman Oaks
38	Griffith Park	Hollywood	96	Valley Village	North Hollywood - Valley Village
39	Hancock Park	Wilshire	97	Van Nuys	Van Nuys - North Sherman Oaks
40	Hansen Dam	Arleta - Pacoima	98	Venice	Venice
41	Harbor City	Wilmington - Harbor City	99	Vermont Knolls	South Los Angeles
42	Harbor Gateway	Harbor Gateway	100	Vermont-Slauson	South Los Angeles
43	Harvard Heights	South Los Angeles	101	Vermont Square	South Los Angeles
44	Harvard Park	South Los Angeles	102	Vermont Vista	South Los Angeles
45	Highland Park	Northeast Los Angeles	103	Watts	Southeast Los Angeles
46	Historic South-Central	Southeast Los Angeles	104	West Adams	West Adams - Baldwin Hills - Leimert
47	Hollywood	Hollywood	105	Westchester	Los Angeles International Airport
48	Hollywood Hills	Hollywood	106	West Hills	Canoga Park - Winnetka - Woodland Hills - West Hills
49	Hollywood Hills West	Hollywood	107	Westlake	Westlake
50	Hyde Park	West Adams - Baldwin Hills - Leimert	108	West Los Angeles	West Los Angeles
51	Jefferson Park	West Adams - Baldwin Hills - Leimert	109	Westwood	Westwood
52	Koreatown	Wilshire	110	Wilmington	Wilmington - Harbor City
53	Lake Balboa	Reseda - West Van Nuys	111	Windsor Square	Wilshire
54	Lake View Terrace	Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon	112	Winnetka	Canoga Park - Winnetka - Woodland Hills - West Hills
55	Larchmont	Wilshire	113	Woodland Hills	Canoga Park - Winnetka - Woodland Hills - West Hills
56	Leimert Park	West Adams - Baldwin Hills - Leimert			
57	Lincoln Heights	Northeast Los Angeles			

Source: Los Angeles Times, AECOM

## 2.2 Density Cohort Framework

This analysis uses a framework of density cohorts as a basis for organizing site conditions in a way that generally reflects housing typologies allowed by base zoning conditions.

This organizing framework is helpful in simplifying the wide variety of general zone classes, specific zoning limitations, height districts, other site-specific regulations, requirements and their many combinations, that allowed such a great diversity of form, scale, and density of housing types across the City. The density cohorts are designed to represent categories of typical density ranges (dwelling units per acre, or DU/AC) allowed by base zoning classes across Los Angeles. The specific density ranges for each cohort are based on the density groups identified in Chapter 3 of the City's Framework Element (Policy 3.7.1), as well as an analysis of maximum allowed densities for parcels identified in the City's Housing Element Site Inventory.

Table 2 below shows the five density cohorts explored in this report, which include: Low Medium I, Low Medium II, Medium, High Medium, High. For context on the prevalence of each density cohort within the City, Table 3 also shows the total land area and estimated unbuilt capacity on Housing Element sites by density cohort. The "Other" Cohort includes parcels that do not have a specified maximum density in the site inventory (e.g., MU zones) or are located in zones that are not necessarily for residential uses (e.g., OS zones).

**Table 2. Density Cohorts and City of LA Housing Element Site Inventory Distribution**

Density Cohort	Max Base Density Range (DUAC)	Land Area (AC)	% of Land Area of Total	Unbuilt Capacity (Units)	Unbuilt Capacity %
Low Medium I	10 - 17	5,693	18.1%	42,465	3.4%
Low Medium II	18 - 29	6,442	20.4%	93,554	7.5%
Medium	30 - 55	5,922	18.8%	190,473	15.3%
High Medium	56 - 109	8,840	28.0%	886,182	71.1%
High Medium	110 - 218	148	0.5%	27,939	2.2%
Others	N/A	4,483	14.2%	5,776	0.5%
Total		31,528	100.0%	1,246,389	100.0%

Source: City of Los Angeles Department of City Planning (LACP), AECOM

## 2.3 Development Prototypes

As part of the previous Market Analysis, AECOM created an inventory of housing typologies based on various types of housing currently being developed in the City. This inventory was supplemented by housing concepts more common in other parts of the country (e.g., row houses, triple decker), aspirational housing developments found in other parts of southern California (e.g., medium-density courtyard-style apartments emerging from Pasadena's City of Gardens Ordinance), as well as various historical forms and use concepts more reminiscent of different eras of LA's past (e.g., bungalow courts, "dingbat" apartments).

AECOM worked closely with City staff to distill these housing concepts into a shortlist of housing typologies to consider for feasibility testing. Table 3 below shows the final list of prototypes selected with the City for testing, organized by density cohort. The typologies were selected to be broadly representative of the types of housing development likely to be built in the near future based on recent development trends, real estate trends, and an understanding of the design guidelines, desired built form, proposed program parameters, and policy goals of the CHIP incentive programs analyzed in this report.

**Table 3. Overview of Prototypes Tested by Program**

Prototype Overview							
Density Cohort (Density Range)	Representative Image	Prototype		CHIP Program Testing by Tenure			
		Abbreviation Description (Typical Density)	Parking Strategy (Parking Ratio)	DBO	TOIA	OC	CT
Low Medium II (18-29 DUAC)		4D Plex Style (10-35 DUAC)	Attached Garage & Surface parking (2 Spaces/Unit)		For Rent		For Rent
		TH Townhomes (15 - 30 DUAC)	Tuck-Under Garage (2 Spaces/Unit)	For Sale			For Sale
		RH Rowhouse (15 - 30 DUAC)	Tuck-Under Garage (0.4 Spaces/Bedroom)	For Rent			For Rent
Medium (30-55 DUAC)		CY3 3-Story Courtyard (35 - 75 DUAC)	Subterranean Parking (0.6 Spaces/Bedroom)	For Rent	For Rent		For Rent & For Sale
		CY4 4-Story Courtyard (50 - 105 DUAC)		For Rent	For Rent	For Rent	
High Medium (56-109 DUAC)		P5 5/6-Story Podium (80 - 170 DUAC)	Podium Parking &Subterranean Parking (0.9/BR)	For Rent	For Rent	For Rent	
High (110-218 DUAC)		P7 Single-Use/Mixed-Use 7-Story Podium <sup>1</sup> (155 - 200 DUAC)		For Rent	For Rent	For Rent	
		TW Single-Use/Mixed-Use Tower <sup>1</sup> (110 - 218 DUAC)	Podium Parking &Subterranean Parking (0.9/BR)	For Rent	For Rent		

*\*Note that the TW prototype is limited to a height of 28 stories. Based on discussion with City staff, this represents the maximum height limit likely to be achieved outside of Downtown Los Angeles.*

*Source: AECOM*



In finalizing the list of prototypes for testing, a primary goal was to test at least one prototype in each density cohort. This approach ensured that the final list of prototypes is broadly representative of the base conditions present in the City, as well as the range of multifamily development expected to be developed in the City over the next eight years. Note, however, that in some cases the typical density ranges for each prototype span several density cohorts. These prototypical density ranges represent the typical, market-supported range of densities that each prototype can accommodate while maintaining the main characteristics of its base form. Identifying a prototype density range allows flexibility to be built into the model as some prototypes may be able to accommodate additional units associated with an incentive program while retaining the main characteristics of the underlying prototype.

Table 4 below shows the typical unit sizes and unit mixes assumed for each prototype. Note that for CY3, CY4, and P5 prototypes, two versions of each prototype are provided based on market research and the assumption that as allowable density increases, developers prioritize design changes (e.g., smaller unit size or smaller units in the unit mix to achieve a higher density product) rather than construction type changes to improve profitability while keeping the same construction method and associated costs.

Under state law, developer applicants that utilize the DBO are entitled to reduce parking below required minimums. However, in recent general practice developers frequently do not take full advantage of this incentive because of concerns about securing competitive financing for underparked projects given typical debt and equity underwriting requirements, as well as the ability to market these properties once constructed. Consequently, AECOM's analysis generally reflects typical market parking ratios rather than statutory minimum parking requirements. Parking ratio assumptions (Table 5) were determined by analyzing the same database used to derive the proforma test typologies.<sup>9</sup> Above-ground parking was counted in the FAR for all projects.

**Table 4. DBO, TOIA, and OC Parking Assumptions by Prototype**

Parking Assumptions							
	4D	TH	CY3	CY4	P5	P7	TW
Associated Density Cohort	Low-Med.II	Low-Med.II	Medium	Medium	High-Med.	High	High
Typology Description	Plex-Style	Townhome	3-story Courtyard- style	4-story Courtyard- style	5/6-Story Podium	7/8-Story Podium	Tower
Use Program	Residential	Residential	Residential	Residential	Residential	Residential	Residential
Parking Strategy	Surface &Tuck-Under	Tuck-Under	Underground	Underground	Underground &Podium	Underground &Podium	Underground &Podium
Parking Ratio (spaces/bedroom)	2 per Unit	2 per Unit	0.60	0.60	0.90	0.90	0.90

For CT, reduced parking assumptions were tested for townhouse and rowhouse prototypes.

Source: CoStar, AECOM

Chapter 3 discusses the methodology for “stepping up” from the base case for each prototype (i.e., 100%-market-rate, by-right projects that do not use CHIP program incentives), to incentive program scenarios (i.e., projects that provide affordable housing set-asides in return for corresponding incentives).

For each incentive program, a subset of relevant prototypes were selected, and the prototypes are assigned a specific site size and zoning designation that represents where the incentive programs are most likely to be utilized. Note that additional adjustments to the prototypes were made during the analysis for each respective CHIP incentive program, to reflect the typical site conditions of properties that are most likely to take advantage of the different programs. These

<sup>9</sup> It should be noted that most examples in the database from which parking assumptions were derived are DBO and TOC projects, and that the parking rates used by these projects were no different from the non-DBO and non-TOC examples. Reduced parking assumptions were tested for rowhouses and townhouses for the CT program; see Section 7.3.3 for discussion.

adjustments are discussed in the following chapters, and detailed information on site sizes and zoning designations by prototype and incentive program is provided in Chapters 4-7.

**Table 5. Typical Unit Size (Square Feet) and Mix (Percent of Total Unit Count)**

Prototype	Typical Density Range	Unit Size						Unit Mix				
		Avg	0BR	1BR	2BR	3BR	4BR	0BR	1BR	2BR	3BR	4BR
4D	10-35	1,250			1,050	1,200	1,400			20%	40%	40%
TH/RH	15-30	1,720			1,600	1,800				40%	60%	
CY3 (Low Density)	35-50	1,320			1,200	1,600				70%	30%	
CY3 (High Density)	50-75	880	600	800	1,100			20%	40%	40%		
CY4 (Low Density)	50-80	1,190			1,100	1,400				70%	30%	
CY4 (High Density)	80-105	900		700	1,100				50%	50%		
P5 (Low Density)	80-135	1,000		700	1,100	1,400			40%	40%	20%	
P5 (High Density)	105-170	800	600	700	1,100			20%	50%	30%		
P7	155-200	700	500	700	1,000			30%	50%	20%		
TW	110-218	850	600	800	1,200			25%	50%	25%		

Source: AECOM

## 3. Financial Analysis Methodology

Chapter 3 describes the methodology used to test the likely financial outcomes of the incentive programs. The chapter begins with a discussion of pro forma analysis, including the measures of return used to gauge financial outcomes and the design of the model. The chapter then describes the key inputs and assumptions used in the model.

### 3.1 Pro Forma Analysis

The analysis of CHIP program development economics uses a pro forma model to evaluate the impacts of proposed program parameters on project returns. The model is designed to consider programming parameters including density bonuses, height and FAR maximums, and affordable set-asides. AECOM worked closely with City Staff to develop various combinations of affordable housing set-asides and corresponding incentives for all four CHIP programs. These combinations are referred to as “incentive program scenarios” throughout this analysis and represent some of the zoning levers that can impact development feasibility.

A pro forma model is a representation of the financial returns of a hypothetical real estate project. The pro forma model includes assumptions about development costs, operating costs and revenues, and typical return expectations for a developer considering investment. The impacts and financial feasibility of different incentive scenarios can be explored through adjusting various model inputs.

The analyses of the various CHIP programs employ a “static” pro forma approach which calculates potential project value at an assumed point of project stabilization. This calculation is made at the assumed year that a for-sale project is fully sold or that a rental project achieves stabilized occupancy and can be sold to an investor who will value based on project cash flows. Static pro forma analysis is a commonly accepted approach to planning-level analysis where comparisons between multiple projects and policy options must be made.<sup>10</sup>

#### 3.1.1 Measures of Return

The measure of financial return used in the analysis is **residual land value (RLV)**. RLV is a common approach used in planning exercises to explore and compare financial outcomes of policy proposals. RLV is the amount that remains after estimated project cost is deducted from estimated project value and represents the amount a developer should be willing to pay for land.

There are two RLV standards used to gauge the expected financial outcomes of the incentive program scenarios tested in this analysis: “feasibility” and “preferability.”

- **Feasibility.** For the purposes of this analysis, feasibility is a determination of **whether the incentive program scenario generates RLV that is consistent with market land value**. If a scenario generates RLV that is equivalent to or greater than the market standard, it is considered feasible.
- **Preferability.** Preferability tests **whether the incentive program scenario generates RLV that is greater than a base case scenario**, where the base case scenario is a 100%-

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<sup>10</sup> While a developer may use static pro formas to initially assess a project opportunity, project underwriting by investors and lenders requires a discounted cash flow approach, which estimates project costs and revenues over time up to and past the point of stabilization. A discounted cash flow analysis allows different investor returns and return expectations as well as the time value of money factors to be considered. However, while necessary for investor decision-making, a cash flow model is too sensitive to investor-specific assumptions and in general too complex to allow for efficient comparison of policy options.

market-rate, by-right project that does not use CHIP program incentives. If the incentive program scenario generates an RLV that is equivalent to or greater than the base case, it is considered preferable.

Table 6 summarizes the market land value thresholds used in the pro forma testing by Market Tier and incentive program. As described further in Section 3.3.2, these thresholds are derived from market research on land costs from sets of recent transactions that are relevant to each respective program. When the model resulted in a higher RLV than the market land value, the project is assumed to be feasible. If the model resulted in a lower RLV than the market land value, the project is assumed to be infeasible under current market conditions.

**Table 6. Market Land Value (\$/Sq. Ft. of Land) Threshold for Feasibility by Program**

RLV Baseline				
	DBO	TOIA	OC	CT
<b>Market Tier 1</b>				
Residential	\$140	\$140	\$140	\$90
Commercial	-	\$115	\$115	-
<b>Market Tier 2</b>				
Residential	\$145	\$145	\$145	\$160
Commercial	-	\$170	\$170	-
<b>Market Tier 3</b>				
Residential	\$175	\$175	\$175	\$215
Commercial	-	\$185	\$185	-
<b>Market Tier 4</b>				
Residential	\$230	\$230	\$230	\$225
Commercial	-	\$240	\$240	-

Source: Redfin, CoStar, AECOM

## 3.1.2 Pro Forma Model Design

The pro forma model developed for this analysis was designed to test the financial impact of various levels of affordable housing set-asides and corresponding incentive levels (the “incentive program scenarios”). The model’s workflow involves three general components for each development prototype:

1. **Calculating the built capacity of the base case scenario** for each prototype (for DBO and TOIA only).<sup>11</sup>
2. **“Stepping up” the prototype** to calculate the built capacity of each incentive program scenario, i.e. the maximum unit count assuming the project provides a given level of affordable housing set-aside and takes advantage of corresponding incentives.
3. **Calculating the financial outcomes** of the base case and incentive program scenarios.

<sup>11</sup> For OC, there is no base case because the analysis modeled the feasibility of prototypes that achieved the maximum densities within each incentive area (limited by height and FAR), rather than “stepping up” from a base. For CT, there is no base case calculation because the CT program will primarily be applied to redevelopment of single-family lots or similarly scaled, low-density residential uses. Since the market land value is based on recent transactions of single-family lots, “feasibility” and “preferability” are effectively the same for CT.

These steps are described in more detail below.

### **Step 1. Calculating the built capacity of each base case scenario**

As an initial step of the process, the model determines the likely unit count developed in the base case. This initial built capacity is determined by a combination of zoning regulations, including allowable density, FAR, and building heights based on specific zoning programs, as well as the capacities of the prototypes themselves.

For example, in the DBO program, the CY4 prototype is assumed to be developed on a 15,000 sq ft parcel in R3-1 zone (see Table 20). The lower-density CY4 can accommodate up to 27 units on this site size based on its height and density design. Under the zoning requirement of R3-1, a CY4 prototype can build up to 30 units with a FAR of 3.0, up to 18 units based on an allowable density of 54.45 DUAC, or up to 35 units with a maximum height of 45 feet. Therefore, considering all the restrictions mentioned, the base scenario for a CY4 development would be 18 units. In this case, the "limiting factor" of the built capacity is the allowable density set by the zoning regulations.

Throughout the model, above ground parking square footage is counted towards overall FAR limits, consistent with the City's proposed policies for the CHIP programs.

### **Step 2. "Stepping up" the prototype**

In the second step of the process, the model calculates the total capacity that the developer can access by making use of a given incentive program and picks the corresponding prototype that would result.

When the incentive program scenarios enable more density than what the prototypes at the base can provide, then the model looks for the next tier of prototypes, also called the "stepping up mechanism" in this report. When the scenario "steps up" from one prototype to a higher density one, the model assumes the site dimensions of the new higher density prototype but same underlying zoning.<sup>12</sup> For scenarios involving unlimited density, such as those seen in TOIA and OC projects, the ultimate cap on density is assumed to be a TW height limit of 28 stories.

For example, for a project for which the base scenario is a lower-density CY4 prototype, when the incentive program scenario exceeds 78 DUAC, which is the limit of its density capacity, the model, before upgrading to the prototype to P5, first steps up to a higher density version of CY4 with smaller unit sizes (reduced from 1,190 sf to 900 sf) and a different unit mix (changed from 70% two-bedroom and 30% three-bedroom to 50% one-bedroom and 50% two-bedroom). When the incentive program scenario exceeds 105 DUAC, the project then steps up to a CY5 prototype. In the case of upgrading from one prototype to a completely different prototype (e.g., from CY4 to P5), the site being tested will increase from 15,000 sq ft to 22,500 sq ft, while the underlying zoning remains the same (i.e., R3-1, as used for CY4).

### **Step 3. Calculating the financial outcomes of each incentive program scenario**

In the third step of the process, the model calculates the financial outcomes of base case scenario and each incentive program scenario.

To do this, the model first calculates the set-aside requirement, i.e. the number of affordable units by income level.<sup>13</sup> All fractional calculations are rounded up. For example, the same

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<sup>12</sup> Reflects ingenuity of developers for finding adequate development sites, either through site consolidation and/or market knowledge of sites appropriate for prototypes that can accommodate higher densities

<sup>13</sup> For the DBO program, the calculation of the set-aside requirement is based on maximum permissible by-right units—i.e., total potential units before application of a density bonus. For example, for a project in a zone allowing 100 units seeking a 50-unit 50% density bonus and setting aside 10% as affordable, the set-aside requirement is 10



density bonus applied to a project with a base of 75 units results in a total unit count of 112.5, which is rounded to 113. The 8% set-aside requirement then computes to 9.04 units, which is rounded up to 10.

Next, the model incorporates market-tier-specific assumptions (such as rent, cap rate, vacancy rates, etc.) and prototype-specific assumptions (such as construction costs, parking requirements, etc.) to calculate project revenues and costs. The key inputs and assumptions used to calculate revenues and costs are described below in Section 3.2.

Finally, the model deducts the estimated project cost from the estimated property value to arrive at the RLV. As described above, if a scenario generates RLV that is equivalent to or greater than the market standard, it is considered feasible. If the incentive program scenario generates a RLV that is equivalent to or greater than the base case scenario, it is considered preferable.

### 3.1.3 Incentives Tested

This analysis tests the impact of density, height, and FAR incentives (sometimes referred to as “base incentives”) that are being considered by the City. The specific incentives tested for each respective program are described in Chapters 4-7, below.

Note that in addition to density, height, and FAR incentives, the DBO and Mixed Income Incentive Program also include incentives related to setbacks, lot width, open space, lot coverage, and other zoning requirements that are not tested in this analysis. It is assumed that the development projects tested may take advantage of additional incentives to maximize density, height, and FAR.

## 3.2 Key Inputs and Assumptions

This section describes the key revenue and cost inputs used in the pro forma analysis.

### 3.2.1 Revenues

#### Market-rate Rents

Table 7 shows the market-rate rent assumptions used in the analysis by typology, market tier, and bedroom count. Market rents are based on analysis of recent asking rent rates from CoStar data on 1,407 multifamily projects constructed since 2018 in Los Angeles. To reflect likely rent appreciation that will occur from construction through project stabilization, a 5% premium has been added to the market-based findings.<sup>14</sup>

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units (10% of 100) and not 15 units (10% of 150). This is the approach used by the current adopted DBO and the State Density Bonus Law. For the TOIA and OC program, the set-aside requirement is based on total project units including density bonus units. For example, for a project with 100 base units and a 50% density bonus requiring that 8% of units be set aside as Extremely Low Income (ELI), there are 150 total units (50 density bonus units added to the 100 base) of which 12 (8% of 150) are set aside as ELI.

<sup>14</sup> For the CT program analysis, the parking ratio for the prototypes is reduced and the rent is assumed to decrease by 5% from typical market rates based on market research.

**Table 7. Market Rent**

Typology	\$ /Sq.Ft.				\$ /Unit				
	Market Tier 1	Market Tier 2	Market Tier 3	Market Tier 4	Sq.Ft./ Unit	Market Tier 1	Market Tier 2	Market Tier 3	Market Tier 4
<b>4D</b>									
Studio	\$3.15	\$3.40	\$4.45	\$5.25	550	\$1,730	\$1,880	\$2,450	\$2,890
1-BR	\$3.15	\$3.40	\$4.45	\$5.25	700	\$2,210	\$2,390	\$3,120	\$3,680
2-BR	\$2.90	\$3.15	\$4.20	\$4.75	1,050	\$3,030	\$3,310	\$4,410	\$4,960
3-BR	\$2.65	\$2.90	\$3.70	\$4.45	1,200	\$3,150	\$3,470	\$4,410	\$5,360
4-BR	\$2.35	\$2.65	\$3.40	\$4.20	1,400	\$3,310	\$3,680	\$4,780	\$5,880
<b>TH/RH</b>									
1-BR	\$3.15	\$3.40	\$4.45	\$5.25	800	\$2,520	\$2,720	\$3,560	\$4,200
2-BR	\$2.90	\$3.15	\$4.20	\$4.75	1,250	\$3,625	\$3,938	\$5,250	\$5,938
3-BR	\$2.65	\$2.90	\$3.70	\$4.45	1,550	\$4,108	\$4,495	\$5,735	\$6,898
4-BR	\$2.35	\$2.65	\$3.40	\$4.20	1,900	\$4,465	\$5,035	\$6,460	\$7,980
<b>CY3</b>									
Studio	\$2.90	\$4.20	\$4.75	\$5.00	600	\$1,730	\$2,520	\$2,840	\$2,990
1-BR	\$2.65	\$3.95	\$4.20	\$4.45	800	\$2,100	\$3,150	\$3,360	\$3,570
2-BR	\$2.35	\$3.70	\$3.95	\$4.20	1,200	\$2,840	\$4,410	\$4,730	\$5,040
3-BR	\$2.10	\$3.15	\$3.40	\$3.70	1,600	\$3,360	\$5,040	\$5,460	\$5,880
4-BR	\$2.10	\$3.15	\$3.40	\$3.70	1,900	\$3,990	\$5,990	\$6,480	\$6,980
<b>CY4</b>									
2-BR	\$2.35	\$3.70	\$3.95	\$4.20	1,100	\$2,600	\$4,040	\$4,330	\$4,620
3-BR	\$2.10	\$3.15	\$3.40	\$3.70	1,400	\$2,940	\$4,410	\$4,780	\$5,150
4-BR	\$2.10	\$3.15	\$3.40	\$3.70	-	-	-	-	-
<b>P5</b>									
Studio	\$3.15	\$4.20	\$4.45	\$5.00	600	\$1,890	\$2,520	\$2,680	\$2,990
1-BR	\$2.90	\$3.95	\$4.20	\$4.45	700	\$2,020	\$2,760	\$2,940	\$3,120
2-BR	\$2.65	\$3.70	\$3.95	\$4.20	1,100	\$2,890	\$4,040	\$4,330	\$4,620
3-BR	\$2.35	\$3.40	\$3.70	\$3.95	1,400	\$3,310	\$4,780	\$5,150	\$5,510
<b>P7</b>									
Studio	\$3.35	\$4.40	\$4.75	\$5.25	500	\$1,680	\$2,210	\$2,360	\$2,630
1-BR	\$3.05	\$4.10	\$4.40	\$4.75	700	\$2,130	\$2,870	\$3,090	\$3,310
2-BR	\$2.75	\$3.90	\$4.10	\$4.40	1,000	\$2,730	\$3,890	\$4,100	\$4,410
3-BR	\$2.50	\$3.55	\$3.90	\$4.10	1,400	\$3,530	\$5,000	\$5,440	\$5,730
4-BR	\$2.20	\$3.35	\$3.55	\$3.90	1,700	\$3,750	\$5,710	\$6,070	\$6,600
<b>TW</b>									
Studio	\$3.15	\$3.95	\$4.20	\$5.25	600	\$1,890	\$2,360	\$2,520	\$3,150
1-BR	\$2.90	\$3.70	\$3.95	\$5.00	800	\$2,310	\$2,940	\$3,150	\$3,990
2-BR	\$2.65	\$3.40	\$3.70	\$4.75	1,200	\$3,150	\$4,100	\$4,410	\$5,670
3-BR	\$2.35	\$3.15	\$3.40	\$4.45	1,700	\$4,020	\$5,360	\$5,800	\$7,590
4-BR	\$2.35	\$2.90	\$3.40	\$4.45	2,000	\$4,730	\$5,780	\$6,830	\$8,930

Source: CoStar, AECOM

## Market-rate For-Sale Pricing

Market for-sale pricing is based on a set of 405 recent residential sales transactions drawn from Redfin/MLS. Table 8 shows pricing assumptions categorized by Market Tier, prototype, and bedroom. To reflect likely value appreciation that will occur from construction through project stabilization, a 5% premium has been added to the market-based findings.

**Table 8. Market Sale Prices**

Typology	\$/Sq.Ft.				Sq.Ft./ Unit	\$/Unit			
	Market Tier 1	Market Tier 2	Market Tier 3	Market Tier 4		Market Tier 1	Market Tier 2	Market Tier 3	Market Tier 4
<b>4D</b>									
2BR	\$475	\$550	\$625	\$650	1,050	\$498,750	\$577,500	\$656,250	\$682,500
3BR	\$450	\$525	\$575	\$600	1,200	\$540,000	\$630,000	\$690,000	\$720,000
4BR	\$375	\$475	\$525	\$550	1,400	\$525,000	\$665,000	\$735,000	\$770,000
<b>TH/RH</b>									
2BR	\$500	\$575	\$700	\$975	1,500	\$750,000	\$862,500	\$1,050,000	\$1,462,500
3BR	\$450	\$525	\$650	\$925	1,800	\$810,000	\$945,000	\$1,170,000	\$1,665,000
<b>CY3</b>									
Studio	\$675	\$800	\$900	\$1,150	600	\$405,000	\$480,000	\$540,000	\$690,000
1BR	\$650	\$750	\$875	\$1,050	800	\$520,000	\$600,000	\$700,000	\$840,000
2BR	\$625	\$725	\$850	\$1,025	1,200	\$750,000	\$870,000	\$1,020,000	\$1,230,000
3BR	\$550	\$650	\$750	\$1,000	1,600	\$880,000	\$1,040,000	\$1,200,000	\$1,600,000
<b>CY4</b>									
2BR	\$625	\$725	\$850	\$1,025	1,100	\$687,500	\$797,500	\$935,000	\$1,127,500
3BR	\$550	\$650	\$750	\$1,000	1,400	\$770,000	\$910,000	\$1,050,000	\$1,400,000
<b>P5</b>									
Studio	\$675	\$825	\$950	\$1,150	600	\$405,000	\$495,000	\$570,000	\$690,000
1BR	\$650	\$800	\$925	\$1,125	700	\$455,000	\$560,000	\$647,500	\$787,500
2BR	\$625	\$750	\$900	\$1,100	1,100	\$687,500	\$825,000	\$990,000	\$1,210,000
3BR	\$600	\$700	\$875	\$1,075	1,400	\$840,000	\$980,000	\$1,225,000	\$1,505,000
<b>P7</b>									
Studio	\$675	\$825	\$950	\$1,150	500	\$337,500	\$412,500	\$475,000	\$575,000
1BR	\$650	\$800	\$925	\$1,125	700	\$455,000	\$560,000	\$647,500	\$787,500
2BR	\$625	\$750	\$900	\$1,100	1,000	\$625,000	\$750,000	\$900,000	\$1,100,000
3BR	\$600	\$700	\$875	\$1,075	1,400	\$840,000	\$980,000	\$1,225,000	\$1,505,000
<b>TW</b>									
Studio	\$625	\$725	\$850	\$1,100	600	\$375,000	\$435,000	\$510,000	\$660,000
1BR	\$600	\$700	\$825	\$1,000	800	\$480,000	\$560,000	\$660,000	\$800,000
2BR	\$525	\$625	\$725	\$900	1,200	\$630,000	\$750,000	\$870,000	\$1,080,000

Source: Redfin, AECOM

## Affordable Rents

Assumed affordable rents are based on the City's published schedules.<sup>15</sup> and the utility allowance schedule published by the Housing Authority of the City of Los Angeles (HACLA) based on Area Median Income (AMI).<sup>16</sup> The analysis includes Very Low Income (VLI at 50% of AMI), Low Income (LI at 80% AMI), and Moderate Income (MI at 120% AMI) units. The calculations for supportable affordable rents by income tier are shown in Table 9.

**Table 9. Affordable Rents**

Supportable Affordable Rents (Monthly)				
	ELI 30% AMI	VLI 50% AMI	LI 80% AMI	MI 120% AMI
<b>Allocated Housing Cost<sup>(1)</sup></b>				
1-Person Household (Studio)	\$663	\$1,104	\$1,766	\$2,406
2-Person Household (1BR)	\$758	\$1,261	\$2,019	\$2,750
3-Person Household (2BR)	\$853	\$1,419	\$2,271	\$3,093
4-Person Household (3BR)	\$946	\$1,576	\$2,523	\$3,437
5-Person Household (4BR)	\$1,023	\$1,703	\$2,725	\$3,713
<b>Utilities<sup>(2)</sup></b>				
1-Person Household (Studio)	\$171	\$171	\$171	\$171
2-Person Household (1BR)	\$228	\$228	\$228	\$228
3-Person Household (2BR)	\$287	\$287	\$287	\$287
4-Person Household (3BR)	\$347	\$347	\$347	\$347
5-Person Household (4BR)	\$436	\$436	\$436	\$436
<b>Total Available for Rent Payment</b>				
1-Person Household (Studio)	\$492	\$933	\$1,595	\$2,235
2-Person Household (1BR)	\$530	\$1,033	\$1,791	\$2,522
3-Person Household (2BR)	\$566	\$1,132	\$1,984	\$2,806
4-Person Household (3BR)	\$599	\$1,229	\$2,176	\$3,090
5-Person Household (4BR)	\$587	\$1,267	\$2,289	\$3,277

Source: Housing Authority of the City of Los Angeles (HACLA); California Housing and Community Development (HCD), AECOM  
 Notes: (1) Area Median Income limits for Extremely Low, Very Low, Low income, and Moderate tiers from California Department of Housing and Community Development (HCD) - Land Use Schedule VI Effective Date: August 1, 2023. AMI is \$98,200.

(2) LACDA Utility Allowance Schedule, effective 12/01/2023; AECOM assumes trash collection is excluded from tenant costs.

## Affordable For-Sale Pricing

Assumed pricing for affordable for-sale prices are based on an estimated monthly household cost calculated using the City's published schedules,<sup>17</sup> the utility allowance schedule published by the Housing Authority of the City of Los Angeles (HACLA),<sup>18</sup> and estimates for HOA fees, homeowner insurance, and property tax. Supportable for-sale value is derived after assuming a 5% down payment, which is a typical required minimum for affordable units. The calculations for affordable for-sale pricing are shown in Table 10.

<sup>15</sup> HCD Net Schedule 6: <https://housing2.lacity.org/partners/land-use-rent-income-schedules>

<sup>16</sup> <https://www.hacla.org/sites/default/files/Section%208/S8%20Forms/2022-25a%20Utility%20Allowance%20Schedule%20Forms.pdf>

<sup>17</sup> HCD Net Schedule 6: <https://housing2.lacity.org/partners/land-use-rent-income-schedules>

<sup>18</sup> <https://www.hacla.org/sites/default/files/Section%208/S8%20Forms/2022-25a%20Utility%20Allowance%20Schedule%20Forms.pdf>

**Table 10. Affordable Sale Prices**

<b>Supportable Affordable Sales Prices</b>				
	<b>ELI</b>	<b>VLI</b>	<b>LI</b>	<b>MI</b>
	<b>30% AMI</b>	<b>50% AMI</b>	<b>80% AMI</b>	<b>120% AMI</b>
<b>Allocated Housing Cost<sup>1</sup></b>				
1-Person Household (Studio)	\$7,950	\$13,245	\$21,195	\$28,875
2-Person Household (1BR)	\$9,090	\$15,135	\$24,225	\$33,005
3-Person Household (2BR)	\$10,230	\$17,025	\$27,255	\$37,118
4-Person Household (3BR)	\$11,355	\$18,915	\$30,270	\$41,248
<b>Utilities<sup>2</sup></b>				
1-Person Household (Studio)	\$2,052	\$2,052	\$2,052	\$2,052
2-Person Household (1BR)	\$2,736	\$2,736	\$2,736	\$2,736
3-Person Household (2BR)	\$3,444	\$3,444	\$3,444	\$3,444
4-Person Household (3BR)	\$4,164	\$4,164	\$4,164	\$4,164
<b>HOA<sup>3</sup></b>				
1-Person Household (Studio)	\$628	\$1,046	\$1,674	\$2,280
2-Person Household (1BR)	\$727	\$1,211	\$1,938	\$2,640
3-Person Household (2BR)	\$826	\$1,376	\$2,202	\$3,000
4-Person Household (3BR)	\$909	\$1,514	\$2,422	\$3,300
<b>Home Owners Insurance<sup>4</sup></b>				
1-Person Household (Studio)	\$1,007	\$1,007	\$1,007	\$1,007
2-Person Household (1BR)	\$1,150	\$1,150	\$1,150	\$1,150
3-Person Household (2BR)	\$1,330	\$1,330	\$1,330	\$1,330
4-Person Household (3BR)	\$1,853	\$1,853	\$1,853	\$1,853
<b>Property Tax<sup>5</sup></b>				
1-Person Household (Studio)	\$774	\$1,660	\$2,989	\$4,273
2-Person Household (1BR)	\$812	\$1,823	\$3,341	\$4,807
3-Person Household (2BR)	\$841	\$1,974	\$3,682	\$5,328
4-Person Household (3BR)	\$804	\$2,068	\$3,964	\$5,797
<b>Available for Mortgage Payment</b>				
1-Person Household (Studio)	\$3,489	\$7,481	\$13,473	\$19,263
2-Person Household (1BR)	\$3,665	\$8,216	\$15,061	\$21,672
3-Person Household (2BR)	\$3,789	\$8,901	\$16,597	\$24,016
4-Person Household (3BR)	\$3,626	\$9,317	\$17,868	\$26,134
<b>Supportable Mortgage<sup>6</sup></b>				
1-Person Household (Studio)	\$61,275	\$131,366	\$236,603	\$338,273
2-Person Household (1BR)	\$64,365	\$144,276	\$264,483	\$380,587
3-Person Household (2BR)	\$66,535	\$156,308	\$291,465	\$421,735
4-Person Household (3BR)	\$63,675	\$163,619	\$313,773	\$458,935
<b>Supportable Sales Price (rounded)</b>				
1-Person Household (Studio)	\$64,500	\$138,300	\$249,100	\$356,100
2-Person Household (1BR)	\$67,800	\$151,900	\$278,400	\$400,600
3-Person Household (2BR)	\$70,000	\$164,500	\$306,800	\$443,900
4-Person Household (3BR)	\$67,000	\$172,200	\$330,300	\$483,100

Source: Housing Authority of the City of Los Angeles (HACLA); California Housing and Community Development (HCD), AECOM  
 Notes: (1) Area Median Income limits for Extremely Low, Very Low, Low income, and Moderate tiers from California Department of Housing and Community Development (HCD) - Land Use Schedule VI Effective Date: August 1, 2023. AMI is \$98,200.

(2) LACDA Utility Allowance Schedule, effective 12/01/2023; AECOM assumes trash collection is excluded from tenant costs.

(3) AECOM estimate assuming developer indexes HOA fees to affordability.

(4) Calculated as 0.19% of market value of the unit (derived from medians for home value and insurance rates, 2021 California).

(5) 1.2% of sales price.

(6) 30-year mortgage, 3.95% rate (based on annual average 2013-7/22/2022).

(7) A 5% down payment is a typical minimum for affordable for-sale units.



## Exit Capitalization Rates

The assumed capitalization rate for a rental project at stabilization is 4.5%, based on data from CBRE and CoStar.

## 3.2.2 Costs and Expenses

### Hard (Direct) Costs

Assumptions used in the scenario pro forma models for vertical improvement costs were developed from several sources including RS Means, developer interviews, recent completed comparable projects, and selected inputs from AECOM cost estimators. Table 11 summarizes construction costs for building structures and parking structures. The hard costs are universal across different programs.

It is important to note that construction costs have been greatly impacted by inflation since 2020 stemming largely from the global pandemic and the Ukraine war. According to Federal Reserve Economic data (FRED) construction cost index, from 2020 through September 2023, construction costs have inflated at 10% annually resulting in costs that in September 2023 were 42% higher than in January 2020. The costs assumed in the scenario pro forma analysis are based on 2022 RS Means data, escalated by 10% to estimate 2023 costs.

**Table 11. Hard Costs**

Prototype Code	4D-R	TH	CY3	CY4	P5	P7	TW
Site Improvement Work (Per Site SF)	\$5	\$10	\$10	\$10	\$10	\$10	\$10
Building Hard Cost (Per Bldg SF)	\$233	\$215	\$220	\$208	\$202	\$238	\$209
Parking Hard Costs (Per Space)							
Surface	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500
Tuck-Under	\$23,900	\$23,200	\$23,800	\$22,400	\$21,800	\$25,700	\$22,600
Podium	\$10,000	\$10,000	\$36,600	\$36,600	\$36,600	\$34,300	\$33,000
Underground	\$10,000	\$10,000	\$49,000	\$47,300	\$43,600	\$44,100	\$41,300

Source: RS Means, AECOM

### Soft (Indirect) Costs

Soft (indirect) costs include all other necessary expenses required to complete the development process. Indirect costs are generally calculated as a percentage of hard (direct) costs using the assumptions shown in Table 12.

**Table 12. Indirect Costs**

Indirect Costs	
Architecture and Engineering Fee	6% of all direct costs
Permits and Fees	\$35 per gross sf
Legal, Insurance, Warranty	2% of all direct costs
Marketing	\$2,000 per unit
General and Administrative	1% of all other indirect costs
Developer Fee	4.5% of all direct costs
Soft Cost Contingency	5% of all other indirect costs

Source: AECOM

## Land Costs

Land cost assumptions are based on a market review of recent transactions and used to establish a basis for financial feasibility.<sup>19</sup>

**For the DBO, TOIA, OC programs**, the land transaction set consists of 278 comparable land transactions drawn from CoStar that occurred in the City of Los Angeles between January 2021 and September 2023.<sup>20</sup> The dataset was filtered to exclude transactions with incomplete data, transactions for sites smaller than 0.11 acres (5,000 square feet) and transactions for sites larger than 5 acres. The size filtering is intended to eliminate outliers, non-standard, and non-representative land transactions from the set. To adjust the nominal value of transactions that took place in 2021 and 2022 to 2023 values, AECOM normalized the dataset by applying County annual land value growth rates based on assessor data.

To assess scenario feasibility, the land value basis is set at the first quartile measure from the transaction set, an approach that sets the threshold for feasibility below the measured median land cost. This is intended to reflect the wide range of land costs observed in each market tier and to generate findings that are broadly representative of the area assessed. Both first quartile and median land values are shown in the tables below.

**Table 13. DBO, TOIA and OC Land Costs**

		\$ / Land Square Foot <sup>2</sup>	
	n <sup>1</sup>	1st Q	Median
<b>Market Tier 1</b>			
Residential	24	\$140	\$160
Commercial	40	\$115	\$140
<b>Market Tier 2</b>			
Residential	31	\$145	\$175
Commercial	27	\$170	\$230
<b>Market Tier 3</b>			
Residential	34	\$175	\$215
Commercial	17	\$185	\$405
<b>Market Tier 4</b>			
Residential	56	\$230	\$275
Commercial	49	\$240	\$375
<b>Citywide</b>			
Residential	145	\$165	\$220
Commercial	133	\$145	\$220

Sources: Redfin, CoStar

(1) Transactions in the City of Los Angeles between 1/1/2021 and 9/2023 on residentially zoned sites tagged as "land" and filtered to exclude transactions with incomplete data and on parcels less than 5,000 sq.ft. or greater than 5 acres.

(2) In \$2023. Transactions that took place in 2021 and 2022 normalized to 2023 by applying County annual land value growth rates (from Assessor Data).

(3) The DBO program is only tested on residential parcels.

<sup>19</sup> Assumes minimal or no acquisition costs for the existing building are assumed; the development site is acquired based on its land value. The analysis also assumes that replacement unit requirements do not apply to the tested scenarios, or if any replacement units are required the scenarios would provide enough affordable housing to meet the minimum requirements stipulated in SEC. 151.28 of the Los Angeles Municipal Code.

<sup>20</sup> The ULA tax has been in effect since April 2023. It has been hypothesized that ULA could apply downward pressure on land values. However, in the assessed land transaction set (which includes a relatively low number of land transactions since 4/1/23), there is no evidence that any softening of land values has yet occurred.

**For the CT program**, land cost assumptions are based on a market review of recent transactions of eligible CT sites. The approach assumes that the CT program will primarily be applied to redevelopment of single-family lots or similarly scaled, low-density residential uses.

AECOM estimated land costs using a set of recent single-family home sales, sourced from Redfin, consisting of 51 transactions in the City between January 2021 and September 2023. These transactions were cross-referenced with a set of eligible CT sites provided by City staff. The set was further filtered to exclude transactions of sites smaller than 4,000 square feet. The size filtering is intended to eliminate outliers, non-standard, and non-representative land transactions from the set.

Single family homes and similar properties found throughout Los Angeles vary widely in parcel size, quality of existing buildings, and type of location. These factors contribute to a wide range of land costs observed in each market tier. To account for this wide range, this analysis uses the median price (sales price/land square feet) of the recent transactions to broadly represent the market value of land in each market tier and determine project feasibility. The median land values for each market tier are shown in the table below. The first quartile of land values is also shown for reference and to indicate redevelopment potential at the lower end of the price range.

The median rather than the first quartile value was used for CT because the program is designed to encourage redevelopment of single-family uses and similarly small-scaled low-density residential uses within Higher Opportunity Areas. Decades of limited development coupled with a scarcity of land suitable for single-family development have led to high single-family home values and a high threshold for feasibility for CT projects.

**Table 14. CT Land Costs**

MM Land Values	\$ / Land Square Foot		
	n1	1st Q	Median
Market Tier 1	8	\$90	\$120
Market Tier 2	2	\$160	\$170
Market Tier 3	10	\$215	\$220
Market Tier 4	31	\$225	\$320
Citywide	51	\$195	\$235

(1) Transactions of single-family houses in the City of Los Angeles between 03/2022 and 04/2023 on the lots above 4,000 sq.ft.

(2) All numbers are rounded off to the nearest 5

Source: Redfin, AECOM

## Financing Costs

Assumptions for construction loan financing are as follows, reflecting typical underwriting assumptions: 65% loan to cost (LTC), 50% average loan balance, 2.5% loan fees, 7.5% interest rate, and a 2-year construction period.

## Return Threshold

The assumed threshold yield on cost used is 12-13% of total costs before land depending on tenure types and prototypes or 10% of total costs after including land. While actual threshold return expectations may vary widely by project, by investor, by market, and by perceived risk, this yield on cost threshold is commonly assumed in planning-level analysis.

## 3.2.3 Policy and Regulatory Costs

### Affordable Housing Linkage Fee

The City's Affordable Housing Linkage Fee (AHLF) charges a fee on market-rate development, which is used to fund the creation of affordable housing across the City. As specified in Municipal Code Section 19.18, residential projects dedicate at least 40% of units to MI households, or at least 20% of units to LI households, or at least 11% of units to VLI households, or at least 8% of total units to ELI units, are exempt from the AHLF.

Linkage fees are applied to the base case (100% market-rate) scenarios, assuming fees are drawn from the schedule effective as of July 1, 2023. All TOIA and OC incentive program scenarios are exempt from the AHLF because these programs are structured so that projects achieve affordability levels that meet the AHLF program exemptions.

For DBO and CT, some incentive program scenarios meet the AHLF program exemptions and others do not. This is determined for each scenario based on the percentage of units dedicated to affordable housing by income level.<sup>21</sup>

Under the existing DBO program, City staff have observed that developers will sometimes contribute an additional affordable unit or minimum number of units required to qualify a project for a Linkage Fee exemption. City staff also noted informal feedback from the development community suggesting that paying the Linkage Fee (not qualifying for an exemption) presents enough of a burden on DBO project economics to cause applicants to withdraw proposals. **This analysis assumes the developer would opt to pay the linkage fee rather than build more units or otherwise restructure the project to qualify for exemptions.** Although analyzing the impacts of the Linkage Fee on project economics was not a component of this study, exploratory testing suggests that Linkage Fee payments have a relatively small impact on typical project feasibility.<sup>22</sup>

### ULA Tax

The ULA tax became effective in the City on April 1, 2023, and is applied to all transactions valued at over \$5 million. The tax rate for transactions between \$5 and \$10 million is 4% and 5.5% for transactions over \$10 million. The impacts of the tax on development costs are complex and will affect different projects differently. For example, a project that includes an initial land acquisition, improvements to the site, and sale of the finished project could incur the ULA tax twice: first on the land sale and second on the sale of the improved project. On the other hand, projects that are valued at less than \$5 million will never incur the tax. The tax also does not affect owner-operators directly since it is only incurred upon sale.

The analysis assumes the seller pays the ULA tax but does not "pass it on" to the buyer. For example, on the initial land transaction, the seller absorbs the tax, resulting in a land value that is effectively lower than the market rate for the seller but not the buyer. Likewise, for the transaction of a finished project, the seller absorbs the tax, which again effectively lowers project value for the seller but not the buyer.

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<sup>21</sup> Note that for the DBO program, the set-aside calculation is based on the base density. Therefore, some projects have nominal set-asides that suggest they would be eligible for the AHLF exemption, but may still be subject to the fee based on the actual percentage of affordable units provided. For example, a project with a 50% density bonus and a 15% VLI set-aside may seem to be exempt from the linkage fee. However, after applying the density bonus, VLI units could account for only 10% of the total units built and the developer would be required to pay the linkage fee. It is also important to note that linkage fee exemption thresholds are based on projects offering single-affordability pathways set-asides and are not designed to give partial credit for meeting the exemption standards using set-asides for mixed-affordability pathways.

<sup>22</sup> For example, for the DBO base case scenarios, linkage fees make up an average of 1.3-3.5% of total project costs.

Developers are reportedly contemplating various strategies for offsetting the impact of ULA on project economics. Anecdotally, these include (but are not limited to): longer-term holds that allow owners to pay down debt through cashflow growth; increased use of condominium tract maps to reduce transaction values to below the \$5 and \$10 million thresholds; and strategies to reduce development and construction costs. It is possible ULA will also apply downward price pressure on land costs (although at the time of this analysis, this land cost decrease had not been observed).

To model the impact of ULA on development economics, the analysis assumes project applicants will deploy a variety of strategies to lower costs for projects that trigger ULA. To reflect this assumption, for project values that trigger compliance with ULA, the analysis assumes a 5% reduction in costs compared to a project that does not trigger ULA compliance.



## 4. Density Bonus Ordinance (DBO) Incentive Program

### 4.1 Overview

Chapter 4 tests the economics of the City's Density Bonus Ordinance (DBO), which serves as the City's primary mechanism for implementing California's State Density Bonus Law. Proposed changes to the City's local DBO include procedural updates as well as revisions that will affirm consistency between the Los Angeles Municipal Code and State Density Bonus Law (SDBL).<sup>23</sup> This chapter outlines the major changes to the SDBL and how the City's proposed DBO update aims to incorporate these new legal parameters. The chapter then provides a description of the incentive program scenarios that were tested, and a discussion of the results of the analysis. The chapter concludes with a summary of findings about the proposed DBO update.

### 4.2 Proposed DBO Update

The City's DBO, an implementation of the SDBL, has been effective since 2008. Since 2008, more than a dozen state bills have significantly amended the SDBL (CA Govt. Code Sections 65915-65918). To date, these changes have been implemented in the City through a range of administrative Implementation Memorandums. The proposed update to DBO will bring the City's local Density Bonus program into full alignment with the current SDBL and will incorporate the most recent changes to the affordable set-aside schedule and additions to the density bonus structure that went into effect on January 1, 2024 under recent legislation, including CA State Assembly Bill 1287 (AB1287). AB 1287 amended SDBL to increase the production of housing units set-aside for Very Low Income and Moderate Income households by enabling additional density bonuses above 50% (the maximum previous to AB 1287) for projects providing additional restricted affordable units.

Under the proposed DBO update, applicants can achieve varying levels of density bonus by providing different set asides of VLI, LI, or MI units. For the purposes of this analysis, the methods of calculating set asides and corresponding density bonuses are organized into two types of "affordability pathways:"

- **Single-Affordability Pathways:** These projects provide set-aside units at one income level (VLI, LI, or MI). By providing the maximum of 25% VLI Income units, single-affordability pathway projects will be able to reach a maximum of 88.75% density bonus.
- **Mixed-Affordability Pathways:** These projects provide a mix of set-aside units at different income levels. By adding MI units to a project that also includes VLI or LI units under a mixed-affordability pathway, projects can achieve density bonuses up to 100%.

Table 15 shows examples of pathways that applicants can take to achieve various levels of density bonus. Note that the set-aside options shown in Table 15 are only a selection of the possible set-aside percentages and associated density bonuses. In many cases there are multiple single- and mixed-affordability pathways for achieving the same level of density bonus.

<sup>23</sup> Note that the City's Value Capture Ordinance (VCO), effective since 2018, complements and extends provisions of DBO by awarding additional density bonus in exchange for additional affordable set-aside. Projects that utilize VCO would be required to obtain a Conditional Use Permit requiring approval from the City Planning Commission, which is a discretionary planning process. The analysis that follows is based on state law and does not consider use of the VCO.

Depending on the affordable set-asides selected, applicants can achieve a density bonus of anywhere from 5% to 100%.

**Table 15. Examples of Density Bonuses Available Under the Proposed DBO Update**

Density Bonus	Type of Affordability	Aggregated Set Aside %		
		VLI	LI	MI
5%	Single-Affordability			10%
35%	Single-Affordability	11%		
35%	Single-Affordability		20%	
35%	Single-Affordability			40%
50%	Single-Affordability	15%		
50%	Single-Affordability		24%	
50%	Single-Affordability			44%
70%	Single-Affordability	20%		
70%	Mixed-Affordability	5%	24%	
70%	Mixed-Affordability	5%		44%
70%	Mixed-Affordability	15%		5%
70%	Mixed-Affordability		24%	5%
70%	Mixed-Affordability			49%
88.75%	Single-Affordability	25%		
88.75%	Mixed-Affordability	10%	24%	
88.75%	Mixed-Affordability	15%		12%
88.75%	Mixed-Affordability		24%	12%
100%	Mixed-Affordability	15%		15%
100%	Mixed-Affordability		24%	15%

*Note: Aggregated set-aside includes the standard density bonus (from pre-AB 1287 SDBL) and the additional density bonus available under AB 1287.*

*Source: SDBL, AB 1287, AECOM*

## 4.3 Density Bonus Scenarios Tested

To explore the economic feasibility of the proposed updated DBO for projects in the City of Los Angeles, AECOM tested a set of scenarios that covers a wide range of the potential affordability pathways and density bonus combinations allowed. This set of scenarios include increases in density bonuses up to 100%. In all, nearly twenty scenarios were tested consisting of single-affordability pathway, mixed-affordability pathway, for-rent, and for-sale scenarios. The scenarios were selected to reflect a broad range of density bonus and affordable set-aside applications. At the City's request, nearly all the scenarios achieve density bonuses of 50% or greater.<sup>24</sup>

All DBO scenarios assume an FAR incentive of up to 50% over the base, and height incentives matching the density bonus percentage.<sup>25</sup>

<sup>24</sup> There is one tested scenario that features a density bonus less than 50%: Scenario 7-R, which is eligible for a 35% density bonus. This scenario was selected to increase the number of LI-tested scenarios in the set.

<sup>25</sup> Note that the program is still under development and the incentives tested in this report may not reflect the City's final policy decisions.

## 4.3.1 For-Rent Scenarios

### Single Affordability Pathway For-Rent Scenarios

Five for-rent scenarios featuring a single affordability pathway were tested. These are numbered 1-R to 5-R for reference.

**Table 16. Single-Tier Affordability For-Rent Density Bonus Scenarios Tested**

Scenario	Density Bonus	Affordability			
		Total Set Aside	VLI	LI	MI
1-R 50.0% DB / 15.0% VLI Set-Aside	50.00%	15%	15%	-	-
2-R 70.0% DB / 20.0% VLI Set-Aside	70.00%	20%	20%	-	-
3-R 88.75% DB / 25.0% VLI Set-Aside	88.75%	25%	25%	-	-
4-R 35.0% DB / 20.0% LI Set-Aside	35.00%	20%	-	20%	-
5-R 50.0% DB / 24.0% LI Set-Aside	50.00%	24%	-	24%	-

Source: AECOM

### Mixed Affordability Pathway For-Rent Scenarios

Ten for-rent scenarios featuring mixed-affordability pathways were tested.

**Table 17. Mixed Affordability For-Rent Density Bonus Scenarios Tested**

Scenario	Density Bonus	Affordability			
		Total Set Aside	VLI	LI	MI
6-R 70.0% DB / 5.0% VLI / 24.0% LI Set-Aside	70.00%	29%	5%	24%	-
7-R 85.0% DB / 9.0% VLI / 24.0% LI Set-Aside	85.00%	33%	9%	24%	-
8-R 70.0% DB / 15.0% VLI / 5.0% MI Set-Aside	70.00%	20%	15%	-	5%
9-R 80.0% DB / 15.0% VLI / 9.0% MI Set-Aside	80.00%	24%	15%	-	9%
10-R 88.75% DB / 15.0% VLI / 12.0% MI Set-Aside	88.75%	27%	15%	-	12%
11-R 100.0% DB / 15.0% VLI / 15.0% MI Set-Aside	100.00%	30%	15%	-	15%
12-R 70.0% DB / 24.0% LI / 5.0% MI Set-Aside	70.00%	29%	-	24%	5%
13-R 80.0% DB / 24.0% LI / 9.0% MI Set-Aside	80.00%	33%	-	24%	9%
14-R 88.75% DB / 24.0% LI / 12.0% MI Set-Aside	88.75%	36%	-	24%	12%
15-R 100.0% DB / 24.0% LI / 15.0% MI Set-Aside	100.00%	39%	-	24%	15%

Source: AECOM

## 4.3.2 For-Sale Scenarios

### Single Affordability Pathway For-Sale Scenarios

Two for-sale scenarios featuring a single-affordability pathway were tested, called 1-S, and 2-S. Per the State Density Bonus Law, for-sale projects are only eligible for participation if providing Moderate Income (MI) set-asides.

**Table 18. Single Affordability For-Sale Density Bonus Scenarios Tested**

Scenario	Density Bonus	Affordability			
		Total Set Aside	VLI	LI	MI
1-S 50.0% DB / 44.0% MI Set-Aside	50.00%	44%	-	-	44%
2-S 72.5% DB / 50.0% MI Set-Aside	72.50%	50%	-	-	50%

Source: AECOM

## Mixed Affordability Pathway For-Sale Scenarios

Finally, two mixed affordability, for-sale scenarios were tested. Note that in practice, developers may choose to rent the lower-income units in for-sale projects at designated affordable rent limits, rather than sell them at sales price limits tied to predefined VLI and LI housing allowances. For the purposes of this analysis, all units in for-sale projects were assumed to be for-sale.

**Table 19. Mixed Affordability For-Sale Density Bonus Scenarios Tested**

Scenario	Density Bonus	Affordability			
		Total Set Aside	VLI	LI	MI
3-S 100% DB / 24% LI / 15% MI Set-Aside	100.00%	39%	-	24%	15%
4-S 100% DB / 15% VLI / 15% MI Set-Aside	100.00%	30%	15%	-	15%

Source: AECOM

## 4.3.3 Sites and Prototypes Tested

Table 20 shows the sites and prototypes that were tested. The prototypes were selected to represent a wide range of likely development projects that could occur across the City. Note that DBO was only tested on residential zoned sites, based on an analysis of recently completed projects that showed that the majority of DBO projects occurred in residential zones (whereas projects in commercial zones were more likely to take advantage of the TOC program, the predecessor to the proposed TOIA program).<sup>26</sup>

<sup>26</sup> Commercial lots generally have smaller underlying FARs than residential lots, and therefore projects on commercial lots may be more likely to take advantage of TOIA in part because the TOIA program offers better FAR incentives compared to DBO.

Table 20. DBO Sites and Prototypes Tested

DBO Base Case Site and Prototype Assumptions											
Base Housing Typology	TH-S	CY3-R	CY3-S	CY4-R	CY4-S	P5-R	P5-S	P7-R	P7-S	TW-R	TW-S
Description	Townhouse	3-story Courtyard-style		4-story Courtyard-style		5/6-Story Podium		7/8-Story Podium		Tower	
Use Program	Residential	Residential		Residential		Residential		Residential		Residential	
Parking Strategy	Tuck-Under	Underground		Underground		1-level podium		2-level podium		4-level podium	
Assumed Density Cohort	Low-Med.II	Medium		Medium		High-Med.		High		High	
Housing Tenure	For Sale	Rental	For Sale	Rental	For Sale	Rental	For Sale	Rental	For Sale	Rental	For Sale
Zone Class of Base Zone	RD1.5	R3	R3	R3	R3	R4	R4	R5	R5	R5	R5
Assumed Height District	1	1	1	1VL	1VL	1	1	2	2	4	4
Base Zone Maximum Height (ft.)	45	45	45	50	45	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
Base Zone Maximum FAR	3.0	3.0	3.0	3.0	3.0	3.0	3.0	6.0	6.0	13.0	13.0
Base Zone Minimum Lot Area/Unit (SF)	1,500	800	800	800	800	400	400	200	200	200	200
Base Zone Max Density (DUAC)	29.0	54.5	54.5	54.5	54.5	108.9	108.9	217.8	217.8	217.8	217.8
Site Area											
Land Area (SF)	15,000	7,500	7,500	15,000	15,000	22,500	22,500	30,000	30,000	44,000	44,000
Residential - Gross Building Area (SF)	15,480	11,880	11,880	21,420	21,420	50,000	14,500	68,533	68,533	131,429	131,429
Unit Count and Mix	9	9	9	18	18	50	50	135	135	219	219
Typical Unit Mix (Lower Density)											
Avg. Unit Size (Lower Density)	1,720	1,320	1,320	1,190	1,190	1,000	1,000	700	700	850	850
0BR	0%	0%	0%	0%	0%	0%	0%	30%	30%	25%	25%
1BR	0%	0%	0%	0%	0%	40%	40%	50%	50%	50%	50%
2BR	40%	70%	70%	70%	70%	40%	40%	20%	20%	25%	25%
3BR	60%	30%	30%	30%	30%	20%	20%	0%	0%	0%	0%
4BR	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Denser Unit Mix Alternative											
Avg. Unit Size	NA	880	880	900	900	800	800	NA	NA	NA	NA
0BR		20%	20%	0%	0%	20%	20%				
1BR		40%	40%	50%	50%	50%	50%				
2BR		40%	40%	50%	50%	30%	30%				
3BR		0%	0%	0%	0%	0%	0%				
4BR		0%	0%	0%	0%	0%	0%				
Parking											
Residential Parking Ratio (spaces/BR)	2 Per Unit	0.60	0.60	0.60	0.60	0.90	0.90	0.90	0.90	0.90	0.90
Total Parking Spaces	18	12	12	25	25	81	81	145	145	246	246
Surface/Tuck Under	18	0	0	0	0	0	0	0	0	0	0
Ground level parking (L1)	0	0	0	0	0	33	33	45	45	74	74
Above-ground podium (L2, L3, L4)	0	0	0	0	0	0	0	60	60	172	172
Subterranean parking (levels)	0	12	12	25	25	48	48	40	40	0	0

Source: AECOM



## 4.4 Results

### 4.4.1 Base Case Scenarios

The base case scenarios represent residential prototypes allowed under an assumed range of base zoning conditions. These scenarios test prototypes that maximize by-right unit potential under base zoning, with 100% market-rate units and no density bonus or incentives. Base case residual land values provide a basis of comparison for the incentive program scenarios to follow.

The table below shows estimated residual land values (RLV) for each base case prototype, the assumed market land value threshold for each Market Tier, and a determination of “feasibility” (F), i.e., whether the base case generates RLV that is equal to or greater than the market threshold.

As shown, all prototypes generate negative RLV in Market Tier 1 and all are not feasible. In Market Tier 2, RLVs are mostly positive, and some typologies meet the market value threshold (shown in the “Market Land Value/Sq.Ft.” rows in the table) for feasibility. In Market Tiers 3 and 4, most typologies meet the market land value thresholds and are feasible. These findings are broadly consistent with observed market activity, which indicates that under today’s market conditions, most development projects are only feasible in stronger markets (or with projects that command rents and sale prices typical of stronger markets). CY4-R is the only prototype not feasible in Market Tier 4; however, its RLV (\$224/sq. ft.) is just below the market threshold (\$230/sq. ft.).

**Table 21. DBO Base Case Residual Land Value Estimates**

<b>DBO Base Case: Estimated Residual Land Value</b>											
<b>Prototype (Sale and Rent)</b>	<b>TH-S</b>	<b>CY3-R</b>	<b>CY3-S</b>	<b>CY4-R</b>	<b>CY4-S</b>	<b>P5-R</b>	<b>P5-S</b>	<b>P7-R</b>	<b>P7-S</b>	<b>TW-R</b>	<b>TW-S</b>
<b>Density Cohort</b>	Low Med.	Medium	Medium	Medium	Medium	High Med.	High Med.	High	High	High	High
<b>Market Tier 1</b>											
RLV/Land Sq.Ft.	(\$11)	(\$295)	(\$42)	(\$269)	(\$20)	(\$400)	(\$86)	(\$542)	(\$254)	(\$642)	(\$415)
Market Land Value/Sq. Ft.	\$140										
Feasibility (RLV > Market)											
<b>Market Tier 2</b>											
RLV/Land Sq.Ft.	\$61	\$84	\$108	\$84	\$118	\$94	\$185	\$187	\$186	\$100	(\$5)
Market Land Value/Sq. Ft.	\$145										
Feasibility (RLV > Market)							F	F	F		
<b>Market Tier 3</b>											
RLV/Land Sq.Ft.	\$183	\$163	\$287	\$155	\$279	\$212	\$512	\$366	\$590	\$326	\$474
Market Land Value/Sq. Ft.	\$175										
Feasibility (RLV > Market)	F		F		F	F	F	F	F	F	F
<b>Market Tier 4</b>											
RLV/Land Sq.Ft.	\$450	\$238	\$576	\$224	\$551	\$313	\$937	\$628	\$1,190	\$1,217	\$1,232
Market Land Value/Sq. Ft.	\$230										
Feasibility (RLV > Market)	F	F	F		F	F	F	F	F	F	F

Note: “P” indicates preferable scenarios, “F” indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

Source: AECOM

### 4.4.2 Density Bonus Scenarios

The incentive scenarios described in Section 4.3. were applied to each of the base case prototypes, each resulting in a higher density prototype based on the stepping up mechanism described in Section 3.1.2.<sup>27</sup> The tables below show the results from this testing using

<sup>27</sup> For the DBO program, the calculation of the set-aside requirement is based on maximum permissible by-right units—i.e., total potential units before application of a density bonus. For example, for a project in a zone allowing 100 units seeking a 50-unit 50% density bonus and setting aside 10% as affordable, the set-aside requirement is 10

measures of residual land value, feasibility, and preferability. The RLV of each density bonus prototype is evaluated against the market cost of land for feasibility and against the base case prototype RLV for preferability.

### **DBO Scenario Feasibility: For-Rent Prototypes**

The updated DBO demonstrated broad feasibility across the prototypes tested in all market tiers except for Market Tier 1, where achievable rents and sales prices are generally lower than in higher market tier neighborhoods. Market Tier 1 produced negative residual land values in nearly all of the scenarios tested (Table 22).

In Market Tier 2 (Table 23), several incentive scenarios in the Medium density cohort (base densities 30-55 DUAC) produced financial returns that are preferable to the base case.

In Market Tier 3, all residual land values are positive, resulting in feasibility in every density cohort and for both single-affordability and mixed-affordability pathway scenarios. Feasibility in Market Tier 3 extends to include typologies in the High Medium (base density up to 109 DUAC) and High (base density greater than 109 DUAC) density cohorts. Approximately half of the scenarios tested are preferable when comparing their RLVs to the base case.

In Market Tier 4, residual land values are all positive, resulting in feasible scenarios in 32 (80%) of single-affordability scenarios tested and 53 (96%) of multi-affordability scenarios tested. In addition to covering a broader range of feasible scenarios, Market Tier 4 results differ from Market Tier 3 mainly by also yielding feasibility of the TW (tower) typology in the High density cohort. Most of the scenarios are preferable as well as feasible.<sup>28</sup>

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units (10% of 100) and not 15 units (10% of 150). This is the approach used by the current adopted DBO and the State Density Bonus Law.

<sup>28</sup> Note that between the podium prototypes, P5 generates lower residual land values compared to P7 in most scenarios. This is largely because the P7 prototype includes two stories of podium parking, while P5 includes one story of podium parking with the remaining parking spaces underground (and underground parking is more expensive than podium parking).

**Table 22. DBO For-Rent Scenarios Market Tier 1 Residual Land Value and Feasibility**

Market Tier 1 (Market Land Value: \$140 Per Sq. Ft.)											
Scenario		DBO Residual Land Value					DBO Feasibility				
Base Case Typology		CY3-R	CY4-R	P5-R	P7-R	TW-R	CY3-R	CY4-R	P5-R	P7-R	TW-R
Single Affordability Pathways		Medium	Medium	High Med.	High	High	Medium	Medium	High Med.	High	High
Base	No DB / No Set-Aside	(\$295)	(\$269)	(\$400)	(\$542)	(\$642)					
Scenario 1-R	50.0% DB / 15.0% VLI Set-Aside	(\$212)	(\$278)	(\$666)	(\$1,049)	(\$1,117)					
Scenario 2-R	70.0% DB / 20.0% VLI Set-Aside	(\$240)	(\$309)	(\$662)	(\$1,222)	(\$1,245)					
Scenario 3-R	88.75% DB / 25.0% VLI Set-Aside	(\$274)	(\$335)	(\$689)	(\$1,393)	(\$1,427)					
Scenario 4-R	35.0% DB / 20.0% LI Set-Aside	(\$225)	(\$401)	(\$469)	(\$914)	(\$960)					
Scenario 5-R	50.0% DB / 24.0% LI Set-Aside	(\$194)	(\$257)	(\$641)	(\$1,014)	(\$1,065)					
Mixed Affordability Pathways											
Scenario 6-R	70.0% DB / 5.0% VLI / 24.0% LI Set-Aside	(\$231)	(\$300)	(\$668)	(\$1,188)	(\$1,260)					
Scenario 7-R	85.0% DB / 9.0% VLI / 24.0% LI Set-Aside	(\$255)	(\$333)	(\$697)	(\$1,323)	(\$1,415)					
Scenario 8-R	70.0% DB / 15.0% VLI / 5.0% MI Set-Aside	(\$232)	(\$304)	(\$658)	(\$1,182)	(\$1,248)					
Scenario 9-R	80.0% DB / 15.0% VLI / 9.0% MI Set-Aside	(\$256)	(\$302)	(\$659)	(\$1,249)	(\$1,316)					
Scenario 10-R	88.75% DB / 15.0% VLI / 12.0% MI Set-Aside	(\$253)	(\$311)	(\$655)	(\$1,309)	(\$1,372)					
Scenario 11-R	100.0% DB / 15.0% VLI / 15.0% MI Set-Aside	(\$228)	(\$464)	(\$651)	(\$1,383)	(\$1,438)					
Scenario 12-R	70.0% DB / 24.0% LI / 5.0% MI Set-Aside	(\$214)	(\$283)	(\$633)	(\$1,148)	(\$1,196)					
Scenario 13-R	80.0% DB / 24.0% LI / 9.0% MI Set-Aside	(\$238)	(\$281)	(\$634)	(\$1,215)	(\$1,264)					
Scenario 14-R	88.75% DB / 24.0% LI / 12.0% MI Set-Aside	(\$235)	(\$290)	(\$629)	(\$1,275)	(\$1,321)					
Scenario 15-R	100.0% DB / 24.0% LI / 15.0% MI Set-Aside	(\$217)	(\$460)	(\$625)	(\$1,348)	(\$1,386)					

Notes: Feasibility rows are blank because all projects tested were infeasible. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.  
Source: AECOM

**Table 23. DBO For-Rent Scenarios Market Tier 2 Residual Land Value and Feasibility**

Market Tier 2 (Market Land Value: \$145 Per Sq. Ft.)											
Scenario		DBO Residual Land Value					DBO Feasibility				
Base Case Typology		CY3-R	CY4-R	P5-R	P7-R	TW-R	CY3-R	CY4-R	P5-R	P7-R	TW-R
Single Affordability Pathways		Medium	Medium	High Med.	High	High	Medium	Medium	High Med.	High	High
Base	No DB / No Set-Aside	\$84	\$84	\$94	\$187	\$100				F	
Scenario 1-R	50.0% DB / 15.0% VLI Set-Aside	\$106	\$137	\$30	\$2	(\$104)					
Scenario 2-R	70.0% DB / 20.0% VLI Set-Aside	\$136	\$156	\$17	(\$42)	(\$100)		P			
Scenario 3-R	88.75% DB / 25.0% VLI Set-Aside	\$140	\$165	(\$31)	(\$91)	(\$170)		P			
Scenario 4-R	35.0% DB / 20.0% LI Set-Aside	\$133	\$28	(\$28)	\$12	(\$84)					
Scenario 5-R	50.0% DB / 24.0% LI Set-Aside	\$115	\$130	\$18	\$5	(\$103)					
Mixed Affordability Pathways											
Scenario 6-R	70.0% DB / 5.0% VLI / 24.0% LI Set-Aside	\$124	\$140	(\$33)	(\$40)	(\$182)					
Scenario 7-R	85.0% DB / 9.0% VLI / 24.0% LI Set-Aside	\$148	\$121	(\$84)	(\$80)	(\$253)	P				
Scenario 8-R	70.0% DB / 15.0% VLI / 5.0% MI Set-Aside	\$134	\$165	\$17	(\$1)	(\$114)		P			
Scenario 9-R	80.0% DB / 15.0% VLI / 9.0% MI Set-Aside	\$158	\$162	(\$5)	(\$7)	(\$132)	P	P			
Scenario 10-R	88.75% DB / 15.0% VLI / 12.0% MI Set-Aside	\$144	\$176	(\$4)	(\$10)	(\$139)		P			
Scenario 11-R	100.0% DB / 15.0% VLI / 15.0% MI Set-Aside	\$14	\$54	(\$15)	(\$8)	(\$138)					
Scenario 12-R	70.0% DB / 24.0% LI / 5.0% MI Set-Aside	\$142	\$159	\$5	\$3	(\$114)		P			
Scenario 13-R	80.0% DB / 24.0% LI / 9.0% MI Set-Aside	\$166	\$156	(\$17)	(\$3)	(\$131)	P	P			
Scenario 14-R	88.75% DB / 24.0% LI / 12.0% MI Set-Aside	\$152	\$169	(\$15)	(\$6)	(\$138)	P	P			
Scenario 15-R	100.0% DB / 24.0% LI / 15.0% MI Set-Aside	\$20	\$36	(\$27)	(\$4)	(\$138)					

Note: "P" indicates preferable scenarios, "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

Source: AECOM

**Table 24. DBO For-Rent Scenarios Market Tier 3 Residual Land Value and Feasibility**

Market Tier 3 (Market Land Value: \$175 Per Sq. Ft.)											
Scenario		DBO Residual Land Value					DBO Feasibility				
Base Case Typology		CY3-R	CY4-R	P5-R	P7-R	TW-R	CY3-R	CY4-R	P5-R	P7-R	TW-R
Single Affordability Pathways		Medium	Medium	High Med.	High	High	Medium	Medium	High Med.	High	High
Base	No DB / No Set-Aside	\$163	\$155	\$212	\$366	\$326			F	F	F
Scenario 1-R	50.0% DB / 15.0% VLI Set-Aside	\$167	\$214	\$195	\$321	\$204		P	F	F	F
Scenario 2-R	70.0% DB / 20.0% VLI Set-Aside	\$206	\$247	\$184	\$317	\$259	P	P	F	F	F
Scenario 3-R	88.75% DB / 25.0% VLI Set-Aside	\$216	\$261	\$132	\$304	\$225	P	P		F	F
Scenario 4-R	35.0% DB / 20.0% LI Set-Aside	\$209	\$112	\$76	\$293	\$180	P			F	F
Scenario 5-R	50.0% DB / 24.0% LI Set-Aside	\$174	\$202	\$173	\$314	\$186		P		F	F
Mixed Affordability Pathways											
Scenario 6-R	70.0% DB / 5.0% VLI / 24.0% LI Set-Aside	\$190	\$222	\$117	\$308	\$143	P	P		F	
Scenario 7-R	85.0% DB / 9.0% VLI / 24.0% LI Set-Aside	\$223	\$205	\$60	\$297	\$96	P	P		F	
Scenario 8-R	70.0% DB / 15.0% VLI / 5.0% MI Set-Aside	\$202	\$252	\$177	\$358	\$229	P	P	F	F	F
Scenario 9-R	80.0% DB / 15.0% VLI / 9.0% MI Set-Aside	\$235	\$248	\$149	\$370	\$226	P	P		P	F
Scenario 10-R	88.75% DB / 15.0% VLI / 12.0% MI Set-Aside	\$217	\$266	\$151	\$384	\$234	P	P		P	F
Scenario 11-R	100.0% DB / 15.0% VLI / 15.0% MI Set-Aside	\$71	\$177	\$136	\$407	\$254		P		P	F
Scenario 12-R	70.0% DB / 24.0% LI / 5.0% MI Set-Aside	\$208	\$240	\$156	\$351	\$211	P	P		F	F
Scenario 13-R	80.0% DB / 24.0% LI / 9.0% MI Set-Aside	\$242	\$236	\$127	\$363	\$208	P	P		F	F
Scenario 14-R	88.75% DB / 24.0% LI / 12.0% MI Set-Aside	\$224	\$253	\$129	\$377	\$216	P	P		P	F
Scenario 15-R	100.0% DB / 24.0% LI / 15.0% MI Set-Aside	\$75	\$154	\$114	\$400	\$236				P	F

Note: "P" indicates preferable scenarios, "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

Source: AECOM



**Table 25. DBO For-Rent Scenarios Market Tier 4 Residual Land Value and Feasibility**

Market Tier 4 (Market Land Value: \$230 Per Sq. Ft.)											
Scenario		DBO Residual Land Value					DBO Feasibility				
Base Case Typology		CY3-R	CY4-R	P5-R	P7-R	TW-R	CY3-R	CY4-R	P5-R	P7-R	TW-R
Single Affordability Pathways		Medium	Medium	High Med.	High	High	Medium	Medium	High Med.	High	High
Base	No DB / No Set-Aside	\$238	\$224	\$313	\$628	\$1,217	F		F	F	F
Scenario 1-R	50.0% DB / 15.0% VLI Set-Aside	\$222	\$283	\$337	\$1,580	\$1,415		P	P	P	P
Scenario 2-R	70.0% DB / 20.0% VLI Set-Aside	\$269	\$339	\$347	\$1,730	\$1,659	P	P	P	P	P
Scenario 3-R	88.75% DB / 25.0% VLI Set-Aside	\$286	\$360	\$290	\$1,862	\$1,760	P	P	F	P	P
Scenario 4-R	35.0% DB / 20.0% LI Set-Aside	\$270	\$194	\$166	\$1,398	\$1,217	P			P	F
Scenario 5-R	50.0% DB / 24.0% LI Set-Aside	\$227	\$266	\$307	\$1,528	\$1,323		P	F	P	P
Mixed Affordability Pathways											
Scenario 6-R	70.0% DB / 5.0% VLI / 24.0% LI Set-Aside	\$249	\$296	\$246	\$1,675	\$1,417	P	P	F	P	P
Scenario 7-R	85.0% DB / 9.0% VLI / 24.0% LI Set-Aside	\$291	\$281	\$184	\$1,779	\$1,470	P	P		P	P
Scenario 8-R	70.0% DB / 15.0% VLI / 5.0% MI Set-Aside	\$263	\$331	\$315	\$1,772	\$1,580	P	P	P	P	P
Scenario 9-R	80.0% DB / 15.0% VLI / 9.0% MI Set-Aside	\$305	\$326	\$282	\$1,854	\$1,632	P	P	F	P	P
Scenario 10-R	88.75% DB / 15.0% VLI / 12.0% MI Set-Aside	\$284	\$347	\$283	\$1,934	\$1,697	P	P	F	P	P
Scenario 11-R	100.0% DB / 15.0% VLI / 15.0% MI Set-Aside	\$120	\$282	\$265	\$2,040	\$1,793		P	F	P	P
Scenario 12-R	70.0% DB / 24.0% LI / 5.0% MI Set-Aside	\$268	\$314	\$285	\$1,720	\$1,487	P	P	F	P	P
Scenario 13-R	80.0% DB / 24.0% LI / 9.0% MI Set-Aside	\$310	\$309	\$252	\$1,802	\$1,539	P	P	F	P	P
Scenario 14-R	88.75% DB / 24.0% LI / 12.0% MI Set-Aside	\$289	\$330	\$253	\$1,882	\$1,604	P	P	F	P	P
Scenario 15-R	100.0% DB / 24.0% LI / 15.0% MI Set-Aside	\$123	\$255	\$235	\$1,988	\$1,701		P	F	P	P

Note: "P" indicates preferable scenarios, "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

Source: AECOM

## **DBO Scenario Feasibility: For-Sale Prototypes**

Feasibility results for the four for-sale prototypes tested are shown for each market tier in Table 26. Residual land values steadily increased with each market tier, starting with Market Tier 1 which produced nearly all negative RLVs, to Market Tier 4 which produced feasible results in every scenario for all but one prototype. However, incentive program scenario preferability is limited, because in most scenarios, the incentive scenarios generate RLVs that fall below the base case RLVs.

For example, in Market Tier 4, where \$230/square foot is the typical market land value, the CY3 base case produces a RLV of \$576 per land square foot – making the base case feasible. However, all four incentive scenarios return RLVs around \$400, which is significantly higher than the market cost of land, but falls short of the \$576 threshold. A developer looking for the highest rate of return would in theory elect to develop the base case (100% market-rate) scenario rather than a larger project incorporating affordable set-asides and density bonuses.

**Table 26. DBO For-Sale Scenarios Residual Land Value and Feasibility by Market Tier**

Scenario		Residual Land Value/Sq.Ft.						Feasibility					
<i>Base Case Prototype</i>		TH-S	CY3-S	CY4-S	P5-S	P7-S	TW-S	TH-S	CY3-S	CY4-S	P5-S	P7-S	TW-S
Density Cohort		Medium	Medium	Medium	High Med.	High	High	Medium	Medium	Medium	High Med.	High	High
<b>Market Tier 1</b>													
(Market Land Value: \$140 Per Sq. Ft.)													
<i>Base Scenario</i>	<i>No DB / No Set-Aside</i>	(\$11)	(\$42)	(\$20)	(\$86)	(\$254)	(\$415)						
Scenario 1-S	50.0% DB / 44.0% MI Set-Aside	(\$191)	\$7	(\$12)	(\$274)	(\$713)	(\$782)						
Scenario 2-S	72.5% DB / 50.0% MI Set-Aside	(\$226)	\$16	(\$6)	(\$302)	(\$836)	(\$916)						
Scenario 3-S	100% DB / 24% LI / 15% M Set-Aside	(\$285)	(\$84)	(\$172)	(\$315)	(\$1,020)	(\$1,134)						
Scenario 4-S	100% DB / 15% VLI / 15% MI Set-Aside	(\$264)	(\$88)	(\$151)	(\$295)	(\$1,025)	(\$1,136)						
<b>Market Tier 2</b>													
(Market Land Value: \$145 Per Sq. Ft.)													
Land Cost		\$145											
<i>Base Scenario</i>	<i>No DB / No Set-Aside</i>	\$61	\$108	\$118	\$185	\$186	(\$5)				F	F	
Scenario 1-S	50.0% DB / 44.0% MI Set-Aside	(\$142)	\$111	\$105	\$29	(\$210)	(\$347)						
Scenario 2-S	72.5% DB / 50.0% MI Set-Aside	(\$177)	\$134	\$130	(\$15)	(\$253)	(\$412)						
Scenario 3-S	100% DB / 24% LI / 15% M Set-Aside	(\$219)	\$43	\$95	(\$0)	(\$291)	(\$470)						
Scenario 4-S	100% DB / 15% VLI / 15% MI Set-Aside	(\$182)	\$43	\$127	\$42	(\$272)	(\$434)						
<b>Market Tier 3</b>													
(Market Land Value: \$175 Per Sq. Ft.)													
<i>Base Scenario</i>	<i>No DB / No Set-Aside</i>	\$183	\$287	\$279	\$512	\$590	\$474	F	F	F	F	F	F
Scenario 1-S	50.0% DB / 44.0% MI Set-Aside	(\$84)	\$243	\$251	\$388	\$378	\$161		F	F	F	F	
Scenario 2-S	72.5% DB / 50.0% MI Set-Aside	(\$120)	\$282	\$300	\$323	\$427	\$177		F	P	F	F	F
Scenario 3-S	100% DB / 24% LI / 15% M Set-Aside	(\$144)	\$196	\$418	\$381	\$553	\$304		F	P	F	F	F
Scenario 4-S	100% DB / 15% VLI / 15% MI Set-Aside	(\$87)	\$199	\$468	\$456	\$598	\$383		F	P	F	P	F
<b>Market Tier 4</b>													
(Market Land Value: \$230 Per Sq. Ft.)													
<i>Base Scenario</i>	<i>No DB / No Set-Aside</i>	\$450	\$576	\$551	\$937	\$1,190	\$1,232	F	F	F	F	F	F
Scenario 1-S	50.0% DB / 44.0% MI Set-Aside	\$15	\$422	\$451	\$859	\$1,309	\$965		F	F	F	P	F
Scenario 2-S	72.5% DB / 50.0% MI Set-Aside	(\$20)	\$483	\$532	\$766	\$1,504	\$1,109		F	F	F	P	F
Scenario 3-S	100% DB / 24% LI / 15% M Set-Aside	(\$1)	\$394	\$837	\$876	\$1,890	\$1,530		F	P	F	P	P
Scenario 4-S	100% DB / 15% VLI / 15% MI Set-Aside	\$84	\$404	\$908	\$990	\$1,976	\$1,678		F	P	P	P	P

Note: "P" indicates preferable scenarios, "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

Source: AECOM

## 4.5 Summary and Implications

This analysis of the proposed updated DBO Incentive Program suggests the program creates sufficient incentives to generate broad potential feasibility—with some key considerations.

- **Feasibility is limited in Market Tiers 1 and 2.** The DBO program does not create financially feasible outcomes in Market Tier 1. Base case (100% market-rate) scenarios are also infeasible in Market Tier 1 under current market conditions. Some for-rent projects are feasible—and preferable to the base case—in Market Tier 2, but only for sites with Medium base densities (i.e., 55 DUAC and below), which are typically associated with prototypes that have lower construction costs relative to higher density prototypes.
- **In Market Tiers 3 and 4, most density cohorts meet the market land value thresholds of feasibility, and many for-rent incentive program scenarios are preferable to the base case – consistent with recent development trends.** These findings are broadly consistent with observed market activity, which indicates that under current market conditions, development projects are generally only feasible in stronger markets (or with projects that command rents and sale prices typical of stronger markets). Higher density levels are also more valuable in stronger markets, where the value created by the additional units can more easily exceed the cost of setting aside additional affordable units.
- **Developers that take advantage of the DBO program in stronger markets are likely to choose set-aside pathways that provide VLI units.** VLI units generate less revenue *per unit* than LI. However, in Market Tier 4, the per unit effect on RLV is outweighed by the fact that projects that provide VLI units are required to provide fewer affordable units, compared to projects that provide LI units.<sup>29</sup>
- **There is no clear pattern in how single- versus mixed-affordability pathway projects compare in terms of feasibility or preferability.** The relative RLVs generated by single-tier versus mixed-affordability pathway projects vary by prototype, Market Tier, and the exact combination of income levels and percentages selected, with no single pattern emerging from this analysis. The City is likely to see development projects selecting a variety of strategies, based on site-specific characteristics that will determine for individual projects the tradeoff between the value of increased density, and the cost of providing different affordable set asides.
- **One for-sale scenario (100% density bonus with a 15% VLI/15% MI set aside) was preferable to the base case across multiple prototypes in Market Tier 4.** In most for-sale scenarios, the added density does not provide sufficient value to outweigh the additional costs associated with providing additional affordable set-aside units. However, in Market Tier 4, Scenario 4-S – which included a 100% density bonus and 15% VLI/15% MI set aside – was preferable to the base case across multiple prototypes.
- **Most DBO scenarios tested were limited by density, rather than the other potential limiting parameters built into the model, such as FAR and height.** In other words, most DBO scenarios tested had sufficient FAR available to allow higher density prototypes, so the associated density bonuses tended to be the key factor in determining the ultimate form of the bonus prototype. Exploratory testing found that since DBO scenarios were mostly limited by density rather than FAR, counting above-grade parking towards FAR had minimal impacts on the feasibility of tested scenarios. Note that this finding reflects the specific FAR

<sup>29</sup> In Market Tier 1, LI unit pathways generate higher residual land values compared to VLI pathways because there is a smaller gap between market-rate and LI units.

and height limits tested and could change depending on the FAR and height limits in the final ordinance.

## 5. Transit Oriented Incentive Areas (TOIA)

### 5.1 Overview

The Transit Oriented Incentive Area program (TOIA) provides density bonus incentives in exchange for affordable housing set-asides in mixed-income residential projects near transit nodes. Both the set-aside requirements and available bonuses increase by TOIA Tiers, where TOIA Tier 1 (T-1) represents the furthest distance from a Major Transit Stop and Tier 4 (T-4) the shortest distance from a Major Transit Stop. The program was previously known as the Transit Oriented Communities (TOC) program. It was initially created after voters passed Measure JJJ in 2016 and became effective in September 2017.

The City is proposing to integrate this program as a local implementation of Density Bonus law, and the TOIA program aims to increase available density bonuses beyond current standards, building off recent changes to state law (AB 1287) which expanded density bonuses in the state density bonus program to up to 100 percent. The proposed TOIA also includes expanding procedures for applicants to request off-menu incentives, which is an option that is not available through the existing TOC program. In addition, the City is contemplating increasing set-aside requirements in higher market tiers.

### 5.2 TOIA Incentive Program

The proposed TOIA schedule will allow for 100% density bonuses in Tier 1, 120% in Tier 2, and unlimited density bonuses in Tiers 3 and 4.<sup>30</sup> The City is considering a variety of potential set-aside schedules, which could be applied as either:

- A single-tier program structure with set-aside requirements that apply consistently across the City; or
- A multi-tier program structure with different set-aside requirements applied in each Market Tier.

Table 28 shows a potential structure for a single-tier program. For example, under this structure, a program could provide 8% ELI units, 11% VLI units, or 20% LI units to achieve a 100% density bonus in Tier 1. Table 29 shows a potential structure for a multi-tier program. Note that these programs are still under development and the final set-aside schedule may differ from those shown here.

Note that TOIA program calculates affordability set-aside requirements based on the total number of units per project. This is a shift from DBO which calculates set-aside requirements as a percentage of units allowed under density limits tied to a site's base zoning condition.

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<sup>30</sup> Previously, the TOC program allowed for a 50% density bonus in Tier 1, 60% in Tier 2, 70% in Tier 3, and 80% in Tier 4.



**Table 27. Proposed TOIA Density Bonuses and Potential Set-Aside Requirements: Single-Tier Program Structure**

Proposed TOIA					
Potential Set Aside Schedules	TOIA Tier	Density Bonus	Affordability		
			ELI	VLI	LI
Single-Tier Program Structure	1	100%	8%	11%	20%
	2	120%	9%	12%	21%
	3	unlimited	10%	14%	23%
	4	unlimited	11%	15%	25%

Source: City of Los Angeles, AECOM

**Table 28. Proposed TOIA Density Bonuses and Potential Set-Aside Requirements: Multi-Tier Program Structure**

Proposed TOIA					
Potential Set Aside Schedules	TOIA Tier	Density Bonus	Affordability		
			ELI	VLI	LI
Market Tier 1	1	100%	9.0%	12.5%	21.0%
	2	120%	10.0%	13.0%	22.0%
	3	unlimited	11.0%	14.0%	23.0%
	4	unlimited	12.0%	15.0%	25.0%
Market Tier 2	1	100%	10.0%	13.0%	21.0%
	2	120%	11.0%	14.0%	22.0%
	3	unlimited	12.0%	15.0%	24.0%
	4	unlimited	13.0%	16.0%	26.0%
Market Tier 3	1	100%	11.0%	14.0%	22.0%
	2	120%	12.0%	15.0%	23.0%
	3	unlimited	13.0%	16.0%	25.0%
	4	unlimited	14.0%	17.0%	27.0%
Market Tier 4	1	100%	12.0%	15.0%	23.0%
	2	120%	13.0%	16.0%	24.0%
	3	unlimited	14.0%	17.0%	25.0%
	4	unlimited	16.0%	19.0%	29.0%

Source: City of Los Angeles, AECOM

In addition to density incentives, the proposed program increases parking and FAR incentives. As shown in Table 29, the Proposed TOIA Schedule adds an additional 0.25 FAR bonus for each TOIA Tier and eliminates the parking minimum, consistent with Assembly Bill 2097 (AB 2097).

**Table 29. FAR, Height, and Parking Requirements: Proposed TOIA Programs**

Proposed TOIA Incentive Structure				
TOC Tier	Parking	FAR Maximum of:		Add'l Height (above Base)
TOIA 1	No Minimum	3.00 FAR	40% over base	1 story/11 feet
TOIA 2	No Minimum	3.50 FAR	45% over base	1 story/11 feet
TOIA 3	No Minimum	4.00 FAR	50% over base	2 stories/22 feet
TOIA 4	No Minimum	4.50 FAR	55% over base	3 stories/33 feet

Source: City of Los Angeles, AECOM

## 5.3 TOIA Scenarios Tested

AECOM explored the development feasibility of four potential set-aside schedules, shown in Table 30.<sup>31</sup> The density bonus incentives remain the same across all of the schedules tested, but the affordability set-aside is increased incrementally with each scenario.

Each incentive program scenario indicated by the schedule in Table 30 is tested for feasibility with height and FAR parameters governed by TOIA standards shown in Table 29.

**Table 30. TOIA Incentives and Set-asides Tested**

TOIA Incentives Tested					
Potential Set Aside Schedules	TOIA Tier	Density Bonus	Affordability		
			ELI	VLI	LI
Schedule A	1	100%	8%	11%	20%
	2	120%	9%	12%	21%
	3	Unlimited	10%	14%	23%
	4	Unlimited	11%	15%	25%
Schedule B	1	100%	9%	12%	21%
	2	120%	10%	13%	22%
	3	Unlimited	11%	15%	24%
	4	Unlimited	12%	16%	26%
Schedule C	1	100%	10%	13%	22%
	2	120%	11%	14%	23%
	3	Unlimited	12%	16%	25%
	4	Unlimited	13%	17%	27%
Schedule D	1	100%	11%	14%	23%
	2	120%	12%	15%	24%
	3	Unlimited	13%	17%	26%
	4	Unlimited	14%	18%	28%

Source: City of Los Angeles, AECOM

<sup>31</sup> Note that Schedule A aligns with the set asides of the proposed single-tier program structure shown in Table 28. Schedules B, C, and D respectively align with the set-asides of the proposed multi-tier program structure for Market Tiers 1, 2, and 3 shown in Table 29.

## 5.3.1 Sites and Prototypes Tested

Table 31 shows the sites and prototypes that were tested. The prototypes were selected with City staff to represent a range of density cohorts likely to be developed in transit-oriented areas (i.e., excluding some of the lower-density prototypes tested for DBO), and include a set of 5 distinct typologies, of which 3 are tested assuming a residential base zone and 4 assuming a commercial base zone. Only rental prototypes are tested.

Where an unlimited density bonus is available, AECOM assumed densities increase until either the maximum FAR was reached, or until a 28-story tower was reached (i.e., the maximum density project for which a prototype is available within the framework for this analysis).

**Table 31. TOIA Test Site and Prototype Assumptions**

TOIA Site and Prototype Assumptions								
	TOIA Residential Zones				TOIA Commercial Zones			
Base Housing Typology	4D	CY3	CY4	P5	CY4	P5	P7	TW
Description	2-Duplex buildings	3-story Courtyard-style	4-story Courtyard-style	5/6-Story Podium	4-story Courtyard-style	5/6-Story Podium	7/8-Story Podium	Tower
Use Program	Residential	Residential	Residential	Residential	Residential	Residential	Mixed-Use	Mixed-Use
Parking Strategy	Surface & tuck-under	Under-ground	Under-ground	1-level podium	Under-ground	1-level podium	2-level podium	4-level podium
Associated Density Cohort	Low-Medium	Medium	Medium	High-Medium	Medium	High-Medium	High-Medium	High-Medium
Zone Class of Base Zone	RD1.5	R3	R3	R4	C1, CM	C2, C4, C5	C2, C4, C5	C2, C4, C5
Assumed Height District	1	1	1VL	1	1VL	1	2	4
Base Zone Maximum Height (ft)	45	45	50	Unlimited	45	Unlimited	Unlimited	Unlimited
Base Zone Maximum # of Stories	Unlimited	Unlimited	Unlimited	Unlimited	3	Unlimited	Unlimited	Unlimited
Base Zone Maximum FAR	3.0	3.0	3.0	3.0	1.5	1.5	6.0	13.0
Base Zone Minimum Lot Area/Unit (SF)	1,500	800	800	400	400	400	400	400
Base Zone Max Density (DUAC)	29.0	54.5	54.5	108.9	108.90	108.9	108.9	108.9
Site Area								
Land Area (SF)	7,500	7,500	15,000	22,500	15,000	22,500	30,000	44,000
Residential - Gross Building Area (SF)	5,000	11,880	21,420	50,000	4,850	14,500	68,533	131,429
Retail - Gross Building Area (SF)	0	0	0	0	0	0	6,000	9,900
Total Gross Building Area (SF)	5,000	11,880	21,420	50,000	4,850	14,500	74,533	141,329
Unit Count and Mix	4	9	18	50	15	25	74	109
Typical Unit Mix (Lower Density)								
Avg. Unit Size (Lower Density)	1,250	1,320	1,190	1,000	1,190	1,000	700	850
0BR	0%	0%	0%	0%	0%	0%	30%	25%
1BR	0%	0%	0%	40%	0%	40%	50%	50%
2BR	20%	70%	70%	40%	70%	40%	20%	25%
3BR	40%	30%	30%	20%	30%	20%	0%	0%
4BR	40%	0%	0%	0%	0%	0%	0%	0%
Denser Unit Mix Alternative								
Avg. Unit Size	NA	880	900	800	900	800	NA	NA
0BR		20%	0%	20%	0%	20%		
1BR		40%	50%	50%	50%	50%		
2BR		40%	50%	30%	50%	30%		
3BR		0%	0%	0%	0%	0%		
4BR		0%	0%	0%	0%	0%		
Parking Strategy								
Residential Parking (spaces/BR)	2 per unit	0.60	0.60	0.90	0.60	0.90	0.90	0.90
Total Parking Spaces	8	12	25	81	20	41	103	162
Surface/Tuck Under	8	0	0	0	0	0	0	0
Ground level parking (L1)	0	0	0	33	0	33	30	49
Above-ground podium (L2, L3, and L4)	0	0	0	0	0	0	60	113
Subterranean parking	0	12	25	48	20	8	13	0

Source: AECOM

## 5.4 Results

### 5.4.1 Base Case Feasibility

The base case is a test of each typology with 100% market-rate units and no density bonus. Base case residual land values provide a basis of comparison with the incentive scenarios to follow. Table 32 below shows estimated residual land value (RLV) for each typology, the assumed market land value threshold for each Market Tier (shown in the “Market Land Value/Sq.Ft.” row in the table), and a determination of whether the scenario is “feasible,” i.e., whether the base case generates RLV that is equal to or greater than the market threshold.

As shown, nearly all typologies generate negative RLV in Market Tier 1. In Market Tier 2, RLVs are more positive but none meet the market value threshold for feasibility. In Market Tier 3, all but the TW-based sites and density cohorts generate positive RLVs, and the High Medium site in the residential zone is feasible with the RLV of \$212 exceeding the \$175 threshold. Notably, two additional residential sites in the Medium density cohort (CY3 and CY4) generate RLVs that are close to meeting the benchmark threshold.

In Market Tier 4, all base typologies generate positive RLV, two meet the market land value thresholds and are feasible (P5 and TW), and two more are close to meeting the benchmark threshold (CY3 and CY4).



**Table 32. TOIA Base Case Prototypes Feasibility**

<i>Prototype</i>	<b>4D-R</b>	<b>CY3-R</b>	<b>CY4-R</b>	<b>P5-R</b>	<b>CY4-R</b>	<b>P5-R</b>	<b>P7-R</b>	<b>TW-R</b>
<i>Site Zoning</i>	<b>Residential</b>				<b>Commercial</b>			
<i>Density Cohort</i>	Low Med II	Medium	Medium	Med. High	Medium	Med. High	High	High
<b>Market Tier 1</b>								
RLV/Land Sq. Ft.	\$7	(\$295)	(\$269)	(\$400)	(\$222)	(\$201)	(\$456)	(\$484)
Market Land Value/Sq. Ft.	\$140	\$140	\$140	\$140	\$115	\$115	\$115	\$115
Feasibility (RLV > Market)								
<b>Market Tier 2</b>								
RLV/Land Sq. Ft.	\$62	\$84	\$84	\$94	\$72	\$46	(\$55)	(\$113)
Market Land Value/Sq. Ft.	\$145	\$145	\$145	\$145	\$170	\$170	\$170	\$170
Feasibility (RLV > Market)								
<b>Market Tier 3</b>								
RLV/Land Sq. Ft.	\$173	\$163	\$155	\$212	\$131	\$104	\$43	(\$1)
Market Land Value/Sq. Ft.	\$175	\$175	\$175	\$175	\$185	\$185	\$185	\$185
Feasibility (RLV > Market)				F				
<b>Market Tier 4</b>								
RLV/Land Sq. Ft.	\$255	\$238	\$224	\$313	\$188	\$155	\$161	\$408
Market Land Value/Sq. Ft.	\$230	\$230	\$230	\$230	\$240	\$240	\$240	\$240
Feasibility (RLV > Market)	F	F		F				F

Note: "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.  
Source: AECOM

## 5.4.2 TOIA Scenario Feasibility

This section summarizes the feasibility results of the TOIA incentive program schedules described in Section 5.3. The tables below show the results using measures of residual land value, feasibility, and preferability, where the RLV of each density bonus prototype is evaluated against the market cost of land for feasibility and against the base case prototype RLV for preferability. Results are presented by Market Tier.

None of the scenarios tested were feasible in Market Tiers 1 and 2 and RLVs are generally negative (Table 33 and Table 34). Increasing the set-aside requirements makes the RLVs more negative (i.e., RLVs are more negative for Schedule B compared to Schedule A, and so on).

Table 35 shows the results for Market Tier 3, organized by residential versus commercial prototype, set aside schedule, TOIA Tier, and affordability level selected to achieve the density bonus. Under Schedule A, several scenarios are feasible (compared to the market and value) and/or preferable (compared to the base case scenario) – representing an improvement over the base case scenario where only the residential-zoned P5-R prototype was feasible. Under Schedules B and C, only one tested scenario is feasible/preferable.

Table 36 shows the results for Market Tier 4. In Market Tier 4, the higher density prototypes are broadly feasible and in many cases preferable, even with increased standards up to Schedule C and D. Some lower and medium density projects are also feasible/preferable. Given current market conditions and the prototypes modeled, Market Tier 4 appears to be the only market tier that can support these higher set aside schedules.

**Table 33. TOIA Scenario Residual Land Value and Feasibility Market Tier 1**

TOIA Incentives Tested (Residential) - Market Tier 1			Residual Land Value/Sq.Ft.				Feasibility			
Base Typology			4D-R	CY3-R	CY4-R	P5-R	4D-R	CY3-R	CY4-R	P5-R
Residential										
Residential			Low Med.	Medium	Medium	Med. High	Low Med II	Medium	Medium	Med. High
Market Land Value/Sq.ft.			\$140							
Potential Set Aside Schedules	TOIA Tier	Affordability								
Base Case Scenario	-	-	\$7	(\$295)	(\$269)	(\$400)				
Schedule A	1	8% ELI	(\$396)	(\$499)	(\$499)	(\$596)				
	2	9% ELI	(\$396)	(\$541)	(\$541)	(\$617)				
	3	10% ELI	(\$694)	(\$631)	(\$631)	(\$617)				
	4	11% ELI	(\$702)	(\$668)	(\$668)	(\$626)				
	1	11% VLI	(\$382)	(\$499)	(\$499)	(\$593)				
	2	12% VLI	(\$423)	(\$538)	(\$538)	(\$609)				
	3	14% VLI	(\$701)	(\$623)	(\$623)	(\$625)				
	4	15% VLI	(\$707)	(\$660)	(\$660)	(\$630)				
	1	20% LI	(\$381)	(\$481)	(\$481)	(\$579)				
	2	21% LI	(\$381)	(\$523)	(\$523)	(\$587)				
	3	23% LI	(\$673)	(\$583)	(\$583)	(\$596)				
	4	25% LI	(\$673)	(\$612)	(\$612)	(\$597)				

TOIA Incentives Tested (Commercial) - Market Tier 1			Residual Land Value/Sq.Ft.				Feasibility			
Base Typology			Commercial							
Base Typology			CY4-R	P5-R	P7-R	TW-R	CY4-R	P5-R	P7-R	TW-R
Density Cohort			Medium	Med. High	High	High	Medium	Med. High	High	High
Market Land Value/Sq.ft.			\$115							
Potential Set Aside Schedules	TOIA Tier	Affordability								
Base Case Scenario	-	-	(\$209)	(\$189)	(\$436)	(\$459)				
Schedule A	1	8% ELI	(\$433)	(\$433)	(\$851)	(\$882)				
	2	9% ELI	(\$526)	(\$526)	(\$813)	(\$968)				
	3	10% ELI	(\$392)	(\$617)	(\$860)	(\$1,709)				
	4	11% ELI	(\$634)	(\$626)	(\$916)	(\$1,739)				
	1	11% VLI	(\$438)	(\$438)	(\$844)	(\$883)				
	2	12% VLI	(\$523)	(\$523)	(\$813)	(\$961)				
	3	14% VLI	(\$401)	(\$625)	(\$863)	(\$1,716)				
	4	15% VLI	(\$629)	(\$630)	(\$913)	(\$1,743)				
	1	20% LI	(\$427)	(\$427)	(\$803)	(\$861)				
	2	21% LI	(\$500)	(\$500)	(\$780)	(\$932)				
	3	23% LI	(\$361)	(\$596)	(\$824)	(\$1,632)				
	4	25% LI	(\$586)	(\$597)	(\$871)	(\$1,654)				

Note: "P" indicates preferable scenarios, "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

Source: AECOM

**Table 34. TOIA Scenario Residual Land Value and Feasibility Market Tier 2**

TOIA Incentives Tested (Residential) - Market Tier 2			Residual Land Value/Sq. Ft.				Feasibility			
Base Typology			4D-R	CY3-R	CY4-R	P5-R	4D-R	CY3-R	CY4-R	P5-R
Residential										
Residential			Low Med.	Medium	Medium	Med. High	Low Med II	Medium	Medium	Med. High
Market Land Value/Sq.ft.			\$145							
Potential Set Aside Schedules	TOIA Tier	Affordability								
Base Case Scenario	-	-	\$62	\$84	\$84	\$94				
Schedule A	1	8% ELI	(\$54)	\$21	\$21	\$52				
	2	9% ELI	(\$54)	\$25	\$25	\$17				
	3	10% ELI	(\$59)	(\$140)	(\$140)	\$17				
	4	11% ELI	(\$72)	(\$159)	(\$159)	\$4				
	1	11% VLI	(\$40)	\$6	\$6	\$40				
	2	12% VLI	(\$122)	\$13	\$13	\$11				
	3	14% VLI	(\$95)	(\$147)	(\$147)	(\$18)				
	4	15% VLI	(\$104)	(\$170)	(\$170)	(\$28)				
	1	20% LI	(\$80)	(\$18)	(\$18)	(\$0)				
	2	21% LI	(\$80)	(\$27)	(\$27)	(\$21)				
	3	23% LI	(\$123)	(\$148)	(\$148)	(\$46)				
	4	25% LI	(\$127)	(\$165)	(\$165)	(\$50)				

TOIA Incentives Tested (Commercial) - Market Tier 2			Residual Land Value/Sq. Ft.				Feasibility			
Base Typology			CY4-R	P5-R	P7-R	TW-R	CY4-R	P5-R	P7-R	TW-R
Density Cohort			Medium	Med. High	High	High	Medium	Med. High	High	High
Market Land Value/Sq.ft.			\$170							
Potential Set Aside Schedules	TOIA Tier	Affordability								
Base Case Scenario	-	-	\$89	\$62	(\$31)	(\$82)				
Schedule A	1	8% ELI	\$32	\$32	(\$85)	(\$184)				
	2	9% ELI	\$26	\$26	(\$206)	(\$208)				
	3	10% ELI	\$125	\$17	(\$225)	(\$329)				
	4	11% ELI	(\$144)	\$4	(\$255)	(\$372)				
	1	11% VLI	\$11	\$11	(\$98)	(\$203)				
	2	12% VLI	\$14	\$14	(\$224)	(\$218)				
	3	14% VLI	\$91	(\$18)	(\$250)	(\$385)				
	4	15% VLI	(\$159)	(\$28)	(\$275)	(\$428)				
	1	20% LI	(\$17)	(\$17)	(\$119)	(\$234)				
	2	21% LI	(\$5)	(\$5)	(\$234)	(\$250)				
	3	23% LI	\$89	(\$46)	(\$260)	(\$407)				
	4	25% LI	(\$158)	(\$50)	(\$289)	(\$456)				

Note: "P" indicates preferable scenarios, "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

Source: AECOM

**Table 35. TOIA Scenario Residual Land Value and Feasibility Market Tier 3**

TOIA Incentives Tested (Residential)			Residual Land Value/Sq.Ft.				Feasibility			
Base Typology			4D-R	CY3-R	CY4-R	P5-R	4D-R	CY3-R	CY4-R	P5-R
Residential										
Residential			Low Med.	Medium	Medium	Med. High	Low Med II	Medium	Medium	Med. High
Market Land Value/Sq.ft.			\$175							
Potential Set Aside Schedules	TOIA Tier	Affordability								
Base Case Scenario	-	-	\$173	\$163	\$155	\$212				F
Schedule A	1	8% ELI	\$21	\$150	\$150	\$213				P
	2	9% ELI	\$21	\$166	\$166	\$175				
	3	10% ELI	\$98	(\$15)	(\$15)	\$175				
	4	11% ELI	\$85	(\$30)	(\$30)	\$161				
	1	11% VLI	\$35	\$130	\$130	\$197				F
	2	12% VLI	(\$56)	\$150	\$150	\$164				
	3	14% VLI	\$55	(\$27)	(\$27)	\$131				
	4	15% VLI	\$45	(\$46)	(\$46)	\$122				
	1	20% LI	(\$13)	\$95	\$95	\$142				
	2	21% LI	(\$13)	\$95	\$95	\$117				
	3	23% LI	\$12	(\$39)	(\$39)	\$88				
	4	25% LI	\$8	(\$53)	(\$53)	\$84				
Schedule B	1	9% ELI	\$21	\$136	\$136	\$175				
	2	10% ELI	\$21	\$128	\$128	\$175				
	3	11% ELI	\$85	(\$21)	(\$21)	\$161				
	4	12% ELI	\$47	(\$46)	(\$46)	\$124				
	1	12% VLI	(\$56)	\$130	\$130	\$164				
	2	13% VLI	(\$56)	\$117	\$117	\$131				
	3	15% VLI	\$45	(\$40)	(\$40)	\$122				
	4	16% VLI	\$13	(\$50)	(\$50)	\$89				
	1	21% LI	(\$13)	\$95	\$95	\$117				
	2	22% LI	(\$13)	\$95	\$95	\$113				
	3	24% LI	\$12	(\$44)	(\$44)	\$88				
	4	26% LI	(\$17)	(\$66)	(\$66)	\$59				
Schedule C	1	10% ELI	\$21	\$136	\$136	\$175				
	2	11% ELI	\$21	\$128	\$128	\$161				
	3	12% ELI	\$47	(\$43)	(\$43)	\$124				
	4	13% ELI	\$9	(\$58)	(\$58)	\$86				
	1	13% VLI	(\$56)	\$121	\$121	\$131				
	2	14% VLI	(\$56)	\$117	\$117	\$131				
	3	16% VLI	\$13	(\$59)	(\$59)	\$89				
	4	17% VLI	\$13	(\$68)	(\$68)	\$89				
	1	22% LI	(\$13)	\$91	\$91	\$113				
	2	23% LI	(\$82)	\$71	\$71	\$88				
	3	25% LI	\$8	(\$52)	(\$52)	\$84				
	4	27% LI	(\$17)	(\$74)	(\$74)	\$59				
Schedule D	1	11% ELI	\$21	\$99	\$99	\$161				
	2	12% ELI	(\$84)	\$115	\$115	\$124				
	3	13% ELI	\$9	(\$58)	(\$58)	\$86				
	4	14% ELI	\$9	(\$74)	(\$74)	\$86				
	1	14% VLI	(\$56)	\$121	\$121	\$131				
	2	15% VLI	(\$56)	\$85	\$85	\$122				
	3	17% VLI	\$13	(\$62)	(\$62)	\$89				
	4	18% VLI	\$3	(\$81)	(\$81)	\$79				
	1	23% LI	(\$82)	\$66	\$66	\$88				
	2	24% LI	(\$82)	\$71	\$71	\$88				
	3	26% LI	(\$17)	(\$65)	(\$65)	\$59				
	4	28% LI	(\$42)	(\$87)	(\$87)	\$34				



TOIA Incentives Tested (Commercial)			Residual Land Value/Sq.Ft.				Feasibility			
			Commercial							
Base Typology			CY4-R	P5-R	P7-R	TW-R	CY4-R	P5-R	P7-R	TW-R
Density Cohort			Medium	Med. High	High	High	Medium	Med. High	High	High
Market Land Value/Sq.ft.			\$185							
Potential Set Aside Schedules	TOIA Tier	Affordability								
Base Case Scenario	-	-	\$152	\$124	\$73	\$35				
Schedule A	1	8% ELI	\$148	\$148	\$108	\$36				
	2	9% ELI	\$163	\$163	(\$16)	\$31				
	3	10% ELI	\$246	\$175	(\$26)	\$105	P			
	4	11% ELI	(\$21)	\$161	(\$48)	\$58				
	1	11% VLI	\$123	\$123	\$88	\$10				
	2	12% VLI	\$147	\$147	(\$39)	\$14				
	3	14% VLI	\$206	\$131	(\$59)	\$32	P			
	4	15% VLI	(\$40)	\$122	(\$76)	(\$16)				
	1	20% LI	\$84	\$84	\$51	(\$41)				
	2	21% LI	\$117	\$117	(\$65)	(\$39)				
	3	23% LI	\$194	\$88	(\$86)	(\$29)	P			
	4	25% LI	(\$52)	\$84	(\$111)	(\$87)				
Schedule B	1	9% ELI	\$110	\$110	\$64	(\$12)				
	2	10% ELI	\$125	\$125	(\$63)	(\$28)				
	3	11% ELI	\$195	\$124	(\$73)	(\$6)	P			
	4	12% ELI	(\$58)	\$86	(\$95)	(\$53)				
	1	12% VLI	\$90	\$90	\$39	(\$28)				
	2	13% VLI	\$114	\$114	(\$64)	(\$39)				
	3	15% VLI	\$176	\$89	(\$98)	(\$55)				
	4	16% VLI	(\$62)	\$89	(\$115)	(\$108)				
	1	21% LI	\$80	\$80	\$30	(\$66)				
	2	22% LI	\$67	\$67	(\$91)	(\$76)				
	3	24% LI	\$174	\$84	(\$112)	(\$87)				
	4	26% LI	(\$65)	\$59	(\$137)	(\$149)				
Schedule C	1	10% ELI	\$110	\$110	\$80	\$8				
	2	11% ELI	\$125	\$125	(\$43)	(\$0)				
	3	12% ELI	\$215	\$161	(\$53)	\$58	P			
	4	13% ELI	(\$43)	\$124	(\$68)	(\$6)				
	1	13% VLI	\$123	\$123	\$70	(\$13)				
	2	14% VLI	\$147	\$147	(\$41)	(\$23)				
	3	16% VLI	\$202	\$122	(\$82)	(\$16)	P			
	4	17% VLI	(\$59)	\$89	(\$99)	(\$55)				
	1	22% LI	\$80	\$80	\$38	(\$50)				
	2	23% LI	\$92	\$92	(\$82)	(\$60)				
	3	25% LI	\$194	\$88	(\$96)	(\$61)	P			
	4	27% LI	(\$65)	\$59	(\$127)	(\$112)				
Schedule D	1	11% ELI	\$97	\$97	\$37	(\$42)				
	2	12% ELI	\$111	\$111	(\$91)	(\$47)				
	3	13% ELI	\$163	\$86	(\$100)	(\$53)				
	4	14% ELI	(\$70)	\$86	(\$115)	(\$100)				
	1	14% VLI	\$90	\$90	\$36	(\$51)				
	2	15% VLI	\$81	\$81	(\$80)	(\$63)				
	3	17% VLI	\$176	\$89	(\$121)	(\$108)				
	4	18% VLI	(\$80)	\$79	(\$138)	(\$146)				
	1	23% LI	\$55	\$55	\$17	(\$82)				
	2	24% LI	\$67	\$67	(\$107)	(\$85)				
	3	26% LI	\$165	\$59	(\$122)	(\$112)				
	4	28% LI	(\$78)	\$34	(\$153)	(\$175)				

Note: "P" indicates preferable scenarios, "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

Source: AECOM

**Table 36. TOIA Scenario Residual Land Value and Feasibility Market Tier 4**

TOIA Incentives Tested (Residential)			Residual Land Value/Sq.Ft.				Feasibility			
Base Typology			4D-R	CY3-R	CY4-R	P5-R	4D-R	CY3-R	CY4-R	P5-R
			Residential							
Residential			Low Med.	Medium	Medium	Med. High	Low Med II	Medium	Medium	Med. High
Market Land Value/Sq.ft.			\$230							
Potential Set Aside Schedules	TOIA Tier	Affordability								
Base Case Scenario	-	-	\$255	\$238	\$224	\$313	F	F		F
Schedule A	1	8% ELI	\$101	\$275	\$275	\$368		P	P	P
	2	9% ELI	\$101	\$302	\$302	\$327		P	P	P
	3	10% ELI	\$251	\$145	\$145	\$327	F			P
	4	11% ELI	\$236	\$135	\$135	\$313	F			P
	1	11% VLI	\$116	\$251	\$251	\$349		P	P	P
	2	12% VLI	\$16	\$282	\$282	\$313		P	P	P
	3	14% VLI	\$200	\$126	\$126	\$277				F
	4	15% VLI	\$190	\$113	\$113	\$266				F
	1	20% LI	\$59	\$205	\$205	\$280				F
	2	21% LI	\$59	\$214	\$214	\$252				F
	3	23% LI	\$143	\$100	\$100	\$219				
	4	25% LI	\$138	\$90	\$90	\$214				
Schedule B	1	9% ELI	\$101	\$260	\$260	\$327		P	P	P
	2	10% ELI	\$101	\$261	\$261	\$327		P	P	P
	3	11% ELI	\$236	\$138	\$138	\$313	F			P
	4	12% ELI	\$195	\$118	\$118	\$272				F
	1	12% VLI	\$16	\$251	\$251	\$313		P	P	P
	2	13% VLI	\$16	\$246	\$246	\$277		P	P	F
	3	15% VLI	\$190	\$112	\$112	\$266				F
	4	16% VLI	\$154	\$108	\$108	\$230				F
	1	21% LI	\$59	\$205	\$205	\$252				F
	2	22% LI	\$59	\$214	\$214	\$247				F
	3	24% LI	\$143	\$93	\$93	\$219				
	4	26% LI	\$110	\$74	\$74	\$186				
Schedule C	1	10% ELI	\$101	\$260	\$260	\$327		P	P	P
	2	11% ELI	\$101	\$261	\$261	\$313		P	P	P
	3	12% ELI	\$195	\$114	\$114	\$272				F
	4	13% ELI	\$154	\$105	\$105	\$231				F
	1	13% VLI	\$16	\$241	\$241	\$277		P	P	F
	2	14% VLI	\$16	\$246	\$246	\$277		P	P	F
	3	16% VLI	\$154	\$91	\$91	\$230				F
	4	17% VLI	\$154	\$88	\$88	\$230				F
	1	22% LI	\$59	\$200	\$200	\$247				F
	2	23% LI	(\$19)	\$186	\$186	\$219				
	3	25% LI	\$138	\$84	\$84	\$214				
	4	27% LI	\$110	\$64	\$64	\$186				
Schedule D	1	11% ELI	\$101	\$219	\$219	\$313				P
	2	12% ELI	(\$13)	\$246	\$246	\$272		P	P	F
	3	13% ELI	\$154	\$97	\$97	\$231				F
	4	14% ELI	\$154	\$87	\$87	\$231				F
	1	14% VLI	\$16	\$241	\$241	\$277		P	P	F
	2	15% VLI	\$16	\$210	\$210	\$266				F
	3	17% VLI	\$154	\$87	\$87	\$230				F
	4	18% VLI	\$143	\$73	\$73	\$220				
	1	23% LI	(\$19)	\$172	\$172	\$219				
	2	24% LI	(\$19)	\$186	\$186	\$219				
	3	26% LI	\$110	\$69	\$69	\$186				
	4	28% LI	\$82	\$49	\$49	\$158				

Note: "P" indicates preferable scenarios, "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

Source: AECOM

TOIA Incentives Tested (Commercial)			Residual Land Value/Sq.Ft.				Feasibility			
			Commercial							
Base Typology			CY4-R	P5-R	P7-R	TW-R	CY4-R	P5-R	P7-R	TW-R
Density Cohort			Medium	Med. High	High	High	Medium	Med. High	High	High
Market Land Value/Sq.ft.			\$240							
Potential Set Aside Schedules	TOIA Tier	Affordability								
Base Case Scenario	-	-	\$219	\$184	\$206	\$463				F
Schedule A	1	8% ELI	\$260	\$260	\$354	\$830	P	P	P	P
	2	9% ELI	\$295	\$295	\$674	\$895	P	P	P	P
	3	10% ELI	\$388	\$327	\$695	\$1,677	P	P	P	P
	4	11% ELI	\$138	\$313	\$702	\$1,614		P	P	P
	1	11% VLI	\$231	\$231	\$327	\$779			P	P
	2	12% VLI	\$276	\$276	\$625	\$853	P	P	P	P
	3	14% VLI	\$341	\$277	\$631	\$1,536	P	P	P	P
	4	15% VLI	\$112	\$266	\$642	\$1,469		P	P	P
	1	20% LI	\$182	\$182	\$268	\$653			P	P
	2	21% LI	\$235	\$235	\$537	\$714			P	P
	3	23% LI	\$315	\$219	\$533	\$1,322	P		P	P
	4	25% LI	\$84	\$214	\$525	\$1,230			P	P
Schedule B	1	9% ELI	\$218	\$218	\$323	\$793			P	P
	2	10% ELI	\$254	\$254	\$637	\$854	P	P	P	P
	3	11% ELI	\$354	\$313	\$659	\$1,614	P	P	P	P
	4	12% ELI	\$114	\$272	\$676	\$1,529		P	P	P
	1	12% VLI	\$231	\$231	\$307	\$747			P	P
	2	13% VLI	\$276	\$276	\$623	\$801	P	P	P	P
	3	15% VLI	\$335	\$266	\$599	\$1,469	P	P	P	P
	4	16% VLI	\$91	\$230	\$610	\$1,414			P	P
	1	21% LI	\$177	\$177	\$252	\$637			P	P
	2	22% LI	\$207	\$207	\$512	\$682			P	P
	3	24% LI	\$315	\$219	\$517	\$1,271	P		P	P
	4	26% LI	\$69	\$186	\$500	\$1,188			P	P
Schedule C	1	10% ELI	\$218	\$218	\$306	\$767			P	P
	2	11% ELI	\$254	\$254	\$611	\$817	P	P	P	P
	3	12% ELI	\$332	\$272	\$632	\$1,529	P	P	P	P
	4	13% ELI	\$97	\$231	\$639	\$1,466			P	P
	1	13% VLI	\$195	\$195	\$272	\$725			P	P
	2	14% VLI	\$240	\$240	\$591	\$779			P	P
	3	16% VLI	\$306	\$230	\$577	\$1,414	P		P	P
	4	17% VLI	\$87	\$230	\$588	\$1,341			P	P
	1	22% LI	\$177	\$177	\$242	\$611			P	P
	2	23% LI	\$179	\$179	\$496	\$656			P	P
	3	25% LI	\$293	\$214	\$492	\$1,230	P		P	P
	4	27% LI	\$68	\$186	\$484	\$1,131			P	P
Schedule D	1	11% ELI	\$204	\$204	\$275	\$726			P	P
	2	12% ELI	\$240	\$240	\$574	\$791			P	P
	3	13% ELI	\$298	\$231	\$596	\$1,466	P		P	P
	4	14% ELI	\$83	\$231	\$613	\$1,403			P	P
	1	14% VLI	\$195	\$195	\$267	\$693			P	P
	2	15% VLI	\$204	\$204	\$568	\$744			P	P
	3	17% VLI	\$306	\$230	\$545	\$1,341	P		P	P
	4	18% VLI	\$67	\$220	\$556	\$1,286			P	P
	1	23% LI	\$149	\$149	\$226	\$586				P
	2	24% LI	\$179	\$179	\$471	\$640			P	P
	3	26% LI	\$282	\$186	\$476	\$1,188	P		P	P
	4	28% LI	\$52	\$158	\$458	\$1,090			P	P

Note: "P" indicates preferable scenarios, "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

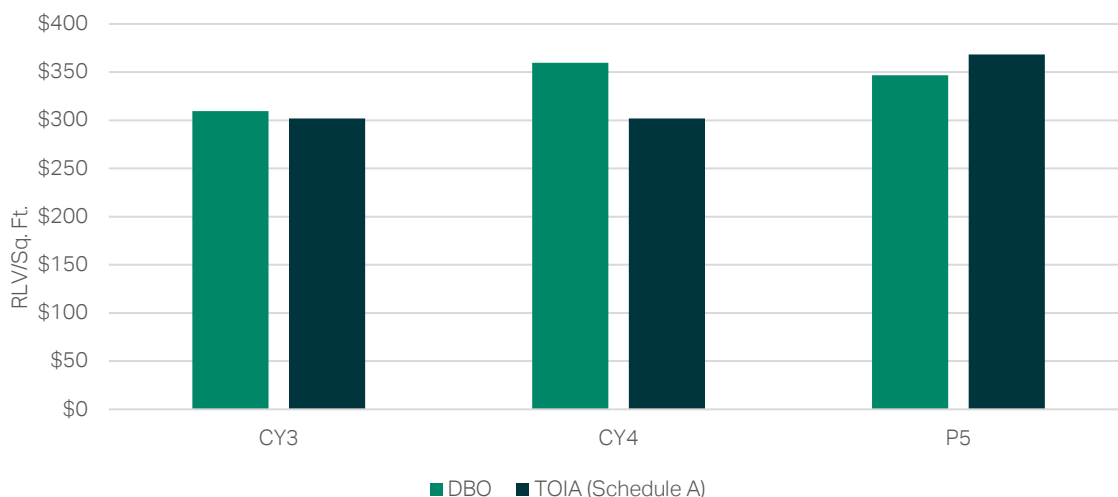
Source: AECOM

## 5.5 Summary and Implications

Findings and implications for policy are summarized below:

- **Overall, the TOIA incentives and associated set-aside requirements should help produce more market-rate and affordable units than would otherwise be feasible.** The analysis of proposed density bonus and affordability parameters for the City's TOIA program show that the scheduled incentives should provide developer applicants with preferred returns in Market 4 and, to a lesser extent, Market Tier 3 areas.
- **Scenario feasibility is very sensitive to increased affordable set-asides.** Based on current market conditions, no scenarios tested in Market Tiers 1 and 2 were feasible. In Market Tier 3, the number of feasible scenarios decreases quickly in schedules where higher levels of affordable set-asides are required.
- **TOIA scenarios in Market Tier 4 result in feasible prototypes across density cohorts, even with increased affordability standards.** Under the market conditions modeled, this is the only market tier that clearly supports higher levels of set-asides (up to Schedule C/D). Increasing set-aside requirements could result in fewer projects being built, particularly in places with weaker market conditions, offsetting some of the potential affordable housing production gains that the proposed TOIA enhancements seek to provide.
- **In residentially zoned areas, TOIA Schedule A produces similar development returns compared to DBO.** Figure 5 shows the highest residual land values achieved by prototype on residential zoned land in Market Tier 4 under TOIA Schedule A, compared to the DBO program. As tested, DBO projects generate higher RLVs for courtyard projects – suggesting that a profit-seeking developer may be more likely to take advantage of the DBO program where both are available. However, TOIA Schedule A generates higher returns for the P5 prototype.<sup>32</sup>

**Figure 5. Highest RLV Achieved by Prototype: DBO v. TOIA Schedule A in Market Tier 4**



Comparison shows rental prototypes in residential zones.  
Source: AECOM

- **While TOIA offers higher density bonuses than DBO, the financial benefit for applicants is in part offset by the method of calculating affordable set-aside units for**

<sup>32</sup> DBO projects were not tested on sites with commercial zoning so cannot be compared.

**TOIA.** The TOIA program calculates affordability set-aside requirements on the total number of units per project. This is a shift from DBO which calculates set-aside requirements as a percentage of units allowed under density limits tied to a site's base zoning condition. In other words, whereas under DBO, all bonus units are market-rate, under TOIA some of the bonus units are required to be set-aside as affordable.

- **In some cases, TOIA project feasibility may also be affected by counting above-ground parking against FAR, although developers may partially offset the impact by reducing parking ratios.** TOIA projects are generally limited by FAR rather than density, so counting above-ground parking as part of FAR has a more significant impact on TOIA projects compared to the DBO program, where density is generally the limiting factor. This analysis assumes that projects will provide parking ratios consistent with the parking ratio of projects recently developed under the existing TOC program.<sup>33</sup> These parking ratios reflect an assumption that parking will be provided as a function of both market demand for parking spaces (which impacts a project's achievable rents, overall marketability, competitive position, etc.) as well as underwriting practices that favor parking standards of previous successful projects that lenders see as market-proven concepts (which impacts a project's ability to attract favorable financing). In some cases, developers may choose to further reduce parking ratios to maximize living area.<sup>34</sup>
- **Developers who take advantage of the TOIA program in strong market tiers are likely to build ELI units.** ELI units generate less revenue *per unit* than LI or VLI. However, ELI projects still generate higher overall returns because projects that provide ELI units are required to provide fewer affordable units, compared to projects that provide LI or VLI units. This is consistent with the City's experience that most projects that have utilized the existing TOC program have built ELI units.<sup>35</sup>

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<sup>33</sup> Recently developed projects under the former TOC program served as the basis for development comparables.

<sup>34</sup> The financial implications of reducing parking vary. On a per-space basis, parking is assumed in this analysis to cost approximately \$50,000 per underground space and \$35,000 per above-ground podium space. Reducing underground parking results in direct cost savings (although the market rents that the developer may achieve may decline slightly as well), so generally increases overall project feasibility. For P5, P7, and TW, where a podium is provided, the developer could replace the parking spaces with additional residential uses to enhance the revenue stream. However, building residential space entails its own construction costs (as well as revenues), and in some cases the building may need to be redesigned to accommodate appropriate residential areas.

<sup>35</sup> In Market Tier 1, at the other end of the spectrum, ELI unit pathways generate higher residual land values compared to LI/VLI pathways because there is a smaller gap between market-rate and VLI/LI units.



## 6. Opportunity Corridors (OC) Incentive Program

### 6.1 Overview

The City's proposed Opportunity Corridors incentive program (OC) advances a holistic vision for livable and sustainable communities by increasing housing capacity along major streets located in Higher Opportunity Areas. This strategy will focus new housing opportunities on major corridors, particularly those with transit access, to provide affordable housing options near transit and amenities. Incentives available in the OC program would be provided generally in excess of incentives available in the DBO and TOIA programs.

The proposed OC program is intended to help the City fulfill Affirmatively Further Fair Housing (AFFH) requirements by creating substantial new housing capacity in Higher Opportunity Areas and in Racially Concentrated Areas of Affluence.

### 6.2 Opportunity Corridor Incentive Program

OC encourages more dense housing development along major thoroughfares located in jobs-rich and transit-rich locations in Higher Opportunity Areas, providing density in exchange for affordable housing set-asides. Given that corridors include commercial and residential zoned areas with varying scales and site considerations, the strategy proposes a tiered incentive-based approach, with incentives designed to reflect differences in commercially (C) zoned stretches compared to residential (R) zoned areas, as well as to reflect the importance of transit-rich locations.

The OC program proposes two main criteria for site eligibility: proximity to transit and location within High or Highest Resource Areas designated by the California Tax Credit Allocation Committee (CTCAC). Eligible sites are categorized into three OC incentive tiers with affordability requirements and FAR and height incentives that largely mirror those available in the proposed TOIA program. Density bonuses for each tier are limited by development standards such as FAR and height regulations. OC site eligibility requirements are shown in Table 37, and key incentive options are shown in Table 38.

**Table 37. Opportunity Corridors Incentive Area Eligibility Requirements**

OC Area Eligibility Requirements			
Incentive Area	Site Requirements <sup>a</sup>	Eligible Underlying Zones <sup>b</sup>	TCAC Opportunity Areas
OC-1	Sites fronting on corridors with Frequent Bus Service	Commercial Zones and Residential Zones (R2, RD6, RD5, RD4, RD3, RD2, RD1.5, RW2, R3, RAS3, R3, RAS4, R5)	High and Highest Resource Areas
OC-2	Sites fronting on High Quality Transit Service Corridors <sup>b</sup>		
OC-3	Sites fronting on an Avenue or Boulevard and located within a ≤ 2640 ft (0.5 mile) radius from intersection of Metro Rail and Rapid Bus Station <sup>c</sup>		

**Notes:**

a. To be an eligible Opportunity Corridor Housing Development, the project must be located on a lot, any portion of which, must meet the eligibility criteria in Section 2, Paragraph (g), including transit eligibility and site requirements, which require a lot to be fronting or have direct pedestrian access to the eligible Opportunity Corridor. Sites that are contiguous or have a lot tie with lots that meet the aforementioned criteria are eligible to receive the Opportunity Corridor Incentives.

b. Frequent Bus Service. Corridors with bus lines that have a 30 minute or less service frequency during peak hours.

c. Corridors within one-half mile (2,640 ft) from a major transit stop or a transit corridor with 15 minutes or less service frequency during peak commute hours.

Source: City of Los Angeles

**Table 38. Proposed Opportunity Corridor Program Incentives**

Proposed OC Program Base Incentives						
OC Area	OC-1		OC-2		OC-3	
Base Zone	Residential	Commercial	Residential	Commercial	Residential	Commercial
FAR Maximum of:	3.00 FAR	3.50 FAR	3.50 FAR	4.00 FAR	4.50 FAR	
				45% over base	50% over base	
Add'l Height (above Base)	Up to total 45'	1 story/11 feet up to 5 total stories	Up to total 56'	2 stories/22 feet up to 6 total stories	3 stories/33 feet up to 7 total stories	
DUAC Bonus	Unlimited		Unlimited		Unlimited	
Parking	No minimum required		No minimum required		No minimum required	

Source: City of Los Angeles, AECOM

## 6.3 Incentive Program Scenarios and Prototypes

As noted above, the proposed OC program uses the TOIA incentive structure as a framework, and the City proposes to align OC set-aside requirements to TOIA set-aside requirements as well. AECOM explored the feasibility of four potential OC set-aside schedules, shown in Table 39.

AECOM tested one prototype in a commercial zone and one prototype in a residential zone for each of the three OC incentive areas. The prototypes were selected to represent the housing typologies that maximizes building envelope under the incentives offered for each OC incentive area and zoning category. OC-1 is modeled as CY4 in residential zones and P5 in commercial zones, OC-2 as P5 in residential zones and P6 in commercial zones, and OC-3 as P7 in both residential and commercial zones. Each typology reflects the maximum height and FAR allowed for its respective tier and zoning designation. The prototypes and associated sites for each of these six scenarios are shown in Table 40.

**Table 39. Proposed OC Incentives Tested**

OC Incentives Tested					
Potential Set Aside Schedules	OC Tier	TOIA Tier*	Affordability		
			ELI	VLI	LI
Schedule A	1	2	9%	12%	21%
	2	3	10%	14%	23%
	3	4	11%	15%	25%
Schedule B	1	2	10%	13%	22%
	2	3	11%	15%	24%
	3	4	12%	16%	26%
Schedule C	1	2	11%	14%	23%
	2	3	12%	16%	25%
	3	4	13%	17%	27%
Schedule D	1	2	12%	15%	24%
	2	3	13%	17%	26%
	3	4	14%	18%	28%

Note: See Table 38 for incentives associated with each OC tier.

\*None of the proposed OC tiers are proposed to align with TOIA Tier 1.

Source: City of Los Angeles

**Table 40. Sites and Prototypes Tested by OC Tier**

<b>Opportunity Corridor (OC) Testing Prototypes Assumptions</b>						
<b>Opportunity Corridor (OC) Incentive Area</b>	<b>Residential Zones</b>			<b>Commercial Zones</b>		
	<b>OC-1</b>	<b>OC-2</b>	<b>OC-3</b>	<b>OC-1</b>	<b>OC-2</b>	<b>OC-3</b>
Maximum FAR (includes base incentives only)	3.0	3.5	4.5	3.5	4.0	4.5
Maximum # stories	4	5	7	5	6	7
<b>Resulting Development Prototype</b>						
Typology	<b>CY4</b>	<b>P5</b>	<b>P7</b>	<b>P5</b>	<b>P6</b>	<b>P7</b>
Description	4-story Courtyard-style	5-Story Podium	7-Story Podium	5-Story Podium	6-Story Podium	7-Story Podium
Use Program	All Residential	All Residential	All Residential	All Residential	All Residential	Mixed-Use
Parking Strategy	Underground parking	1-level podium parking	2-level podium parking	1-level podium parking	1-level podium parking	2-level podium parking
<b>Site Area</b>						
Land Area (SF)	6,500	13,000	19,500	10,000	15,000	20,000
Gross Building Area (SF without Parking)	16,875	37,333	59,733	28,800	50,133	65,600
Gross Building Area (SF with Parking)	17,330	45,133	87,033	34,800	59,133	89,600
Net Leasable Area (NLA, unit space only)	13,500	28,000	44,800	21,600	37,600	46,200
<b>Unit Count and Mix</b>						
<b>Total Number of Units</b>	<b>15</b>	<b>35</b>	<b>64</b>	<b>27</b>	<b>47</b>	<b>66</b>
<b>Unit Mix</b>						
0BR	0	7	19	5	9	20
1BR	8	18	32	14	24	33
2BR	8	11	13	8	14	13
3BR	0	0	0	0	0	0
4BR	0	0	0	0	0	0
<b>Approximate Mix as a % of Total</b>						
0BR	0%	20%	30%	20%	20%	30%
1BR	50%	50%	50%	50%	50%	50%
2BR	50%	30%	20%	30%	30%	20%
3BR	0%	0%	0%	0%	0%	0%
4BR	0%	0%	0%	0%	0%	0%
<b>Density and Intensity</b>						
Effective Density (DUAC)	101	117	143	118	136	144
Effective FAR (Without Parking)	2.6	2.9	3.1	2.9	3.3	3.3
Effective FAR (With Parking)	2.7	3.5	4.5	3.5	3.9	4.5
<b>Affordable Set-Aside Level</b>	<b>Equivalent to TOIA-2</b>	<b>Equivalent to TOIA-3</b>	<b>Equivalent to TOIA-4</b>	<b>Equivalent to TOIA-2</b>	<b>Equivalent to TOIA-3</b>	<b>Equivalent to TOIA-4</b>
<b>Parking</b>	<b>Underground</b>	<b>Podium &amp; Underground</b>	<b>Podium &amp; Underground</b>	<b>Podium &amp; Underground</b>	<b>Podium &amp; Underground</b>	<b>Podium &amp; Underground</b>
Residential Parking (spaces/BR)	0.6	0.9	0.9	0.9	0.9	0.9
Total Parking Spaces	20	63	76	48	84	95
Above-Ground Podium	0	19	68	15	22	60
Underground	20	44	8	33	62	35

Source: AECOM

## 6.4 Results

This section describes the results of the OC analysis. For the OC analysis, no base case was tested because the analysis modeled the maximum densities within each incentive area (limited by height and FAR) that each prototype could achieve, rather than “stepping up” up from a base. A feasible scenario is one that generates a residual land value that is consistent with the observed market values.

In Market Tiers 1 and 2 (Table 41), all scenarios generate fail to meet the land value standard for feasibility. Increasing the set aside requirements further reduce the RLV.

**Table 41. OC Scenario Residual Land Value and Feasibility in Market Tier 1 and 2**

OC Incentives Tested - Market Tier 1				RLV	Feasibility	RLV	Feasibility
				Residential		Commercial	
Market Land Value/Sq.ft.				\$140		\$115	
Potential Set Aside Schedules	OC Tier	TOIA Tier	Affordability				
Schedule A	OC-1	2	9% ELI	(\$557)		(\$530)	
			12% VLI	(\$527)		(\$534)	
			21% LI	(\$518)		(\$498)	
	OC-2	3	10% ELI	(\$550)		(\$628)	
			14% VLI	(\$549)		(\$628)	
			23% LI	(\$524)		(\$589)	
	OC-3	4	11% ELI	(\$460)		(\$646)	
			15% VLI	(\$449)		(\$636)	
			25% LI	(\$400)		(\$585)	

OC Incentives Tested - Market Tier 2				RLV	Feasibility	RLV	Feasibility
				Residential		Commercial	
Market Land Value/Sq.ft.				\$145		\$170	
Potential Set Aside Schedules	OC Tier	TOIA Tier	Affordability				
Schedule A	OC-1	2	9% ELI	\$40		\$19	
			12% VLI	\$72		(\$6)	
			21% LI	(\$3)		(\$3)	
	OC-2	3	10% ELI	(\$4)		\$2	
			14% VLI	(\$24)		(\$22)	
			23% LI	(\$52)		(\$26)	
	OC-3	4	11% ELI	\$14		(\$161)	
			15% VLI	\$8		(\$167)	
			25% LI	\$18		(\$155)	

Note: “F” indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

Source: AECOM

Table 42 shows the results for Market Tier 3, organized by residential versus commercial zoned prototypes, set aside schedule, OC tier, and affordability level selected to achieve the density bonus. Under Schedule A and B, OC-1 (tested with CY4 prototype) is feasible on residential zoned parcels.

**Table 42. OC Scenario Residual Land Value and Feasibility in Market Tier 3**

OC Incentives Tested - Market Tier 3				RLV	Feasibility	RLV	Feasibility
				Residential		Commercial	
Market Land Value/Sq.ft.				\$175		\$185	
Potential Set Aside Schedules	OC Tier	TOIA Tier	Affordability				
Schedule A	OC-1	2	9% ELI	\$166		\$155	
			12% VLI	\$198	F	\$124	
			21% LI	\$106		\$119	
	OC-2	3	10% ELI	\$132		\$157	
			14% VLI	\$106		\$128	
			23% LI	\$65		\$113	
	OC-3	4	11% ELI	\$135		(\$38)	
			15% VLI	\$124		(\$49)	
			25% LI	\$124		(\$49)	
Schedule B	OC-1	2	10% ELI	\$166		\$155	
			13% VLI	\$198	F	\$124	
			22% LI	\$106		\$119	
	OC-2	3	11% ELI	\$132		\$137	
			15% VLI	\$89		\$114	
			24% LI	\$65		\$76	
	OC-3	4	12% ELI	\$135		(\$38)	
			16% VLI	\$119		(\$54)	
			26% LI	\$124		(\$69)	
Schedule C	OC-1	2	11% ELI	\$166		\$155	
			14% VLI	\$106		\$124	
			23% LI	\$106		\$63	
	OC-2	3	12% ELI	\$66		\$137	
			16% VLI	\$89		\$114	
			25% LI	\$65		\$76	
	OC-3	4	13% ELI	\$111		(\$62)	
			17% VLI	\$119		(\$81)	
			27% LI	\$104		(\$69)	
Schedule D	OC-1	2	12% ELI	\$166		\$85	
			15% VLI	\$106		\$51	
			24% LI	\$106		\$63	
	OC-2	3	13% ELI	\$66		\$81	
			17% VLI	\$89		\$114	
			26% LI	\$22		\$69	
	OC-3	4	14% ELI	\$111		(\$95)	
			18% VLI	\$91		(\$81)	
			28% LI	\$104		(\$81)	

Note:

1. "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

2. The sites of OC-1, OC-2, and OC-3 are tested with the prototypes of CY4, P5, and P7 respectively.

Source: AECOM

Table 43 shows the results for Market Tier 4. In Market Tier 4, many scenarios are feasible across potential set-aside schedules and OC tiers. In general, ELI projects generate the highest RLVs, suggesting that developers will choose options to build fewer ELI units v. more VLI or LI units.

**Table 43. OC Scenario Residual Land Value and Feasibility in Market Tier 4**

OC Incentives Tested - Market Tier 4				RLV		Feasibility		RLV		Feasibility	
				Residential*		Commercial*					
Market Land Value/Sq.ft.				\$230		\$240					
Potential Set Aside Schedules	OC Tier	TOIA Tier	Affordability								
Schedule A	OC-1	2	9% ELI	\$303	F	\$287	F				
			12% VLI	\$335	F	\$251	F				
			21% LI	\$222		\$237					
	OC-2	3	10% ELI	\$263	F	\$309	F				
			14% VLI	\$232	F	\$274	F				
			23% LI	\$177		\$247	F				
	OC-3	4	11% ELI	\$290	F	\$119					
			15% VLI	\$274	F	\$103					
			25% LI	\$259	F	\$87					
Schedule B	OC-1	2	10% ELI	\$303	F	\$287	F				
			13% VLI	\$335	F	\$251	F				
			22% LI	\$222		\$237					
	OC-2	3	11% ELI	\$263	F	\$287	F				
			15% VLI	\$213		\$258	F				
			24% LI	\$177		\$205					
	OC-3	4	12% ELI	\$290	F	\$119					
			16% VLI	\$267	F	\$96					
			26% LI	\$258	F	\$64					
Schedule C	OC-1	2	11% ELI	\$303	F	\$287	F				
			14% VLI	\$235	F	\$251	F				
			23% LI	\$222		\$174					
	OC-2	3	12% ELI	\$191		\$287	F				
			16% VLI	\$213		\$258	F				
			25% LI	\$177		\$205					
	OC-3	4	13% ELI	\$263	F	\$92					
			17% VLI	\$267	F	\$66					
			27% LI	\$234	F	\$64					
Schedule D	OC-1	2	12% ELI	\$303	F	\$211					
			15% VLI	\$235	F	\$170					
			24% LI	\$222		\$174					
	OC-2	3	13% ELI	\$191		\$225					
			17% VLI	\$213		\$258	F				
			26% LI	\$129		\$197					
	OC-3	4	14% ELI	\$263	F	\$56					
			18% VLI	\$236	F	\$66					
			28% LI	\$234	F	\$50					

Note:

1. "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

2. The sites of OC-1, OC-2, and OC-3 are tested with the prototypes of CY4, P5, and P7 respectively.

Source: AECOM

## 6.5 Summary and Implications

Findings and implications for policy are summarized below:

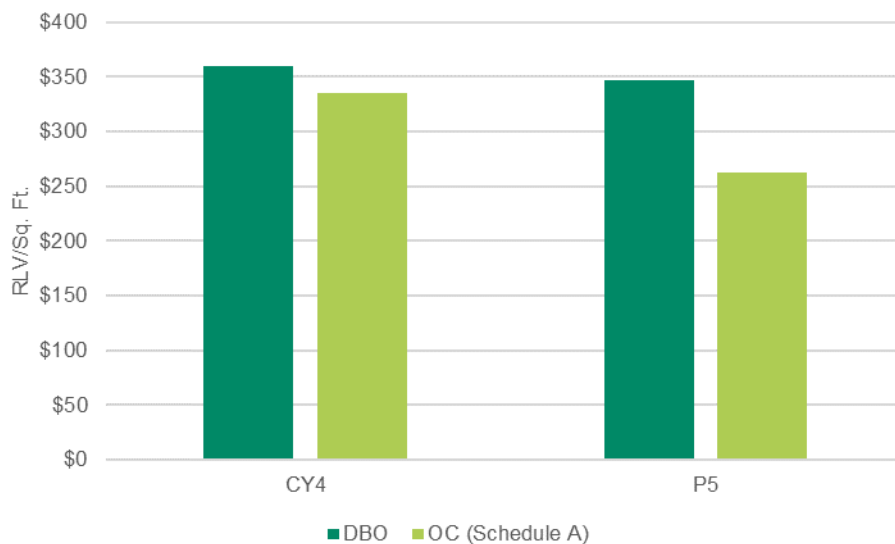
- **The OC incentives and associated set-aside requirements may help produce more market-rate and affordable units than would otherwise be feasible.** The analysis of the proposed OC program indicates the proposed incentives create sufficient value for developer applicants to acquire and redevelop land in Market Tier 4 across OC areas – and, to a lesser extent, in Market Tier 3.
- **OC scenarios in Market Tier 4 result in feasible prototypes across OC tiers, even with increased affordability standards.** Under the market conditions modeled, only Market Tier



4 clearly supports higher levels of set-asides (up to Schedule C/D). Similar to TOIA, scenario feasibility is sensitive to increased affordable set-asides, suggesting that increasing set-aside requirements could result in fewer projects being built in areas with less optimal market conditions, offsetting some of the potential affordable housing production gains that the proposed OC enhancements seek to provide.

- **However, in areas zoned for residential, developers may choose to take advantage of DBO rather than OC as currently proposed, although the decision will ultimately depend on the underlying zoning and other project specifics.** Figure 6 shows the highest residual land values achieved by prototype on residential zoned land in Market Tier 4 under OC Schedule A, compared to the DBO program. As tested, DBO projects generate slightly higher RLVs for across prototypes—suggesting that a profit-seeking developer may be more likely to take advantage of the DBO program in some cases. Similar to TOIA, while OC offers higher density bonuses than DBO, the financial benefit for applicants is in part offset by the method of calculating affordable set-aside units for OC. In addition, the FAR limits associated with OC limit the total building footprint that the prototypes can achieve, whereas the sites tested for DBO on residential parcels could generally achieve higher densities within the density and FAR bonuses allowed. Ultimately, however, the comparison between programs will depend in part on the specific zoning district where the parcel is located.<sup>36</sup>

**Figure 6. Highest RLV Achieved by Prototype: DBO v. OC (Schedule A) in Market Tier 4**



Comparison shows rental prototypes in residential zones. CY4 and P5 were tested with OC-1 and OC-2 Tiers, respectively.  
Source: AECOM

- **Developers who take advantage of the OC program in stronger market areas are likely to build ELI units.** ELI units generate less revenue *per unit* than LI or VLI. However, ELI projects still generate higher overall returns in Market Tier 4 because projects that provide ELI units are required to provide fewer affordable units, compared to projects that provide LI

<sup>36</sup> The P7 prototype was also tested under both OC-3 and DBO. However, the results are not directly comparable because the OC-3 project is limited to a total of 7 stories, while the DBO project was assumed to step up to a 28-story tower in the model. This level of density will not be possible on all sites. DBO projects in commercial zoning districts were not tested.

or VLI units. This is consistent with the City's experience that most projects that have utilized the existing TOC program have built ELI units.<sup>37</sup>

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<sup>37</sup> In Market Tier 1, at the other end of the spectrum, ELI unit pathways generate higher residual land values compared to LI/VLI pathways because there is a smaller gap between market-rate and VLI/LI units.

## 7. Opportunity Corridor Transition (CT) Incentive Area Program

### 7.1 Overview

This chapter focuses on the development economics and financial feasibility of housing typologies envisioned to be developed through the City's proposed Opportunity Corridor Transition Incentive Area Program (CT). CT builds on the proposed Opportunity Corridor program's vision for livable and sustainable communities with increased housing capacity along major streets located in Higher Opportunity Areas. This strategy will incentivize new low-rise housing opportunities in areas in parcels behind the Opportunity Corridor Incentive Areas, allowing higher densities than would be permitted under base zoning conditions in exchange for providing affordable units.

The proposed CT is the City's strategy for promoting lower scale housing typologies, also known as "missing middle housing." Missing middle is a term used to refer to the gap in housing options between detached single-family homes and mid-rise apartment buildings. Examples of missing middle typologies include bungalow courts, multiplex buildings (duplex/triplex to six-plex), townhomes, courtyard-style apartments, and walk-up rowhouses. Many of these were commonly built before the 1950s and already exist in various places throughout the Los Angeles area, but there are also areas in the City where they are not currently found. Over the years, fewer missing middle housing options were developed due to more restrictive zoning requirements, changes in market conditions, and increased single-family home development.

CT is an incentive-based program designed to fill the gap in housing options that exists between detached single-family homes and the type of mid-rise apartment buildings expected to be developed along Opportunity Corridors. CT takes a form-based approach that removes limitations to facilitate missing middle construction, while ensuring new development respects the scale of existing neighborhoods.

### 7.2 Corridor Transition Incentive Program

CT promotes low-scale, medium-density housing development in Higher Opportunity Areas. The incentive program proposes increasing allowable density in exchange for affordable housing set-asides. CT builds on the proposed Opportunity Corridor program, using a similar tiered incentive-based approach, with incentives designed to reflect differences in distance between more dense mid-rise development along corridors and less dense single-family homes.

The CT program proposes three main criteria for site eligibility: proximity to Opportunity Corridor Incentive areas, base zone designation, and location within CTCAC-designated High or Highest Resource Areas. Eligible sites are categorized into two CT incentive areas, with CT-1 being the lower incentive tier and CT-2 offering more generous incentives. Density bonuses for each tier are limited to 6 units per parcel in CT-1 and 10 units per parcel in CT-2. Additional FAR is awarded commensurate with the number of units built, but new development is constrained by height limits. The City is also considering allowing increased height and/or FAR for projects with more than 40% two-bedroom units. CT site eligibility requirements are shown on Table 44 and key incentive options are shown on Table 45.

**Table 44. Corridor Transition Incentive Area Eligibility Requirements**

<b>CT Area Eligibility Requirements</b>		
	<b>CT-1</b>	<b>CT-2</b>
<b>Site Requirements</b>	350 ft buffer from sites eligible Opportunity Corridor Incentives except RC-1	150 ft buffer from sites eligible for Opportunity Corridor Incentives except RC-1
<b>Eligible Underlying Zones</b>	Residential properties in R2 and RD zones	
<b>TCAC Opportunity Areas</b>	Within High and Highest Resource Areas	

Source: City of Los Angeles, AECOM

**Table 45. Proposed Corridor Transition Incentives**

<b>Proposed CT Program Incentives</b>		
	<b>CT-1</b>	<b>CT-2</b>
<b>FAR</b>	1.30 FAR for 5 units (per lot) + 0.15 FAR for each additional unit	
<b>Density Bonus</b>	Up to 6 units per lot	Up to 10 units per lot
<b>Max Height</b>	2 stories	3 stories
<b>Parking</b>	No requirement	

Note: A Project that includes a minimum of 40% of total Residential Units as 2-bedrooms or larger, shall be granted either additional Floor Area up to 0.5 FAR or an additional 11 feet in height.

Source: City of Los Angeles, AECOM

## 7.3 CT Program Scenario Tested

### 7.3.1 Incentive Areas

The analysis is organized by the two proposed CT incentive areas. CT-1 areas are allowed up to 6 units per parcel, and CT-2 areas up to 10 units per parcel. The program parameters allow for CT projects to take a variety of forms. For example, CT-1 projects could include a single-lot project with 6 units, or a double-lot project with 12 units. A C-2 project could include a single-lot project with 8 units or a double-lot project with 16 units. Other key parameters include a 2-story limit for CT-1 and a 3-story limit for CT-2. Both CT-1 and CT-2 allow up to a maximum number of units within an FAR that is commensurate to the number of units provided (Table 45).

AECOM developed prototypes that reflect the allowable range of unit counts, i.e., 5 and 6 units per lot for CT-1 and 8 and 10 units per lot for CT-2. These are shown in Table 46. It should be noted that while these prototypes are examples of the forms that CT projects map take, they are not a comprehensive set of possible applications.

### 7.3.2 Affordable Set-Aside Requirements

To explore the amount of affordability that can be supported by the CT program, AECOM tested a range of affordable set-aside options. Given the small-scale nature of missing middle typologies and the round-up methodology for fulfilling affordable set-aside requirements

described in California State Law, the set-aside analysis uses a set-aside schedule tied to a specific number of units rather than the percentage-based approach used for the other incentive programs.

As shown in Table 46, 1-unit and 2-unit set aside options were tested. Each set-aside level is tested at each affordability level (i.e., ELI, VLI, LI, and MI rental projects and MI for-sale projects). As shown, this results in effective set-aside percentages (calculated as affordable units divided by total units) that range from 11% to 20% in scenarios tested for CT-1, and 20% to 40% for scenarios tested for CT-2.

**Table 46. CT Test Scenarios**

Corridor Transition		Effective Set-Aside (% of total)				
Incentive Area	CT-1			CT-2		
Prototype (Rent or Sale)	4D-R	RH-R	TH-S	CY3-R	CY3-S	CY3-R
Lot Configuration	1	2	2	2	2	1
Units per Lot	5	6	6	8	8	10
Total Units	5	12	12	16	16	10
Set-Aside Scenarios		Effective Set-Aside (% of total)				
1-Unit Set-Aside Per Lot						
Moderate (For Sale)	-	-	17%	-	13%	-
Moderate (For Rent)	20%	17%	-	13%	-	10%
LI	20%	17%	-	13%	-	10%
VLI	20%	17%	-	13%	-	10%
ELI	20%	17%	-	13%	-	10%
2-Unit Set-Aside Per Lot						
Moderate (For Sale)	-	-	33%	-	25%	-
Moderate (For Rent)	40%	33%	-	25%	-	20%
LI	40%	33%	-	25%	-	20%
VLI	40%	33%	-	25%	-	20%
ELI	40%	33%	-	25%	-	20%

Source: AECOM

### 7.3.3 Sites and Prototypes Tested

The CT prototypes and site sizes are shown in Table 47. Prototypes were selected in coordination with City staff to align with the envisioned scale of CT projects and typical eligible lot size.

The specific parameters of the proposed CT program have some implications for development that require adjustments to the prototypes compared to those used for the analysis of other programs. Specifically, under the CT program, the proposed FAR allowances require the RH-R and TH-S prototypes to provide reduced parking ratios.<sup>38</sup> For-sale townhomes (TH-S) are assumed to provide 1.0 parking spaces per unit and rental rowhomes (RH-R) have an average parking ratio of 0.83, meaning that some units would not have an assigned parking space.

<sup>38</sup> Note: above-ground parking is included in the FAR across all programs. For other prototypes and programs, however, the FAR allowances generally do not pose a significant constraint on the parking ratios tested.

Reduced parking ratios are expected to have a negative impact on rents. A review of existing, comparable real estate projects showed that small-scale rental properties with less than 1.0 space per unit typically achieve rents ranging from 2 to 8 percent less compared to projects with more typical parking ratios. For the purposes of this analysis, it is assumed that the RH-R prototype with reduced parking would command 5% lower rents compared to the typical market rents shown in Chapter 3, Table 7.

The impact of reduced parking on for-sale products is less conclusive. Based on a review of comparable projects, existing ownership townhomes with 1.0 space per unit in Los Angeles are generally built in high-value places where land is priced at a premium, and development has lower-than-average unit sizes and commands a higher sales price per square foot. Based on this observation, no change was made to for-sale revenues compared to the typical for-sale prices shown in Chapter 3, Table 8.

In addition to FAR, the maximum height is a limiting factor for the CT program. The most typical townhome in Los Angeles is three stories; as shown in Table 45, the maximum height in CT-1 is two stories, requiring a slightly reduced unit average unit size and more living space to be provided on the ground-floor than in a typical townhome. In the CT-2 zone, the FAR and height limitations are expected to require parking to be provided below ground, which significantly increases costs and affects feasibility. The City's proposed multi-bedroom unit incentive – which would grant projects either an additional Floor Area up to 0.5 FAR or an additional 11 feet in height if they provide a minimum of 40% of total Residential Units as 2-bedrooms or larger – could help alleviate these constraints.



**Table 47. Corridor Transition Sites and Prototypes**

Corridor Transition Sites and Prototypes						
	CT Incentive Area 1			CT Incentive Area 2		
	CT1-5-R	CT1-6-R	CT1-6-S	CT2-8-R	CT2-8-S	CT2-10-R
	4D-Rent	RH-Rent	TH-Sale	CY3-Rent	CY3-Sale	CY3-Rent
	2-Duplex	Row House	Townhome	3-Story Courtyard	3-Story Courtyard	3-Story Courtyard
<b>Development Configuration</b>						
Lot configuration	Single-lot	Double-lot	Double-lot	Double-lot	Double-lot	Single-Lot
Number of Units per Lot	5	6	6	8	8	10
Total Number of Units	5	12	12	16	16	10
Site Size AC	0.14	0.28	0.28	0.25	0.25	0.13
Site Size SF	6,000	12,000	12,000	11,000	11,000	5,500
<b>Resulting Prototype</b>						
Net Leaseable/Sellable Area SF*	6,850	14,850	15,900	17,800	18,350	10,600
Building Efficiency Ratio	95%	95%	100%	95%	97%	96%
Gross Building Area SF	7,179	16,832	17,340	18,737	18,918	11,042
Maximum FAR allowed with Bonus	1.30	1.45	1.45	1.75	1.75	2.00
Effective FAR	1.20	1.40	1.45	1.70	1.72	2.01
Effective Density (DUAC)	36	44	44	63	63	79
Height (stories)	2	2	2	3	3	3
<b>Avg Unit Size</b>	<b>1,250</b>	<b>1,238</b>	<b>1,325</b>	<b>1,113</b>	<b>1,147</b>	<b>1,060</b>
0BR	0	0	0	0	0	0
1BR	700	800	800	800	950	800
2BR	1,050	1,250	1,250	1,200	1,200	1,200
3BR	1,200	1,550	1,550	1,500	1,500	1,500
4BR	1,400	1,900	1,900	1,900	1,900	1,900
<b>Unit Mix</b>	<b>5</b>	<b>12</b>	<b>12</b>	<b>16</b>	<b>16</b>	<b>10</b>
0BR	0	0	0	0	0	0
1BR	0	3	0	5	7	5
2BR	1	5	9	9	6	3
3BR	2	4	3	2	3	2
4BR	2	0	0	0	0	0
<b>Parking</b>	<b>10</b>	<b>10</b>	<b>12</b>	<b>17</b>	<b>17</b>	<b>10</b>
Spaces Per BR	0.63	0.40	0.44	0.59	0.61	0.59
Spaces per Unit	2.00	0.83	1.00	1.06	1.06	1.00
Parking Strategy	Surface &Tuck-Under	Tuck-Under	Tuck-Under	Underground	Underground	Underground

Source: AECOM

## 7.4 Results

This section describes the results of the feasibility testing. Note that for the CT program, only one RLV standard (“feasibility”) is used to gauge the expected financial outcomes of the incentive program scenarios. This is because the CT program will primarily be applied to redevelopment of single-family lots or similarly scaled, low-density residential uses. Accordingly, the market land value assumptions are based on recent transactions of single-family family lots. The base case (100% market-rate) scenario would also most likely be a single-family home, so “feasibility” and “preferability” are effectively the same for the CT analysis.

### 7.4.1 Residual Land Value and Feasibility Analysis

The following four tables summarize tested residual land value and feasibility for each CT incentive area in Market Tiers 1 through 4. A feasible scenario is one that generates a residual land value that is consistent with observed market values.

In Market Tier 1, residual land values are mostly negative and none of the scenarios meet the \$120 market land value threshold for feasibility (Table 48).

**Table 48. CT Scenario Residual Land Value and Feasibility (Market Tier 1)**

Market Tier 1 (Market Land Value: \$140 Per Sq. Ft.)												
	Residual Land Value (\$/Land SF)						Feasibility					
Incentive Area	CT-1			CT-2			CT-1			CT-2		
Prototype	4D-R	RH-R	TH-S	CY3-R	CY3-S	CY3-R	4D-R	RH-R	TH-S	CY3-R	CY3-S	CY3-R
Units per Lot	5	6	6	8	8	10	5	6	6	8	8	10
Total Units	5	12	12	16	16	10	5	12	12	16	16	10
Market Land Value (\$/SF)	\$120											
1-Unit Set-Aside Per Lot												
Moderate (For Sale)			\$1		\$86							
Moderate (For Rent)	(\$68)	\$20		(\$174)		(\$148)						
LI	(\$92)	(\$4)		(\$199)		(\$172)						
VLI	(\$117)	(\$19)		(\$208)		(\$197)						
ELI	(\$135)	(\$35)		(\$225)		(\$194)						
2-Unit Set-Aside Per Lot												
Moderate (For Sale)			(\$18)		\$41							
Moderate (For Rent)	(\$95)	\$12		(\$165)		(\$146)						
LI	(\$148)	(\$31)		(\$201)		(\$179)						
VLI	(\$203)	(\$83)		(\$252)		(\$233)						
ELI	(\$239)	(\$117)		(\$286)		(\$268)						

Note: Feasibility rows are blank because all scenarios are infeasible. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

Source: AECOM

In Market Tier 2 (Table 49), several courtyard (CY) scenarios with one affordable set-unit unit are feasible. The 10-unit CY3-R prototype is also feasible with two MI or LI set-aside units.

**Table 49. CT Scenario Residual Land Value and Feasibility (Market Tier 2)**

Market Tier 2 (Market Land Value: \$170 Per Sq. Ft.)												
Market Tier 2	Residual Land Value (\$/Land SF)						Feasibility					
Incentive Area	CT-1			CT-2			CT-1			CT-2		
Prototype	4D-R	RH-R	TH-S	CY3-R	CY3-S	CY3-R	4D-R	RH-R	TH-S	CY3-R	CY3-S	CY3-R
Units per Lot	5	6	6	8	8	10	5	6	6	8	8	10
Total Units	5	12	12	16	16	10	5	12	12	16	16	10
<b>1-Unit Set-Aside Per Lot</b>												
Moderate (For Sale)			\$72		\$229						F	
Moderate (For Rent)	\$37	\$90		\$197		\$284				F		F
LI	\$12	\$64		\$171		\$259				F		F
VLI	(\$16)	\$50		\$165		\$233						F
ELI	(\$34)	\$33		\$147		\$241						F
<b>2-Unit Set-Aside Per Lot</b>												
Moderate (For Sale)			\$39		\$165							
Moderate (For Rent)	(\$4)	\$72		\$162		\$231						F
LI	(\$61)	\$28		\$128		\$201						F
VLI	(\$119)	(\$28)		\$74		\$146						
ELI	(\$158)	(\$65)		\$38		\$109						

Notes: "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

Source: AECOM

In Market Tier 3 (Table 50), CT-2 courtyard prototypes are feasible across a broader range of set-aside scenarios. The RH-R prototype is also feasible with one MI set-aside unit.

**Table 50. CT Scenario Residual Land Value and Feasibility (Market Tier 3)**

Market Tier 3 (Market Land Value: \$220 Per Sq. Ft.)												
Market Tier 3	Residual Land Value (\$/Land SF)						Feasibility					
Incentive Area	CT-1			CT-2			CT-1			CT-2		
Prototype	4D-R	RH-R	TH-S	CY3-R	CY3-S	CY3-R	4D-R	RH-R	TH-S	CY3-R	CY3-S	CY3-R
Units per Lot	5	6	6	8	8	10	5	6	6	8	8	10
Total Units	5	12	12	16	16	10	5	12	12	16	16	10
<b>1-Unit Set-Aside Per Lot</b>												
Moderate (For Sale)			\$193		\$399						F	
Moderate (For Rent)	\$178	\$235		\$271		\$376		F		F		F
LI	\$153	\$209		\$244		\$350				F		F
VLI	\$126	\$197		\$242		\$324				F		F
ELI	\$141	\$180		\$224		\$338				F		F
<b>2-Unit Set-Aside Per Lot</b>												
Moderate (For Sale)			\$134		\$311						F	
Moderate (For Rent)	\$132	\$182		\$227		\$313				F		F
LI	\$74	\$139		\$196		\$286						F
VLI	\$15	\$83		\$141		\$231						F
ELI	(\$24)	\$46		\$105		\$194						

Notes: "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

Source: AECOM

In Market Tier 4 (Table 51), there are multiple feasible projects across each prototype tested in CT-1 and CT-2. In particular, two MI set-aside units per lot is feasible across all for-sale prototypes. One MI set-aside unit per lot is feasible for all CT-1 rental prototypes, and one LI set-aside unit is feasible for 4D-R. One ELI unit or two VLI units is feasible for the highest density rental CT-2 projects.

**Table 51. CT Scenario Residual Land Value and Feasibility (Market Tier 4)**

Market Tier 4 (Market Land Value: \$320 Per Sq. Ft.)												
Incentive Area	Residual Land Value (\$/Land SF)						Feasibility					
	CT-1			CT-2			CT-1			CT-2		
Prototype	4D-R	RH-R	TH-S	CY3-R	CY3-S	CY3-R	4D-R	RH-R	TH-S	CY3-R	CY3-S	CY3-R
Units per Lot	5	6	6	8	8	10	5	6	6	8	8	10
Total Units	5	12	12	16	16	10	5	12	12	16	16	10
<b>1-Unit Set-Aside Per Lot</b>												
Moderate (For Sale)			\$458		\$675				F		F	
Moderate (For Rent)	\$322	\$339		\$359		\$489	F	F		F		F
LI	\$326	\$313		\$332		\$463	F			F		F
VLI	\$299	\$308		\$341		\$436				F		F
ELI	\$281	\$290		\$323		\$464				F		F
<b>2-Unit Set-Aside Per Lot</b>												
Moderate (For Sale)			\$343		\$554				F		F	
Moderate (For Rent)	\$235	\$262		\$307		\$415						F
LI	\$180	\$223		\$286		\$401						F
VLI	\$156	\$166		\$230		\$344						F
ELI	\$116	\$129		\$192		\$306						

Notes: "F" indicates feasible scenarios, and blank indicates infeasible scenarios. All RLVs are rounded, and the determination of feasibility is based on the actual numbers before rounding.

Source: AECOM

## 7.4.2 Summary and Implications

Key policy implications of this analysis include:

- **The CT incentive program may produce housing products that are not currently commonly built in LA today.** These products include rental rowhouses and courtyard apartments—two housing typologies that have historical precedent in LA but have not been commonly built since at least 2000.<sup>39</sup> Analysis of the proposed Corridor Transition program indicates the proposed incentives create sufficient value for developer applicants to acquire and redevelop land in Market Tiers 3 and 4 in the CT-2 incentive area, and to a more limited extent in the CT-1 area.
- **Affordable set-asides have a bigger impact on feasibility for smaller-scale CT-1 typologies than for larger-scale CT-2 projects.** In this analysis, The CT-2 typologies (courtyard projects) typically generated higher RLVs than the CT-1 typologies (fourplexes, row houses, and townhomes). Townhomes have long been validated by the market and can be constructed efficiently without the use of structured or subterranean parking. However, it is more challenging for smaller-scale CT-1 projects to bear the cost of set-aside units. Even in Market Tier 4, CT-1 feasibility is generally limited to projects that set-aside just one MI unit.
- **To enable a relatively broad range of projects to take advantage of the CT program, the City could consider requiring set asides as follows:**
  - CT-1: 1 MI unit per lot (rental projects), or 2 MI units per lot (for-sale projects).

<sup>39</sup> See analysis of housing typologies in "Task 3: Market Analysis: Market & Economic Study for the Density Bonus Ordinance Update and RHNA Rezoning Program," developed by AECOM for LACP, May 2024.

- CT-2: 1 ELI unit or 2 VLI units per lot (rental projects), or 2 MI units per lot (for-sale projects)

At these set-aside levels, prototypes are generally feasible in Market Tier 4 under current market conditions, and a more limited set of prototypes are feasible in Market Tiers 2 and 3.

Note that the CT results are not directly comparable with the DBO results, because the CT prototypes are assumed to occur on different size lots (that reflect conditions on CT-eligible parcels, rather than citywide averages) and, in the case of townhomes and rowhomes, have reduced parking ratios as a result of FAR limitations.

## 8. Conclusion

This analysis tested key elements of the City of Los Angeles' Rezoning Program, which is intended to create additional housing capacity and expand housing production. The updated DBO program is likely to expand housing opportunities across the City by enabling a broad range of different development types. The Mixed-Income Incentive Program is intended to complement DBO by incentivizing housing development near transit and encouraging the construction of various types of "low scale/low rise" housing.

This report offers analysis that is intended to inform City policy decisions about the appropriate tradeoff between affordability requirements and development incentives in different parts of the City. Key conclusions from the analysis include:

- **The updated DBO program and the Mixed-Income Incentive Program will create new opportunities for market-rate and affordable housing development across the City.** In many scenarios and Market Tiers, development projects that utilize the programs are likely to be feasible and preferable to base case projects.
- **The feasibility of incentive program scenarios varies significantly by Market Tier.** Incentive program scenarios tested are generally most feasible in Market Tier 4 (high market strength). There is more limited feasibility in Market Tier 3, and some scenarios are feasible under the DBO and CT programs in Market Tier 2 (medium/low market strength). None of the incentive program scenarios tested were feasible in Market Tier 1 (low market strength).
- **The ultimate impact of the Mixed-Income Incentive Program will depend on the set-aside schedules selected.** In general, scenario feasibility is sensitive to increased affordable set-asides, particularly in Market Tiers 2 and 3. Under the scenarios and market conditions modeled, only Market Tier 4 clearly supports the higher set-aside levels tested.
- **In addition to set-aside levels, other program parameters such as the methodology for calculating set-asides and FAR have a significant effect on project feasibility.** In particular, while TOIA and OC offer higher density bonuses than DBO, the financial benefit for applicants is in part offset by the method of calculating affordable set-aside units for TOIA and OC based on the total number of units per project. This is a shift from DBO which calculates set-aside requirements as a percentage of units allowed under density limits tied to a site's base zoning condition. Based on the incentive program parameters tested, TOIA and OC project feasibility may also be more affected than DBO project feasibility by counting above-ground parking against FAR. However, developers may partially offset the impact of this policy by reducing parking ratios.
- **Ultimately, the program that individual developers elect to pursue will depend in part on base zoning and other factors specific to the site.** Sites that are eligible for the Mixed-Income Incentive Program will also be eligible for DBO. This report finds that under the program parameters tested, DBO may offer higher RLVs than TOIA or OC for some projects on residentially zoned sites.<sup>40</sup> However, the relative benefits of each program will depend in part on the underlying zoning districts. For example, commercially zoned lots generally have smaller underlying FARs than residentially zoned lots, and therefore projects on commercial lots may be more likely to take advantage of TOIA in part because the TOIA program offers better FAR incentives compared to DBO.

<sup>40</sup> The CT results were not directly comparable with the DBO results, because the CT prototypes are assumed to occur on different size lots (that reflect conditions on CT-eligible parcels, rather than citywide averages) and, in the case of townhomes and rowhomes, have reduced parking ratios as a result of FAR limitations.



# **Task 11. Rent Stabilization Ordinance (RSO) Housing Analysis**

## **Additional Analysis of the Impact of Increased RSO Replacement Requirements on Development Feasibility**

City of Los Angeles Planning Department

September 20, 2024

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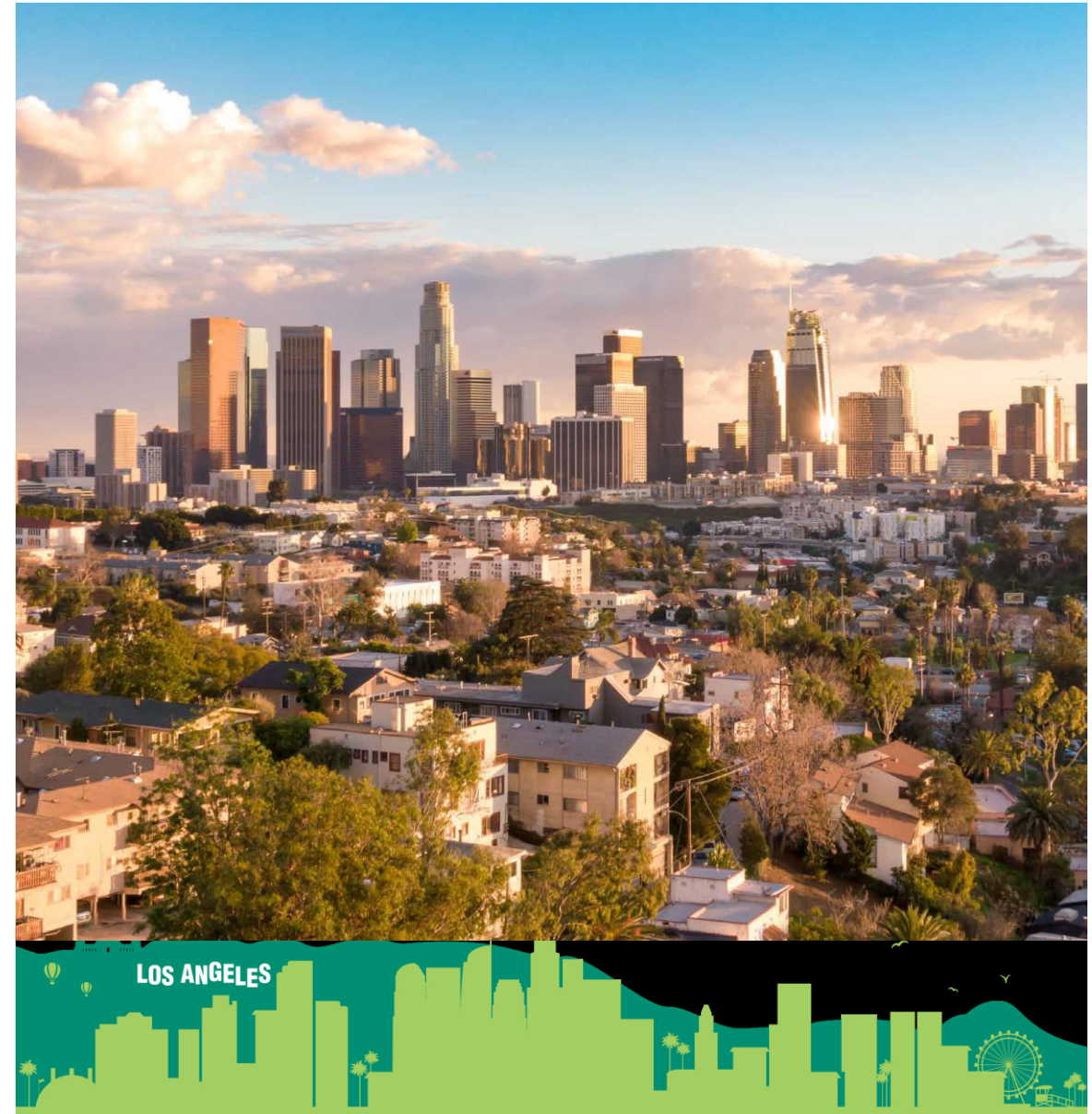
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2. Key Findings
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# 1. Overview and Approach

# Overview

## Purpose

The City of Los Angeles Department of City Planning (LACP) engaged AECOM to prepare **a high-level analysis of the potential impact of increasing the replacement requirement for affordable housing units to demolished Rent Stabilization Ordinance (RSO) Units**. The analysis and findings are intended to show how increasing the replacement ratio might affect the feasibility of RSO redevelopment projects. This document summarizes the approach and findings from the study. A technical report, currently under development, will provide additional detail on the methodology and implications.

## Current Policy

In general, redevelopment projects that involve demolition of RSO units and other protected units are required to either extend the RSO to all new rental units or provide covenanted affordable housing units as stipulated by the following two policies:

**Pursuant to LAMC Section 151.281**, if a building with housing units covered by the Rent Stabilization Ordinance is redeveloped with new housing units that are rented within five years of the pre-existing units' withdrawal from the market, the RSO will apply to all newly constructed rental units on that property. Alternatively, if the new development provides covenanted affordable units at least equal in number to the pre-existing RSO units or 20% of the new development's total units (whichever is greater), the newly constructed affordable units can apply for an exemption from the RSO, but any remaining market-rate units will be subject to RSO provisions.

**Pursuant to The Housing Crisis Act of 2019**, as amended by SB 8 and AB 1218 (California Government Code Section 66300 et seq.), new housing development projects must replace any existing, demolished or removed protected units, which include units that have either been: subject to an affordability covenant within the past five years; subject to rent or price control within the past five years; occupied by lower or very low income households within last five years; or withdrawn from rent or lease per the Ellis Act within the past 10 years.

The replacement ratio of existing RSO or protected units to new affordable housing units depends on whether the income levels of residents is known or unknown.

**If the current tenants' incomes are *known*** (e.g., a tenant submits their income information and exercises their right to return), developments replacing protected units (including RSO units) must include at least the same number of units of equivalent size (number of bedrooms) made affordable at the same or lower income category as the existing households at the time the units were occupied.

**If the income level of current tenants is *unknown***, a percentage of replacement units must be made affordable in accordance with the citywide percentage of low-income households reported in the CHAS database (69% as of September 5, 2023).

RSO redevelopment projects generally use one of the City's incentive zoning programs, Density Bonus Ordinance (DBO) and Mixed-Income Incentive Programs (MIIP) (Suite of programs that includes the Transit Oriented Incentive Area (TOIA), Opportunity Corridor Incentive (OC), and Corridor Transition (CT) Programs) to maximize density in return for providing affordable set-aside units.

# Scenarios Tested

## Additional Policy Scenarios Tested

This analysis tested sixteen RSO replacement ratio scenarios, that range from current requirements to higher replacement ratios with additional affordable housing set-asides. The **RSO replacement ratio** represents the number of newly constructed affordable units built for each pre-existing RSO unit in an RSO redevelopment project.

This analysis tested the following scenarios, which represent a range of options for the City’s consideration:

**Scenarios 1A through 1F:** Under these scenarios, the number of affordable housing units is based on the replacement ratio. This ranges from 0.69:1 replacement ratio (Scenario 1A; current effective policy) to 2:1 (Scenario 1F). Thus, under Scenario 1A, if 100 RSO units were demolished, 69 affordable housing units would be required in the redevelopment project. Under Scenario 1F, the redevelopment project would be required to include 200 affordable units.

**Scenarios 2A through 2F:** These scenarios represent the same range of replacement ratios (0.69:1 in Scenario 2A to 2:1 in Scenario 2F). However, these scenarios assume that RSO replacement units would not count towards the affordable housing set-aside requirements associated with incentive zoning programs.

**Scenarios 3A through 3B** and **Scenarios 4A through 4B:** In these scenarios, different RSO replacement ratios are applied based on whether the demolished RSO units are assumed to be vacant or occupied, either 1:1, 1.5:1, or 2:1.

See Section 3 for additional information on these sixteen scenarios.

Table 1. Scenarios Tested

	Scenarios	RSO Replacement Ratio	Application of Incentive Programs
Scenario 1	Scenario 1A	.69:1	RSO replacement units count towards set-asides for incentive programs.
	Scenario 1B	1:1	
	Scenario 1C	1.25:1	
	Scenario 1D	1.5:1	
	Scenario 1E	1.75:1	
	Scenario 1F	2:1	
Scenario 2	Scenario 2A	.69:1	RSO replacement units do not count towards set-asides for incentive programs. Total set-asides calculated as the sum of RSO replacement units and incentive program set-asides.
	Scenario 2B	1:1	
	Scenario 2C	1.25:1	
	Scenario 2D	1.5:1	
	Scenario 2E	1.75:1	
	Scenario 2F	2:1	
Scenario 3	Scenario 3A	Vacant units replaced at 1:1; 69% of occupied units at 1.5:1	RSO replacement units count towards set-asides for incentive programs.
	Scenario 3B	Vacant units replaced at 1:1; 69% of occupied units at 1.5:1; 31% of occupied units at 1:1	
Scenario 4	Scenario 4A	Vacant units replaced at 1:1; 69% of occupied units at 2:1	RSO replacement units count towards set-asides for incentive programs.
	Scenario 4D	Vacant units replaced at 1:1; 69% of occupied units at 2:1; 31% of occupied units at 1:1	



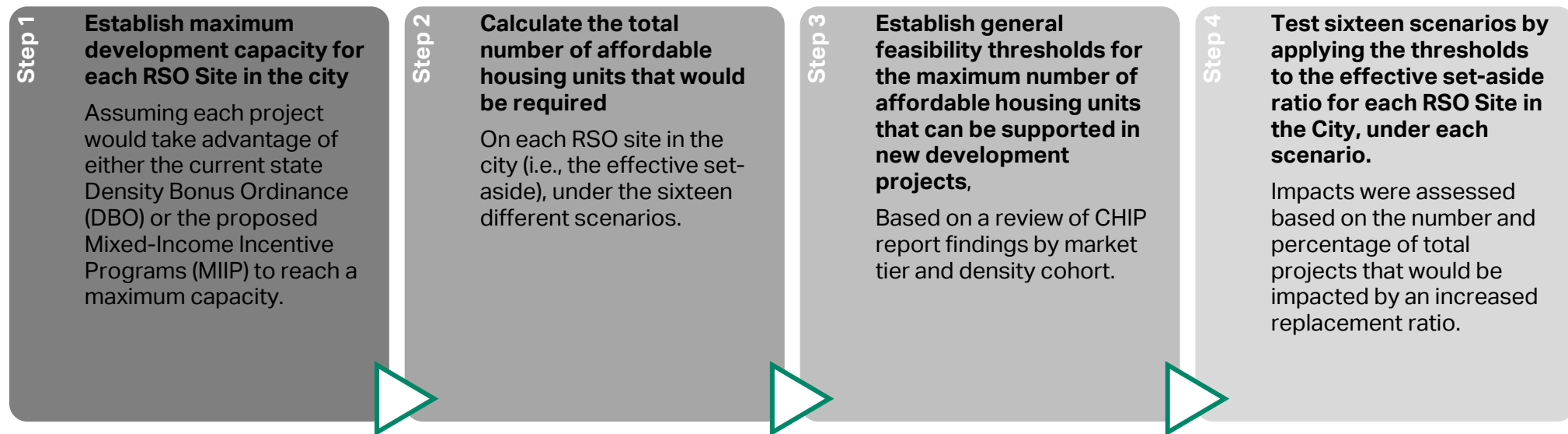
# Analysis Steps

## Dataset

LACP provided AECOM with a database of all properties in the City that have existing RSO units and are eligible for incentive programs, including information on market tier, density cohort and incentive program.

## Analysis Steps

The analysis followed four general steps and was based upon the “Economic and Feasibility Analysis for the Citywide Housing Incentive Program DBO, TOIA, OC, and CT Strategies” report (“CHIP Report”) submitted by AECOM to LACP in 2024 that analyzed potential affordable housing set-aside requirements and development incentives for several City programs.



For the purposes of this analysis, AECOM did not evaluate other factors that may affect redevelopment feasibility, such as specific site conditions or existing tenant incomes.

# Feasibility Thresholds

## Establishing Feasibility Thresholds

Findings from the CHIP Report suggest that DBO projects within Market Tier 4 can set aside as much as **25% of base units as affordable housing** (for VLI households), while MIIP projects within Market Tier 4 can set aside as much as **15% of total units for affordable housing** (for VLI households). These set-asides were used to establish the thresholds for the replacement ratios to be applied to the RSO data set. In general, projects in Market Tier 3 can support slightly lower set-asides. To reflect this difference in market conditions, the thresholds for feasibility in Market Tier 3 were assumed to be 5% lower than in Market Tier 4.

The following thresholds were used for the corresponding programs and Market Tiers:

- **DBO Market Tier 4: 25% Effective Set Aside Ratio**
- **DBO Market Tier 3: 20% Effective Set Aside Ratio**
- **MIIP Market Tier 4: 15% Effective Set Aside Ratio**
- **MIIP Market Tier 3: 10% Effective Set Aside Ratio**

For the purposes of this analysis, RSO sites in Market Tiers 1 and 2 and density cohorts Low, Low Medium I, and Low Medium II were excluded. The CHIP Report found that new development is generally infeasible under current market conditions in Market Tiers 1 and 2 and Low Medium II density cohorts. The CHIP Report did not include analysis of Low Medium I and II density cohorts, so it was not possible to establish feasibility thresholds for projects in those density cohorts.

See Section 3 for more information on the findings from the CHIP Report that informed this analysis.

# Key Terms

## Definitions

**Rent Stabilization Ordinance (RSO).** Chapter XV, Article 1 (Sections 151.00 to 151.35) of the Los Angeles Municipal Code. The ordinance regulates rent increases and evictions on certain rental properties (generally multifamily units built on or before October 1, 1978, and new rental units replacing pre-existing units covered under RSO).

**RSO sites.** Parcels that contain or have contained a building with residential units subject to the provisions of the RSO within the past five years. For the purpose of this analysis, “RSO sites” also refers to sites with units withdrawn from rent or lease per the Ellis Act within the past 10 years.

**RSO redevelopment projects.** Also referred to as **RSO projects.** Projects that necessitate the removal or demolition of existing RSO units on the site of the new development, or projects located on RSO sites (as defined above).

**RSO-affordable replacement ratio (replacement ratio).** The number of newly constructed affordable units built for each pre-existing RSO unit in an RSO redevelopment project. Commonly expressed as a ratio “e.g., 1:1” in which the first number represents the number of required affordable units, and the second number represents one pre-existing RSO unit. Sometimes expressed as a percentage, representing the affordable units as a percentage of pre-existing RSO units.

**Effective set-aside ratio.** The number of affordable housing units that would be required on redeveloped RSO sites relative to the maximum total units, determined by the replacement ratio and affordable housing set-aside requirements by relevant scenario and incentive program.

**RSO replacement units.** Housing units within a redevelopment project that are fulfilling replacement requirements such as affordability to lower income residents.

**Affordable units.** For the purposes of this analysis, “affordable units” refers specifically to units that are subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income.

**Market tier.** This analysis draws upon previous findings from the Market Analysis Report associated with the CHIP Report that defines and analyzes four market tiers that range from low to high and are intended to represent the relative strength of the residential market in different geographies across the City based on an index that accounts for rents and for-sale prices of recently built housing, as well as the relative production of rental and for-sale housing over the past 10 years. Market Tier 1 is the weakest market, while Market Tier 4 is the strongest. See Section 3 for map of neighborhoods by Market Tier.

**Density cohort.** This analysis uses a framework of density cohorts as a basis for organizing site conditions in a way that generally reflects housing typologies allowed by base zoning conditions. The following designations are used to delineate the possible densities and corresponding typologies analyzed in this memo:

Table 2. Density Cohorts

Density Cohort	Base Density Range
Low Medium I	10-17 DU/AC
Low Medium II	18-29 DU/AC
Medium	30-55 DU/AC
High Medium	56-109 DU/AC
High	110-218 DU/AC

## 2. Key Findings

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# Interpreting Results

## Interpreting Results

It is important to note that many other factors not tested in this analysis could affect actual project feasibility, including existing site conditions, neighborhood/location, and the specific affordability pathway selected by the developer.

These findings are based on analysis of incentive zoning programs<sup>1</sup>, assuming mixed-income, unsubsidized development. The analysis is based on maximum development capacity under the respective incentive programs, but projects might choose not to build to maximum capacity or otherwise unable to do so due to other project or site-specific constraints.

Additionally, this analysis did not consider redevelopment of residential typologies found at densities below 10 DU/AC or projects with fewer than 5 DU.

<sup>1</sup> Different incentive programs can support different set-aside levels, in part because of the differing way that the incentives are calculated. Specifically, the DBO program calculates set-aside units as a percentage of base total units according to zoning specifications of a particular parcel. The MIIP program calculates set-asides as a percentage of total units, including additional market rate units made available through density bonus incentives.

# Key Findings: RSO Redevelopment Feasibility

## Potential Impacts on RSO Development Feasibility

Using the thresholds for maximum affordable set-asides established based on the CHIP Report, the analysis determined the number and percentage of RSO sites that would be feasible to redevelop under these requirements. Table 3 shows the number and percentage of sites in each scenario whose replacement ratios fall above or below the threshold. Out of 66,744 sites in the RSO data set, 16,191 (or ~24%) were located in Market Tiers 3 and 4 and density cohorts Medium, Medium High, and High Projects in the RSO data set, and thus included in the analysis.

**Under current policy (Scenario 1A), 3,393 sites accounting for 21% of all RSO sites that are eligible for incentive programs are below the feasibility threshold, and potentially feasible.** This suggests that redevelopment of these sites is potentially feasible based solely on the number of affordable units required compared to the maximum development capacity. As noted above, many other factors not tested in this analysis could affect actual project feasibility.

**More stringent requirements further reduce the percentage of projects that are likely to be feasible.** For example, in Scenario 1F (2:1 replacement ratio), redevelopment of 458 sites or 3% of RSO sites analyzed is potentially feasible. In Scenario 2A-2F, which assume that RSO replacement units would not count towards the affordable housing set-aside requirements associated with incentive zoning programs, fewer than 1% of sites fall below the threshold for feasibility. In Scenarios 3 and 4, where different RSO replacement ratios are applied based on whether the demolished RSO units are assumed to be vacant or occupied, approximately 10% of sites fall below the threshold for feasibility.

Table 3. RSO Sites by Scenario and Likely Feasibility

	Scenario 1						Scenario 2						Scenario 3		Scenario 4	
	1A Replace RSO .69:1	1B Replace RSO 1:1	1C Replace RSO 1.25:1	1D Replace RSO 1.5:1	1E Replace RSO 1.75:1	1F Replace RSO 2:1	2A Affordable + RSO .69:1	2B Affordable + RSO 1:1	2C Affordable + RSO 1.25:1	2D Affordable + RSO 1.5:1	2E Affordable + RSO 1.75:1	2F Affordable + RSO 2:1	3.A	3.B	4.A	4.B
Possibly Feasible (Below Threshold)	3,393	2,537	1,052	852	475	458	63	53	24	19	16	14	1,808	1,479	1,697	1,435
Unlikely Feasible (Above Threshold)	12,798	13,654	15,139	15,339	15,716	15,733	16,128	16,138	16,167	16,172	16,175	16,177	14,383	14,712	14,494	14,756
% Possibly Feasible (Below Threshold)	21.0%	15.7%	6.5%	5.3%	2.9%	2.8%	0.4%	0.3%	0.1%	0.1%	0.1%	0.1%	11.2%	9.1%	10.5%	8.9%
% Unlikely Feasible (Above Threshold)	79.0%	84.3%	93.5%	94.7%	97.1%	97.2%	99.6%	99.7%	99.9%	99.9%	99.9%	99.9%	88.8%	90.9%	89.5%	91.1%

Sources: LACP and AECOM, 2024.



# Key Findings: Maximum Capacity

## Potential Impacts on Maximum Capacity

Table 4 shows the total maximum units that could be built on the RSO sites analyzed. Total maximum units represents the maximum buildout capacity of each site based on zoning and maximum program incentives.

Out of 1,301,922 total maximum units in the RSO data set, 426,471 (or ~33%) were located in Market Tiers 3 and 4 and Density Cohorts Medium, Medium High, and High Projects in the RSO data set, and thus included in the analysis.

**Under current policy (Scenario 1A), approximately 104,259 units accounting for 24% of the potential maximum capacity on the RSO sites tested are potentially feasible** based on this analysis. In comparison, **under Scenario 1F, approximately 24,752 units are potentially feasible**, representing a decline of more than 75% in the total maximum units that could be built on the RSO sites considered in this analysis. **Scenario 2A-2F would represent a greater decline in maximum capacity, while the impact of Scenarios 3 and 4 on potential maximum capacity is more moderate.**

Table 4. Total Maximum Units on RSO Sites by Scenario and Likely Feasibility

	Scenario 1						Scenario 2						Scenario 3		Scenario 4	
	1A Replace RSO .69:1	1B Replace RSO 1:1	1C Replace RSO 1.25:1	1D Replace RSO 1.5:1	1E Replace RSO 1.75:1	1F Replace RSO 2:1	2A Affordable + RSO .69:1	2B Affordable + RSO 1:1	2C Affordable + RSO 1.25:1	2D Affordable + RSO 1.5:1	2E Affordable + RSO 1.75:1	2F Affordable + RSO 2:1	3.A	3.B	4.A	4.B
Below Threshold (Potentially Feasible)	104,259	76,652	42,829	35,764	25,874	24,752	14,160	13,692	1,315	1,114	1,020	970	60,631	51,475	56,660	49,333
Above Threshold (Unlikely Feasible)	322,212	349,819	383,643	390,708	400,598	401,720	412,312	412,780	425,157	425,358	425,452	425,502	365,840	374,997	369,812	377,139
% Below Threshold (Potentially Feasible)	24.4%	18.0%	10.0%	8.4%	6.1%	5.8%	3.3%	3.2%	0.3%	0.3%	0.2%	0.2%	14.2%	12.1%	13.3%	11.6%
% Above Threshold (Unlikely Feasible)	75.6%	82.0%	90.0%	91.6%	93.9%	94.2%	96.7%	96.8%	99.7%	99.7%	99.8%	99.8%	85.8%	87.9%	86.7%	88.4%

Sources: LACP and AECOM, 2024.

# Key Findings: RSO Unit Preservation

## Potential Impacts on RSO Unit Preservation

Table 5 shows the number and percentage of RSO units on the RSO sites analyzed. These represent the existing protected units on the sites considered for this study. Out of 401,881 RSO units in the RSO data set, 142,220 (or ~35%) were located in Market Tiers 3 and 4 and Density Cohorts Medium, Medium High, and High Projects in the RSO data set, and thus considered in this analysis.

Under current policy (Scenario 1A), **approximately 13,291 RSO units, representing 9% RSO units analyzed, are on sites that could potentially be redeveloped** based on the thresholds applied. **More stringent requirements would further reduce the number of RSO units on sites that may be feasible for redevelopment.**

Table 5. Potentially Impacted RSO Units by Scenario and Likely Feasibility

	Scenario 1						Scenario 2						Scenario 3		Scenario 4	
	1A Replace RSO .69:1	1B Replace RSO 1:1	1C Replace RSO 1.25:1	1D Replace RSO 1.5:1	1E Replace RSO 1.75:1	1F Replace RSO 2:1	2A Affordable + RSO .69:1	2B Affordable + RSO 1:1	2C Affordable + RSO 1.25:1	2D Affordable + RSO 1.5:1	2E Affordable + RSO 1.75:1	2F Affordable + RSO 2:1	3.A	3.B	4.A	4.B
RSO Units that could potentially redevelop (Below Threshold)	13,291	8,070	3,790	2,866	1,949	1,818	1,170	1,077	65	49	35	23	6,079	5,108	5,532	4,833
RSO Units unlikely to redevelop (Above Threshold)	128,929	134,150	138,430	139,354	140,271	140,402	141,050	141,143	142,155	142,171	142,185	142,197	136,141	137,112	136,688	137,387
% RSO Units that could potentially redevelop (Below Threshold)	9.3%	5.7%	2.7%	2.0%	1.4%	1.3%	0.8%	0.8%	0.0%	0.0%	0.0%	0.0%	4.3%	3.6%	3.9%	3.4%
% RSO Units unlikely to redevelop (Above Threshold)	90.7%	94.3%	97.3%	98.0%	98.6%	98.7%	99.2%	99.2%	100.0%	100.0%	100.0%	100.0%	95.7%	96.4%	96.1%	96.6%

Sources: LACP and AECOM, 2024.

# 3. Appendix

# Takeaways from the CHIP Report

## CHIP Report Findings

To establish a threshold of feasibility by which to assess the impact of the current baseline and potentially increased Replacement Ratios, AECOM analyzed the results of the CHIP report by market tier, density cohort, and incentive program. Takeaways from the CHIP report include:

- **There are substantial differences in feasibility based on incentive programs, density cohorts, market tiers, and effective set-aside ratios.**
- **Under current market conditions, very few projects tested in Market Tiers 1 and 2 were found to be feasible.** Note that these findings reflect historically high construction prices and interest rates, among other factors, and only reflect the feasibility of typical prototypes tested. Historically, RSO redevelopment projects have occurred throughout the City, including in Market Tiers 1 and 2, as detailed in “Potential Impact of RSO-Affordable Replacement Requirement Report” (“RSO Report”) submitted by AECOM to LACP on July 31, 2024.
- **Under current market conditions, very few projects tested in low/low medium density cohorts (under 30 Dwelling Units/Acre) were found to be feasible.**
- **Different incentive programs can support different set-aside levels, in part because of the differing way that the incentives are calculated.** Specifically, the DBO program calculates set-aside units as a percentage of base total units according to zoning specifications of a particular parcel. The MIIP program calculates set-asides as a percentage of total units, including additional market rate units made available through density bonus incentives.

The CHIP report tested a wide variety of potential development projects with varying set aside percentages. In addition to set aside percentage (i.e. the percent of units set aside as affordable units), the tested projects also reflected variations in the affordability level of the set-aside units, density cohort, incentive program, and market tier. The tables to the right show the **percent of tested projects that were found to be financially feasible** for selected affordability pathways in Market Tier 4 by incentive program (DBO v. MIIP), set aside percentage, and density cohort. The tables focus on a select set of affordability pathways – setting aside Very Low Income, or VLI units – that were generally found to be most feasible.

**Table 6: Percentage of Projects Found Financially Feasible for VLI-Only Pathways, by Set-Aside Level and Density Cohort in Market Tier 4: DBO v. MIIP Programs**

DBO Market Tier 4 (VLI-Only Pathways)				
% Set Aside	Percentage of Projects Found Feasible			
	Low-Med II	Med	High Med	High
0%	0%	71%	86%	100%
5%	0%	100%	100%	100%
9%	0%	100%	0%	100%
15%	0%	80%	100%	100%
20%	0%	100%	100%	100%
25%	0%	100%	100%	100%

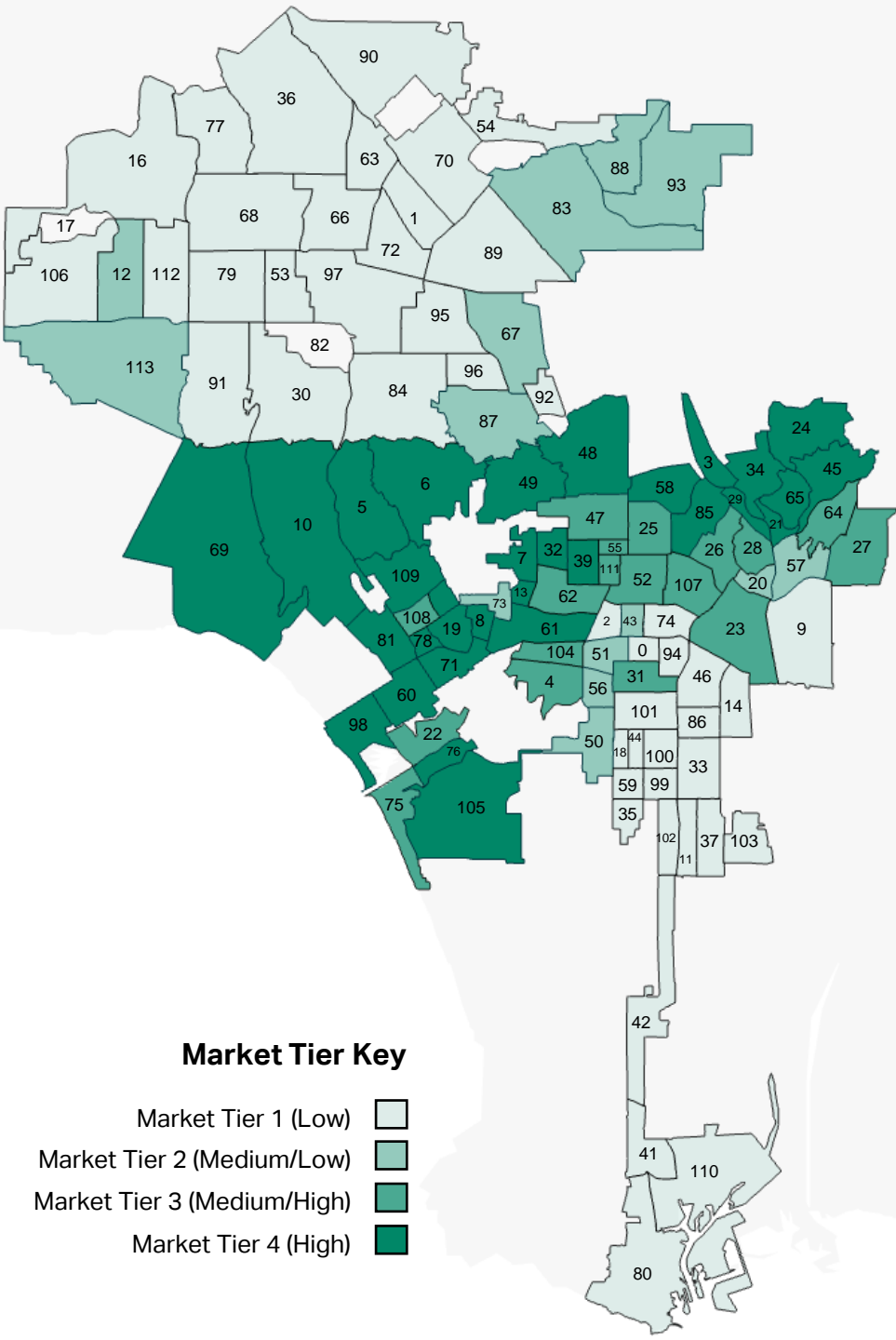
MIIP Market Tier 4 (VLI-Only Pathways)				
% Set Aside	Percentage of Projects Found Feasible			
	Low-Med II	Med	High Med	High
0%	3%	15%	27%	26%
10%	0%	50%	0%	0%
11%	0%	50%	50%	50%
12%	0%	58%	50%	33%
13%	0%	57%	43%	29%
14%	0%	35%	60%	30%
15%	0%	8%	50%	29%
16%	0%	6%	38%	31%
17%	0%	6%	33%	28%
18%	0%	0%	0%	38%
20%	0%	25%	0%	0%
25%	0%	0%	0%	0%
33%	0%	0%	0%	0%
40%	0%	0%	0%	0%

Source: AECOM, 2024.

# Market Tiers by Neighborhood

The map on the right shows the market tier classifications for each neighborhood that was used for the purposes of this analysis. The legend below shows the name of each neighborhood that corresponds to the number labels used in the map, as well as the CPA that each neighborhood falls primarily within. For more information on the market tier methodology, see AECOM's "Task 3: Market Analysis" submitted to LACP on June 28, 2024.

#	Neighborhood	Primary CPA	#	Neighborhood	Primary CPA
0	Adams-Normandie	South Los Angeles	58	Los Feliz	Hollywood
1	Arlleta	Arlleta - Pacoima	59	Manchester Square	South Los Angeles
2	Arlington Heights	West Adams - Baldwin Hills - Leimert	60	Mar Vista	Palms - Mar Vista - Del Rey
3	Atwater Village	Northeast Los Angeles	61	Mid-City	West Adams - Baldwin Hills - Leimert
4	Baldwin Hills/Crenshaw	West Adams - Baldwin Hills - Leimert	62	Mid-Wilshire	Wilshire
5	Bel-Air	Bel Air - Beverly Crest	63	Mission Hills	Mission Hills - Panorama City - North Hills
6	Beverly Crest	Bel Air - Beverly Crest	64	Montecito Heights	Northeast Los Angeles
7	Beverly Grove	Wilshire	65	Mount Washington	Northeast Los Angeles
8	Beverlywood	West Los Angeles	66	North Hills	Mission Hills - Panorama City - North Hills
9	Boyle Heights	Boyle Heights	67	North Hollywood	North Hollywood - Valley Village
10	Brentwood	Brentwood - Pacific Palisades	68	Northridge	Northridge
11	Broadway-Manchester	Southeast Los Angeles	69	Pacific Palisades	Brentwood - Pacific Palisades
12	Canoga Park	Canoga Park - Winnetka - Woodland Hills - West Hills	70	Pacoima	Arlleta - Pacoima
13	Carthay	Wilshire	71	Palms	Palms - Mar Vista - Del Rey
14	Central-Alameda	Southeast Los Angeles	72	Panorama City	Mission Hills - Panorama City - North Hills
15	Century City	West Los Angeles	73	Pico-Robertson	Wilshire
16	Chatsworth	Chatsworth - Porter Ranch	74	Pico-Union	South Los Angeles
17	Chatsworth Reservoir	Chatsworth - Porter Ranch	75	Playa del Rey	Westchester - Playa del Rey
18	Chesterfield Square	South Los Angeles	76	Playa Vista	Westchester - Playa del Rey
19	Cheviot Hills	West Los Angeles	77	Porter Ranch	Chatsworth - Porter Ranch
20	Chinatown	Central City North	78	Rancho Park	West Los Angeles
21	Cypress Park	Northeast Los Angeles	79	Reseda	Reseda - West Van Nuys
22	Del Rey	Palms - Mar Vista - Del Rey	80	San Pedro	San Pedro
23	Downtown	Central City	81	Sawtelle	West Los Angeles
24	Eagle Rock	Northeast Los Angeles	82	Sepulveda Basin	Encino - Tarzana
25	East Hollywood	Hollywood	83	Shadow Hills	Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon
26	Echo Park	Silver Lake - Echo Park - Elysian Valley	84	Sherman Oaks	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass
27	El Sereno	Northeast Los Angeles	85	Silver Lake	Silver Lake - Echo Park - Elysian Valley
28	Elysian Park	Silver Lake - Echo Park - Elysian Valley	86	South Park	Southeast Los Angeles
29	Elysian Valley	Silver Lake - Echo Park - Elysian Valley	87	Studio City	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass
30	Encino	Encino - Tarzana	88	Sunland	Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon
31	Exposition Park	South Los Angeles	89	Sun Valley	Sun Valley - La Tuna Canyon
32	Fairfax	Wilshire	90	Sylmar	Sylmar
33	Florence	Southeast Los Angeles	91	Tarzana	Encino - Tarzana
34	Glassell Park	Northeast Los Angeles	92	Toluca Lake	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass
35	Gramercy Park	South Los Angeles	93	Tujunga	Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon
36	Granada Hills	Granada Hills - Knollwood	94	University Park	South Los Angeles
37	Green Meadows	Southeast Los Angeles	95	Valley Glen	Van Nuys - North Sherman Oaks
38	Griffith Park	Hollywood	96	Valley Village	North Hollywood - Valley Village
39	Hancock Park	Wilshire	97	Van Nuys	Van Nuys - North Sherman Oaks
40	Hansen Dam	Arlleta - Pacoima	98	Venice	Venice
41	Harbor City	Wilmington - Harbor City	99	Vermont Knolls	South Los Angeles
42	Harbor Gateway	Harbor Gateway	100	Vermont-Slauson	South Los Angeles
43	Harvard Heights	South Los Angeles	101	Vermont Square	South Los Angeles
44	Harvard Park	South Los Angeles	102	Vermont Vista	South Los Angeles
45	Highland Park	Northeast Los Angeles	103	Watts	Southeast Los Angeles
46	Historic South-Central	Southeast Los Angeles	104	West Adams	West Adams - Baldwin Hills - Leimert
47	Hollywood	Hollywood	105	Westchester	Los Angeles International Airport
48	Hollywood Hills	Hollywood	106	West Hills	Canoga Park - Winnetka - Woodland Hills - West Hills
49	Hollywood Hills West	Hollywood	107	Westlake	Westlake
50	Hyde Park	West Adams - Baldwin Hills - Leimert	108	West Los Angeles	West Los Angeles
51	Jefferson Park	West Adams - Baldwin Hills - Leimert	109	Westwood	Westwood
52	Koreatown	Wilshire	110	Wilmington	Wilmington - Harbor City
53	Lake Balboa	Reseda - West Van Nuys	111	Windsor Square	Wilshire
54	Lake View Terrace	Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon	112	Winnetka	Canoga Park - Winnetka - Woodland Hills - West Hills
55	Larchmont	Wilshire	113	Woodland Hills	Canoga Park - Winnetka - Woodland Hills - West Hills
56	Leimert Park	West Adams - Baldwin Hills - Leimert			
57	Lincoln Heights	Northeast Los Angeles			



Market Tier Key

Market Tier 1 (Low)

Market Tier 2 (Medium/Low)

Market Tier 3 (Medium/High)

Market Tier 4 (High)

# Scenario Details: Scenarios 1A-1F

## Scenarios 1A-1F: Increased Replacement Ratios

LACP provided AECOM with a database of all DBO and MIIP eligible sites with RSO units sorted by market tier, density cohort and incentive program. After conducting data cleaning and analysis, the following sixteen scenarios were tested based on maximum RSO units and incentive program:

### Scenario 1: Increased Replacement Ratios

Scenario 1 determines the number of RSO replacement units required to be built based on (1) existing RSO units to be replaced and (2) affordable set-asides for a particular project and incentive program. RSO units are assumed to count towards the incentive program set-asides, reflecting current policy.

- **Replace RSO .69:1:** Assumes replacement of 69% of all RSO units with affordable housing units in a development. This replacement ratio reflects general current practice.
- **Replace RSO 1:1:** 100% of all RSO units replaced with affordable housing units in a development.
- **Replace RSO 1.25:1:** 125% of all RSO units replaced with affordable housing units in a development.
- **Replace RSO 1.5:1:** 150% of all RSO units replaced with affordable housing units in a development.
- **Replace RSO 1.75:1:** 175% of all RSO units replaced with affordable housing units in a development.
- **Replace RSO 2:1:** 200% of all RSO units replaced with affordable housing units in a development.



# Scenario Details: Scenarios 2A-2F

## Scenarios 2A-2F: Increased Replacement Ratios + Incentive Units Counted Separately

Scenario 2 assumes that replacement units do not count towards affordable units required by the incentive program, meaning affordable units will be provided due to the RSO replacement ratio, as well as set-asides from each incentive program. Affordable units provided in exchange for density bonuses and other incentives will not count towards RSO replacement units. Affordable units set-asides are calculated for each incentive program (DBO, TOIA & OC, and CT). For CT, the analysis assumes a feasible approach of one moderate unit for each of the three programs. Additionally, it assumes that DB projects are maximizing density and providing the commensurate affordability, with 15% allocated to Very Low Income (VLI) and 15% to Moderate Income (Mod)<sup>2</sup>. These incentive programs units are then added to the number of RSO replacement units for each scenario.

- **Affordable + RSO .69:1**: 69% of all RSO units replaced with affordable housing units + affordable unit set-aside from respective incentive program.
- **Affordable + RSO 1:1**: 100% of all RSO units replaced with affordable housing units + affordable unit set-aside from respective incentive program.
- **Affordable + RSO 1.25:1**: 125% of all RSO units replaced with affordable housing units + affordable unit set-aside from respective incentive program.
- **Affordable + RSO 1.5:1**: 150% of all RSO units replaced with affordable housing units + affordable unit set-aside from respective incentive program.
- **Affordable + RSO 1.75:1**: 175% of all RSO units replaced with affordable housing units + affordable unit set-aside from respective incentive program.
- **Affordable + RSO 2:1**: 200% of all RSO units replaced with affordable housing units + affordable unit set-aside from respective incentive program.

<sup>2</sup>See next page for details on affordability assumptions.

# Affordability Assumption Table

Program	Market Tier	ELI Set-Aside	VLI Set-Aside	Mod Set-Aside
RC1	4	11%		
	3	11%		
	2	9%		
	1	9%		
RC2	4	11%		
	3	11%		
	2	9%		
	1	9%		
RC3	4	11%		
	3	11%		
	2	9%		
	1	9%		
TOIA	4	11%		
	3	11%		
	2	9%		
	1	9%		
DB	N/A		15%	15%
CT1	N/A			1 unit
CT2	N/A			2 units
CT3	N/A			3 units

# Scenario Details: Scenarios 3A-4B

## Scenarios 3A-3B and 4A-4B: Increased Replacement Ratios Based on Occupancy

Scenarios 3 and 4 determine the number of RSO replacement units by randomly classifying projects into vacant (48%) and occupied (52%) units. This split is based on data for vacant vs. occupied RSO units proposed for redevelopment from LAHD Replacement Unit Determinations data between January 2022 and August 2024. After classifying the projects as vacant or occupied, different replacement ratios are then applied to each scenario.

### Scenario 3: Vacant vs Occupied; 1.5:1 Replacement Ratios

- **3.A:** Determines the number of RSO replacement units by replacing 100% of vacant units at a ratio of 1:1 and replacing 69% of occupied units at 1.5:1
- **3.B:** Determines the number of RSO replacement units by replacing 100% of vacant units at a ratio of 1:1 and replacing 69% of occupied units at 1.5:1 and 31% of occupied units at 1:1

### Scenario 4: Vacant vs Occupied; 2:1 Replacement Ratios

- **4.A:** Determines the number of RSO replacement units by replacing 100% of vacant units at a ratio of 1:1 and replacing 69% of occupied units at 2:1
- **4.B:** Determines the number of RSO replacement units by replacing 100% of vacant units at a ratio of 1:1 and replacing 69% of occupied units at 2:1 and 31% of occupied units at 1:1

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September 23, 2024

Los Angeles City Planning Commission

**Re: ACCE Feedback on Draft Resident Protections Ordinance - CPC-2024-388-CA**

Dear City Planning Commission Members:

I write on behalf of the Alliance of Californians for Community Empowerment (ACCE) Los Angeles to submit feedback on the draft Resident Protections Ordinance. We previously submitted feedback on August 1 and now submit comments on the new draft ordinance.

This ordinance is important to us because we want affordable housing in our neighborhoods and because demolitions are already impacting our communities. Many of our members live in areas where the frequent demolition of existing housing has begun to remake neighborhoods to facilitate the construction of more expensive housing. Much of this new housing is not intended for existing neighborhood residents, largely longtime Black and Latino residents who are low income. Sometimes the replacement units required under state law are not sufficient replacement for the lost housing of the tenants who originally lived there.

The Resident Protections Ordinance outlines several rights and benefits for displaced tenants. While it does not have everything we originally requested from the city, there are many parts of the draft that we think are a step in the right direction. We still have more suggestions aimed at ensuring that the rights in the RPO are effective so that tenants have the opportunity to return once construction is completed, rather than being permanently displaced.

**1. We applaud the private right of action as an enforcement tool - RPO § 16.60.A.7.**

A number of the rights in the RPO for displaced tenants occur after a developer applicant receives their approvals and entitlements from the city. In order to ensure that displaced tenants are correctly offered a right of return and developers follow the procedures of the Resident Protections Ordinance, it is important that tenants can enforce their rights later on. Without the right to sue, tenants may never complete their legal right of return.

We ask you to keep this section as-is, so that if a developer prevents a tenant from receiving a replacement unit, doesn't adequately replace their unit, doesn't allow them to remain until six

months before the start of construction, or lies to the city about whether tenant households were present, the tenant has some recourse. This provision acts as a deterrent to encourage compliance with the Ordinance even after developers receive their entitlements.

**2. We applaud the increased relocation benefits to comply with state law and procedures to ensure that tenants get enough notice to allow them to return - RPO § 16.60.A.3.b.3, 5.**

The relocation benefits and procedures provided for in the draft Resident Protections Ordinance are important to ensure that displaced tenants are not permanently displaced, but are able to return and claim a replacement unit.

The relocation amounts specified in Resident Protection Ordinance section 16.60(A)(3)(b)(3) are necessary to fulfill the amounts required by Government Code section 66300.6(b)(4)(A)(4). The City must require relocation payment amounts sufficient to meet this need and ensure that low income tenants who are eligible actually receive these amounts.

Additionally, to ensure that tenants can claim their new units, the Resident Protections Ordinance adds in procedures for displaced tenants to claim new units: requiring timelines for developers to notify tenants that the new units are available and specifying how long tenants have to claim a new unit. These are important to ensure that tenants are adequately informed and don't lose the opportunity to return to an affordable unit.

**3. We applaud the inclusion of a harasser database to ensure tenants are not removed from their homes by harassment, effectively removing their right of return - RPO § 16.60.A.6.**

The Resident Protections Ordinance is intended to give tenants in demolished units the right to a replacement unit. However, currently, some demolished properties in the City are emptied of tenants prior to any processes that would trigger additional requirements or notify the tenants that they have a right to a replacement unit. For example, in section 16.60(A)(3)(a)(1), the ordinance applies specific rent requirements to “[u]nits occupied on the date of application.” If a tenant leaves before then because of unlawful harassment, the requirement will not attach.

In order to de-incentivize this behavior, the draft Ordinance includes a policy similar to one found in New York City: preventing a developer applicant from receiving permits that would result in demolition if the City has found documented cases of unlawful tenant harassment or unlawful eviction attempts in the prior five year period. In our investigation of one particularly disruptive developer demolishing tenant-occupied housing in South LA, we found a high amount of tenant complaints of harassment and unlawful eviction at those addresses before the properties were demolished. We ask you to leave this section as-is, included in the ordinance.

**4. The Resident Protections Ordinance still needs robust replacement unit requirements so that tenants have homes to return to - RPO § 16.60.A.3.a.1.**

The Resident Protections Ordinance provides that developers must replace certain protected demolished units and that displaced low-income tenants have a right of return. Unfortunately, the



replacement unit requirements in the Resident Protections Ordinance currently mirror loopholes in state law that prevent tenants from returning to replacement units that should be theirs to claim.

The Ordinance should be amended to ensure that replacement units are not inadequately sized or not sufficiently affordable. Our organization has already sought fixes to these issues in the most recent amendments to the South Los Angeles CPIO, which requires that replacement units have the same floor area ratio or greater than the demolished protected units. This is our recommended fix for this issue. Another option would be to ensure that replacement units have a floor area ratio at least as large as the average unit size for newly constructed units of that number of bedrooms in the city of Los Angeles each year.

The draft Resident Protections Ordinance provides, as required by state law, that developers must replace demolished affordable units in certain categories. Unfortunately, it does not require that the replacement units are comparable in size or bathrooms, which means that tenants may be prevented from returning because the new units do not have space for all original residents. Fixing the floor area ratio and bathroom loopholes by adding these criteria to the definition of comparable units are important to ensure that demolished units are not replaced with smaller units, reducing the occupancy capacity of the housing.

The draft Ordinance also duplicates the loopholes in state law for defining the affordability levels of replacement units. Currently, if the income of departing tenants is not known, not all of the units are required to be replaced as lower income units--instead, a regional AMI formula is applied so that only a percentage of the units will be low income units. This belies the reality that it is typically housing of low income tenants that is demolished--not a regional cross section. Instead of using the formula, if the income of the displaced household is not known, there must be a rebuttable presumption that the household was extremely low income. This ensures that the rent levels of newly constructed housing are not out of reach for displaced tenants attempting to return.

While we requested that the units where tenant household income was unknown be replaced as Extremely Low Income units, similar to the presumption in the South LA CPIO, and still think that this is the correct model, we do think that the draft ordinance requirements in section 16.60.A.3.a.1 where there is no replacement unit allocation for moderate income and above, but those units are instead replaced with lower income units, are a step in the right direction. We further ask that the replacement income requirements that prioritize Extremely Low Income replacement units for demolished rent-controlled units apply to both units in higher and moderate opportunity areas as well as lower opportunity areas.

## **5. Implement the ACT-LA recommendations**

ACCE-LA is a member of the ACT-LA coalition. We join in the recommendations of the ACT-LA feedback letters submitted on August 1, 2024 and September 24, 2024 which in particular provides additional suggested edits for the Draft Citywide Housing Incentive Program Ordinance. These include:

- A. Expanding the MIIP and AHIP to apply to single family zoned parcels in High and Highest Opportunity Areas and requiring deeper affordability;
- B. Increasing affordability requirements in areas experiencing gentrification and displacement pressure;
- C. Requiring robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns;
- D. Strengthening enforcement and outreach systems to ensure that newly-developed units reach their intended occupants;
- E. Protecting the City's rent-stabilized housing stock by requiring 2:1 replacement of demolished RSO units;
- F. Counting replacement units in addition to affordable set-aside requirements; and
- G. Encouraging deeply affordable units by expanding "Acutely Low Income" incentives.

These edits will additionally assist in incentivizing the production of affordable housing while preventing displacement.

### **Conclusion**

Our edits to the draft Resident Protections Ordinance are meant to serve its intended purpose and provide for construction of new affordable housing while preventing permanent displacement. We urge you to ensure that the ordinances do not merely track existing state law, but go above and beyond it to provide a tangible benefit to Los Angeles residents.

Sincerely,

Estuardo Mazariegos

Co-Director

Alliance of Californians for Community Empowerment (ACCE) Los Angeles



September 23, 2024

Via email to [cpc@lacity.org](mailto:cpc@lacity.org)

**Re: Secondary Submission; [Case Numbers CPC-2023-7068-CA and CPC-2024-388-CA]**

Dear Members of the City Planning Commission:

The ACT-LA coalition previously submitted [recommendations](#) and feedback in response to the June 24, 2024 draft Citywide Housing Incentive Program Ordinance (CHIP) and draft Resident Protections Ordinance (RPO)(ACT-LA's "August 1<sup>st</sup> letter"). This letter provides additional feedback in response to the Staff Recommendation Reports and changes to the draft Citywide Housing Incentive Program Ordinance (CHIP) and the Draft Resident Protections Ordinance (RPO) included in the agenda for the September 26, 2024 meeting of the City Planning Commission.

The coalition deeply appreciates planning staff's consistent engagement on the issues that matter most to our constituents, and applaud the many changes to the ordinances that have been made in direct response to our advocacy. However, we continue to recommend that the draft ordinances be further amended to incorporate deeper affordability, apply strong anti-displacement protections and replacement requirements for rent stabilized units, and expand affordable housing incentives to lots with single family zoning.

ACT-LA is a countywide coalition of 46 organizations working on the forefront of economic, racial, and environmental justice. Our coalition members represent tenants' rights organizations, affordable housing developers, workers' centers, public interest law firms, and environmental justice advocates, among many others. ACT-LA helped lead the campaign to pass Measure JJJ (the origin of the Transit-Oriented Communities program) and Measure ULA, and is now focused on implementing those measures to greatly increase our City's affordable housing supply, as well as enact new policies that promote equitable development.

### **Reactions to Staff Recommendations for the Citywide Housing Incentive Program**

**Adjust affordability requirements in the MIIP to focus on deep affordability, replacing moderate income incentives.** Rents in moderate income units are not affordable to the nearly two-thirds of renter households in Los Angeles that are low income or below. Housing incentives in the MIIP should focus on producing housing at rents where the need is greatest. The mixed affordability option for the Transit Oriented Incentive Areas and Opportunity Corridor Incentive

Areas should be amended to focus on deeply affordable housing.<sup>1</sup> The requirement for moderate income housing in Higher Opportunity Areas should be removed and replaced with an increased requirement for acutely and extremely low income housing. The mixed affordability requirement in Moderate and Lower opportunity areas should be adjusted to require a portion of the affordable units be affordable to acutely low income households.

Additionally, under the current draft for Opportunity Corridor Transition Area Incentives, developers have no incentive to include **any** units at the ALI, ELI or VLI level. Projects using this incentive in the CT-1A area are only required to include one moderate income unit. In the CT-1B, CT-2, and CT-3 areas, developers are unlikely to include any VLI units because the incentive is available to projects with the same number of higher-rent LI units. Therefore, the VLI menu option is an empty promise. For this program to truly advance the City's obligation to affirmatively further fair housing, the affordability requirements for Opportunity Corridor Transition Area Incentives should be amended to replace the Moderate Income option with deeper affordability. To be eligible for this incentive, projects should be required to include at least one ALI, ELI, or VLI unit.<sup>2</sup>

**Allow MIIP and AHIP incentives to be used on single-family zoned parcels in Higher Opportunity areas (“Option 1”), and require deeper affordability.** The draft MIIP focuses incentives on sites with the highest quality transit service or along major corridors in high-opportunity neighborhoods. These are exactly the sites where the City should be incentivizing new mixed-income housing. Excluding single family zoned parcels maintains exclusionary zoning. This will limit the effectiveness of the MIIP to affirmatively further fair housing by undermining the goal of increasing affordable housing opportunities in high opportunity areas. The City's wealthiest and most privileged areas, R1 zones in high and highest opportunity areas, should not remain off-limits to mixed-income and affordable development. “Option 1” discussed in Exhibit D would allow the MIIP program to be used on sites in high-opportunity neighborhoods, and expand the sites in high-opportunity neighborhoods eligible for AHIP incentives. If coupled with deeper affordability requirements discussed above, Option 1 offers the potential to meaningfully increase access to affordable housing in high opportunity areas and reduce development pressure on sites where low-income renters live today, affirmatively furthering fair housing. The City should not acquiesce to exclusionary attitudes about housing development to maintain a status quo that was shaped through racial animus. **ACT-LA urges the City Planning Commission to recommend “Option 1” in combination with the deeper affordability requirements discussed above.**

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<sup>1</sup> See Table 12.22 A. 38(c)(3)(iv) on page 57 of [Exhibit A.1](#).

<sup>2</sup> See Table 22.22. A. 38(c)(3)(v) on page 57 of [Exhibit A.1](#).

**Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns.** The draft CHIP ordinance requires that projects seeking the MIIP or AHIP incentives complete a Phase I Environmental Site Assessment, and a Phase II assessment if warranted, if the project is proposed on a site with heightened environmental risks. ACT-LA supports this policy and believes the additional environmental justice measures outlined are necessary.

Current toxic site lists (such as DTSC’s Cortese List and Envirostor) are incomplete and do not identify all the brownfields that exist. To address deficiencies in existing data sources and harness local knowledge, we recommend that a requirement for a community meeting of people living in the neighborhood for projects proposed in areas that score at the 80th percentile and above on CalEnviroScreen 4.0. The required community meeting would be a non-CEQA, non-voting meeting to collect information from community members about historical uses of the site that may otherwise not show up through traditional data searches currently utilized during the Phase I process, as described above, and minimize environmental harms in vulnerable areas.

### **Reactions to Staff Recommendations for the Resident Protections Ordinance**

**ACT-LA supports the robust and streamlined implementation of state relocation payment requirements reflected in the draft RPO.** The September 16, 2024 draft of the Resident Protection Ordinance is a significant improvement over the previous draft. The draft RPO now includes a streamlined implementation of the relocation payment requirements in the Housing Crisis Act that will be easy for tenants and developers to understand and navigate, and enforcement mechanisms to punish developers that illegally evade relocation requirements. This policy will help low-income tenants secure comparable replacement housing and maintain that housing long enough to exercise their right to return. New housing development should not occur at the expense of existing low-income renters. Strong relocation, replacement, right to remain, and right to return requirements are essential to achieving the goal of development without displacement. This policy will help ensure that low-income tenants are not displaced, reducing the risk of homelessness and further demand on the City’s limited affordable housing stock and oversubscribed housing voucher programs.

**Strengthen replacement requirements by requiring 2:1 replacement of demolished RSO units.** Too often, new housing projects demolish existing below-market rent stabilized housing and create only a few more affordable units than the number of units demolished. In fact, the AECOM analysis revealed that mixed-income RSO development projects between 2020-2023 resulted in the demolition of 1,091 RSO units and produced only 1,161 affordable units - a net increase of only 70 protected units.<sup>3</sup> It is clear that development incentives need to change.

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<sup>3</sup> See page 9 of “Potential Impact of 1:1 RSO-Affordable Replacement Requirement” in [Appendix 3](#).



Increasing the replacement requirement to require that RSO units be replaced with affordable covenanted units at a 2:1 ratio will steer development away from sites with large numbers of RSO units and from projects that provide little net increase in affordable housing.<sup>4</sup> We urge the City Planning Commission to recommend this higher replacement obligation, in addition to the other policies to strengthen replacement requirements discussed in ACT-LA's August 1<sup>st</sup> letter, such as not double-counting replacement and inclusionary unit obligations, ensuring that replacement units are equivalent in size to the units they are replacing, and presuming that a displaced household was extremely low-income if that household's income is not known.

### **Conclusion**

The City's Housing Element Rezoning Program is a massive undertaking, and we greatly appreciate City staff's tireless dedication to revamping Los Angeles's development and zoning protocols to ensure that necessary affordable housing development happens quickly with as little displacement as possible. ACT-LA urges the City Planning Commission to adopt the staff recommendations with the modifications described above, as well as any remaining recommendations from our previous letters which have not yet been incorporated. This is the moment for our City to stand up and reject our history of exclusionary and racist planning practices, moving forward with a dedication to ensuring equitable opportunity for all Angelenos.

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<sup>4</sup> ACT-LA was encouraged to see city planning staff facilitating discussion on this issue: "To facilitate deliberations, one potential iteration of this concept could retain 1:1 replacement ratios when there are 1-2 existing RSO units, but apply higher ratios as RSO units increase (e.g. 1.25:1 for 3-4 units, 1.5:1 for 5-9 units, 1.75:1 for 10-14 units and 2:1 for 15 or more RSO units)" on page A-78 of the [Staff Recommendation Report](#).



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## Re: CITY COUNCIL NEEDS YOUR EMAIL SUPPORT BY TUESDAY TO FINALIZE PROTECTING OUR NEIGHBORHOODS!

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Barbara Levy <bdlevy21@yahoo.com>  
To: "cpc@lacity.org" <cpc@lacity.org>  
Cc: Nancy Sogoian <cellbroker@sbcglobal.net>

Mon, Sep 23, 2024 at 4:55 PM

I strongly respond along with the single family homeowners to the Planning Department decision to exempt our single -family neighborhoods from apartment buildings. L.A. City Council must confirm  
Draft #3 no later than September 24th.

Sincerely,  
Barbara D Levy  
[14026 Hartsook St.](#)  
[Sherman Oaks, 91423](#)

P.S.

I have been a resident of the above address since 1968 and have lived between Hazeltine and Ranchito I have seen homeowners ,young families with children growing up and families come and go. I am very lucky to still be in my home with friends all around me. We are lucky to have had wonderful Councilmen, starting with Joel Wach. Now I hope we continue to have our Council listen to our desire.

Sunday, September 22, 2024 at 08:49:27 PM PDT, Nancy Sogoian <[cellbroker@sbcglobal.net](mailto:cellbroker@sbcglobal.net)> wrote:

Hi Friends - **GOOD NEWS:** In response to the huge homeowner response, the Planning Department has decided to exempt our single-family neighborhoods from apartment buildings - **BUT** the L.A. City Council must confirm Draft #3 in order to finalize this protection!

**IN ORDER TO OBTAIN CITY COUNCIL CONFIRMATION, IT'S CRITICAL TO SEND AN EMAIL OF SUPPORT FOR DRAFT 3 NO LATER THAN TUESDAY, SEPTEMBER 24!**

Please send a quick public comment email (below is a template you can copy and paste into an email for quick completion). NOTE: Supporting Draft #3 means abundant multi-story density will be built in convenient locations along corridors where existing mass transit and other services are located. Draft #3 speeds the building of needed affordable housing by utilizing the hundreds of existing locations best suited for it.

Please share this info with your friends & neighbors to protect our neighborhoods and ensure abundant density is added where most convenient for residents. Please click on my name and send a private message with any questions. *PLEASE ACT NOW! Thank you!* **TEMPLATE PARAGRAPH (BE SURE TO ADD YOUR NAME & ADDRESS AS SIGNATURE):**

EMAIL TO: [cpc@lacity.org](mailto:cpc@lacity.org)

**RE: CPC\_2023\_7068: Housing Element Rezoning - Draft 3** We SUPPORT Draft #3 of the CHIP program that places density on our commercial corridors. As previously illustrated to the L.A. Planning Department, there is ample housing capacity in LA to meet all housing needs while still protecting existing RSO multi-family neighborhoods, single-family neighborhoods, HPOZs that are the historic heart of our city, and vulnerable communities in high-fire and coastal zones.

## SHERMAN OAKS HOMEOWNERS ASSOCIATION

# STAND UP FOR YOUR COMMUNITY!

**AN URGENT PLEA TO SUPPORT  
THE LA PLANNING DEPARTMENT'S  
DRAFT #3 REZONING PLAN**

**Draft #3 protects our neighborhoods from allowing large apartments to be built in single-family and sensitive multi-family areas and instead rezones our commercial corridors to allow needed housing and create new vibrant neighborhoods.**



PO Box 49427 ■ Los Angeles, California 90049 ■ (424) BHA-8765 ■ [info@brentwoodhomeowners.org](mailto:info@brentwoodhomeowners.org)

September 22, 2024

Email: [cpc@lacity.org](mailto:cpc@lacity.org)

RE: Case file CPC-2023-7068-CA; Housing Element Rezoning

Dear Commissioners,

The Brentwood Homeowners Association (BHA) represents approximately 4,500 homeowners and condo residents living west of the 405, north of San Vicente Boulevard and east of Canyon View Drive in a Very High Fire Hazard Severity Zone.

BHA urges your support of Draft #3 of the Housing Element which places density on our commercial corridors. As has been documented, there is plenty of capacity in Los Angeles to meet our housing needs while still protecting existing RSO multi-family neighborhoods, single-family housing, HPOZs (the historic heart of our city), and our vulnerable communities in high fire and coastal zones.

With the Commission's support, new and vibrant neighborhoods can be created on our commercial corridors in each and every high resource community using existing infrastructure. All of us will be part of the solution to create affordable housing in Los Angeles. Our community, like so many others over the past few years, has seen many businesses in the commercial district close and leave empty buildings.

Thank you for your consideration and I hope you will support Draft #3.

Sincerely,

*Thelma Waxman*

Thelma Waxman  
President

cc: Mayor Karen Bass; [karen.bass@lacity.org](mailto:karen.bass@lacity.org)  
Councilwoman Traci Park, CD 11; [traci.park@lacity.org](mailto:traci.park@lacity.org)  
Jeff Khau, Planning Deputy; [Jeff.Khau@lacity.org](mailto:Jeff.Khau@lacity.org)



HUGO SOTO-MARTINEZ  
Councilmember, Thirteenth District

September 23, 2024

Los Angeles City Planning Commission  
Department of City Planning  
200 N. Spring Street  
Los Angeles, CA 90012

**RE: COUNCILMEMBER SOTO-MARTINEZ HOUSING ELEMENT REZONING PROGRAM  
RECOMMENDATIONS**

Commissioners,

Overall, I am writing to express how strongly I support the majority of the measures proposed in the Housing Element Rezoning Program. The program, as a whole, proactively faces our housing production challenge head on and proposes reasonable solutions. In particular, the pairing of housing production in the Citywide Housing Incentive Program (CHIP) and the Housing Element Sites and Minimum Density Ordinance (HESMD) with the Resident Protection Ordinance is critical, as it addresses my primary concern for the housing incentive program that new affordable housing should not cause displacement of existing affordable housing, including naturally-occurring affordable housing. The City must do everything in its power to prevent the displacement of tenants in protected rent stabilized units. In the rare cases where tenants are displaced, they must be made whole to prevent their slide into homelessness, and the new projects must provide substantially more housing than was at the site previously.

We cannot forget that past versions of our incentive programs regularly offered less new affordable housing than units of Rent Stabilized Housing (RSO) that were there before. Within my district alone, I can also name multiple addresses where low income tenants were evicted many years ago, and today, those sites are still vacant, with the future of the project remaining unknown. None of this status quo is acceptable. In adopting the Housing Element Rezoning Program as a whole, we can prevent these outcomes.

I am also extremely pleased to see the CHIP program include the creation of the new "Public Land Project," a program incorporated after the introduction of my motion [21-1230-S4](#), which identifies a crucial issue in the production of public housing on public land. This component of

the Affordable Housing Implementation Program (AHIP) will mean that public projects are no longer subject to arbitrary density limits and zoning restrictions. The City of Los Angeles and our sister public agencies, such as The Housing Authority of the City of Los Angeles (HACLA) and Los Angeles County Metropolitan Transportation Authority (Metro), must reduce our bureaucratic processes. This program will do just that as we use public land to build public housing at a greater speed and volume than ever in our history.

I have reviewed the materials produced by the Housing Element Rezoning Program, including the September 16, 2024 Staff Report prepared for your hearing on September 26th. I have the following additional recommendations for your consideration. It is my hope to congratulate the staff at the Department of City Planning for their hard work and enthusiastically support the recommendations coming out of your Commission at Council.

### **CITYWIDE HOUSING INCENTIVE PROGRAM:**

#### **Above Ground Parking Disincentives:**

In the prior drafts of the Housing Element program, the CHIP ordinance included above ground parking disincentives intended to promote our transit goals and reduce the overproduction of parking. Several comment letters argued that this disincentive might also deter the overall production of housing as most developers still provide parking in order to finance their projects. It's my understanding that staff recommendations as of this most recent report removed that recommendation.<sup>1</sup>

I am supportive of pushing our housing stock away from an overproduction of parking. This is particularly important in my district when it comes to housing projects located directly on top of permanent transit infrastructure, such as the Metro subway red line stops which run through Hollywood and East Hollywood. I would recommend adding specific design standards for above ground parking based on the prior design requirements that your Commission has imposed in the past: such as requiring adaptable floors and wrapped podiums and considering whether some light disincentives might still be appropriate for the locations closest to transit.

#### **Mandatory Street Widenings:**

In 2022, Councilmembers Raman, Blumenfield, and Bonin put forward a motion ([22-1476](#)) to address a citywide issue related to mandatory street widenings as a part of new multifamily development. Mandatory street widenings create substantial costs during project construction and are not always compliant with other city mobility goals. In [August](#) of this year, the Bureau of Engineering (BOE) released a report with recommendations to further refine the process, putting forward amendments to Los Angeles Municipal (LAMC) Code Section 12.37 by creating a checklist to prioritize our desired mobility plan goals. The checklist is a much needed update that will greatly improve our streetscapes overall for all types of projects in the City and one I will enthusiastically support.

However, the resolution by BOE is specifically tailored based on their checklist criteria, and

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<sup>1</sup> [CPC staff Report released September 16, 2024](#) "Ordinance Revision, item 4", A-31



BOE, as a department, is clear that they do not want to offer a blanket waiver of improvement by use type, such as affordable housing, so they can review with nuance. While I respect their position as consistent with the mandates of their department, I disagree with BOE. I would like to see relief from mandatory street widening (which does not relieve the applicant from dedication of the full right-of-way, only from moving an existing curb and all associated street infrastructure) to be offered as a baseline incentive or deviation of development standards for, at least, projects enrolled in AHIP and even potentially MIIP. I ask your Commission to include that recommendation in your recommendations to the Planning and Land Use Management (PLUM) Committee of City Council.

### **Affordable Housing on Public Land Projects:**

In September of last year, I was extremely proud to introduce Council File [21-1230-S4](#). This motion instructed the City to amend our practice of requiring that affordable housing projects developed on City land go through the City Planning department for discretionary entitlements and increases to their extremely limited base density. Currently, our government-led housing projects go through more discretionary reviews than any other type of project in the City. The timeline for public housing project approvals is far too long for city-supported and financed projects. We have tied our own hands by giving public facility zoned properties a default of extremely low residential density. For any public agency without sovereign immunity, we also treat their projects similarly. Agencies such as the Housing Authority of the City of Los Angeles (HACLA) are trapped under the same red tape.

The addition of the Public Lands Project category is extremely exciting as it will finally free up our public land for the provision of permanent affordable housing. The City and all our other public partners must have access to flexibility to build housing without restrictions on land we own and I believe the new Public Land Project type will achieve this goal.

I do recommend one modification to the Public Land Program. Several sites that the City has looked at recently have been found infeasible for redevelopment as 100% affordable housing due to high costs. I ask that the program definitions ensure that Council is given the flexibility to authorize Shared Equity Housing projects, including the proposed affordability ranges and the definition of Shared Equity Housing Projects to be made inclusive of projects on public land held by public agencies defined in the Public Land Project definitions. It is my intent to ensure that social housing projects can be built by public agencies as well as by non-profits and limited equity cooperatives.<sup>2</sup>

### **RESIDENT PROTECTION ORDINANCE:<sup>3</sup>**

The Resident Protection Ordinance (RPO) is a groundbreaking piece of legislation. While individual community plan implementing ordinances such as the South LA CPIO or the Hollywood CPIO have included targeted residential protections, to my knowledge, the RPO represents the first time that the City has deliberately paired anti-gentrification and tenant

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<sup>2</sup> [CPC staff Report released September 16, 2024](#), A-33

<sup>3</sup> [ACT-LA letter of August 1st](#), AB1218

protections with new development standards citywide. This focus on incentivizing the growth the City needs while also directly mitigating the potential negative impacts of that growth on our tenants is critical to a more just planning process. I consider this ordinance to be central to the program.

As the only renter on City Council and a long time advocate for tenants in our City, I have many suggestions for enhancement of this ordinance. I am in support of the recommendations from the Alliance for Community Transit- LA (ACT- LA) coalition, with a special acknowledgement of the member organizations that benefit Council District 13 every day: Public Counsel, the Alliance of Californians for Community Empowerment (ACCE), the Koreatown Immigrant Workers Alliance (KIWA), the Beverly-Vermont Community Land Trust (BVCLT) the Little Tokyo Service Center, Community Power Collective, LA Forward, the Inner City Law Center, Communities for a Better Environment, the Southern California Association of Non-Profit Housing (SCANPH), the Los Angeles Neighborhood Land Trust, Brilliant Corners, and Strategic Actions for a Just Economy (SAJE) as well as the individual recommendations from Public Counsel and the Alliance of Californians for Community Empowerment (ACCE). These organizations have been working for a very long time to make sure this implementation goes into effect, and in the RPO we see their work transformed into our best chance of making meaningful change.

I do recognize that a number of the recommendations will fall on the Los Angeles Housing Department to implement and I think it is critical that we acknowledge how important it is that decisions about housing projects are not made in a silo between the departments. The Planning Department must have the authority to recommend projects not move forward unless the adverse impacts to tenants are fully mitigated, and the Housing Department must be able to impose the requirements set out through project approvals for developers. Tenants must not fall through the cracks between agency procedures.

### **Key Components in the Recommendations:**

While I have some suggestions to strengthen the RPO, I want to start by highlighting the key provisions in the RPO before you today that are critical to the success of this program and which were incorporated thanks to the key activism of our housing allies. These are: the right to return, documentation of the right to remain, changes to ensure better definitions for comparable units, the increase of relocation standards to match state requirements, the right of private action for tenants, and true penalties for bad faith landlords. These are all immensely critical to ensure that demolition for new development does not create displacement as a side effect.

Additionally, critical processes which must be enforced by the Los Angeles Housing Department and which have been requested for many years; include local marketing and outreach, a comprehensive affordable housing registry inclusive of affordable housing covenanted in market rate projects, and priority placement for displaced tenants in new affordable units. I will continue to push LAHD to prioritize these programs to ensure that the RPO and other tenant protections are fully implemented.

**Stronger Eviction Safeguards and Compliance:**

The Housing Crisis Act (HCA) of 2019 and Senate Bill 1218 (SB1218) gives tenants in protected units the right to remain in their units for up to 6 months prior to demolition. The enforcement of the 6 month right must be a focus in our City. For instance, project DIR-2023-2587-TOC-SPP-HCA, located at 5271 Sunset Boulevard, was filed on April 13, 2023. The project will remove 4 RSO units in order to create 19 new rental units (2 affordable). In February of this year, an Ellis Act filing was completed and the tenants were given a move out date at the start of August. Thankfully, one of the tenants was able to obtain a one year extension which was granted to the other residents by the developer as a courtesy. However, the fundamental non-compliance with the Housing Crisis Act is ongoing. We have a project not yet entitled, with an unknown date of demolition and yet, our current City processes would have supported removing these tenants from their units despite their existing rights under the Housing Crisis Act. They remain under a ticking clock that is not based around their actual rights.

As another example these three projects are fully entitled: the Crossroads of the World project (CPC-2015-2025-MCUP-CU-SPR-DB), the Yucca-Argyle Tower (CPC-2014-4705-ZC-HD-DB-MCUP-CU-SPR), and the Whitley Hotel (DIR-2016-4920-SPR). Combined, these three sites alone equalled 162 occupied units of RSO. All sites Ellised their tenants prior to my taking office. None of these projects have yet moved into full demolition. I know that these three sites do not represent the entire scope of empty RSO with fully entitled projects in my District. It is unconscionable to me that these 162 rent controlled units have been vacant for years when we are in such a severe housing crisis. At times the argument is made that it is always to the benefit of the City to lose 10 RSO units if the site will then have 30 new units of housing. This has been called “churn”. But what is never factored into this cynical math is the time cost. I would always rather have 10 occupied units today than a vacant building and 30 hypothetical units that might be built sometime in the next 10 years.

At a minimum, I recommend that our City not allow any Ellising of tenants while projects are being reviewed for entitlements and building permits. My goal would be that we do not give clearances on demolition permits or Ellis filings until the City is absolutely sure that the project is ready to proceed. There will be no point in posting a notice letting tenants know they have 6 months to stay if the City is processing Ellis cases evicting them years or months before the posting.

**Expiration of HCA and SB1218:**

The Housing Crisis Act and AB1218 expire on January 1, 2030 and some provisions of the RPO are suggested to be tied to these expiration dates. I do not support any sunset provisions for any part of the RPO. The housing crisis was a long time in the making and every protection of the RPO should be permanent. The point of adopting local implementing ordinances of state regulations is to impose tailored local processes. City Council is entirely capable of determining when to amend or repeal an ordinance without State imposed deadlines.

**Anti Harassment Database:**

I'm glad to see a recommendation for a centralized database of violators of our City's tenant anti-harassment laws. The proposal to retain beneficial ownership data based on citations or legal judgments is a positive first step, and I would encourage the Commission to explore further possibilities. A database recording beneficial ownership for perpetrators of illegal harassment could be expanded to include other bad faith actors in violation of additional laws with similar impacts. At a minimum, owners who have failed to comply with departmental orders and become subject to the Rent Escrow Account Program (REAP), nuisance abatement orders, or violators of the City's cash-for-keys requirements should be on the same list. Finally, while this program may opt to have records of these violations removed after penalties are satisfied, I would like to see this database used to permanently maintain beneficial ownership records and to solicit additional sources of beneficial ownership information from the various departments that engage in this work, so this database could be the starting point for further transparency as to who actually owns units in our City, used to fill in the gaps for other enforcement efforts.

**Replacement Unit Requirements & Right To Return:**

I support the recommended option to subject demolitions of larger buildings to higher replacement ratios in order to disincentivize the loss of larger RSO units.<sup>4</sup> Larger RSO buildings are more concentrated in higher density multifamily areas and the provision of the range from 1:1 to 2:1 is a reasonable compromise to prevent greater displacement at sites where the impact would be more severe. Combining this provision with the greater amounts of relocation tenants are entitled to will ensure redevelopment focuses more appropriately on sites that are providing lower densities of housing or sites which have no housing uses to begin with, creating a more substantial net gain to loss of affordable housing.

**Assumption of Lower Income for Replacement Units:**

Fundamentally, our Housing Element Update Program has an obligation to prioritize desegregating the City and to affirmatively further fair housing. Advocates have asked that when incomes are not known for a unit, that replacement housing is assumed for lower income tenants because at the core, displacement happens more predictably and regularly to low income tenants, and their lack of housing access and instability is highest. I am happy to see that the replacement ratios that are being proposed would use ratios reflective of the real need of areas where tenants are low income (45% ELI, 26% VLI, and 29% LI). I support using that formula across all areas, for units where incomes are not known. Fundamentally we must ensure lower income tenants gain new access to higher income areas, not perpetuate ratios that reflect the current reality of existing segregation. Pairing a ratio reflective of the need with an expanded affordable housing registry that prioritizes displaced tenants will be a powerful tool for justice.

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<sup>4</sup> [CPC staff Report released September 16, 2024](#) 1:1 vs. 2:1 Replacement of RSO Units A-78

## **ADDITIONAL RECOMMENDATIONS:**

### **Labor Support and Incentives:**

The State law Senate Bill (SB) 4, also called Faith-Based Organization (FBO) Projects includes specific labor standards. Standards for SB4 were based on frameworks also established in Assembly Bill (AB) 2011. Both types of incentive programs require prevailing wages for projects over 10 units and add additional labor standards on projects over 50 units. I am strongly opposed to removing protections that workers fought for statewide from our local implementation programs under CHIP and creating parallel tracks that can allow projects to opt out of these hard won labor standards. Locally, implementation should be offset with greater incentives if necessary, to make the local program more attractive than that of the State program.

I completely reject the idea that projects will only be able to provide either affordable housing or labor standards and therefore labor must give way before housing. Instead of undercutting these State programs we have the opportunity to use them as examples for how we should make decisions in our local programs. The City must analyze labor incentives that will not only apply to the CHIP programs but can be expanded to include non-housing projects. I have always supported a stronger development sector and increased streamlining of project approvals. But my support is dependent on capturing every bit of public benefit in exchange for release of our discretionary powers. Right now, it is the projects which need the most permission and permitting that give Los Angeles the highest public benefits. This system makes no sense. Rationally, it is those projects which do not provide adequate public benefits that should have our highest review and approval. The CHIP program, SB4 and AB2011 have shown the path forward, and we must expand on that approach. It is critical that we take all public benefits available to us.

### **Better Environmental Impact Review for Projects:**

ACT- LA has brought up the need for environmental review specific to communities affected by the legacy of oil operations and toxic waste.

The current process is flawed: soil testing is only required after project approvals during the building permit phase. Similarly, tree removal permits are not considered or mitigated during discretionary removals, and the permitting is happening after project approval, which means that projects cannot be instructed to design to avoid protected tree species or sensitive habitats. Our housing programs note that the only reason to deny these projects would be for the discovery of “specific adverse impacts” and our CEQA process is designed to fully disclose potential impacts and mitigate them but our environmental review of sites is lacking in clear testing of these impacts during the pre-approval phase.

Much like my comments regarding labor components for projects, I believe that this change in process needs to apply universally to affected areas and should not be restricted to only projects under the CHIP. Environmental Consideration Areas need further delineation to separate out areas which are dangerous for additional density due to future climate challenges

from areas which are dangerous today for the residents who live there due to toxic legacies. Areas of higher pollution need up front soil testing during the review process, as do areas of concentrated oil field sites or remediated brownfields.

We must turn this backwards process around and ensure that communities are fully informed of the environmental implications of projects during the design phase when changes can be made. This would also help the developers of these projects as it is harder to make substantial changes in a project after discretionary entitlements are acquired. New development doesn't have to be in conflict with environmental remediation so long as the information is presented as part of the decision-making and public review process and can lead to appropriate design and remediation of the projects. It is my hope that the CPC can recommend these recommendations are more fully followed up as part of both the Environmental Justice and Open Space Element work that is ongoing at the City Planning Department.

### **Single Family Residential Zones:**

I am aware of the overwhelming consensus regarding the need to create more housing opportunities in high resource areas of the City. It is not some accident or coincidence that single family housing is concentrated in high wealth areas and that these are areas of higher segregation. It is the direct result of generations of government intervention and policy which we can no longer ignore. Today, it is our duty to right these historical injustices and ensure the children and grandchildren of the intentionally excluded have equal access in our highest opportunity areas. This must include single family housing areas. I understand that this will be challenging work for us all, and it is my intent that our process is thoughtful, empathetic and unhurried.

While we wait, our multifamily, low income neighborhoods are shouldering the vast majority of new housing developments. South Los Angeles, Westlake, Boyle Heights, East Hollywood, Koreatown: all of these high density multifamily neighborhoods have seen explosive housing production, with far too much of that housing production also displacing vulnerable renters who have nowhere more affordable to go. Meanwhile, very little has changed in our single family zones and only 14% of all new affordable housing has been developed in Higher Opportunity Areas of the City.<sup>5</sup>

State laws keep changing to try and push increases in density towards a more fair distribution across cities. We have already seen many updates to the state Accessory Dwelling Unit program, as well as the first round of Senate Bill 9. Because of these laws, in reality, there is now no longer any true single family zoning left in Los Angeles. What these changes teach us is that when we do not make active plans, the political powers in Sacramento will continue to make changes. It is the responsibility of those of us who get to decide policy to be ahead of the curve and dictate, on our own terms, what will best suit our City.

The City of Los Angeles has displayed great courage when it comes to challenging the status quo of housing production by developing local programs like Executive Directive 1 (ED1) and

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<sup>5</sup>[CPC staff Report released September 16, 2024](#), "Affirmatively Furthering Fair Housing", A-60



Transit Oriented Communities (TOC). We took a courageous stand in supporting the extremely high Regional Housing Needs Allocation (RHNA) that prioritized housing near jobs and transit across the region. We should be proud of being leaders in the state in producing new units. This is why Los Angeles is where the courage for this conversation must begin. The longer we wait, the more we risk that those who come from areas which produce so much less housing than we do will again tell us exactly how to add density to our single family zones.

We should discuss many possible options, such as: setting minimum new density in areas next to fixed rail transit; adding increased and gradual low-scale single and multi family density and commercial infill along major corridors; and creating Affordable Housing Overlay Zones as my colleagues Councilmember Raman and Council President Harris-Dawson have already proposed. We should be open to a variety of answers and to all the hard conversations we will need to have. We need to acknowledge the variation within single family zones and make sure our policies acknowledge the many types of constrained single family zones (such as: hillsides, high fire hazard areas, substandard streets, historic districts, and areas impacted by hazardous substances).

I know we cannot do this quickly in the last few months before our CHIP program is adopted, but it is time to face our legacy head on and acknowledge that after we finish out this program, our work on solving the housing crisis and meeting our mandate of affirmative fair housing cannot be complete until we directly face our history of exclusion and begin to change it. When we do, this work will have my support.

**Conclusion:**

In closing, I thank your Commission and the staff at City Planning for your work in bringing these transformative implementing ordinances of the Housing Element forward to the City Council and I look forward to closely considering all your recommendations in our deliberations and adoption.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hugo Soto-Martinez', with a stylized flourish at the end.

Hugo Soto-Martinez  
Los Angeles City Councilmember, 13<sup>th</sup> District

CC: Vince Bertoni, Director of Planning, Los Angeles City Planning Department



- COMMUNITY IMPACT STATEMENT -

Council File: [21-1230](#)

Title: Housing Element / General Plan / 2021-2029

Position: For if Amended

City Planning Case Number: [CPC-2020-1365-GPA](#)

Title: Citywide Housing Element 2021-2029 Update

Position: For if Amended

City Planning Case Number: [ENV-2020-6762-EIR](#)

Title: Citywide Housing Element 2021-2029 and Safety Element Update

Position: For if Amended

City Planning Case Number: [ENV-2020-6762-EIR-ADD1](#)

Position: For if Amended

Council File: [21-1230-S3](#)

Title: Housing Element / Equity Indicators and Methodologies / Future Land Use

Position: For

City Planning Case Number: [CPC-2023-7068-CA](#)

Title: Code Amendments to Implement the Housing Element and the Associated Housing Element Rezoning Program

Position: For if Amended

City Planning Case Number: [CPC-2024-387-CA](#)

Title: The Proposed Ordinance Aims to Fulfill Housing Element Requirements of Establishing Regulations Regarding Affordable Housing Devel., Housing Replacement Requirements, and to Comply with State Law

Position: For if Amended

Summary:

The North Westwood Neighborhood Council opposes any attempt to prevent new housing from being banned in single-family zones in Los Angeles. Single-family zoning—which amounts to banning duplexes, triplexes, cottage apartments, bungalow courts, small apartments, etc.—began as a product of and is a continued legacy of racial and class segregation. We are in the midst of a dire housing crisis, and allowing new housing in well-resourced areas of the city is a necessary step to furthering fair housing.

As [preeminent housing researchers at UCLA](#) write: “Privileging of single-family homes, normally called R1 zoning, exacerbates inequality and undermines efficiency. R1’s origins are unpleasant: Stained by explicitly classist and implicitly racist motivations, R1 today continues to promote exclusion. It makes it harder for people to access high-opportunity places, and in expensive regions it contributes to shortages of housing, thereby...forcing many housing consumers to spend more on housing.”

And the City of Los Angeles itself acknowledges the problem. As [the City Planning Department wrote in October 2023](#): “In Los Angeles, 72% of land permitting residential uses is restricted to the development of single-family housing....Furthermore, in Higher Resource Areas of the City, 76% of land is zoned for the development of single-family housing....This has created clear disparities in housing access throughout the City. In particular, the lack of affordable housing constructed in Higher Resource Areas contributes to limited access for many Angelenos to place-based opportunities including jobs, transit, and high-performing schools.”

For this reason, our Council supports allowing for Affordable Housing Overlay incentives, Transit Oriented Communities Affordable Housing Incentives, streamlining under the codification of Executive Directive 1, and other such housing production programs in single-family zones. We oppose the City Planning Department’s plans to exempt them, which appear influenced by political pressure from an unrepresentative, minority opinion.

We also strongly dispute the notion that there is enough capacity on commercial corridors to meet housing demands and state mandates. Not only is this not supported by data and research, but also, it relegates renters, those living in apartments, and those living in new subsidized housing to the pollution, noise, traffic, and street safety dangers of the city's major arterials and commercial corridors and bars those same people from neighborhoods away from those.

Finally, this notion ignores the fact that, in our neighborhood, single-family zones directly abut some of the densest concentrations of jobs and opportunities in the state, such as UCLA and central Westwood. If housing should go in commercial corridors, then these single-family zones certainly should qualify, given their immediate proximity to a mega employment hub.

September 23, 2024

City Planning Commission  
Department of City Planning  
City of Los Angeles  
Re: CPC\_2023\_7068: Housing Element Rezoning

Dear City Planning Commission:

The Doheny Sunset Plaza Neighborhood Association represents the 2000 households in Los Angeles in the hills above Sunset Strip.

The housing crisis in our City must be solved. We support Draft #3 of the Housing Element because it places density on our commercial corridors. We believe that there is an abundance of opportunity to build housing on these corridors. This draft also appropriately protects Very High Fire Hazard Severity Zones from dangerous densification.

We appreciate the work that went into this revision and believe that it will bring vibrant neighborhoods to high resource communities.

Sincerely,



Ellen Evans  
President  
Doheny Sunset Plaza Neighborhood Association



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## CHIP Public Comment

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Howard Yi <hyi12000@gmail.com>

Mon, Sep 23, 2024 at 12:27 PM

To: cpc@lacity.org

Dear Los Angeles City Planning Department staff,

I am a Resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Citywide Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in building affordable housing in our city and I also believe that we need to ensure that affordable housing production is done equitably and that it "Affirmatively Furthers Fair Housing". I have the following recommendations in order to improve the ordinances proposed.

1. Protect the City's rent-stabilized housing stock by requiring 2:1 replacement of demolished RSO units
2. Replacement Units Should Be Counted in Addition to Affordable Set-Aside Requirement.
3. Encourage deeply affordable units by adding "Acutely Low Income" incentives
4. Expand the MIIP and AHIP to apply to single family zoned parcels
5. Specify and strengthen the relocation requirements of the Resident Protections Ordinance to ensure displaced households receive affordable replacement housing and a true opportunity to return
6. Strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants
7. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns

Sincerely,

Ho-Sung Yi





**HANCOCK PARK**  
HOMEOWNERS ASSOCIATION  
— EST. 1948 —

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September 23, 2024

**SENT VIA EMAIL**

Planning Commissioners:

The Hancock Park Homeowners Association supports the approval of Draft # 3 of the CHIP/Housing Element Rezoning to provide affordable housing in underutilized commercial corridors. The Planning Department analysis that the Housing Element is based on shows there is more than adequate capacity in these corridors to meet the State-mandated regional housing needs. Unless and until additional capacity is needed, there is no reason the Housing Element should not also fully protect RSO multiple-family housing, HPOZs and single-family residential areas.

Thanks for your consideration.

Cynthia Chvatal-Keane  
President

Mark Alpers  
Land Use Committee Chair



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## CPC\_2023\_7068: Housing Element Rezoning - oppose overlays in R1 and HPOZ districts

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Jay Ross <ross\_jay@hotmail.com>  
To: "CPC@LACity.org" <CPC@lacity.org>

Wed, Sep 18, 2024 at 8:21 PM

To CPC,

L.A. is currently zoned for 11,000,000 persons (including density bonuses and C zones that allow apartments), so no upzoning or overlays are needed to accommodate LA's future population of 4,200,000. The Planning Dept should not propose overlays to R1 or HPOZs without telling us first what the current zoning is. The City has not told us that.

The other CHIP programs that channel new housing to commercial corridors provide enough zoning capacity.

No upzoning or overlays in R1 is provided.

Abundant Housing cannot tell us what the current zoning capacity of the city is either, so until they provide that information, don't believe their "claims" that R1 upzoning or overlays are needed.

Also, the LA Times never reports on the existing zoning capacity, so ignore their uninformed opinions too.

Jay Ross  
West LA 90064

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**From:** Los Angeles City Planning <[housingelement-lacity.org@shared1.ccsend.com](mailto:housingelement-lacity.org@shared1.ccsend.com)>

**Sent:** Wednesday, September 18, 2024 4:02 PM

**To:** [ross\\_jay@hotmail.com](mailto:ross_jay@hotmail.com) <[ross\\_jay@hotmail.com](mailto:ross_jay@hotmail.com)>

**Subject:** Upcoming City Planning Commission Meeting for Housing Element Rezoning Program Draft Ordinances /  
Próxima Reunión de la Comisión de Planeación de la Ciudad para el Borrador de Ordenanzas del Programa



*Para español siga hacia abajo.*

한글을 원하시면 아래로 스크롤하세요.

Dear Interested Parties,

This is a friendly reminder that the [draft ordinances](#) supporting the Housing Element Rezoning Program will be considered by the City Planning Commission (CPC) in one week! To review the staff recommendation report and associated materials please click [here](#). As a reminder, the meeting will take place at 8:30 a.m. on Thursday, September 26, 2024 in person in the John Ferraro Council Chamber, Room 340, City Hall, [200 N. Spring St.](#) (entrance on Main St)., Los Angeles 90012. You may also join virtually via Zoom, or listen via telephone. Attendees joining via Zoom may still give public comment. Additional information on how to participate in the meeting can be found in the agenda which is available [here](#).

Simultaneous translation in Spanish and Korean will be available in-person only. However, if you join virtually via Zoom you will still be able to provide public comment in Spanish or Korean and it will be interpreted for the CPC. You may also use the call-in information provided on the agenda to listen in, but note that you cannot provide public comment via telephone.

**Please also be aware that high attendance is expected at next week's CPC meeting and the room for the CPC meeting has a capacity limit that will be enforced.** Entry into City Hall will not be permitted any earlier than 8 a.m. on Thursday morning. If you arrive prior to the building opening, we ask that you patiently line up outside of the building in a single file line to best facilitate making your way through security once you are admitted into the building. Please note that in order to enter the building, individuals will need to present a government-issued ID, sign-in, and be screened through a metal detector.

Although public comment closed on Aug. 26, **you can still provide a public comment by contacting the City Planning Commission at [cpc@lacity.org](mailto:cpc@lacity.org).** Please ensure that the case number of the ordinance you wish to comment on is included in the subject line (see below for the applicable case numbers associated with the Housing Element Rezoning Program Ordinances).

To view more information on the proposed Citywide Housing Incentive Program (CHIP) Ordinance, Housing Element Sites and Minimum Density Ordinance, and Resident Protections Ordinance, please visit our [webpage](#), where you will find resources such as Fact Sheets for each draft ordinance.

Thank you.

**City Planning Commission**  
**Thursday, September 26, 2024, 8:30 am PST**  
Los Angeles City Hall  
John Ferraro Council Chamber  
[200 N. Spring St.](#) (entrance on Main St), Room 340, 3rd Floor  
Los Angeles 90012

This meeting may be available virtually, in a hybrid format. Please check the meeting agenda approximately 72 hours before the meeting for additional information. To view the meeting agenda and to search the date of the meeting, please visit [Planning4LA.org/hearings](https://Planning4LA.org/hearings).

### About the Draft Citywide Housing Incentive Program Ordinance (CPC-2023-7068-CA)

The [Citywide Housing Incentive Program \(CHIP\) Ordinance](#) proposes several new programs that would streamline review procedures and introduce bold new incentives for eligible project types in order to expand access to affordable housing near transit, jobs, along major corridors, and in higher opportunity areas. These programs include the State Density Bonus Program, the Mixed Income Incentive Program, and the Affordable Housing Incentive Program.

**State Density Bonus Program:** Since the adoption of the City's Density Bonus Ordinance in 2008, numerous state bills have made significant amendments to the State's Density Bonus Law. The program aims to make key revisions to align with the State Density Bonus Law.

**Mixed-Income Incentive Program:** The Mixed-Income Incentive Program intends to codify new incentives for housing development projects along Opportunity Corridors and projects constructing Missing Middle typologies in Higher Opportunity Areas. Additionally, this program will memorialize transit-based incentives currently housed in the Transit Oriented Communities (TOC) Affordable Housing Incentive Guidelines.

**Affordable Housing Incentive Program:** The Affordable Housing Incentive Program offers new incentives for 100% Affordable Housing Projects with additional incentives for Higher and Moderate Resource areas. This program will also provide citywide tailored incentives for sites where residential uses are currently restricted, including sites owned by faith-based organizations or community land trusts, publicly owned land, and sites zoned for parking.

### About the Draft Housing Element Sites and Minimum Density Ordinance (CPC-2024-387-CA)

The [Housing Element Sites and Minimum Density Ordinance](#) is intended to enact state housing element law for different types of sites related to the most recent Housing Element of the General Plan. In particular, it addresses housing element law requirements around housing replacement, no net loss, by-right development for 20% affordable housing projects, and minimum densities. The various requirements apply to three different kinds of Housing Element Sites, including the Inventory of Sites, sites located on Prior Inventory of Sites, and Lower Income Rezoning Sites. In addition, the draft ordinance would add minimum density requirements to various multifamily zone classifications to facilitate the implementation of state law as well as ensure new development in these areas complies with policy objectives.

### About the Draft Resident Protections Ordinance (CPC-2024-388-CA)

The [Resident Protections Ordinance](#) would establish consistent protections for residents citywide and would expand access to new affordable housing for Angelenos. The ordinance would establish longer affordability terms (99 years), and ensure the equitable distribution and quality, including the size, location and amenities, of affordable units. It would also strengthen and expand housing replacement requirements and occupant protections, including a tenant's right to remain, right to relocation, and right to return for all housing development projects.

Estimadas partes interesadas,

¡Este es un recordatorio amistoso de que la Comisión de Planeación de la Ciudad (CPC por sus siglas en Inglés) considerará las [ordenanzas redactadas](#) que apoyan el Programa de Rezonificación del Elemento de Vivienda en una semana! Para revisar el reporte de recomendaciones del personal y materiales asociados por favor haga clic [aquí](#). Acompañe al Departamento de Planeación de la Ciudad de Los Angeles el jueves 26 de septiembre del 2024 en persona en la Cámara del Consejo John Ferraro, Sala 340, en el Palacio Municipal, ubicado en [200 N. Spring St.](#) (entrada por la calle Main St), Los Ángeles 90012, virtualmente a través de la plataforma Zoom, o si desea escuchar por teléfono información adicional sobre cómo participar en la reunión está disponible [aquí](#).

Traducción simultánea en español y coreano será disponible solamente en persona. Sin embargo, si se conecta virtualmente por Zoom puede proporcionar su comentario en español o coreano y será interpretado para la Comisión de la Ciudad (o CPC por sus siglas en inglés) Usted también puede usar la información para marcar por teléfono proporcionada en la agenda para escuchar la junta, pero note que no puede proporcionar comentario público por teléfono.

**Por favor tome en cuenta que se espera una larga tendencia para la junta de CPC en la siguiente semana y el cuarto donde se lleva a cabo la junta de CPC tiene límites de capacidad que serán reforzados.** Entrada al Ayuntamiento de la Ciudad no se permite antes de las 8 a.m. de la mañana del Jueves. Si usted llega antes de que el edificio abra, le preguntamos que pacíficamente haga una línea en la entrada del edificio para mejor facilitar su entrada por seguridad cuando entre al edificio. Por favor note que para entrar al edificio, cada persona deberá de presentar su Identificación Emitida de Gobierno, registrarse y revisado por un detector de metales.

Aunque los comentarios públicos cerraron el 26 de agosto, **aún puede brindar un comentario público comunicándose con la Comisión de Planeación de la Ciudad en [cpc@lacity.org](mailto:cpc@lacity.org).** Asegúrese de que el número de caso de la ordenanza sobre la que desea comentar esté incluido en la línea de asunto (consulte a continuación los números de caso aplicables asociados con las Ordenanzas del Programa de Rezonificación del Elemento de Vivienda).

Para ver más información sobre el programa para la propuesta de Incentivos de Vivienda para toda la Ciudad (CHIP), La Ordenanza de Sitios y Densidad Mínima y la ordenanza de Protección de Inquilinos, visite nuestra [página web](#), donde encontrará recursos tales como hojas informativas para cada borrador de ordenanza.

**Comisión de Planeación de la Ciudad de Los Ángeles**  
**Jueves, Septiembre 26 del 2024 a las 8:30 am**  
**Palacio Municipal de Los Ángeles**  
Cámara de Consejo John Ferraro  
[200 N. Spring St.](#) (entrada por la calle Main St), sala 340, 3er piso  
Los Angeles 90012

Esta reunión estará disponible virtualmente, en formato híbrido. Por favor consulte la agenda de la reunión aproximadamente 72 horas antes de la reunión para obtener información adicional. Para ver la agenda y buscar la fecha de la reunión, visite [Planning4LA.org/hearings](https://Planning4LA.org/hearings).

**Acerca del Borrador de la Ordenanza del Programa de Incentivos de Vivienda en toda la Ciudad (CPC-2023-7068-CA)**

La [Ordenanza del Programa de Incentivos de Vivienda](#) para la Ciudad (CHIP por sus siglas en inglés) abarca varias estrategias clave de CHIP, incluidos los Corredores con Oportunidades, la Superposición de Vivienda Asequible y las actualizaciones para

programas de incentivos de desarrollo para la vivienda existente en la Ciudad. En particular, estas estrategias se han adaptado en tres programas que componen la Ordenanza CHIP. Estos programas incluyen el Programa de bonificación de densidad estatal, el Programa de incentivos para ingresos mixtos y el Programa de incentivos para viviendas asequibles.

**Programa de Bonificación de Densidad Estatal:** desde que la Ciudad adoptó la Ordenanza de bonificación de densidad en el 2008, numerosos proyectos de ley estatales han realizado modificaciones significativas a la Ley de Bonificación de Densidad Estatal. El programa tiene como objetivo realizar revisiones clave para alinearse con la Ley de Bonificación de Densidad Estatal.

**Programa de Incentivos para Hogares con Ingresos Mixtos:** El Programa de Incentivos para hogares con Ingresos Mixto busca codificar incentivos nuevos para proyectos de desarrollo de vivienda en Corredores con Oportunidades y proyectos que construyen tipologías con Vivienda de Escala Media en Áreas de Mayor Oportunidad. Además, este programa conmemora los incentivos basados en el transporte que están actualmente incluidos en las Pautas de incentivos de vivienda asequible de las comunidades orientadas al transporte público (TOC por sus siglas en Inglés).

**Programa de incentivos para crear Vivienda Asequible:** El Programa de Incentivos para la Vivienda Asequible ofrece nuevos incentivos a proyectos que sean 100 % vivienda asequible con incentivos adicionales para áreas con recursos más altos y moderados. Este programa también ofrecerá incentivos personalizados en toda la ciudad para sitios donde los usos residenciales están actualmente restringidos, incluidos sitios que son propiedad de organizaciones religiosas o fideicomisos de tierras comunitarias, terrenos de propiedad pública y sitios zonificados para estacionamientos.

#### **Acerca del Borrador de la Ordenanza de Sitios y Densidad Mínima del Elemento de Vivienda (CPC-2024-387-CA)**

La [Ordenanza de Sitios y Densidad Mínima del Elemento de Vivienda](#) tiene como objetivo promulgar la ley estatal del elemento de vivienda en diferentes tipos de sitios relacionados con el Elemento de Vivienda más reciente del Plan General. En particular, trata los requisitos de la ley del elemento de vivienda en torno al reemplazo de viviendas, sin pérdida neta, desarrollo por derecho para proyectos de viviendas con un 20% de asequibilidad y densidades mínimas. Los diversos requisitos se aplican en tres tipos diferentes en los Sitios del Elemento de Vivienda, incluido el Inventario de Sitios, los que se encuentran ubicados en el Inventario Previo de Sitios y los Sitios de Rezonificación para hogares con Bajos Ingresos. Además, el borrador de la ordenanza agregaría requisitos de densidad mínima a varias clasificaciones de zonas multifamiliares para facilitar la implementación de la ley estatal y garantizar que los nuevos desarrollos en estas áreas cumplan con los objetivos de la política.

#### **Acerca del Borrador de la Ordenanza de Protección de Habitantes (CPC-2024-388-CA)**

La [Ordenanza para la Protección de Habitantes](#) establecería protecciones consistentes para los residentes en toda la Ciudad y ampliará el acceso a nuevas viviendas asequibles para los angelinos. La ordenanza establecerá plazos de asequibilidad más largos (99 años) y garantizará la distribución equitativa y la calidad, incluyendo el tamaño, la ubicación y las comodidades para la vivienda asequible. También fortalecerá y ampliará los requisitos de reemplazo de viviendas, incluido el derecho del inquilino a quedarse, el derecho a la reubicación y el derecho a regresar para todos los proyectos de desarrollo de viviendas.



이해관계자들께,

주거환경 요소 리조닝 프로그램을 지원하게 될 [조례 초안](#)이 일주일 안에 도시 계획 위원회 (CPC)에 의해 검토될 예정입니다. 추천 보고서와 관련 자료를 검토하려면 [여기](#)를 클릭하세요. 2024년 9월 26일 목요일 회의를 참여하시기 바랍니다. 일반인들은 City Hall [200 N. Spring St.](#) (Main St. 입구), Los Angeles, 90012, 존 페라로 대회의실 (John Ferraro Council Chamber, Room 340)에서 직접 참석하거나 Zoom을 통해 가상으로 참석하거나 전화로도 참석할 수 있습니다. Zoom을 통해 참여하시는 분도 대중 의견을 제시할 수 있습니다. 회의에 참여하는 방법에 대한 추가 정보는 [여기에서](#) 확인할 수 있습니다.

스페인어와 한국어 동시 통역은 직접 방문하시는 분에게만 가능합니다. 그러나 Zoom을 통해 참여하시는 분의 대중 의견은 영어로 통역해드립니다. 또한 일정에 제공된 전화 참여 정보를 사용하여 청취할 수 있지만 전화로 대중 의견을 제공할 수는 없습니다.

**다음 주 CPC 회의에는 높은 참석률이 예상되며, 회의실에는 강제 수용 인원 제한이 있습니다.** 목요일 오전 8시 이전에는 시청 출입이 허용되지 않습니다. 개장 전에 도착하는 경우, 건물에 입장한 후 보안 검색을 가장 쉽게 통과할 수 있도록 한 줄로 건물 외부에 안내심을 갖고 줄을 서 주시기 바랍니다. 건물에 입장하려면 개인이 신분증을 제시하고 서명하고 들어간 후 금속 탐지기를 통해 검사를 받아야 합니다.

제안된 수정조례들에 대한 일반인들로 부터의 의견 수렴기간은 8월26일로 일단 마감되었지만, 여러분들은 원하시는 의견들을 CPC([cpc@lacity.org](mailto:cpc@lacity.org))를 통해서 계속 접수할 수 있습니다. 의견을 보낼 때는 꼭 해당 조례안의 케이스번호를 제목에 포함시켜 주시기 바랍니다(주거환경 요소 리조닝 프로그램 조례안에 관한 해당 케이스번호들은 아래를 참조하십시오).

제안된 시 전체 주택 인센티브 프로그램(CHIP) 조례, 주택계획 부지 조례 및 거주자 보호 조례에 대한 더 많은 정보를 얻으려면 우리의 [웹사이트](#)를 방문하십시오. 각 조례 초안들에 대한 팩트시트와 같은 자료들을 찾을 수 있습니다.

**도시계획위원회**  
**2024년 9월 26일 목요일 오전 8시 30분**  
로스앤젤레스 시청  
존 페라로 대회의실  
[200 N. Spring St.](#) (Main St. 쪽 입구), 340호, 3층  
Los Angeles 90012

이 회의는 하이브리드 형식으로 제공될 것입니다. 추가 정보는 회의 시작 약 72시간 전에 회의 안건을 확인하십시오. 회의 안건을 보고 회의 날짜를 검색하려면 [Planning4LA.org/hearings](http://Planning4LA.org/hearings) 를 방문하십시오.

#### **시 전역 주택 인센티브 프로그램 조례 초안 정보 (CPC-2023-7068-CA)**

**시 전체 주택 인센티브 프로그램(CHIP) 조례**에는 기회 통로, 저렴한 주택 오버레이, 시의 기존 주택 개발 인센티브 프로그램 업데이트 등 몇 가지 주요 CHIP 전략이 포함되어 있습니다. 특히 이러한 전략은 CHIP 조례를 구성하는 세 가지 프로그램에 적용되었습니다. 이러한 프로그램에는 주 밀도 보너스 프로그램, 혼합 소득 인센티브 프로그램, 저렴한 주택 인센티브 프로그램이 포함됩니다. 이러한 전략이 CHIP 조례 초안에 어떻게 통합되는지에 대한 자세한 내용은 아래에서 확인할 수 있습니다.

**주정부 밀도 보너스 프로그램:** 2008년 시 밀도 보너스 조례가 채택된 이후 수많은 주 법안에서 주 밀도 보너스 법에 대한 중대한 개정이 이루어졌습니다. 이 프로그램은 주 밀도 보너스 법에 맞춰 주요 사항을 개정하는 것을 목표로 합니다.

**혼합 소득 인센티브 프로그램:** 은 기회도가 높은 지역에 중산층 주택을 건설하는 프로젝트에 대한 새로운 인센티브를 명문화할 계획입니다. 또한, 이 프로그램은 현재 대중교통 중심 커뮤니티(TOC) 저렴한 주택 인센티브 가이드라인에 포함되어 있는 대중교통 기반 인센티브를 구체화하고자 합니다.

**저렴한 주택 인센티브 프로그램:** 저렴한 주택 인센티브 프로그램은 100% 저렴한 주택 프로젝트에 대한 새로운 인센티브와 함께 고가 및 중간 자원 지역에 대한 추가 인센티브를 제공합니다. 이 프로그램은 또한 종교 단체 소유 부지, 커뮤니티 토지 신탁, 공공 소유 부지, 주차 구역으로 지정된 부지 등 현재 주거 용도가 제한되어 있는 부지에 대해 도시 전체에 맞춤형 인센티브를 제공할 것입니다.

#### **주택 요소 부지 및 최소 밀도 조례 초안 정보 (CPC-2024-387-CA)**

**주택 요소 부지 및 최소 밀도 조례**는 가장 최근의 주택 요소와 관련된 다양한 유형의 부지에 대한 주 주택 법을 제정하기 위한 것입니다. 특히 주택 대체, 순손실 금지, 20% 저렴한 주택 프로젝트를 위한 바이라이트 개발, 최소 밀도에 관한 주택 요소법 요건을 다루고 있습니다. 이러한 다양한 요건은 부지 목록, 이전 부지 목록에 있는 부지, 저소득 재구역 부지 등 세 가지 종류의 주택 요소 부지에 적용됩니다. 또한 조례 초안은 다양한 다가구 지역 분류에 최소 밀도 요건을 추가하여 주법의 이행을 용이하게 하고 해당 지역의 신규 개발이 정책 목표를 준수하도록 보장합니다.

#### **주민 보호 조례 초안 정보 (CPC-2024-388-CA)**

**거주자 보호 조례**는 시 전역의 주민들을 일관되게 보호하고 주민들을 위한 새로운 저렴한 주택에 대한 접근성을 확대할 것입니다. 이 조례는 더 긴 임대 기간(99년)과 저렴한 주택의 규모, 위치 및 편의시설에 관한 동등한 정책을 수립할 것입니다. 또한 모든 주택 개발 프로젝트에 대한 세입자의 거주권, 이주권, 환수권 등 주택 교체 요건을 강화하고 확대할 것입니다.

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## CPC-2024-388-CA, CPC-2024-387-CA, CPC-2023-7068-CA

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Jina Park <mrs.jinapark@gmail.com>

Thu, Sep 19, 2024 at 9:40 AM

To: cpc@lacity.org

Cc: matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org, petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

Re:

Citywide Housing Incentive Program (CHIP) Ordinance: CPC-2023-7068-CA

Housing Element Sites and Minimum Density Ordinance: CPC-2024-387-CA

Resident Protections Ordinance: CPC-2024-388-CA

Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Jina Park

# Kentwood HOME GUARDIANS

*Community building community...*

September 18, 2024

**Via Email & Certified Mail**

Mayor Karen Bass  
karen.bass@lacity.org  
200 N. Spring Street  
Los Angeles, CA 90012

Traci Park, Councilwoman  
councilmember.park@lacity.org  
Los Angeles City Council District 11  
200 N. Spring Street, Suite 410  
Los Angeles, CA 90012

Vincent Bertoni, Director of Planning  
vince.bertoni@lacity.org  
201 N. Figueroa St., 4th Floor  
Los Angeles, CA 90012

Planning Commission via Public Comments Submission

Re: CPC-2024-387-CA

**Kentwood Home Guardians Supports Exclusion of Single-Family Zones From the  
CHIP Ordinance**

Dear City Officials:

Kentwood Home Guardians is a large homeowners association of approximately 3400 properties in Westchester 90045 organized in the 1940's. Our members are predominantly

single family homeowners, but we also count churches, a major brand grocery store, a handful of apartment buildings and various commercial businesses among our membership. We are extremely organized and we are vocal.

We are writing to you to express our support for excluding R-1 zones from the CHIP Ordinance of the Housing Element.

We are not opposed to our community taking its fair share of density. We are opposed to random density littered throughout our mature single family neighborhood (1) when there are other viable options; and (2) when other non-CHIP density is already mandated in the single-family zones via state law.

These factors support our position:

1. Single-family neighborhoods are already subject to ADU development.
2. Single-family neighborhoods are already subject to SB-9 density and likely additional density when the current legislative session concludes.
3. Mature single-family zoned neighborhoods are decades in the making and should be protected as a viable housing alternative until such time as there is nowhere else to build.
4. There is still ample room along commercial corridors for density with equal opportunity to community resources, as demonstrated by the Planning Department's willingness to take single-family zones out of draft two of the CHIP Ordinance.
5. The sheer scope of density contemplated by state mandates and the Housing Element will surely require updates and expansion to the City's aging infrastructure.
6. Commercial corridors are more viable for concentrated infrastructure improvements within the City's beleaguered budget

Respectfully submitted,

Kentwood Home Guardians



523 West Sixth Street, Suite 826  
Los Angeles, CA 90014

213 623 2489 OFFICE  
213 623 3909 FAX  
[laconservancy.org](http://laconservancy.org)

September 20, 2024

Los Angeles City Planning Commission  
Attn: Theadora Trindle, City Planner  
200 North Spring Street, Room 340  
Los Angeles, CA 90012  
[cpc@lacity.org](mailto:cpc@lacity.org)

**Re: Housing Element Rezoning Program  
CPC-2023-7068-CA**

Dear Commissioners,

In reviewing the draft Citywide Housing Inceptive Ordinance (CHIP), the Los Angeles Conservancy is providing comments that focus on potential adverse impacts in historic resources and recommendations for modifications.

Our primary concern is CHIP unjustly targets Los Angeles' historic low-rise multifamily neighborhoods and legacy businesses for redevelopment. These neighborhoods have produced the majority of accessible and affordable housing (RSO and Naturally Occurring Affordable Housing) in LA and are being asked to produce more. If implemented as currently envisioned, we believe CHIP will directly lead to the redevelopment of and unnecessary loss of existing multifamily housing, increasing the displacement of longtime tenants and the potential de-stabilization of neighborhoods.

In comments provided to City Planning staff on August 26<sup>th</sup>, the Conservancy made recommendations on how to rebalance the program to expand eligibility into some single-family zones and remove multifamily zones from consideration. We have reviewed the supplemental maps included in *Exhibit D: Single Family Considerations*. We thank staff for providing these detailed maps that respond to public comment. Upon review, we feel Options 1, 2 and 4 are too expansive and could have unintended consequences in historic neighborhoods, especially in the HPOZs located in the Central APC.





We continue to support Option 5, which removes R2 and RD zones from eligibility in the Opportunity Corridor Program. The memo notes that this change would remove approximately 1,900 parcels from the program, collectively containing thousands of Rent Stabilization Ordinance (RSO) Units. Many of these parcels fall in existing Historic Preservation Overlay Zones (HPOZs) including in Highland Park-Garvanza, Carthay Circle, and Angelino Heights, which are some of Los Angeles's most historic neighborhoods.



*Left: 1435 Bellevue Ave. is a historic fourplex and a contributor to the Angelino Heights HPOZ. Its current zoning is RD2, but would be designated OC-1 in CHIP. Photo courtesy of Historic Places LA. Right: 4973 Franklin Ave. is an early Postwar apartment building, built 1948 in the Minimal Traditional style and identified as a contributor to the Los Feliz Square Multi-Family Residential Historic District by SurveyLA. It is currently zoned R2, but would be OC-2 in CHIP. Photo courtesy of Historic Places LA.*

We understand that an offset must occur due to the reduction in capacity, and suggest that Option 3 be considered. Option 3 modestly upzones single-family zones but only in the areas with greatest access to the transit. This refined option introduces new low-rise typologies at a 2- to 3-story scale, which we believe can be compatible with single family zones. The option transitions from larger, denser development closest to transit to a lower scale towards the interior of neighborhoods. We also note that no HPOZs seem to be affected in this option – though many will be affected by the Corridor Transition and Opportunity Corridor programs. We suggest that these two options, adopted in conjunction, will help to relieve pressure on historic resources and existing multifamily housing while locating new missing-middle housing in the most necessary areas.



## **Eligible Historic Resources on Opportunity Corridors**

Due to the concentration of new development intended to be located on commercial corridors in the CHIP Ordinance, there will be intense development pressure placed on these corridors. Not only will this likely lead to the loss of some historic buildings along these corridors, another potential unintended result will be the loss and displacement of longtime, legacy businesses.

While the Conservancy understands that some corridors are underutilized, or have large parcels suitable for redevelopment, many of Los Angeles' streets are defined by small-scale commercial and mixed-use buildings. These "background buildings" define some of the most iconic commercial streets, including Melrose Avenue and Beverly Boulevard. SurveyLA identified many of these buildings as eligible, either individually or as potential historic districts. As a planning approach, CHIP could help prioritize and direct redevelopment to parcels that do not contain historic resources or legacy businesses.



*Left: Mel's on Ventura Blvd., built 1953, is an excellent example of an Armet & Davis Googie design. It has been determined eligible but not designated, and qualifies for the OC-3 program.*

*Right: Tempura House on Sawtelle Blvd. opened in 1949 and has been a fixture of Sawtelle's Japantown. Though eligible for designation, it qualifies for the OC-1 program. Photo courtesy of Historic Places LA.*

Based upon comments made in our previous letter, city planning staff has crafted an incentive to encourage the preservation of the front portion of the façade and ensure architectural compatibility for new construction. While this is not the ideal preservation approach, the alternative would lead to the wholesale destruction of these buildings. We believe it is a compromise approach, and would like it strengthened to extend to more than just facades and be extended to include meaningful portions of historic buildings as a partial preservation outcome. As has been done in the Downtown Community Plan, we hope that additional tools to

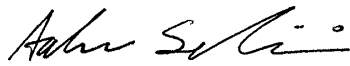


encourage preservation, such as a Transfer of Floor Area Rights (TFAR) can additionally be included in CHIP or in subsequent Community Plans.

**About the Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 member households throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Sincerely,



Andrew Salimian  
Director of Advocacy

cc: Mayor Karen Bass  
Eunisses Hernandez, Council District 1  
Paul Krekorian, Council District 2  
Bob Blumenfield, Council District 3  
Nithya Raman, Council District 4  
Katy Yaroslavsky, Council District 5  
Imelda Padilla, Council District 6  
Monica Rodriguez, Council District 7  
Marqueece Harris-Dawson, Council District 8  
Curren D. Price Jr., Council District 9  
Heather Hutt, Council District 10  
Traci Park, Council District 11  
John Lee, Council District 12  
Hugo Soto-Martínez, Council District 13  
Kevin de León, Council District 14  
Tim McOsker, Council District 15  
Ken Bernstein, Office of Historic Resources  
Lambert Giessinger, Office of Historic Resources





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## LA City Rezoning Program

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Phil Brown <phillip@flowblvd.com>  
To: cpc@lacity.org

Tue, Sep 17, 2024 at 3:51 PM

I received an email from LA City planning on 8/29/24 entitled Housing Element Rezoning Program that stated within it, that the public comment period has now closed. In speaking with a CD Community Development & Planning Director I was given the [cpc@lacity.org](mailto:cpc@lacity.org) address which is said to be open even to the day of the hearing on the 26th of September.

So please include the thoughts below that refer to the CHIP and its required corridor transit when considering the Up Zoning issues.

### LA City Rezoning Program

9-9-24

Adding population density to existing land use usually means increases in capacity for mobility in existing streets as necessary so that congestion does not occur. Assuming this is what the LA City Planning intends with their CHIP and Opportunity Corridor programs, may I suggest a particular corridor for such increased vehicle and transit traffic to serve in the up zoning process to provide for the additional housing that the RHNA is calling for. In addition I will refer to the HLA Ordinance that now has various Networks to be used for various street upgrades and in particular to the Vehicle Enhanced Network as it would be used in the City Planning Corridor Opportunities program.

The suggested corridor is the Historic Route 66 corridor coming out of DTLA on Sunset Boulevard, moving westerly then turning into the Santa Monica Boulevard corridor as travel would continue west through the various Hollywood communities. The age of related communities is ready for renewal and the continuity of the corridor needs to be secured now for the future growth that will inevitably happen due to increased density.

Thankfully, there is a new urban boulevard system based on traffic signalization that is able to provide the necessary increased capacity for growth. At [www.flowblvd.com](http://www.flowblvd.com) is shown a plan view animation of the signal cycle where a mile long of multimodal traffic in both directions of travel has continuous flowing corridor traffic at the beginning third of the basic signal cycle while retaining regular stop and go traffic for various traffic crossing, traffic maneuvers and pedestrian street crossings in the remaining two thirds of the signal cycle. This signal organization also creates the Bus Rapid Transit without dedicated lanes which is needed in most narrow Los Angeles boulevards (such as Sunset Boulevard) so that curb side parking is available to serve business and other adjacent land uses.



And further, this new boulevard system called Flow Boulevard comes in two corridor configurations, the Single Street Flow Boulevard for corridors with just one major street and the Couplet Flow Boulevard where two one way streets, a block or more apart, provide the two directions of traffic flow which often occurs in a grid of streets that has been made. The Couplet's two different traffic flows also removes the gridlock congestion so often found in high density land use areas within a grid of streets.

Again thankfully, in the case of the Sunset portion of route 66 coming out of DTLA headed west for about 5 miles there are existing grade separations that have been made to facilitate the major cross traffic demands. And in the 5 miles of Couplet Flow Boulevard moving between Vermont to La Cienega the major crossing Boulevards are all made on a one mile spacing which is the basis of which the Flow Boulevard signal cycle has been innovated to operate within. Again, it is all in place ready to be up graded and used for the higher capacity Flow Boulevard system that would be meant to carry the increasing person trip travel demand as a result of increased housing and other land uses.

In addition to how well the two different corridor configurations can move traffic and work together, the Flow Boulevard system with its traffic "pack" organization for one third of the signal cycle provides a safer (think Vision Zero) traffic flow in the continuous flowing traffic phase because all vehicles in the pack would be going the same speed. The pack continuous flowing speed is a set speed probably between 30 and 35 mph and is used for the entire Vehicle Enhanced Network with the Single Street and Couplet configurations included. In the two thirds portion of the signal cycle traffic flow the Stop and Go phase having lighter travel demand gives time for safe turning movements, parking maneuvers, and street crossing for pedestrians. This traffic organization can also accommodate the other HLA Ordinance Networks to cross and interrelate with the Vehicle Enhanced Network of the Flow Boulevard system at opportune conditions. Regarding capacity, existing Route 66 boulevards have a capacity of about 30,000 person trips per day. With a Flow Boulevard the Continuous Flowing Pack of vehicles doubles that initial person trip amount to roughly 60,000 person trips per day. And with the use of BRT in the same corridor an additional 30,000 person trips per day can be built up over time to give a total of basically 90,000 person trips per day for the corridor at some point in the future. The expectation is that over time traffic management can displace some automobile vehicles with Bus vehicles thereby gaining the higher amount of person trip capacity for the boulevard. This kind of capacity can be expected for both the Single Street Flow Boulevard and the Couplet Flow Boulevard as the system makes the Vehicle Enhanced Network work.

The existing population needs to be interacted with to help in the understanding of what opportunities are being made for the sake of a more sustainable Los Angeles and also those opportunities that are made for the people living in the various communities that the up-zoning and BRT would be going through.

For example, in the Flow Boulevard system the BRT does not need dedicated lanes because the Buses can flow along with the other vehicles in the continuous flowing pack period as well as in the Stop and Go period. In this way no loss of curbside parking along Sunset Boulevard are not made which would impact businesses fronting on Sunset, down grading their property values and the result of impacts of directing such needed parking into adjacent residential neighborhoods. And in neighborhoods with increased population there should be larger public open spaces made to accommodate the higher number of pedestrians using the higher density land use as well as for Transit boarding safety and aesthetic enjoyment of said public open space. Said open space is a functional necessity and an opportunity for the community to acquire it in the up-zoning process.

The interaction with the public in the planning of such up-zoning should educate existing residents as to the various real estate opportunities as well as potential problems that could happen and reveal how they would want to solve the problems that could influence their neighborhood. The NIMBY reaction to change must be dealt with so that the RHNA becomes a Win-Win with public and private objectives.

Public services and institutions for the higher density community need to be accounted for and understood. Young people starting out should be accommodated so they don't have to leave LA to find affordable shelter and to get a job. Programs and opportunities would be identified and solutions developed in the various public discussions in the planning stage of the corridor development. The low cost of using existing Right of Ways for this increase in travel demand allows for increased funds from property taxes to be used for additional public services. An objective would be to expect the up-zoning and infrastructure development to conceivably pay for its self in a few decades, thus making this problem solving urban improvement becomes a truly sustainability success.

At [www.flowblvd.com](http://www.flowblvd.com) there is an animation of the Flow Boulevard traffic innovation that should be of interest.



## Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

- 1) Award **similar** 'proximity' rights to Transit Oriented Incentive Area (TOIA) as awarded to Opportunity Corridors Incentive areas (OC)
- 2) Remove underlying minimum of 5 for Transit Oriented Incentive Area (TOIA) as this requirement is not required for Opportunity Corridors Incentive Area (OC)

# TOPIC #1

Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

- 1) Award **similar** 'proximity' rights to Transit Oriented Incentive Area (TOIA) as awarded to Opportunity Corridors Incentive areas (OC)

# Sites Abutting, Across OC also get OC incentives, but this is not allowed for TOIA

- Exhibit A-1, Page 55, Item (c) (2), states in part “properties abutting, across the street or alley, or having a common corner with a site eligible for Opportunity Corridor Incentives shall also be eligible for the Opportunity Corridor incentives....”
- The above creates equal or similar distribution of density in OC – similar rights based on ‘proximity’. OC also does not differentiate based on underlying zoning as long as it is not R1 or more restrictive. Therefore R2, RD3, RD2, RD1.5 all receive same incentives as R3 and above.
- Item (c) (2) does **not** include Transit Oriented Areas (T-1, 2, 3). Therefore they do not get ‘proximity’ incentives and In addition Transit Oriented incentives are based on underlying zoning thus R2, RD3, RD2, RD1.5 do NOT receive same incentives as R3 and above. This creates ‘islands’, unequal distribution of density, spot zoning, in Transit Oriented Areas as described in the next slides.

(c) **Eligibility.** To qualify for the provisions of this subdivision, a Project approved under the Mixed Income Incentive Program must satisfy all of the following eligibility requirements:

- (1) Meet the definition of one of the following Project Types described in Table 12.22 A.38(c)(1)(i):

TABLE 12.22 A.38(c)(1)(i) Eligible Project Types and Total Units Required	
Project Type	Total Units Required
Mixed Income Incentive Project	Five or more
Opportunity Corridor Transition Area Incentive Project	Four or more
Type I Unified Adaptive Reuse Project <sup>1</sup>	Five or more

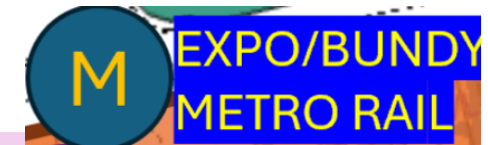
Footnote

<sup>1</sup> See LAMC 12.22 A.26(h)(1) for additional requirements associated with a Type I Unified Adaptive Reuse Project.

- (2) Be located in and meet the requirements of a Transit Oriented Incentive Area, Opportunity Corridor Incentive Area, or an Opportunity Corridor Transition Incentive Area as described in Paragraphs (e), (f), and (g) below, except that properties abutting, across the street or alley, or having a common corner with a site eligible for Opportunity Corridor Incentives shall also be eligible for the Opportunity Corridor Incentives as described in paragraph (f) below,

and Transit Oriented Areas

# For Example, Density around Expo/Bundy Transit area (TOI)



Density for Units per 6250 Lot Size, FAR = 4.5, 200 sqft/DU = 140

	West Centinela (HI)	East Centinela	West Wellesley	East Wellesley	West Amherst	East Amherst	Bundy West	Bundy East
2200 BLOCK	187	187	187	187	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
2300 BLOCK	187	140	10	140	140	140	140	140
	187	140	16	140	140	140	140	140
	187	140	16	140	140	140	140	140
	187	140	16	140	140	140	140	140
	187	140	16	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140

2300 Block Wellesley Avenue (West):  
 1) 5 lots of R2 (10-16 density)  
     a) 140 unit density Across the street, Left, Right and Behind.  
     b) Surrounded by 140 units

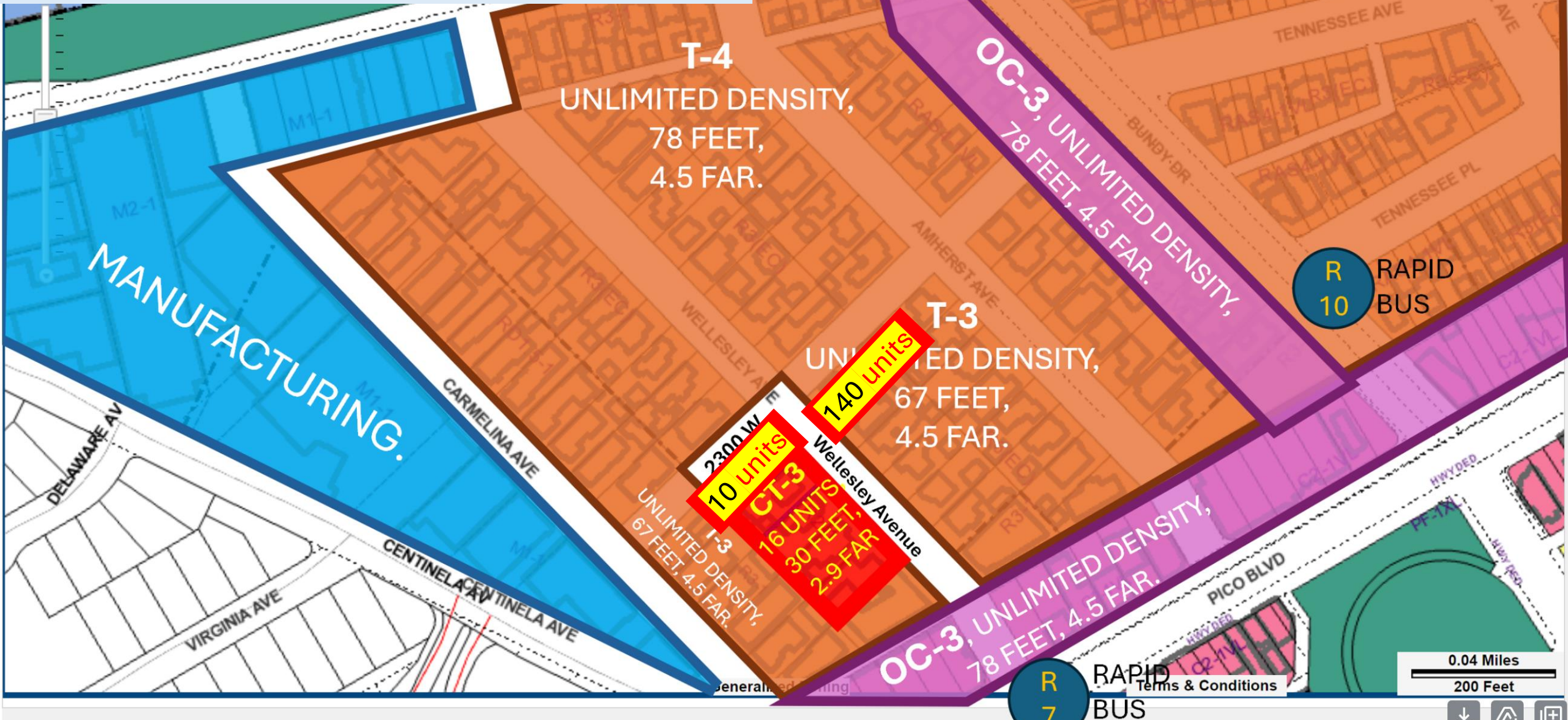
**This is one example. Many such Disparities may be found along the many Transit Stops across LA and can be avoided**

ALL LOTS In **YELLOW** Were R1s for over 80 years.  
  
 In 2018, They were upzoned to R3 and RAS4 in 2019 Expo-Line Transit Plan



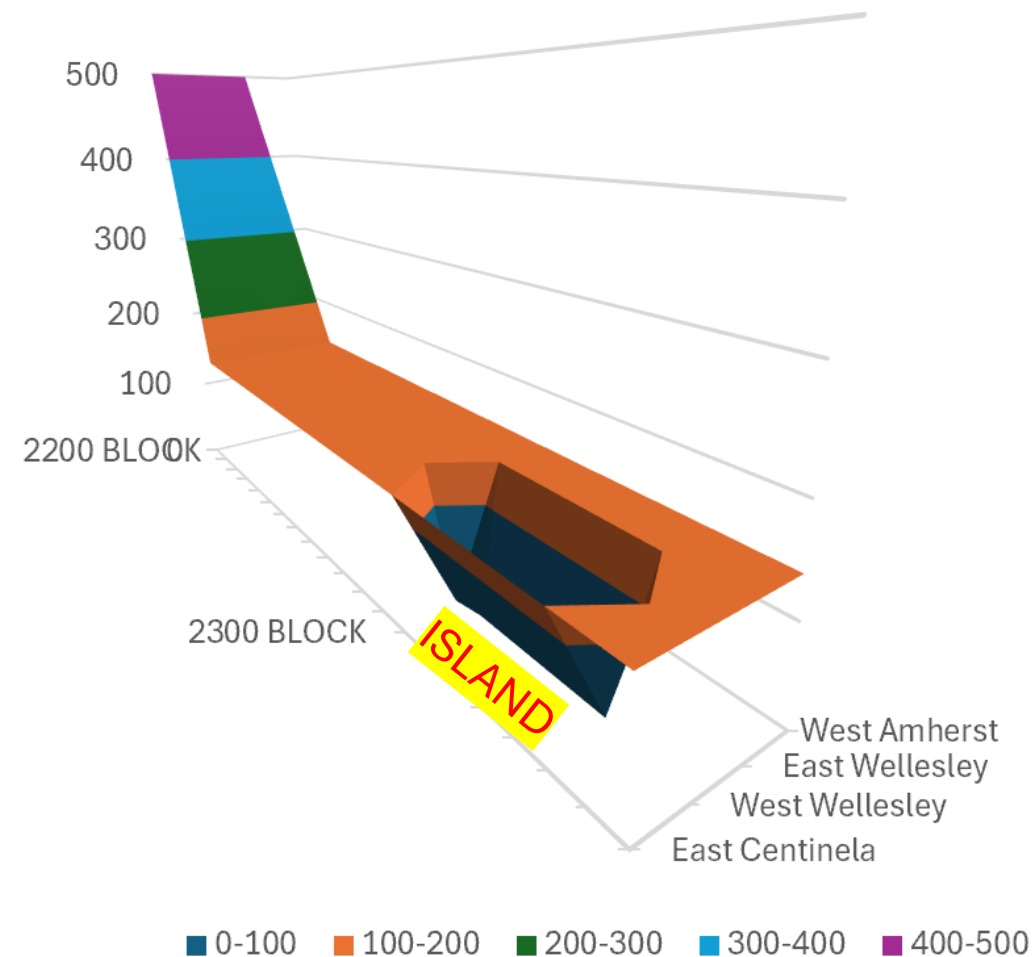
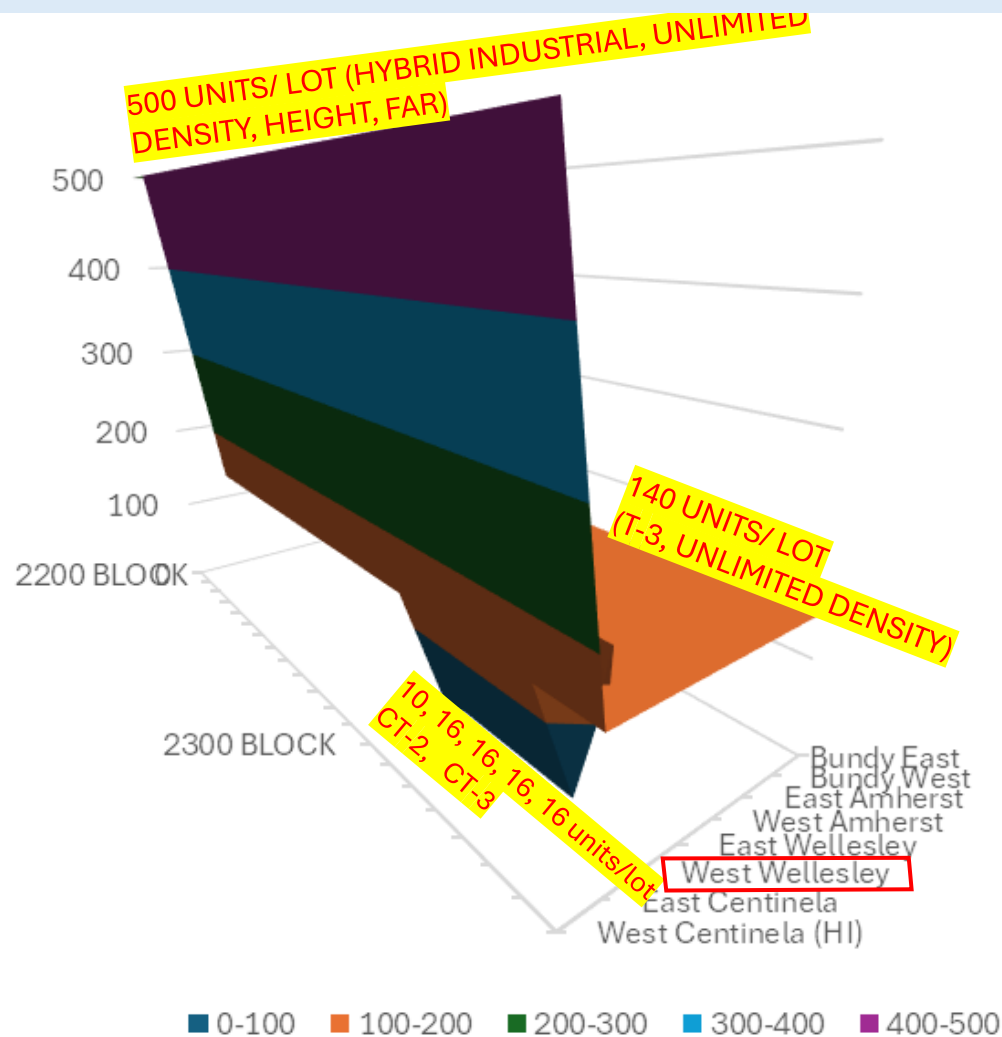
Large Density Disparity around Expo/Bundy Transit area (TOI).

- 10 vs 140 across the street and around
- West Wellesley vs East Wellesley Ave. at 2300 Block



# Island of Low density surrounded by Extremely High density (Disparity)

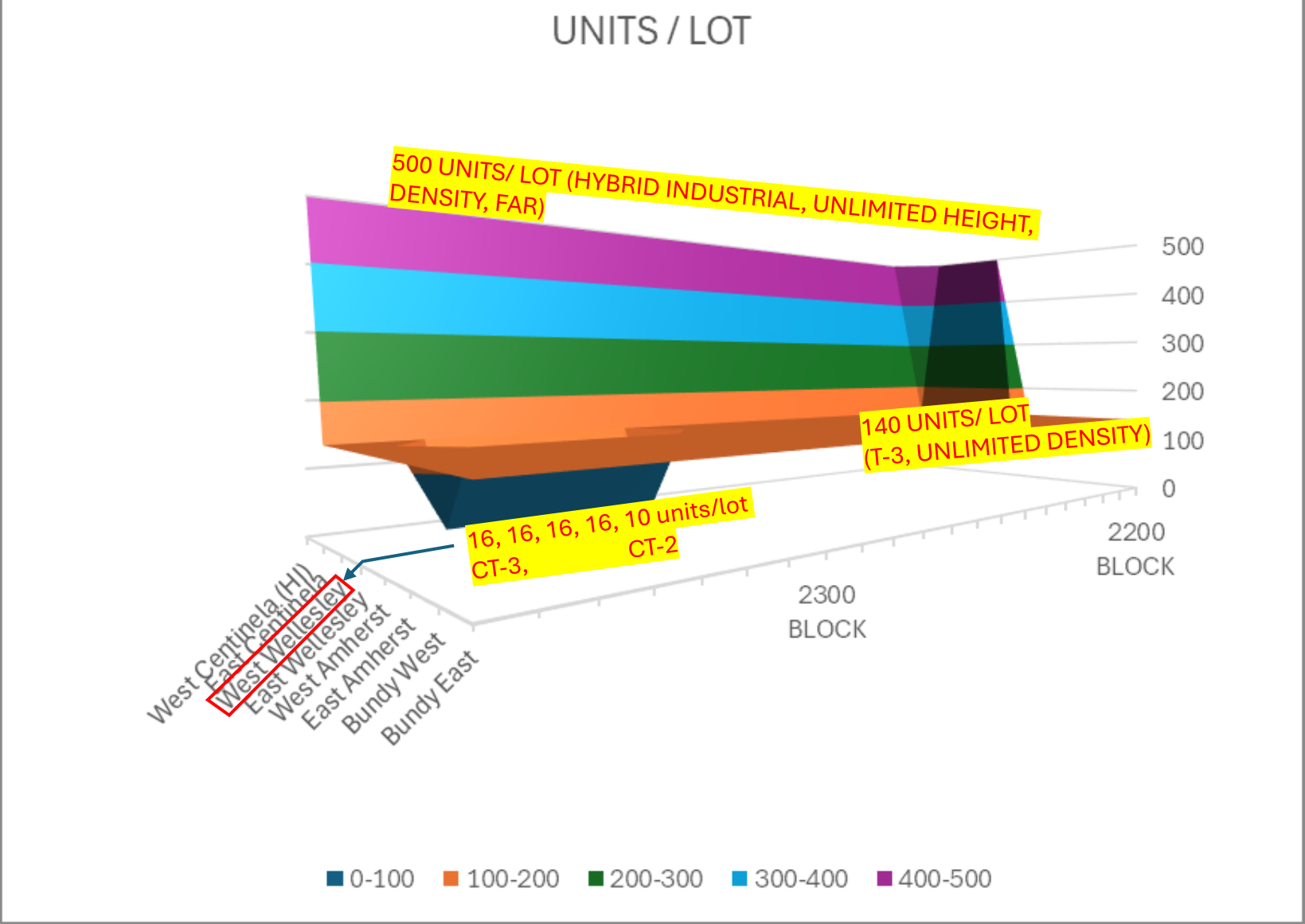
UNITS / LOT



**'ISLAND' of 5 R2/RD3 lots 10 units/lot surrounded by over 140 units per lot with R3, RAS4 and Hybrid Industrial (HI) zoning.**



# Island of Low density surrounded by Extremely High density (Disparity)



# TOPIC #2

Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

2) Remove underlying minimum of 5 for Transit Oriented Incentive Area (TOIA) as this requirement is not required for Opportunity Corridors Incentive Area (OC)

Transit Oriented Areas in  
High opportunity areas,  
Density is Limited only by  
floor area + get 33'  
additional height+ FAR 45%

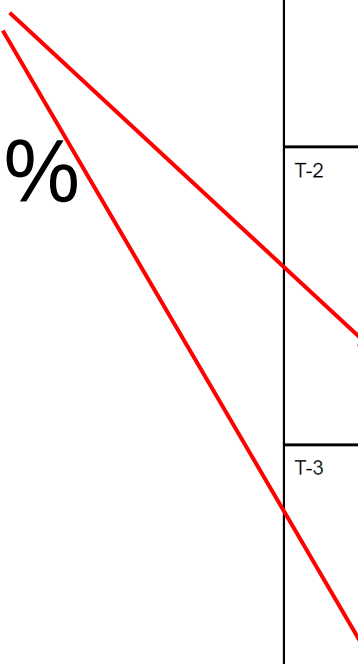


Table 12.22 A.38(e)(2)(i)				
Eligibility Subarea	Density Bonus	Parking	Floor Area Ratio (FAR)	Height
	In each subarea, the maximum increase in the otherwise Maximum Allowable Residential Density shall be as follows:	In each subarea, the required parking ratio shall be as follows: <sup>1 2 6</sup>	In each subarea, the maximum allowable FAR shall be as follows: <sup>3 4</sup>	In each subarea, the maximum allowable height permitted shall be equal to the following: <sup>5</sup>
T-1	Moderate and Lower Opportunity Areas: 100%	No parking minimum required. If parking is provided, up to 40% of spaces may be provided as compact vehicular spaces. Tandem parking may also be permitted so long as a 24-hour attendant is present on-site.	R - zones: 40% increase.	One additional story, up to 11 additional feet.
			C - zones: 3.25:1, or 40% increase, whichever is greater.	
	Higher Opportunity Areas: 120%		R - zones: 40% increase.	
			C - zones: 4.2:1, or 45% increase, whichever is greater.	
T-2	Moderate and Lower Opportunity Areas: 110%		R - zones: 40% increase.	Two additional stories, up to 22 additional feet.
			C - zones: 4.2:1, or 50% increase, whichever is greater.	
	Higher Opportunity Areas: Limited by Floor Area		R - zones: 45% increase.	
			C - zones: 4.5:1, or 50% increase, whichever is greater.	
T-3	Moderate and Lower Opportunity Areas: 120%		R - zones: 45% increase.	Three additional stories up to 33 additional feet.
			C - zones: 4.5:1, or 50% increase, whichever is greater.	
	Higher Opportunity Areas: Limited by Floor Area		R - zones: 50% increase.	
			C - zones: 4.65:1, or 55% increase, whichever is greater.	

# But Exceptions for limiting density for sites less than base 5 units

## Section (e) (2)(i) Exceptions on Page 64

### Exceptions:

a. Sites with a Maximum Allowable Density of less than 5 units, shall be eligible for Density Bonus of:

- i. T-1: 60%
- ii. T-2: 70%
- iii. T-3: 80%

b. Sites with a Maximum Allowable Density of less than 5 units are not eligible to increase FAR or height.

But these Exceptions DO NOT exist for Opportunity Corridors

#### Footnotes:

1 Required automobile parking applies for all Residential Units in a Project (not just the restricted affordable units), inclusive of disabled and required guest parking, where applicable. All parking spaces provided shall comply with Subdivision 12.21 A.5 of the Code. Except that any combination of standard, compact or tandem spaces may be provided. Tandem parking spaces that do not comply with Subparagraph 12.21 A.5(h)(2) of the Code may be provided in any configuration as long as a parking attendant or an automated parking system is provided at all times.

2 Pursuant to California Civil Code Section 1947.1, provided parking shall be sold or rented separately from the units in properties with 16 or more units, as verified by the Los Angeles Housing Department.

3 The maximum increase in the allowable FAR permitted shall be equal to the table above, provided that any additional floor area provided through this Paragraph is utilized only by residential uses. Any nonresidential uses shall be limited to the FAR associated with a site's underlying zoning prior to the application of any Incentive.

4 For the purpose of applying this incentive, commercial zones include Hybrid Industrial zones, Commercial Manufacturing zones and any defined area in a Specific Plan or overlay district that allows for both commercial uses and residential uses.

5 The increase in height shall be applicable to a Project over the entire project site regardless of the number of underlying height limits. The height increase may be applied to the maximum allowable height in feet or stories permitted by the zone, including for mixed-use Projects.

6 Consistent with California Government Code Section 65915(p)(4), required parking spaces provided allowable may be uncovered.

#### (i) Exceptions.

a. Sites with a Maximum Allowable Residential Density of less than 5 units shall be eligible for the following Density Bonuses:

- i. T-1: 60%
- ii. T-2: 70%
- iii. T-3: 80%

b. Sites with a Maximum Allowable Residential Density of less than 5 units, Designated Historic Resource(s), or Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code shall not be eligible for an incentive to increase allowable FAR or height above one additional story, up to 11 additional feet.

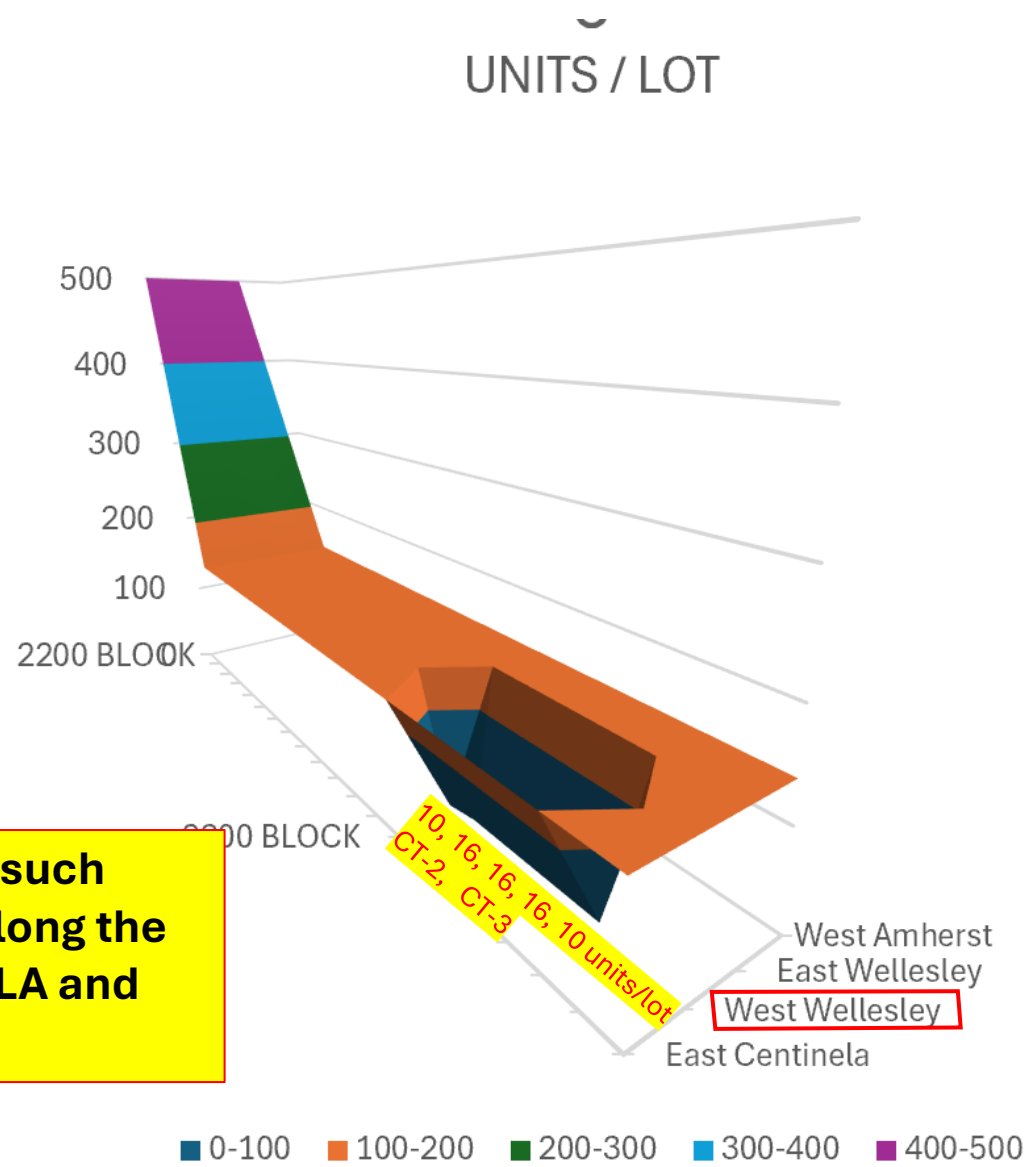
# Because these Exceptions (<5) DO NOT exist for Opportunity Corridors

- Opportunity corridors with R2, RD3, RD1.5, etc are treated equally and uniformly with respect to Density, FAR and Height as R3 and higher zoned areas.
- This Produces uniform density, FAR, Height application across multi-family lots, reducing Disparity.

Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

2) Remove underlying minimum of 5 for Transit Oriented Incentive Area (TOIA) as this requirement is not required for Opportunity Corridors Incentive Area (OC)

# Example of Disparity of density near Expo/Bundy Transit



**This is one example. Many such Disparities may be found along the many Transit Stops across LA and can be avoided**





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## Request to CPC re: Citywide Housing Incentive Program (CHIP) Ordinance: CPC-2023-7068-CA

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Ron Prasanna <rangapras@gmail.com>

Fri, Sep 20, 2024 at 6:31 PM

To: Housing Element <housingelement@lacity.org>, cpc@lacity.org

Cc: Erika Cui <erika.cui@lacity.org>, Arthi Varma <arthi.varma@lacity.org>, Blair Smith <blair.smith@lacity.org>, mira prasanna <mira.prasannas@gmail.com>, matthew.glesne@lacity.org

Thanks Christine Bustillos !

### Dear CPC members and Planning Team:

First, thanks to everyone for their tireless efforts to provide much needed housing to Los Angeles.

Reading through EXHIBIT A.1: Citywide Housing Incentive Program Ordinance, making the requested modifications will help reduce Disparities in Density, FAR and Height between close neighbors living near Major Transit and help maximize the production of housing units, reduce animosity of living in a 2 story building surrounded by 7 or 8 story buildings of living in a low density building across a hyper dense building for example, and bring equity and harmony to those communities in Transit Oriented Areas. Find attached slides highlighting the issues faced and Requested Changes (copied below):

### Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

- 1) Award similar 'proximity' rights to Transit Oriented Incentive Area (TOIA) as awarded to Opportunity Corridors Incentive areas (OC)
- 2) Remove underlying exception of minimum of 5 for Transit Oriented Incentive Area (TOIA) as this exception is not required for Opportunity Corridors Incentive Area (OC)

I am available to present this to anyone in the team or at the Sept 26 CPC presentation. Please let me know.

Thank you very much.

regards,  
Ron Prasanna  
West LA

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On Wed, Sep 18, 2024 at 10:04 AM Housing Element <housingelement@lacity.org> wrote:

Hi Ron,

Thank you for your email. Please note that the public comment period for the Housing Element Rezoning Program Ordinances, including the Citywide Housing Incentive Program (CHIP) Ordinance, Housing Element Sites and Minimum Density Ordinance, and Resident Protections Ordinance, closed on Monday, August 26, 2024 at 5:00p.m. Apologies for any misinformation or confusion about this date. At this time, any written comments with the applicable case number in the subject line may be submitted to [cpc@lacity.org](mailto:cpc@lacity.org) for consideration by the City Planning Commission. Please see below for case numbers associated with each draft ordinance.

Citywide Housing Incentive Program (CHIP) Ordinance: CPC-2023-7068-CA

Housing Element Sites and Minimum Density Ordinance: CPC-2024-387-CA

Resident Protections Ordinance: CPC-2024-388-CA

As a reminder, the above ordinances will be considered by the CPC on Thursday, September 26, 2024. To review the agenda for the upcoming CPC meeting, please click [here](#). To review City Planning's staff recommendation report and supporting materials, click [here](#).

Thank you,



**Housing Element Staff**  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



On Tue, Sep 17, 2024 at 11:39 AM Ron Prasanna <[rangapras@gmail.com](mailto:rangapras@gmail.com)> wrote:

Hi Erica: see email below from Rose Kato who is working closely with Cesar and helped run several petition campaigns in West LA.

Has the deadline for feedback been extended till Sept 20 as stated below ?

Also, the petitions need to have just the First Name, Last Name and Email address, with no physical address ? The reason I ask is the following petition drive to all the Council Members can be coming from people who are not living in that Council District. It could even come from out of state or out of the country (think BOTs).

Is there an address attached to a petition? If I click any of the links below, it only asks for Name and Email? Is there a way to ascertain that the Petitions are reasonably equally distributed across all council districts, to ensure proper representation across LA county?

Are these petitions public data? if so, I have SQL query skills to quickly analyze any repetition and zip code locations to assess the petitions are roughly equally distributed across all Council Districts, and prevent any smaller group from determining the positions of everyone in LA county.

In addition, Matthew Glesne was in a meeting where the preservation of Sawtelle JapanTown was pitched at a downtown meeting.. He may also know the background of this request and how it became LA County wide petition.

much regards and glad to help analyzing petitions for equitable distribution across Council Districts.

- Ron Prasanna

----- Forwarded message -----

From: R K <[rmkato1516@hotmail.com](mailto:rmkato1516@hotmail.com)>

Date: Fri, Sep 13, 2024 at 8:34 PM

Subject: NEW DEADLINE to LEVEL THE PLAYING FIELD - FRIDAY, SEPT 20

To: R K <[rmkato1516@hotmail.com](mailto:rmkato1516@hotmail.com)>

## **NEW DEADLINE to LEVEL THE PLAYING FIELD: FRIDAY, SEPT 20**

**WE ASK FOR YOUR SUPPORT of this petition that would equitably distribute density based on street width across LA...** that would relieve pressure for all of Sawtelle (and other historic ethnic minority neighborhoods) and would protect the R2s because those streets are Collector streets (even Sawtelle Blvd.).

This petition would help lighten the unfair burden placed on ethnic minority communities through the Citywide Housing Incentive Program (CHIP). It would make the Interim Control Ordinance (ICO) easier because the load would be reduced.

[https://planning.lacity.gov/odocument/a38fe378-2c4b-4260-807e-af66a053a95b/FD\\_CHIP\\_Fact\\_Sheet.pdf](https://planning.lacity.gov/odocument/a38fe378-2c4b-4260-807e-af66a053a95b/FD_CHIP_Fact_Sheet.pdf)

Citywide Housing Incentive Program's (CHIP) exempts R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 further drives displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to 'meet' the City's housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive

deed restrictions. Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities.

**This also proposes a 50% sidewalk tree canopy standard for a climate resilient L.A.**

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously shouldered environmental injustices. Tree shade reduces surface temperatures between 22-54°F. It save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. Preserve the existing canopy and expand tree coverage and affordable homes along our corridors.

- **CHIP pre-empts the Community Plan Updates and will densify non-R1 zones beyond what the Community Plan Updates envision by Feb. 2025\***. CHIP crushes historic ethnic minority communities **WELL BEFORE** Community Plan Updates ever happen.
- **R1s got a TOTAL exemption from ED 1 and ALL of the CHIP—all other zoning categories are forced to shoulder the housing burden.**
- This petition removes the exemption from R1s on streets as big as Pico or larger in exchange for exemptions of R2s on streets as big as Barrington or smaller.
- **This petition would protect both R1s and R2s on smaller streets--but upzone them on the really large streets.**
- This petition would determine density by **STREET SIZE--NOT BY ZONING CATEGORY** alone.
- **It would mean historic ethnic neighborhoods get protected by Feb. 2025.**
- **It also asks for a 50% sidewalk tree canopy standard because setbacks are easier to do on wider streets.**

PLEASE urge City Council to motion to include in the CHIP, R1 lots on high opportunity corridors classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller streets to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

L.A. cannot become affordable by providing a complete and total exemption to its largest residential zoning category. Help prevent an extremely inequitable CHIP. **Incentivize multifamily homes on R1 lots on opportunity corridors with a public tree canopy standard for all.**

**This is a realistic compromise that would be better than dumping everything on the R2s and R3s on Collector streets. It asks L.A. City to zone based on the size of the street--not entirely on pre-existing zoning.**

**The goal is to exempt R2s on SMALL COLLECTOR streets by including every lot on LARGE corridors even R1s...**

**The CHIP deadline for comments has been extended to FRI, SEPT 20.**

**\* Each signed petition sends a powerful message to Mayor Karen Bass, each petitioner's Council District member and City Planning/Director Vince Bertoni.**

NOTE: For family, friends, etc. who reside in the other 14 Council Districts, petition links are listed below:

**Council District 1 - Councilmember Eunisses Hernandez**

<https://sawtellera.org/save-our-cd-1-l-a-environmentally-just-affordable-housing/>

**Council District 2 - Councilmember Paul Krekorian**

<https://sawtellera.org/save-our-cd-2-l-a-environmentally-just-affordable-housing/>

**Council District 3 - Councilmember Bob Blumenfield**

<https://sawtellera.org/save-our-cd-3-l-a-environmentally-just-affordable-housing/>

**Council District 4 - Councilmember Nithya Raman**

<https://sawtellera.org/save-our-cd-4-l-a-environmentally-just-affordable-housing/>

**Council District 5 - Councilmember Katy Yaroslavsky**

<https://sawtellera.org/save-our-cd-5-l-a-environmentally-just-affordable-housing/>

**Council District 6 - Councilmember Imelda Padilla**

<https://sawtellera.org/save-our-cd-6-l-a-environmentally-just-affordable-housing/>

**Council District 7 - Councilmember Monica Rodriguez**

<https://sawtellera.org/save-our-cd-7-l-a-environmentally-just-affordable-housing/>

**Council District 8 - Councilmember Marqueece Harris-Dawson**

<https://sawtellera.org/save-our-cd-8-l-a-environmentally-just-affordable-housing/>

**Council District 9 - Councilmember Curren D. Price, Jr.**

<https://sawtellera.org/save-our-cd-9-l-a-environmentally-just-affordable-housing/>

**Council District 10 - Councilmember Heather Hutt**

<https://sawtellera.org/save-our-cd-10-l-a-environmentally-just-affordable-housing/>

**Council District 11 - Councilmember Traci Park**

<https://sawtellera.org/save-our-cd-11-l-a-environmentally-just-affordable-housing/>

**Council District 12 - Councilmember John Lee**

<https://sawtellera.org/save-our-cd-12-l-a-environmentally-just-affordable-housing/>

**Council District 13 - Councilmember Hugo Soto-Martinez**

<https://sawtellera.org/save-our-cd-13-l-a-environmentally-just-affordable-housing/>

**Council District 14 - Councilmember Kevin de Leon**

<https://sawtellera.org/save-our-cd-14-l-a-environmentally-just-affordable-housing/>

**Council District 15 - Councilmember Tim McOsker**

<https://sawtellera.org/save-our-cd-15-l-a-environmentally-just-affordable-housing/>

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## 2 attachments



**Request CPC to Administer Similar Rights to Transit Oriented Area (T-1,2,3) as Opportunity Corridor I Areas (OC-1, 2, 3).pdf**

1424K



**EXHIBIT A.1 - Citywide Housing Incentive Program Ordinance.pdf**

3370K

West of Westwood  
Homeowners Association

September 23, 2024

City Planning Commission

RE: CPC-2023-7068: Draft 3 CHIP/Housing Element Rezoning Plan

I am writing on behalf of the West of Westwood HOA (WOWHOA) representing 1200 households in Rancho Park.

We have been following the Housing Element Rezoning process very closely.

After much research, and attending events and meetings that the planning department discussed the Housing Element Rezoning, we feel very strongly that the city can meet the state housing obligations mandate without rezoning any residential neighborhoods. As you know, state law currently allows 4 units of housing per lot.

Commercial corridors that run through all the high resource areas of the city have been identified. Every community can create new vibrant affordable neighborhoods on existing commercial properties.

We support Draft #3 that places density on our commercial corridors. There is plenty of capacity in LA to meet our housing needs while still protecting existing RSO multi-family neighborhoods, single-family, our HPOZs that are the historic heart of our city, and our vulnerable communities in high fire and coastal zones.

Thank you for your time and consideration.

*Terri Tippit*

Terri Tippit, President

Cc: Councilwoman Katy Yaroslavsky, CD5  
Westside Neighborhood Council



September 23, 2024

Los Angeles City Planning Commission  
c/o Los Angeles Department of City Planning  
200 North Spring Street  
Los Angeles, CA 90012

**Re: Recommendations for the Citywide Housing Incentive Program**  
**September 26, 2024 Hearing: CPC-2023-7068-CA, Agenda Item Number 7**

Dear President Lawshe and Honorable Commissioners,

This coalition of the undersigned organizations represents thousands of individual and organizational members in Los Angeles who collectively advocate for greater housing production to address our region's severe housing affordability crisis, which is rooted in decades-long failure to build enough homes to meet the substantial need for housing. As a result of the housing shortage, Los Angeles has extremely unfavorable conditions for renters and aspiring homeowners. Among large cities in the United States, Los Angeles consistently has the highest levels of homelessness, rent burdened tenants, and overcrowding and the lowest rates of homeownership. As summarized in the City's Housing Element adopted in 2021:

"Angelenos pay more of their income on housing, live in more overcrowded conditions, and have the highest rates of unsheltered homelessness of any city in the country. Almost half of all households struggle to pay their rent and mortgage, with more than a third of renters spending half their paycheck on rent. . . . This shortage has developed primarily since the 1980s, as the population in Los Angeles grew much faster than the creation of new housing. Downzonings during this period limited the land area and intensities at which housing could be built."

Los Angeles needs to act with urgency and resolve to produce more housing at all income levels. United with this goal in mind, our coalition is focused on ensuring that the proposed Citywide Housing Incentive Program (CHIP) maximizes the potential for creating new housing in LA.

Our coalition submitted a letter in July 2024 to the Department of City Planning to offer recommendations on the prior version of the CHIP, based on technical guidance provided in partnership by Urban Land Institute Los Angeles' (ULI-LA) members who have unparalleled expertise and experience with planning, land use and development in LA. Our recommendations in that letter focused on key areas the CHIP could be amended to support the financial feasibility of projects and depoliticization of planning decisions in our city, ultimately with the goal of realizing the full potential of the CHIP to yield substantial new affordable and mixed-income housing across all of the city's neighborhoods, particularly in



high-resource areas. Several of our most important recommendations were incorporated in the current version of the CHIP that has been presented to you.

**We appreciate the Department of City Planning incorporating many of our most important recommendations. We are writing to ask that you preserve these provisions as you consider and vote on the CHIP. Additionally, we suggest five additional areas that we believe the CHIP can further be refined to maximize the potential for the CHIP to produce new housing, ensuring its provisions yield financially feasible projects and that its approval pathways are clear, predictable and streamlined and protect against potential politicization of development.**

We recognize that the CHIP is a complex program that includes multiple incentive programs within it. It will serve as the successor to the most important housing production tools that currently exist in the city: the Density Bonus (DB) and the Transit Oriented Communities (TOC) programs. It will impact the entire city, and beyond this, there is a tight deadline for the CHIP to be enacted and useable by early next year or else the city will face significant consequences due to state law. We commend City Planning staff for the extensive outreach, genuine engagement and hard work they have done and continue to do to see through the adoption and implementation of the CHIP.

The CHIP contains many strong features to support mixed-income and affordable growth in our city. For example, it (i) creates an incentive program for mixed-income development in commercial corridors, (ii) increases density bonuses in the Mixed-Income Incentive Program (MIIP), (iii) established pathways for streamlined ministerial approvals for mixed-income and 100% affordable projects, (iv) enables development in P zones in some instances, and (v) incentivizes multi-bedroom units. Additionally, staff has modified the CHIP in the most recent version before you to further strengthen its potential. **As such, we recommend preserving the following provisions:**

- **Not counting above-ground parking count as floor area;**
- **MIIP affordable set aside requirements in alignment with existing TOC requirements for lower market tiers;**
- **Affordable Housing Linkage Fee exemption for projects that provide MIIP-level affordability set asides;**
- **Project Review exemption for projects that provide MIIP-level affordability set asides;**
- **More nuanced Environmental Protection Measures rather than the previously blunt approach to Environmental Consideration Areas;**
- **Expanded Administrative Review as no longer appealable and with an optional hearing;**
- **Allowing one waiver under the Affordable Housing Incentive Program (AHIP) through Expanded Administrative Review rather than discretionary review;**
- **Eliminating the potential for appeals for discretionary waiver cases at City Planning Commission; and**
- **Enabling FAR and story incentives for projects with 10% of total units set aside for multi-bedroom units (instead of 20% proposed in prior versions).**

Our coalition called for many of these provisions and we are grateful for their inclusion. They are crucial to creating the best framework for financially viable development to occur under the CHIP and to realize the outcomes envisioned by the CHIP.

**Relatedly, we also agree with the Department's findings that a 2-to-1 replacement requirement under the Resident Protections Ordinance (RPO) for units subject to the Rent Stabilization Ordinance (RSO) would not be economically feasible and would be a considerable barrier to the creation of the new housing at all income levels.** We note that the RPO includes extensive resident protections for tenants in RSO buildings and that the 2:1 replacement requirement, in addition to impeding needed housing production, will not provide additional protection to those tenants.

Beyond preserving the provisions outlined above, we offer five additional areas the CHIP can be further strengthened:

**1. Provide the DB Program with the Same Level of Benefits as the MIIP and AHIP Programs.**

The DB program is one of our most effective tools for mixed-income housing production yet, under the CHIP, it is at a great disadvantage compared to the MIIP and AHIP. As proposed, DB projects requesting a single waiver are precluded from using the Expanded Administrative Review procedure. In addition, MIIP and AHIP receive more incentives than a typical DB project. The on-menu FAR bonus is substantially less than that of the MIIP and AHIP. The DB program allows 3 Public Benefit Options (childcare facility, commercial project providing off-site affordable units, and multi-bedroom unit). In contrast, the MIIP and AHIP provide 7 different Public Benefit Options. The severity of the housing crisis requires an “all hands on deck” approach and the DB program should not be restricted.

**Recommendation:** As noted below, the DB program should be afforded (i) up to 3 waivers before Expanded Administrative Review is not available, and (ii) up to five Additional Incentives or one off-menu incentive. In addition, the DB program should include the same 7 Public Benefit Options as the other CHIP programs and have the same on-menu FAR incentive.

**2. Increase the FAR Incentives.**

The CHIP presents an excellent opportunity to expand the DB and TOC programs to maximize their potential for producing mixed-income housing. However, the FAR incentives are too low to be effective in optimizing the construction of projects using Type IIIA (i.e., wood frame construction with fire rated improvements on a reinforced concrete podium also known as “5 over 2”) over Type I construction mid-rise buildings.

A. Density Bonus. Under the City’s current density bonus ordinance, the on-menu FAR incentives include (i) an increase in FAR equal to the density bonus percentage (not to exceed 35%), or (ii) up to a 3.0 FAR in commercial zones. For DB projects in the CHIP, the on-menu FAR incentive for projects in C zones has been retained as the greater of (i) the density bonus percentage (not to exceed 35%), or (ii) 3.0, but only if the project is within one-half mile of a Major Transit Stop. (See *proposed* LAMC 12.22.A.37(f)(2)(ii).) This requirement to be within one-half mile of a Major Transit Stop is redundant with the Transit Oriented Incentive program and will force many projects to seek off-menu incentives for FAR, especially considering that projects can now receive up to 100% density bonus under state law. Without adequate available FAR, the additional density cannot be achieved under the on-menu alternative. The density bonus law has proven to one of the City’s most important tools for producing mixed-income housing and, due to our housing crisis, it should be expanded substantially.

**Recommendation:** The on-menu FAR should be increased to at least 4.5 for both C and multi-family R zones, and without a requirement for proximity to a Major Transit Stop.

B. Transit Oriented Incentive. For Transit Oriented Incentive projects, the maximum FAR in C zones ranges between 3.25 in Tier 1 to 4.65 in Tier 3 and in multifamily R zones the FAR increases between 40% and 45%. For projects in the Opportunity Corridor Incentive areas, the FAR in the C zones ranges between 4.5 and 4.8 and in R zones the FAR increases are between 45% and 60%. These FARs are also too low, particularly in light of the density bonuses ranging between 100% and 120% in the Transit Oriented Incentive areas and the unlimited density in the Opportunity Corridors, and will limit the feasibility of some projects. In addition, the CHIP reconfigures the geography of the four tiers in the TOC, eliminating Tier 4 and expanding Tier 1 and constricting Tiers 2 and 3. (*Proposed* LAMC, Tables 12.22.A.38(e)(2) and 12.22.A.38(f)(2).)

**Recommendation:** The FARs in Tiers 1 through 3 should be increased further. The FAR in C and R zones should be increased to at least 4.5 in Tier 1, 5.0 in Tier 2 and 5.5 in Tier 3. In the Opportunity Corridor program, the FAR in the C and R zones should be increased to at least 4.5 in OC-1 and to at least 5.5 in OC-2 and OC-3.

### **3. Maximize the Availability of Ministerial Procedures.**

As shown by the success of Executive Directive 1, streamlined ministerial approval procedures dramatically reduce processing time and increase certainty. Shortening delays in the entitlement process can reduce carrying costs and enhance project feasibility. This ministerial treatment is critically important to successfully incentivizing mixed-income housing because it reduces uncertainty and speeds the development process. Some aspects of the CHIP, however, will cause projects that should be able to use a ministerial procedure to instead be forced into a discretionary process.

Additionally, the CHIPs procedures are not uniform across programs. For example, for DB projects, even one waiver triggers this City Planning Commission review (CPC). For MIIP projects, the use of more than one waiver and for AHIP projects more than three waivers triggers this requirement. In most cases, due to the Housing Accountability Act and state density bonus law, the CPC will not have the discretion to disapprove the projects. Besides, waivers of development standards are ministerial in nature and are routinely handled administratively.

With respect to incentives, an eligible Transit Oriented Incentive project is allowed to use four Additional Incentives (on-menu) or one incentive to gain relief from an off-menu development standard. A project in the AHIP is allowed to use five Additional Incentives or one off-menu incentive. By contrast, the DB program follows the State Density Bonus Law and allots the number of incentives in accordance with the level of affordability provided, which can yield only one incentive in many cases.

**Recommendation:** Any project under the DB or MIIP program should be able to use up to 3 waivers and be eligible for Expanded Administrative Review. Additionally, any project under the DB, MIIP or AHIP should be able to use up to five Additional Incentives or one incentive not on the menu of Additional Incentives.

### **4. Eliminate the Increases in the MIIP's Affordability Requirements in the High Medium and High Market Tiers.**

The CHIP creates a two-tiered structure for affordability requirements in the MIIP programs. For the projects in the High Medium and High Market Tiers under the Linkage Fee ordinance, the CHIP increases the set asides for the Transit Oriented Incentive and Opportunity Corridor Incentives by at least 30%. For example, the CHIP increases the ELI set aside to 11% in Tier 1 (from 8%), 12% in Tier 2 (from 9%), and 13% in Tier 3 (from 10%). (*proposed* LAMC, Tables 12.38.A(c)(3)(iii)). These increases will pose significant financial feasibility challenges for projects, prevent some projects from being developed and may inadvertently push development into lower-income neighborhoods.

**Recommendation:** Revise the Transit Oriented Incentive and Opportunity Corridor programs to a single tier system by eliminating the increased affordability requirements for the High Medium and High Market Tiers in their entirety.

### **5. Utilize the Transit Oriented Incentives in All Future Community Plan Updates.**

The staff report states that the Transit Oriented Incentive and Opportunity Corridor programs will not be available in community plan updates that will use the new zoning code (Chapter 1A) (i.e., all future community plans and those plans already reviewed by the City Planning Commission). This change will exclude significant areas of the City and substantially erode the benefits of the MIIP as new Community Plans are adopted. There is no reason that the MIIP cannot be adopted so that it applies in all Community Plan areas, including those to be adopted in the future. Given the severity of our housing crisis, we need an "all of the above" approach that presents as many options as possible for developing mixed-income housing.

**Recommendation:** Amend the CHIP so that it is applicable in all Community Plan updates adopted in the future by the City Council.

We believe these additional recommendations would build upon the most recent version of the CHIP and provide the robust tool that is needed to make significant progress on housing production. Again, we reiterate our gratitude to the Department of City Planning for heeding our prior recommendations and we appreciate the City Planning Commission's consideration of our comments. We welcome the opportunity to further discuss these concerns and recommendations.

Sincerely,



Nella McOsker  
President & CEO  
Central City Association



Corey Smith  
Executive Director  
Housing Action Coalition



Jessica Hencier  
Project Manager  
Craig Lawson & Co., LLC



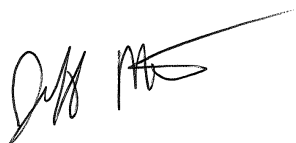
Maria S. Salinas  
President & CEO  
Los Angeles Area Chamber of Commerce



Annette Wu, AIA  
2024 President, AIA Los Angeles  
Principal, NAC Architecture



Alex Melendrez  
LA Organizing Manager  
YIMBY Action



Jeff Montejano  
CEO  
Building Industry Association of Southern California,  
Inc.



Mott Smith  
Board Chair  
Council of Infill Builders

cc: Housing Element Rezoning Team  
Ms. Blair Smith, [blair.smith@lacity.org](mailto:blair.smith@lacity.org)  
Ms. Theadora Trindle, [theadora.trindle@lacity.org](mailto:theadora.trindle@lacity.org)  
[housingelement@lacity.org](mailto:housingelement@lacity.org)

# **600+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT TO THE [CPC@LACITY.ORG](mailto:CPC@LACITY.ORG) INBOX FOR THE CITY PLANNING COMMISSION'S CONSIDERATION:**

## **Items 06-08:**

Case Nos. CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA

## **Subject Lines:**

CPC\_2023\_7068: Housing Element Rezoning

CPC\_2023\_7068: Housing Element Rezoning / Support for Draft #3

## **Message:**

Planning Commission,

I support Draft #3 which places density on our commercial corridors.

There is plenty of capacity in Los Angeles to meet our housing needs while still protecting existing RSO multi-family neighborhoods, single-family, our HPOZs that are the historic heart of our city, and our vulnerable communities in high fire and coastal zones.

I support the density of our commercial corridors where new vibrant neighborhoods can be created in each and every high-resource community.

All of us will be part of the solution to create affordable housing in LA



Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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**Alison Schur** <aschur@me.com>  
To: housingelement@lacity.org

Tue, Aug 27, 2024 at 10:04 PM

Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

Sent from my iPhone







Housing Element &lt;housingelement@lacity.org&gt;

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**Re: CPC-2023-7068-CA**

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**Anne Billingsley** <annebillingsley@ca.rr.com>  
To: housingelement@lacity.org

Tue, Aug 27, 2024 at 9:26 PM

Save Our Single Family, Historic & RSO Homes!

Re: CPC-2023-7068-CA

Dear Housing Element Team of the Planning Department,

I support the CHIP Ordinance / House Element June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Housing from being rezoned.

I am aware of the need for and support the creation of more affordable housing in Los Angeles.

I appreciate and support the thoughtful changes made, after the solicitation of public input, to the Housing Element, that protect single-family neighborhoods and focuses development in areas already zoned for increased density and along the hundreds of miles of underutilized commercial corridors in each of our communities. I acknowledge the collaborative work that led to these revisions including the recent decision which adheres to state-mandated time-of-ownership limits on development by Faith Based Organizations.

I oppose any revision to the June 2024 version of the Housing Element that would undo the protections afforded single-family neighborhoods, HPOZs and RSO housing from being up-zoned.

Thank you,

Anne Billingsley MD

330 S Las Palmas Ave

Los Angeles, CA 90020







**ari coine** <noreply@jotform.com>  
to me ▾

Fri, Sep 20, 7:12 PM (3 days ago)



### **Urgent Community Concern: Increased Density Proposal**

To the Los Angeles Planning Department,I am opposed to increased density in single-family neighborhoods and the construction of tall buildings adjacent to single-family properties. This increased density would be harmful to our communities.

Sincerely,

ari coine

[aricoine@gmail.com](mailto:aricoine@gmail.com)







Housing Element &lt;housingelement@lacity.org&gt;

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## HPOZ

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**Audrey Moruzzi** <audreymoruzzi@gmail.com>  
To: housingelement@lacity.org

Tue, Aug 27, 2024 at 4:56 PM

Dear Housing Element Team of the Planning Department,

I support the CHIP Ordinance/Housing Element June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Housing from being rezoned.

Of course I am aware of the need for and support the creation of more affordable housing in Los Angeles.

I appreciate and support the thoughtful changes made, after the solicitation of public input, to the Housing Element, that protect single-family neighborhoods and focus development in areas already zoned for increased density and along the hundreds of miles of underutilized commercial corridors in each of our communities.

I acknowledge the collaborative work that led to these revisions including the recent decision which adheres to state-mandated time-of-ownership limits on development by Faith Based Organizations.

I oppose any revision to the June 2024 version of the Housing Element that would undo the protections afforded single-family neighborhoods, HPOZs and RSO housing from being up-zoned.

Thank you.

Audrey Moruzzi

[1350 N Orange Grove Ave](#)

[Spaulding Square](#) HPOZ

Sent from my iPhone





Housing Element &lt;housingelement@lacity.org&gt;

## CHIP R1s on Avenue-I or larger [CPC-2023-7068-CA, CPC-2024-387-CA]

Azalia Dou &lt;azaliadev@gmail.com&gt;

Tue, Aug 27, 2024 at 5:26 AM

Reply-To: Azalia Dou &lt;azaliadev@gmail.com&gt;

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org

<p dir="ltr">尊敬的洛杉磯市規劃部及市議員Traci Park,

<p dir="ltr">我寫信是為了表達對於城市住房激勵計劃（Citywide Housing Incentives Program CHIP）的深切不滿。它排除了所有的R-1（single unit lots, Residential Zone 1 單一單位地）既然是住房激勵計劃，想要建造更多住房，新增建築物，然而卻不顧這些R-1位於寬大街道上，或者狹窄街道上。譬如：位於寬大街道上屬於R1, Avenue-1（如Pico Blvd）。CHIP它排除所有R1，因而，此時此刻，我們發現 R1.5, R2, 在小街道上迅速的被開發，而且快速地建造高密度低收入住宅公寓(high density affordable housing)。這種做法，祇顧幾十年前的土地分類 分區方法，卻不顧街道大小，是狹隘且偏頗的。這本質上是不公正的，因為，這些基於幾十年前的土地分類，分區，直接延續了"種族排他性契約限制"。相反的，洛杉磯必須在所有社區的寬闊大街道上，無例外地，進行密集開發低收入住宅公寓，才是正確的城市住房激勵計劃。 <p dir="ltr">我們需要CHIP 城市住房激勵計劃 沿高工作機會走廊，建造高密度，低收入住宅公寓，**包括 R1**。這一措施還必須將CHIP，與50%的行人道樹冠標準相結合，以種樹的樹蔭來降低溫度，減緩地球暖化，建立氣候適應力強的洛杉磯。那些經歷過熱，熱島效應的社區，往往是以前承受過舊有的土地分類，不公正的分區方法的脆弱社區。。樹蔭可以將地表溫度降低 22-54°F，對於減緩全球暖化，和拯救生命，至關重要。寬闊大街道上的地區，包括 R1 地段，最能同時容納樹冠和高密度低收入住宅公寓。我們必須保護現有的樹冠，同時沿著寬闊大街道走廊擴展樹蔭覆蓋，並提供經濟適用房，高密度低收入住宅公寓。 <p dir="ltr">我敦促您向市議會提出異議，將高工作機會走廊上屬於 Avenue-1 或更大範疇的 R1 地段納入 CHIP，並豁免 Avenue-2 或小街道上的 R2 地段，以減少歷史上紅線社區的人口密度壓力，和樹冠損失風險。洛杉磯必須保持其多元文化的歷史。洛杉磯不可能通過，完全豁免R1，其最多數的住宅分區(R1)類別，來實現開發，建造，高密度低收入住宅公寓。。我敦促您，盡全力強烈地抗議，防止一個極不公平的（Citywide Housing Incentives Program CHIP）CHIP 計劃。 <p dir="ltr">謹上， -- Azalia Dou  
[azaliadev@gmail.com](mailto:azaliadev@gmail.com)





Housing Element &lt;housingelement@lacity.org&gt;

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## Re: I OPPOSE All Three Draft Ordinances of Housing Element of General Plan Rezoning Program

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Planning SouthLA &lt;planning.southla@lacity.org&gt;

Tue, Aug 27, 2024 at 4:12 PM

To: Bill Evashwick &lt;bevashwick@yahoo.com&gt;, Planning South LA &lt;planning.southla@lacity.org&gt;, housingelement@lacity.org

Good Afternoon,

Questions and comments on the Citywide Housing Incentive Program Ordinance can be submitted to:  
[housingelement@lacity.org](mailto:housingelement@lacity.org).

South Los Angeles Development Services Center

On Sun, Aug 25, 2024 at 12:18 PM 'Bill Evashwick' via Planning South LA <[planning.southla@lacity.org](mailto:planning.southla@lacity.org)> wrote:

Dear Los Angeles City Planning Department: I OPPOSE the above draft ordinances. Here's why:

1. Our neighborhoods are already crowded enough. The idea of "Minimum Density" is simply a way for developers to make more money.
2. The city's infrastructure is already pushed to the limit. We don't need more housing.
3. L.A.'s population is declining. We don't need more giant apartment buildings

Bill Evashwick









Carol Selimah Nemoy <noreply@jotform.com>

to me ▾

Aug 27, 2024, 9:36 AM



### **Urgent Community Concern: Increased Density Proposal**

To the Los Angeles Planning Department, I am opposed to increased density in single-family neighborhoods and the construction of tall buildings adjacent to single-family properties. This increased density would be harmful to our communities.

Sincerely,

Carol Selimah Nemoy

[selimahn@yahoo.com](mailto:selimahn@yahoo.com)





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## Strengthen the CHIP ordinance to boost housing production in LA!

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**Christopher Rhie** <chris.rhie@everyactioncustom.com>

Tue, Aug 27, 2024 at 1:31 PM

Reply-To: chris.rhie@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write to you to express my deep frustration that the revision of the Citywide Housing Incentive Program (CHIP) Ordinance continues to exclude single family zone parcels - 72% of the city - from the proposed incentive programs. The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also appreciate certain revisions City Planning has made to the ordinance, including wider geographic eligibility for the Opportunity Corridor Transition Areas. Unfortunately, the most substantial changes in the latest draft add new restrictions across the multiple programs and geographies in the ordinance. Overall, the revised CHIP ordinance would make it even more difficult to accommodate an additional 200,000 new homes, equitably distribute new housing across the city, and prevent displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for key changes to the CHIP.

Specifically, I urge the City to allow all CHIP incentive programs in single-family zones. Making single-family zoned parcels in highest and high opportunity areas eligible for incentive programs is of particular importance, as these areas are rich in jobs, public investments, and services, and have historically excluded Angelenos of color and lower income Angelenos. I appreciate that City Planning has made improvements to the Opportunity Corridor Transition Area program, but please go further by eliminating the CT-1 and CT-2 subareas and expanding CT-3 to at least a quarter-mile from the rear property lines of parcels abutting the corridors.

Not only does the revised ordinance fail to make meaningful improvements on housing equity; the revision actively makes the ordinance less equitable by completely exempting the Coastal Zone from the Mixed Income Incentive Program and adding new limitations to incentives in historic districts. Furthermore, the rolling back of unlimited density incentives in the upper tiers of the Transit Oriented Incentive Area program, and FAR and height incentives for the State Density Bonus Program will drive further displacement as a greater number of existing multifamily parcels will need to be redeveloped to meet the need for more housing.

The rezoning program offers a once in a generation opportunity for the city to build a future where all Angelenos enjoy access to opportunity and are able to live in the neighborhoods of their choice. I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles - near transit and in high opportunity communities - and for creating new streamlined processes to deliver new housing. But walling off single family neighborhoods from these programs reinforces exclusionary zoning and hobbles their effectiveness. I stand with Abundant Housing LA in urging the City of Los Angeles to undo these historic wrongs.

Sincerely,

Sincerely,  
Christopher Rhie  
Los Angeles, CA 90041-3497  
[chris.rhie@gmail.com](mailto:chris.rhie@gmail.com)





Housing Element <housingelement@lacity.org>

Re: Urgent Community Concern: Increased Density Proposal -

David Kervella <davidkervella@gmail.com>  
To: Housing Element <housingelement@lacity.org>

Tue, Aug 27, 2024 at 1:07 PM

Hello,

I am sorry you are experiencing challenges with your system. In responding to the survey, I declared that I am opposing the proposal to increase the density of our neighborhoods. Please do not increase the density as it is already overpopulated as is.

I am happy to provide more information if needed.

Thank you,

David

On Mon, Aug 26, 2024 at 12:23 PM Housing Element <housingelement@lacity.org> wrote:  
Hello,

Thank you for your email. We are unable to view your comment in the format it was delivered. Please re-send your comment as a response to this email thread, and we will ensure that it is added to the appropriate case file and taken into consideration as we continue to refine our draft ordinances. If you have any questions, please let us know.

Thank you,



**Housing Element Staff**  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



On Sat, Aug 24, 2024 at 4:06 PM David Kervella <noreply@jotform.com> wrote:



Urgent Community Concern: Increased Density Proposal

Name	David Kervella
E-mail	davidkervella@gmail.com









Housing Element &lt;housingelement@lacity.org&gt;

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## MIRACLE MILE REZONIING

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**Delane Vaughn** <vaughndelane5@gmail.com>

Tue, Aug 27, 2024 at 7:21 AM

To: housingelement@lacity.org

Case File CPC -2023-7068-CA.

Dear Planning Department,

I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single - family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

I have lived in this neighborhood for over 40 years. It's called Miracle Mile for a reason. Because it is truly a special and unique place to live.

Please save Single Family, RSO's and Historic Neighborhoods. They are some of LAs greatest assets and the reason people move to and to stay

in LA. By rezoning underutilized adjacent commercial corridors to allow for more housing we can create vibrant neighborhoods/communities for everyone.

without destroying what we already have. Data shows that we can protect our existing residential and historic areas and still meet affordable housing needs.

Our communities have worked hard to show where more housing could be added in each neighborhood. Answering the Mayor's call to solve the housing crisis.

I strongly recommend that the city Council approve the current Planning Department's proposed revisions to the Housing Element and CHIP program.

Thank-you

Roy Vaughn  
[5569 West Olympic Blvd.](#)

[Miracle Mile](#) Neighbor

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Housing Element <housingelement@lacity.org>

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## Keep single family neighborhoods

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**DonMar** <donmar395@gmail.com>  
To: housingelement@lacity.org

Tue, Aug 27, 2024 at 9:42 AM

I'm a resident of Shadow Hills (Sunland), CA.

Re: Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned for higher density."

Don Dunham,  
Esq.  
Tel. 818 446-0457





Housing Element <housingelement@lacity.org>

Re: Urgent Community Concern: Increased Density Proposal -

Donna Reilly <1darrick@mindspring.com>  
To: Housing Element <housingelement@lacity.org>

Tue, Aug 27, 2024 at 11:12 AM

Mu husband, George and I are completely against denser housing. Keep Valley Village clean from developers. Thank you.

On 8/26/2024 12:13 PM, Housing Element wrote:

Hello,

Thank you for your email. We are unable to view your comment in the format it was delivered. Please re-send your comment as a response to this email thread, and we will ensure that it is added to the appropriate case file and taken into consideration as we continue to refine our draft ordinances. If you have any questions, please let us know.

Thank you,



**Housing Element Staff**  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



On Mon, Aug 26, 2024 at 11:40 AM Donna Reilly <noreply@jotform.com> wrote:



Urgent Community Concern: Increased Density Proposal

Name	Donna Reilly
E-mail	1darrick@mindspring.com







Housing Element &lt;housingelement@lacity.org&gt;

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**Re: CPC-2023-7068-CA**

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**Sean Silva** <sean.silva@lacity.org>

Tue, Aug 27, 2024 at 9:11 AM

To: Linda Reynolds &lt;LReyn@outlook.com&gt;, Housing Element &lt;housingelement@lacity.org&gt;

Hi Linda,

Thanks for your email and for your engagement.

The [Housing Element Rezoning Program draft ordinances](#), which include the Citywide Housing Incentive Program (CHIP) Ordinance, Housing Element Sites and Minimum Density Ordinance, and Resident Protections Ordinance, are managed by the Housing Element team. I've copied them here so they can record your comments.

Please don't hesitate to reach out with any further questions, comments, or concerns.

All the best,  
Sean

**Sean Silva** | Deputy, Venice | Planning Liaison**Office of Councilwoman Traci Park** ★ 11th District**WESTCHESTER:** 7166 W. Manchester Ave, LA, CA 90045

(310) 568-8772 TEL |



\*PLEASE NOTE: E-mail correspondence with the Office of Councilwoman Traci Park may be subject to public disclosure under the California Public Records Act. (including attachments) \*

On Mon, Aug 26, 2024 at 1:03 PM Linda Reynolds &lt;LReyn@outlook.com&gt; wrote:

Sean Silva,

We support more housing and we support it on our commercial corridors. We have enough capacity to build all the housing we need by just staying on these commercial corridors which run through all our high resource communities. We can create housing for people in all our communities while protecting all the housing that already exists. We support Draft #2 of the CHIP program case file CPC-2023-7068-CA.

Sincerely,

Linda Reynolds

[7001 W 83<sup>rd</sup> St.](#)

LA CA 90045







Housing Element &lt;housingelement@lacity.org&gt;

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**Re: Urgent Community Concern: Increased Density Proposal -**

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**Lori Endara** <lori.endara@gmail.com>

Tue, Aug 27, 2024 at 7:08 AM

To: Housing Element &lt;housingelement@lacity.org&gt;

Hello

My comment was in response to offering other ideas to increase living options other than saturating existing residential neighborhoods.

The suggestion was to consider converting vacant commercial properties in neighborhoods into personal dwellings (apartments, condo, bungalos).

So many businesses are closing and staying vacant for quite sometime. Incent owners to be a different type of landlord.

Thank you

**Lori Endara**

818-209-7003

---

**From:** [christine.bustillos@lacity.org](mailto:christine.bustillos@lacity.org) <[christine.bustillos@lacity.org](mailto:christine.bustillos@lacity.org)> on behalf of Housing Element <[housingelement@lacity.org](mailto:housingelement@lacity.org)>

**Sent:** Monday, August 26, 2024 12:24 PM

**To:** [lori.endara@gmail.com](mailto:lori.endara@gmail.com) <[lori.endara@gmail.com](mailto:lori.endara@gmail.com)>

**Subject:** Re: Urgent Community Concern: Increased Density Proposal -

Hello,

Thank you for your email. We are unable to view your comment in the format it was delivered. Please re-send your comment as a response to this email thread, and we will ensure that it is added to the appropriate case file and taken into consideration as we continue to refine our draft ordinances. If you have any questions, please let us know.

Thank you,

**Housing Element Staff****Los Angeles City Planning**

200 N. Spring St., Room 750

Los Angeles, CA. 90012

Planning4LA.org

T: (213) 978-1302



On Sat, Aug 24, 2024 at 5:15 PM Lori Endara <[noreply@jotform.com](mailto:noreply@jotform.com)> wrote:



## Urgent Community Concern: Increased Density Proposal

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Name	Lori Endara
E-mail	<a href="mailto:lori.endara@gmail.com">lori.endara@gmail.com</a>

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Housing Element <housingelement@lacity.org>

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## Protect single-family neighborhoods

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**MARGARET HEALY** <thehealyfamily1@verizon.net>

Tue, Aug 27, 2024 at 11:20 AM

To: housingelement@lacity.org

To : Housing Element Members  
Mayor Karen Bass  
CM Katy Yaroslavsky

Dear Housing Element Staff, Mayor Bass and Councilmember Yaroslavsky,

My family and I are strongly in favor of protecting our single-family from upzoning, and instead concentrating development on commercial corridors.

Future consideration of residential area upzoning and special circumstances need to be addressed as part of the community planning process, not the Housing Element.

Thank you for your attention to our input on this.

Sincerely,  
Margaret and Charles Healy  
2370 Midvale Ave.  
Los Angeles, CA 90064







Housing Element &lt;housingelement@lacity.org&gt;

---

**re: Council File #CPC-2023-7068-CA Please END EXCLUSIONARY single-family ZONING!**

---

**Marilyn Wells** <mtwdemille@gmail.com>

Tue, Aug 27, 2024 at 9:50 AM

To: housingelement@lacity.org

Dear City Planning --

As you know, 72% of Los Angeles is zoned for single family housing while over 80% of Angelenos are renters.

To end our homeless crisis we need to build more affordable multifamily housing.

I strongly support building in Transit Oriented Communities (TOC) adjacent to single family zones. We need more density to house our workforce, seniors on fixed incomes and young adults.

If we don't increase our affordable housing stock, we will not put an end to our housing shortage.

All Angelenos need housing that is affordable, where children can go to good schools and have access to parks. Our workforce is the unique cornerstone that provides the stability of life in Los Angeles.

Thank you.

Marilyn Wells  
90004

Marilyn

Stories From The Frontline  
<https://www.storiesfrontline.org/>





Housing Element &lt;housingelement@lacity.org&gt;

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**CHIP R1s on Avenue-I or larger [CPC-2023-7068-CA, CPC-2024-387-CA]**

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**Migoto Megumi** <migotomegumi@gmail.com>

Tue, Aug 27, 2024 at 5:18 AM

Reply-To: Migoto Megumi &lt;migotomegumi@gmail.com&gt;

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org

<p dir="ltr">尊敬的洛杉磯市規劃部及市議員Traci Park,

<p dir="ltr">我寫信是為了表達對於城市住房激勵計劃（Citywide Housing Incentives Program CHIP）的深切不滿。它排除了所有的R-1（single unit lots, Residential Zone 1 單一單位地）既然是住房激勵計劃, 想要建造更多住房, 新增建築物, 然而卻不顧這些R-1位於寬大街道上, 或者狹窄街道上。譬如: 位於寬大街道上屬於R1, Avenue-1 (如Pico Blvd)。CHIP它排除所有R1, 因而, 此時此刻, 我們發現 R1.5, R2, 在小街道上迅速的被開發, 而且快速地建造高密度低收入住宅公寓(high density affordable housing)。這種做法, 祇顧幾十年前的土地分類 分區方法, 卻不顧街道大小, 是狹隘且偏頗的。這本質上是不公正的, 因為, 這些基於幾十年前的土地分類, 分區, 直接延續了"種族排他性契約限制"。相反的, 洛杉磯必須在所有社區的寬闊大街道上, 無例外地, 進行密集開發低收入住宅公寓, 才是正確的城市住房激勵計劃。<p dir="ltr">我們需要CHIP 城市住房激勵計劃 沿高工作機會走廊, 建造高密度, 低收入住宅公寓, **包括 R1**。這一措施還必須將CHIP, 與50%的行人道樹冠標準相結合, 以種樹的樹蔭來降低溫度, 減緩地球暖化, 建立氣候適應力強的洛杉磯。那些經歷過熱, 熱島效應的社區, 往往是以前承受過舊有的土地分類, 不公正的分區方法的脆弱社區。。樹蔭可以將地表溫度降低 22-54°F, 對於減緩全球暖化, 和拯救生命, 至關重要。寬闊大街道上的地區, 包括 R1 地段, 最能同時容納樹冠和高密度低收入住宅公寓。我們必須保護現有的樹冠, 同時沿著寬闊大街道走廊擴展樹蔭覆蓋, 並提供經濟適用房, 高密度低收入住宅公寓。<p dir="ltr">我敦促您向市議會提出異議, 將高工作機會走廊上屬於 Avenue-1 或更大範疇的 R1 地段納入 CHIP, 並豁免 Avenue-2 或小街道上的 R2 地段, 以減少歷史上紅線社區的人口密度壓力, 和樹冠損失風險。洛杉磯必須保持其多元文化的歷史。洛杉磯不可能通過, 完全豁免R1, 其最多數的住宅分區(R1)類別, 來實現開發, 建造, 高密度低收入住宅公寓。。我敦促您, 盡全力強烈地抗議, 防止一個極不公平的（Citywide Housing Incentives Program CHIP）CHIP 計劃。<p dir="ltr">謹上, -- Migoto Megumi  
[migotomegumi@gmail.com](mailto:migotomegumi@gmail.com)





Housing Element &lt;housingelement@lacity.org&gt;

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**Re: Urgent Community Concern: Increased Density Proposal -**

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**Nancy Gowani** <nancyg900@gmail.com>

Tue, Aug 27, 2024 at 2:00 AM

To: Housing Element &lt;housingelement@lacity.org&gt;

Hello:

Density in suburban areas is a very dangerous idea. People buying homes in the suburbs are usually older and have worked many years to move to a quiet and safe area.

Density causes parking wars and fighting. These areas were designed with a certain number of people in mind. Having people live on top of each other in these areas will wipe out the middle class living conditions. Which are conditions that many of us dream of for years. Not only is the Density a cause for parking wars, fighting and unsafe streets; but higher Density leads to higher crime rates. We would be ruining living conditions for many people and it is not fair. Many of us who fight Density have worked decades, day in and day out in rain, illness and while having family issues. We saved for years to get a semblance of peace, quiet and guaranteed parking spaces even if we come home from work late at night. We don't have to circle searching for a parking space and parking a half a block or more.

Please, please do not ruin the daily lives of thousands of hard working citizens who have followed all the rules of society. They do not deserve to be punished because someone thought thus would solve the overpopulation problem. It is a horrible and punitive idea. Thank you for taking the time to read this. Respectfully, Nancy Gowani

On Mon, Aug 26, 2024, 12:19 PM Housing Element &lt;housingelement@lacity.org&gt; wrote:

Hello,

Thank you for your email. We are unable to view your comment in the format it was delivered. Please re-send your comment as a response to this email thread, and we will ensure that it is added to the appropriate case file and taken into consideration as we continue to refine our draft ordinances. If you have any questions, please let us know.

Thank you,



**Housing Element Staff**  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



On Sat, Aug 24, 2024 at 12:48 AM Nancy Gowani &lt;noreply@jotform.com&gt; wrote:



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**Urgent Community Concern: Increased Density Proposal**

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Name	Nancy Gowani
E-mail	<a href="mailto:nancyg900@gmail.com">nancyg900@gmail.com</a>

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Housing Element <housingelement@lacity.org>

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## case file CPC-2023-7068-CA

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milehi4@gmail.com <milehi4@gmail.com>

Tue, Aug 27, 2024 at 2:40 PM

To: housingelement@lacity.org

Cc: Blair.smith@lacity.org, Matthew.glesne@lacity.org, Shana.bonstin@lacity.org, Kevin.keller@lacity.org, Councilmember.park@lacity.org, Sean.silva@lacity.org, Jeff.khau@lacity.org

We support more housing and we support it on our commercial corridors. We have enough capacity to build all the housing we need by just staying on these commercial corridors which run through all our high resource communities. We can create housing for people in all our communities while protecting all the housing that already exists. We support Draft #2 of the CHIP program case file CPC-2023-7068-CA.

Sincerely,

Peter Denvir



Housing Element <housingelement@lacity.org>

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## case file CPC-2023-7068-CA

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**Sean Silva** <sean.silva@lacity.org>

Wed, Aug 28, 2024 at 10:01 AM

To: milehi4@gmail.com

Cc: housingelement@lacity.org, Blair.smith@lacity.org, Matthew.glesne@lacity.org, Shana.bonstin@lacity.org, Kevin.keller@lacity.org, Councilmember.park@lacity.org, Jeff.khau@lacity.org

Good morning Peter,

Thanks for including us on this email to the Housing Element team.

I see you've already written to the Housing Element team directly, but should you write to us directly with any concerns in the future, we will relay them directly to the appropriate team as well.

All the best,  
Sean



**Sean Silva** | Deputy, Venice | Planning Liaison

**Office of Councilwoman Traci Park** ★ 11th District

**WESTCHESTER:** 7166 W. Manchester Ave, LA, CA 90045

(310) 568-8772 TEL |



\*PLEASE NOTE: E-mail correspondence with the Office of Councilwoman Traci Park may be subject to public disclosure under the California Public Records Act. (including attachments) \*

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## case file CPC-2023-7068-CA

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**Housing Element** <housingelement@lacity.org>

Fri, Sep 6, 2024 at 5:18 PM

To: milehi4@gmail.com

Cc: Sean Silva <sean.silva@lacity.org>, Blair.smith@lacity.org, Matthew.glesne@lacity.org, Shana.bonstin@lacity.org, Kevin.keller@lacity.org, Councilmember.park@lacity.org, Jeff.khau@lacity.org

Hello,

Thank you for your comment on the draft Citywide Housing Incentive Program (CHIP) Ordinance. Your comment will be added to our case file and taken into consideration as we continue to refine our draft ordinance.

For more information on the Housing Element Rezoning Program, please visit our [website](#), and/or join our [listserv](#), if you have not already, to stay informed.

Thank you,

**Housing Element Staff**  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## case file CPC-2023-7068-CA

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**Peter Denvir** <milehi4@gmail.com>

Fri, Sep 6, 2024 at 5:37 PM

To: Housing Element <housingelement@lacity.org>

Cc: Sean Silva <sean.silva@lacity.org>, Blair.smith@lacity.org, Matthew.glesne@lacity.org, Shana.bonstin@lacity.org, Kevin.keller@lacity.org, Councilmember.park@lacity.org, Jeff.khau@lacity.org

Thank you for the update.

[Quoted text hidden]





Housing Element <housingelement@lacity.org>

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## STRONGLY OPPOSING RE-ZONING OF SINGLE FAMILY NEIGHBORHOODS

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**Selimah Nemoy** <selimah@yahoo.com>

Tue, Aug 27, 2024 at 9:39 AM

To: "housingelement@lacity.org" <housingelement@lacity.org>

As a homeowner since 1940 in the Valley Village 91602 zip code, I strongly oppose rezoning and densifying single-family neighborhoods.

Carol Selimah Nemoy









Housing Element &lt;housingelement@lacity.org&gt;

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## I OPPOSE All Three Draft Ordinances of Housing Element of the General Plan Rezoning Program

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Sharron Walters &lt;swchic@msn.com&gt;

Tue, Aug 27, 2024 at 12:08 PM

To: "housingelement@lacity.org" &lt;housingelement@lacity.org&gt;, "media@gtInc.org" &lt;media@gtInc.org&gt;

Dear Los Angeles City Planning Department,

I OPPOSE the above draft ordinances. Here's why:

### **I live in the community an**

**I did not want to live in an area with high rises.****Our parking is already strained, and don't know where you are planning to park the people that work there.****It will block the sun from our neighborhood and houses, that we didn't buy into when we moved there.****It will cause a traffic nightmare with the already crowded streets.****It will negatively impact our neighborhood and turn it into an ultra urban area.****Sincerely,****Sharron Walters****Clybourn and N.Valley property owner**





Sonyia Eshaya <noreply@jotform.com>  
to me ▾

Aug 27, 2024, 9:48 AM ☆ ↩ ⋮

**Urgent Community Concern: Increased Density Proposal**

To the Los Angeles Planning Department,I am opposed to increased density in single-family neighborhoods and the construction of tall buildings adjacent to single-family properties. This increased density would be harmful to our communities.

Sincerely,

Sonyia Eshaya

[sonyara30@gmail.com](mailto:sonyara30@gmail.com)





Housing Element &lt;housingelement@lacity.org&gt;

## CHIP R1s on Avenue-I or larger [CPC-2023-7068-CA, CPC-2024-387-CA]

Tara chu &lt;tamesisliu@gmail.com&gt;

Tue, Aug 27, 2024 at 5:33 AM

Reply-To: Tara chu &lt;tamesisliu@gmail.com&gt;

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org

<p dir="ltr">尊敬的洛杉磯市規劃部及市議員Traci Park,

<p dir="ltr">我寫信是為了表達對於城市住房激勵計劃（Citywide Housing Incentives Program CHIP）的深切不滿。它排除了所有的R-1（single unit lots, Residential Zone 1 單一單位地）既然是住房激勵計劃，想要建造更多住房，新增建築物，然而卻不顧這些R-1位於寬大街道上，或者狹窄街道上。譬如：位於寬大街道上屬於R1, Avenue-1（如Pico Blvd）。CHIP它排除所有R1，因而，此時此刻，我們發現 R1.5, R2, 在小街道上迅速的被開發，而且快速地建造高密度低收入住宅公寓(high density affordable housing)。這種做法，祇顧幾十年前的土地分類 分區方法，卻不顧街道大小，是狹隘且偏頗的。這本質上是不公正的，因為，這些基於幾十年前的土地分類，分區，直接延續了"種族排他性契約限制"。相反的，洛杉磯必須在所有社區的寬闊大街道上，無例外地，進行密集開發低收入住宅公寓，才是正確的城市住房激勵計劃。<p dir="ltr">我們需要CHIP 城市住房激勵計劃 沿高工作機會走廊，建造高密度，低收入住宅公寓，**包括 R1**。這一措施還必須將CHIP，與50%的行人道樹冠標準相結合，以種樹的樹蔭來降低溫度，減緩地球暖化，建立氣候適應力強的洛杉磯。那些經歷過熱，熱島效應的社區，往往是以前承受過舊有的土地分類，不公正的分區方法的脆弱社區。。樹蔭可以將地表溫度降低 22-54°F，對於減緩全球暖化，和拯救生命，至關重要。寬闊大街道上的地區，包括 R1 地段，最能同時容納樹冠和高密度低收入住宅公寓。我們必須保護現有的樹冠，同時沿著寬闊大街道走廊擴展樹蔭覆蓋，並提供經濟適用房，高密度低收入住宅公寓。<p dir="ltr">我敦促您向市議會提出異議，將高工作機會走廊上屬於 Avenue-1 或更大範疇的 R1 地段納入 CHIP，並豁免 Avenue-2 或小街道上的 R2 地段，以減少歷史上紅線社區的人口密度壓力，和樹冠損失風險。洛杉磯必須保持其多元文化的歷史。洛杉磯不可能通過，完全豁免R1，其最多數的住宅分區(R1)類別，來實現開發，建造，高密度低收入住宅公寓。。我敦促您，盡全力強烈地抗議，防止一個極不公平的（Citywide Housing Incentives Program CHIP）CHIP 計劃。<p dir="ltr">謹上， -- Tara chu  
tamesisliu@gmail.com







Housing Element &lt;housingelement@lacity.org&gt;

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**Re: Comm8unity Plan Update**

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**Sean Silva** <sean.silva@lacity.org>

Tue, Aug 27, 2024 at 9:11 AM

To: William Capone &lt;williamcapone0531@outlook.com&gt;

Cc: Housing Element &lt;housingelement@lacity.org&gt;

Hi William,

Thanks for your email and for your engagement.

The [Housing Element Rezoning Program draft ordinances](#), which include the Citywide Housing Incentive Program (CHIP) Ordinance, Housing Element Sites and Minimum Density Ordinance, and Resident Protections Ordinance, are managed by the Housing Element team. I've copied them here so they can record your comments.

Please don't hesitate to reach out with any further questions, comments, or concerns.

All the best,  
Sean

**Sean Silva** | Deputy, Venice | Planning Liaison**Office of Councilwoman Traci Park** ★ **11th District****WESTCHESTER:** 7166 W. Manchester Ave, LA, CA 90045

(310) 568-8772 TEL |



\*PLEASE NOTE: E-mail correspondence with the Office of Councilwoman Traci Park may be subject to public disclosure under the California Public Records Act. (including attachments) \*

On Sun, Aug 25, 2024 at 4:52 PM William Capone <[williamcapone0531@outlook.com](mailto:williamcapone0531@outlook.com)> wrote:

Sean

We support more housing and we support it on our commercial corridors. We have enough capacity to build all the housing we need by just staying on these commercial corridors which run through all our high resource communities. We can create housing for people in all our communities while protecting all the housing that already exists. We support Draft #2 of the CHIP program case file CPC-2023-7068-CA.

Respectfully

William Capone

310-686-2766 Cell / Text

[williamcapone0531@outlook.com](mailto:williamcapone0531@outlook.com)





Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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**Catherine Musicant** <musicant@icloud.com>

Wed, Aug 28, 2024 at 4:52 PM

To: housingelement@lacity.org

Stop changes to R1

Case file CPC-2023-7068-CA

I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

Catherine Musicant  
10322 La Grange Ave  
Los Angeles 90025





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Alice Miketa <alkeets2125@gmail.com>

Thu, Aug 29, 2024 at 9:15 AM

Reply-To: Alice Miketa <alkeets2125@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org

—  
Dear LA City Planning and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the R1 exemption. These small streets are home to most of our mature tree canopy.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors, and exempts both R1 and R2 lots on Avenue-2 or smaller streets to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Alice Miketa

[alkeets2125@gmail.com](mailto:alkeets2125@gmail.com)







Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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**Kathleen Edwards** <mskbelle@gmail.com>

Thu, Aug 29, 2024 at 4:32 PM

To: housingelement@lacity.org

Re: Case file CPC-2023-7068-CA:

I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

Kathleen Edwards  
19211 Nashville St.  
Northridge, CA 91326





Housing Element <housingelement@lacity.org>

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**. Re: CPC--2023-7068-CA**

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**Lionel Chetwynd** <lionel@chetwyndproductions.com>  
To: HousingElement@lacity.org

Thu, Aug 29, 2024 at 2:34 PM

To: L.A. Planning Dept

I strongly support Los Angeles keeping Draft #2 of the Housing Element in place! DRAFT #2 provides a SUPERIOR Housing Element plan which provides AMPLE DENSITY OPPORTUNITIES TO MEET L.A.'s HOUSING NEEDS AND STATE MANDATES WITHOUT DESTROYING SINGLE FAMILY NEIGHBORHOODS! This is a QUALITY OF LIFE issue for thousands of families in single family neighborhoods! Research and detailed information was previously provided to the City Planning Dept. from UnitedNeighbors and other community groups that clearly illustrates there is NO NEED to destroy family neighborhoods in order to provide ample new housing (with added benefit of being along EXISTING CORRIDORS OF MASS TRANSIT!). KEEP DRAFT #2

Thank you!

H.L.Chetwynd,

Sherman Oaks 91423





Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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loretaazarian@gmail.com <loretaazarian@gmail.com>

Thu, Aug 29, 2024 at 8:22 AM

To: housingelement@lacity.org

Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

Sent from my iPhone





Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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**Louise Zutler** <lzutler@icloud.com>

Thu, Aug 29, 2024 at 5:41 PM

To: housingelement@lacity.org

Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

Sent from my iPhone







Housing Element <housingelement@lacity.org>

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## August Steurer's Comments on the Proposed CHIP ordinance

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**August Steurer** <augustinca@mac.com>  
To: housingelement@lacity.org

Fri, Aug 30, 2024 at 10:21 AM

Please include my comments in your final reviews of the CHIP ordinance.



**CHIP Comment Letter from August Steurer.pdf**  
59K

August Steurer  
1122 6<sup>th</sup> St #208  
Santa Monica, CA 90403

August 25<sup>th</sup>, 2024

Los Angeles Department of City Planning  
200 N. Spring Street, Room 525  
Los Angeles, CA 90012

Re: Comments on Draft Citywide Housing Incentive Program (CHIP) Ordinance

Dear City Planners,

As a veteran of Los Angeles urban planning with 20 years of involvement (through local employment) in the Woodland Hills-Warner Center Neighborhood Council, 8 years on the Warner Center Specific Plan Advisory Committee, multiple terms on the Ventura/Cahuenga Boulevards Corridor Specific Plan Review Board, and 18 years on the PlanCheckNC steering committee, I write to express significant concerns about the draft Citywide Housing Incentive Program (CHIP) ordinance.

**1. Insufficient Community Engagement:** The lack of meaningful neighborhood council involvement has resulted in grossly inadequate analysis of properties regarding proposed densities and bonuses. Given the city's history of infrequent plan revisions, we cannot afford such a potentially damaging approach. Future planning efforts must work more closely with the community to avoid unintended consequences.

**2. Site-Specific Feasibility:** The blanket upzoning approach fails to account for infrastructure limitations, parking constraints, and site-specific issues. For example, many lots along Ventura Boulevard are inadequately sized or topographically challenged to support the proposed densities, often abutting hillside ridges. Many sites are right against the high-fire risk zones and decreased separation of structures is concerning. Counting density increases for these properties without considering feasibility or lot consolidation is misleading and potentially harmful. If CHIP cannot be customized, the underlying zoning must have greater open space requirement to compensate for CHIP relaxations.

**3. West Valley Climate Considerations:** The West Valley's designation as a high-resource zone ignores climate suitability for affordability. Woodland Hills experiences temperature extremes, routinely exceeding 100°F in summer, with a few days over 115°, and being one of the coldest areas in winter. These conditions will significantly impact energy costs and water costs, diminishing the area's suitability for affordable housing when considering the total cost of living.

**4. Faith-based Development:** The constraints on this are inadequate for urban planning. Many properties are not located at major intersections where the density should be, and without the necessary transit and local amenities, a 500-foot radius for density development creates a ghetto.

**5. Jobs-Housing Imbalance:** Los Angeles has failed to make the West Valley a jobs magnet. Despite appearing as a high-resource area on paper, the only significant growth has been in

housing. For 20 years, Warner Center has developed major housing projects, but only housing by consuming commercial. The Warner Center Specific Plans have not delivered on job creation promises, except retail jobs through the Westfield Mall's expansion.

**6. Preserving Single-Family Neighborhoods:** Wholesale inclusion of all single-family zones in CHIP would have severe negative consequences. Single-family homes remain a vital housing option for many families and a pathway to generational wealth. Surveys show that most renters aspire to own single-family homes. Removing single-family homes from the market decreases their affordability for families who want this existing housing type. We should not increase the unaffordability of one housing type to improve the affordability of another kind when there are alternatives. We should maintain the vast majority of single-family zoning, limiting strategic upzoning to locations that can support walkable communities. CHIP in single-family neighborhoods will reduce the opportunity of home ownership.

**7. Gentrification Risks:** Blanket upzoning of single-family areas could lead to more gentrification. Flippers will buy affordable homes and upgrade them for higher resale prices in response to decreasing SFD availability in high-resource areas. I recommend banning CHIP in SFD zones, limiting them to ADUs and and maybe duplexes, and implementing strong anti-displacement provisions.

**8. Holistic Planning Approach:** CHIP focuses myopically on increasing density without considering other crucial planning needs. A comprehensive approach must address quality of life factors such as parks, jobs, and community services. This ordinance, as it stands, is inadequate urban planning that ignores the problems it causes without proposing mitigations.

**9. Infrastructure and Services:** The ordinance must include mechanisms to fund necessary infrastructure improvements alongside new development. It currently fails to mandate sufficient parks or address potential traffic issues, particularly in areas like Ventura Boulevard where increased density could impact hillside residents' access and emergency evacuation routes.

**10. Transit-Oriented Limitations:** While focusing on density near transit is positive, we must ensure transit service levels can support the proposed growth. Include better minimum service frequency requirements before allowing maximum density bonuses. Be aware that relying on significant density increases near transit may lead to overcrowding, potentially disincentivizing transit use. Moreover, transit-oriented development without job creation near transit stations encourages long-distance commutes. My concern is that creating transit-oriented communities will exceed our capability to add transit capacity. Mass-transit development is taking decades while increased density may not.

**11. Design Standards:** Implement strong design standards for larger buildings to help them integrate visually, especially in formerly single-family areas. Consider incentivizing Mass Timber construction for faster, more cost-effective, and greener building. Use lot size to determine appropriate building types and mandate features like courtyards on large lots rather than using them as incentives.

**12. Affordability and Quality of Life:** Strengthen affordability requirements to ensure density bonuses translate to meaningful affordable housing production. However, reducing setbacks and

open space is counterproductive, especially in the West Valley climate. Available amenities such as markets, parks, personal services, and medical resources are necessary for true affordability.

**13. Streetscapes and frontages:** No mention is made of addressing streetscape requirements for the long term. More attention must be given to maintaining adequate space for the changing mobility needs of higher future densities. CHIP is not synchronized with the mobility element. The community plans will not necessarily provide the frontage space for the increased density, and they don't cover the streetscape, which is not addressed by the mobility element sufficiently to be successful.

**14. Jobs-Housing Balance:** Incorporate more stringent incentives for mixed-use development that includes job-creating commercial spaces. The West Valley needs local job growth to match housing increases, rather than relying on jobs in distant areas like El Segundo and Culver City.

**15. Monitoring and Adjustment:** Include clear provisions to monitor the ordinance's impacts over time and make data-driven adjustments as needed.

**16. Minimum Density Requirements:** Implement minimum density requirements in strategic locations to support local businesses and create vibrant, walkable communities. Mixed-use developments require multiple blocks of high-density buildings to thrive, which is challenging to achieve along linear commercial corridors.

**15. Warner Center Concerns:** Including CHIP in Warner Center undermines the existing Warner Center 2035 Plan, which already allows for significant density and height. CHIP incentives may defeat the plan's intentions for quality urban design and work-life balance. The affordable housing achieved so far has come at the cost of breaking specific plan requirements, resulting in monotonous 6-story developments with no connectivity or commercial space.

**16. The Futility of CHIP:** Our housing deficit is so bad that it deters people from staying in LA. The "hole" is so deep that a systemic thinker will realize we cannot dig our way out of the affordability issue. We will not meet the demand for affordability until way in the future. It's just like expanding freeways induces additional traffic. The more housing we build will induce more influx back to LA, but we most likely cannot ever increase production quickly enough, for various reasons, to keep up with induced demand. For Los Angeles, with the practical constraints, like city limits and topography, combined with climate desirability, we will always have an affordability problem.

In conclusion, while increasing affordable housing is crucial, CHIP's current approach is overly simplistic and potentially harmful. A more nuanced, context-sensitive strategy is necessary to balance housing production with sustainable community development. I urge you to revise this ordinance substantially, taking a holistic view of urban planning rather than focusing solely on density increases.

I appreciate your consideration. I look forward to seeing a more comprehensive and thoughtful approach to housing and community development in Los Angeles.

Sincerely,

August Steurer





Housing Element <housingelement@lacity.org>

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## Save our R1 neighborhpods ,at least for 2028 olympics

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**Larry Boring** <larrydaleb1@gmail.com>  
To: housingelement@lacity.org

Fri, Aug 30, 2024 at 1:54 PM







Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Alyssa Leiva** <alyssaleiva.81@gmail.com>

Sat, Aug 31, 2024 at 3:04 PM

Reply-To: Alyssa Leiva <alyssaleiva.81@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Alyssa Leiva

[alyssaleiva.81@gmail.com](mailto:alyssaleiva.81@gmail.com)





Housing Element <housingelement@lacity.org>

---

## More trees throughout the city

---

ellen ellencolley.com <ellen@ellencolley.com>

Sat, Aug 31, 2024 at 10:36 AM

To: "housingelement@lacity.org" <housingelement@lacity.org>

Hello,

My key concern for our city is the rising heat, and the dwindling water supply.

We can help both the most efficiently by several simple methods:

1: having porous, light colored surfaces on all paved areas to capture rainfall into the aquifer instead of letting it run off, and the light color will reflect the sun's heat instead of absorbing it.

2: The city must forbid black buildings, which are far too numerous these days, and are absorbing high amounts of sunlight and heat, and require excessive use of electricity to cool. Light colored buildings stay cooler and require less energy to cool them.

As many trees as possible need to be planted throughout the city to keep the city cool, prevent rain runoff, prevent mudslides, convert carbon dioxide and carbon monoxide into oxygen, and additionally reduce crime, as studies have shown that streets in poor neighborhoods noticed significantly reduced crime when the streets had many trees planted along them.

Please enact these measures as soon as possible, to keep our communities safe and livable.

Thank you.

Sincerely

Ellen Colley

Get [Outlook for iOS](#)





Housing Element <housingelement@lacity.org>

---

## Density housing project

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**Jayne Campbell** <viardotmezzo@gmail.com>  
To: HousingElement@lacity.org

Sat, Aug 31, 2024 at 8:29 AM

To: L.A. Planning Dept.  
Re: CPC--2023-7068-CA  
[HousingElement@lacity.org](mailto:HousingElement@lacity.org)

I strongly support Los Angeles keeping Draft #2 of the Housing Element in place! DRAFT #2 provides a SUPERIOR Housing Element plan which provides AMPLE DENSITY OPPORTUNITIES TO MEET L.A.'s HOUSING NEEDS AND STATE MANDATES WITHOUT DESTROYING SINGLE FAMILY NEIGHBORHOODS!

This is a QUALITY OF LIFE issue for thousands of families in single family neighborhoods! Research and detailed information was previously provided to the City Planning Dept. from UnitedNeighbors and other community groups that clearly illustrates there is NO NEED to destroy family neighborhoods in order to provide ample new housing (with added benefit of being along EXISTING CORRIDORS OF MASS TRANSIT!). KEEP DRAFT #2

Thank you!  
Dr. Jayne Campbell  
3625 Longview Valley Rd  
Sherman Oaks, Ca 91423

(Note: For any questions or comments, please click on my name and send a PM.) Thanks!  
Jayne E Campbell DMA  
Emeritus Member  
National Association of Teachers of Singing  
"Dwell in possibility"  
—Emily Dickinson





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

---

Jina Park <mrsjinapark@gmail.com>

Sat, Aug 31, 2024 at 10:04 PM

Reply-To: Jina Park <mrsjinapark@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Jina Park  
[mrsjinapark@gmail.com](mailto:mrsjinapark@gmail.com)







Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Nicholas Negroponte <nn@mit.edu>

Sat, Aug 31, 2024 at 12:19 PM

Reply-To: Nicholas Negroponte <nn@mit.edu>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

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Sincerely,

-- Nicholas Negroponte  
[nn@mit.edu](mailto:nn@mit.edu)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Dakota Peterson** <tika.rose.peterson@gmail.com>

Mon, Sep 2, 2024 at 7:31 PM

Reply-To: Dakota Peterson <tika.rose.peterson@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

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Sincerely,

-- Dakota Peterson  
[tika.rose.peterson@gmail.com](mailto:tika.rose.peterson@gmail.com)





Housing Element <housingelement@lacity.org>

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## CPC-2023-7068-CA Save Our Neighborhoods, Multit Family RSO and Historic Districts!

---

Andrew Jebb <ajebb@nashentertainment.com>

Tue, Sep 3, 2024 at 10:31 AM

To: Housing Element <housingelement@lacity.org>, brian setzer <brian.setzer@gmail.com>

Re: **CPC-2023-7068-CA**

Dear Housing Element Team of the Planning Department,

I support the CHIP Ordinance / House Element June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Housing from being rezoned.

I am aware of the need for and support the creation of more affordable housing in Los Angeles.

I appreciate and support the thoughtful changes made, after the solicitation of public input, to the Housing Element, that protect single-family neighborhoods and focuses development in areas already zoned for increased density and along the hundreds of miles of underutilized commercial corridors in each of our communities. I acknowledge the collaborative work that led to these revisions including the recent decision which adheres to state-mandated time-of-ownership limits on development by Faith Based Organizations.

I oppose any revision to the June 2024 version of the Housing Element that would undo the protections afforded single-family neighborhoods, HPOZs and RSO housing from being up-zoned.

Thank you,

Andrew Jebb

[Quoted text hidden]

|





Housing Element <housingelement@lacity.org>

---

## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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**Mark Leos** <markleos@aol.com>

Tue, Sep 3, 2024 at 1:22 PM

To: housingelement@lacity.org

Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.







Housing Element <housingelement@lacity.org>

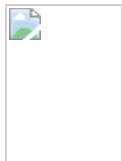
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## Fwd: A PERSONAL NOTE From Nancy at SOHA re CPC - 2023 - 7068 - CA - Housing Element

---

**Matthew Glesne** <matthew.glesne@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Wed, Sep 4, 2024 at 10:58 AM



**Matthew Glesne**

Preferred Pronouns: He, Him, His

Senior City Planner

**Los Angeles City Planning**

200 N. Spring St., Room 750

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-2666



----- Forwarded message -----

From: **Flora Melendez** <flora.melendez@lacity.org>

Date: Wed, Sep 4, 2024 at 7:55 AM

Subject: Fwd: A PERSONAL NOTE From Nancy at SOHA re CPC - 2023 - 7068 - CA - Housing Element

To: Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>

CC: Jenna Monterrosa <jenna.monterrosa@lacity.org>, Arthi Varma <arthi.varma@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie



**Flora (Angie) Melendez**

Pronouns: She, Hers, Her

Executive Administrative Assistant III

**Los Angeles City Planning**

200 N. Spring St., Room 525

Los Angeles, CA 90012

T: (213) 978-1271 | F: (213) 978-1275

planning.lacity.gov



----- Forwarded message -----

From: **Nancy Sogoian** <[cellbroker@sbcglobal.net](mailto:cellbroker@sbcglobal.net)>

Date: Tue, Sep 3, 2024 at 5:37 PM

Subject: A PERSONAL NOTE From Nancy at SOHA re CPC - 2023 - 7068 - CA - Housing Element

To: [vince.bertoni@lacity.org](mailto:vince.bertoni@lacity.org) <[vince.bertoni@lacity.org](mailto:vince.bertoni@lacity.org)>

Hello Vince!

Hope this message finds you doing well. Do you remember me and the spontaneous laugh we shared when you came to speak at SOHA (Sherman Oaks Homeowners Assoc.)? I came over to welcome you and proceeded to bungle a compliment that came out like bungled flirting ...?!?

Next we saw each other, I was with then-Councilperson David Ryu outside the Council chamber after a PLUM meeting. You greeted me warmly with a smile and a hug. It's been too long and so much has happened since!

In our first conversation at SOHA, you told me about your own hard-fought efforts on behalf of your community, including going door-to-door, opposing a neighborhood development issue. And thus you could relate to what it's like to champion protections for one's community...

I'm writing to express my deep concern regarding CPC-2023-7068. Having been a longtime SOHA Board Member, I'm very familiar with the extensive research and thorough and excellent report submitted to your Planning Department by United Neighbors. As you're aware, it clearly and precisely pinpointed **plentiful** locations where there is more than enough capacity citywide to fulfill State housing mandates - *without destroying single family neighborhoods*. The United Neighbors' findings show we can deliver needed new housing WITHOUT DESTROYING EXISTING NEIGHBORHOODS. And undoubtedly, it's a quality of life issue for Los Angeles communities.

**We support your revised DRAFT #2 --**

There is NO legitimate reason or need to change the City's position away from the exemption of single family neighborhoods from the Housing Element!

Additionally, placing new housing on corridors along **existing** mass transit is hugely beneficial to residents (and to city transit goals!). This virtually on-doorstep mass transit does NOT (and will never) exist within single family neighborhoods!

Vince, please remember your own deeply-felt community efforts and KEEP Draft #2 in force!

Sending you my sincere thanks and warm good wishes, and hope to see you again soon,

Nancy Sogoian  
818-906-7500





Housing Element <housingelement@lacity.org>

---

## Fwd: Community Impact Statement - Submission Details

---

**D. Henderson** <denzel.henderson@lacity.org>

Wed, Sep 4, 2024 at 8:20 AM

To: Planning Housing Policy <planning.housingpolicy@lacity.org>, Housing Element <housingelement@lacity.org>, Planning Liaison <planning.liaison@lacity.org>

----- Forwarded message -----

From: **Jacob Wasserman** <jacobnwwnc@gmail.com>

Date: Thu, Aug 29, 2024 at 10:14 AM

Subject: Fwd: Community Impact Statement - Submission Details

To: <denzel.henderson@lacity.org>

-----  
Jacob Wasserman  
Board member, Worker Seat and Secretary  
North Westwood Neighborhood Council  
<jacobnwwnc@gmail.com>  
Pronouns: he/him/his

----- Forwarded message -----

From: **Jacob Wasserman** <jacobnwwnc@gmail.com>

Date: Thu, Aug 29, 2024 at 10:11 AM

Subject: Fwd: Community Impact Statement - Submission Details

To: <planning.liaison@lacity.org>

-----  
Jacob Wasserman  
Board member, Worker Seat and Secretary  
North Westwood Neighborhood Council  
<jacobnwwnc@gmail.com>  
Pronouns: he/him/his

----- Forwarded message -----

From: **Jacob Wasserman** <jacobnwwnc@gmail.com>

Date: Thu, Aug 22, 2024 at 8:25 PM

Subject: Fwd: Community Impact Statement - Submission Details

To: <planning.liaison@lacity.org>, <chris.galindo@lacity.org>

-----  
Jacob Wasserman  
Board member, Worker Seat and Secretary  
North Westwood Neighborhood Council  
<jacobnwwnc@gmail.com>  
Pronouns: he/him/his

----- Forwarded message -----

From: **LA City SNow** <[cityoflaprod@service-now.com](mailto:cityoflaprod@service-now.com)>

Date: Mon, Mar 11, 2024 at 11:24 AM

Subject: Community Impact Statement - Submission Details

To: <[CPC@lacity.org](mailto:CPC@lacity.org)>

A Neighborhood Council Community Impact Statement (CIS) has been successfully submitted to your Commission or City Council. We provided information below about CISs and attached a copy of the CIS.

We encourage you to reach out to the Community Impact Statement Filer to acknowledge receipt and if this Community Impact Statement will be scheduled at a future meeting. Neighborhood Council board members are volunteers and it would be helpful if they received confirmation that you received their CIS.

The CIS process was enabled by the Los Angeles Administrative Code §Section 22.819. It provides that, "a Neighborhood Council may take a formal position on a matter by way of a Community Impact Statement (CIS) or written resolution." NCs representatives also testify before City Boards and Commissions on the item related to their CIS. If the Neighborhood Council chooses to do so, the Neighborhood Council representative must provide the Commission with a copy of the CIS or resolution sufficiently in advance for review, possible inclusion on the agenda, and posting on the Commission's website. Any information you can provide related to your agenda setting schedule is helpful to share with the NC.

If the CIS or resolution pertains to a matter *listed on the Commission's agenda*, during the time the matter is heard, the designated Neighborhood Council representative should be given an opportunity to present the Neighborhood Council's formal position. We encourage becoming familiar with the City Council's rules on the subject. At the Chair's discretion, the Neighborhood Council representative may be asked to have a seat at the table (or equivalent for a virtual meeting) typically reserved for City staff and may provide the Neighborhood Council representative more time than allotted to members of the general public. They are also permitted up to five (5) minutes of time to address the legislative body. If the CIS or resolution pertains to a matter *not listed on the agenda*, the designated Neighborhood Council representative may speak during General Public Comments.

We share this information to assist you with the docketing neighborhood council items before your board/commission. If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at [empowerla@lacity.org](mailto:empowerla@lacity.org).

\*\*\*\*\* This is an automated response, please DO NOT reply to this email. \*\*\*\*\*

#### Contact Information

Neighborhood Council: North Westwood

Name: Jacob Wasserman

Email: [jacobnwwnc@gmail.com](mailto:jacobnwwnc@gmail.com)

The Board approved this CIS by a vote of: Yea(17) Nay(0) Abstain(0) Ineligible(0) Recusal(0)

Date of NC Board Action: 03/06/2024

Type of NC Board Action: For

#### Impact Information

Date: 03/11/2024

Update to a Previous Input: No

Directed To: City Planning Commission

Council File Number: 21-1230-S2

Agenda Date:

Item Number:

Summary: The North Westwood Neighborhood Council supports the framework of the Livable Communities Initiative (LCI), Program #131 in Los Angeles' Housing Element, as a way to create high-quality, lower-cost homes and home ownership opportunities in walkable, 15-minute communities near transit that do not have on-site parking. We support creating safe mobility for vulnerable road users and residents who cannot drive or choose not to drive as a way to create equitable access to transportation for all, as well as to address California's goals for air quality, climate emissions, and reduction in vehicle miles traveled. We ask the City Council to pass an ordinance implementing LCI. One viable option is a Livable Communities Overlay, facilitating mid-scale transit-oriented development, incentivizing the creation of housing units where they do not currently exist, and promoting development that enhances commercial, mixed uses. The ordinance should follow the motion's call for by-right, objective zoning and design standards that include, as appropriate, waivers or reductions of setback, unit-floor-area, and other development standards; a minimum density requirement to promote multifamily, mixed-use development; provisions to encourage greater lot density, such as allowing for shared housing or increasing floor area ratio allowances; and the elimination of parking minimums. We also support the framework of single-staircase reform/point access blocks to facilitate courtyard buildings with ample air and light.

Additionally, we support the creation of standard plans—streamlined, pre-approved off-the-shelf architectural plans that are an option for property owners and builders, promoting efficient infill projects without the need for lot assembly and extensive entitlement processes.

Ref:MSG9970786



**CIS\_Livable Cities Initiative.pdf**

137K



## - COMMUNITY IMPACT STATEMENT -

Council File: [21-1230-S2](#)

Title: Livable Communities Initiative / Transit-Rich Corridors / Analogous Citywide Regulations / Mid-Scale Development

Position: For

### Summary:

The North Westwood Neighborhood Council supports the framework of the Livable Communities Initiative (LCI), Program #131 in Los Angeles' Housing Element, as a way to create high-quality, lower-cost homes and home ownership opportunities in walkable, 15-minute communities near transit that do not have on-site parking. We support creating safe mobility for vulnerable road users and residents who cannot drive or choose not to drive as a way to create equitable access to transportation for all, as well as to address California's goals for air quality, climate emissions, and reduction in vehicle miles traveled.

We ask the City Council to pass an ordinance implementing LCI. One viable option is a Livable Communities Overlay, facilitating mid-scale transit-oriented development, incentivizing the creation of housing units where they do not currently exist, and promoting development that enhances commercial, mixed uses. The ordinance should follow the motion's call for by-right, objective zoning and design standards that include, as appropriate, waivers or reductions of setback, unit-floor-area, and other development standards; a minimum density requirement to promote multifamily, mixed-use development; provisions to encourage greater lot density, such as allowing for shared housing or increasing floor area ratio allowances; and the elimination of parking minimums.

We also support the framework of single-staircase reform/point access blocks to facilitate courtyard buildings with ample air and light. Additionally, we support the creation of standard plans—streamlined, pre-approved off-the-shelf architectural plans that are an option for property owners and builders, promoting efficient infill projects without the need for lot assembly and extensive entitlement processes.







Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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**Andrea Cross** <andreakcross9@gmail.com>

Thu, Sep 5, 2024 at 4:19 PM

To: housingelement@lacity.org

Case file CPC-2023-7068-CA:

I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

Andrea Cross

[andreakcross9@gmail.com](mailto:andreakcross9@gmail.com)

Miracle Mile Neighborhood





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Jeffery Cole <jeff.john.cole@gmail.com>

Sat, Sep 7, 2024 at 8:34 PM

Reply-To: Jeffery Cole <jeff.john.cole@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Jeffery Cole

[jeff.john.cole@gmail.com](mailto:jeff.john.cole@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Junsuke Sato <junsuke@junsukesato.com>

Sat, Sep 7, 2024 at 2:27 PM

Reply-To: Junsuke Sato <junsuke@junsukesato.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

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Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

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I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Junsuke Sato

[junsuke@junsukesato.com](mailto:junsuke@junsukesato.com)





Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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**Wendy Kurtzman** <wendykurtzman@gmail.com>

Sat, Sep 7, 2024 at 2:06 PM

To: housingelement@lacity.org

Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.







Housing Element <housingelement@lacity.org>

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## Letter in support of Draft #2 of June 2024 CHIP Ordinance

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**Brentwood Homeowners Association** <info@brentwoodhomeowners.org>

Mon, Sep 9, 2024 at 5:12 PM

To: housingelement@lacity.org

Cc: vince.bertoni@lacity.org, traci.park@lacity.org, star.parsamyan@lacity.org, marian.ensley@lacity.org

Attached please find our letter in support of Draft #2 of the June 2024 CHIP Ordinance.

Thank you.

Thelma Waxman  
President

**Brentwood Homeowners Association PO Box 49427 Los Angeles, CA 90049**



**BHA Letter in support of Draft 2.pdf**

493K



PO Box 49427 ■ Los Angeles, California 90049 ■ (424) BHA-8765 ■ [info@brentwoodhomeowners.org](mailto:info@brentwoodhomeowners.org)

September 9, 2024

Email: [housingelement@lacity.org](mailto:housingelement@lacity.org)

RE: Case file CPC-2023-7068-CA

Dear Planning Department Housing Element Team:

The Brentwood Homeowners Association (BHA) is registering its support of Draft # 2 of the June 2024 CHIP Ordinance. BHA represents approximately 4,500 homeowners and condo residents living west of the 405, north of San Vicente Boulevard and east of Canyon View Drive in the 90049 zip code.

We support more housing for Los Angeles and believe we have enough capacity, primarily on our commercial corridors, to create housing in all communities while protecting the housing that already exists. It has been shown that we have capacity to build the needed housing by staying on these commercial corridors which run through all of our high resource communities.

Too many commercial corridors remain blighted and underutilized, lacking economic benefit to the neighborhoods surrounding them. We believe Draft #2 offers a blueprint that can transform these corridors into vibrant districts in high resource areas. There is no need to upzone our neighborhoods given the flight of business from our commercial corridors since 2020.

In addition, the City owns 7,508 properties that could provide additional opportunities for housing. Former Controller Ron Galperin identified these properties that can be seen on the interactive map developed by his technology and innovation team. Another 6,000 plus properties are owned by the county, state, LAUSD, Metro and the federal government within the City. Every possibility should be explored.

Support single family neighborhoods and revitalize our commercial districts for a win-win solution.

Respectfully,

*Thelma Waxman*

Thelma Waxman  
President

cc: Mayor Karen Bass  
Councilwoman Traci Park, CD 11  
Director of Planning Vince P. Bertoni





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Javier Muinos <javieritomu@hotmail.com>

Mon, Sep 9, 2024 at 1:32 PM

Reply-To: Javier Muinos <javieritomu@hotmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Javier Muinos

[javieritomu@hotmail.com](mailto:javieritomu@hotmail.com)





Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA

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**Sharon Mastropietro Malone** <sharonmastro@me.com>

Mon, Sep 9, 2024 at 9:35 AM

To: housingelement@lacity.org

Case file CPC-2023-7068-CA:

Dear Planning Department,

I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

Please save Single Family, RSO's and Historic Neighborhoods. They are some of the City's greatest assets and the reason people move to and stay in Los Angeles. By rezoning underutilized adjacent commercial corridors to allow for more housing we can create vibrant communities for everyone, without destroying what we already have. Data shows that we can protect our existing residential and historic areas and still meet affordable housing needs. Many of our communities have worked hard to show where more housing could be added in each of their neighborhoods, answering the Mayor's call to solve the housing crisis by having "skin-in-the-game". I strongly recommend that the City Council approve the current Planning Department's proposed revisions to the Housing Element and CHIP program.

Sharon Mastropietro  
940 South Genesee Ave  
Miracle Mile Neighborhood

email: [sharonmastro@me.com](mailto:sharonmastro@me.com)







Housing Element <housingelement@lacity.org>

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## Protect single-family tracts

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**Evelyn Luner** <evelyn@luner.net>

Mon, Sep 9, 2024 at 6:09 PM

To: "housingelement@lacity.org" <housingelement@lacity.org>, "contactcd4@lacity.org" <contactcd4@lacity.org>

We support the June 2024 draft of the Housing Element Chip program (CPC-2023-7068-CA) that protects single-family neighborhoods, historic districts, and rent stabilized housing. We support the draft that adds more density on our commercial corridors and protects existing neighborhoods. It will, as well, direct housing density towards available public transportation.

Stephen J. Luner, Evelyn J. Luner 13000 Hesby Street, Sherman Oaks,  
CA 91423 818-231-7210





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## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

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America Gil <americag713@gmail.com>

Fri, Sep 13, 2024 at 5:50 PM

Reply-To: America Gil <americag713@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, steven.bautista@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear L.A. City Planning, Commissioners, and Councilman Kevin de Leon,

I am a renter and stand in solidarity with the residents of Barrington Plaza. Less than 20% of 577 households survived the illegal eviction attempt, despite a battle won in court. Their experience of harassment and intimidation highlights the precarious situation of renters across Los Angeles, where affordable housing is increasingly scarce, and tenant protections are constantly under threat. This petition is on behalf of all renters who face similar uncertainties in an ever-tightening housing market. <a href="https://controller.lacity.gov/landings/evictions">Between February and December of 2023, the Los Angeles Housing Department received a total of **77,049** eviction notices.

The Citywide Housing Incentives Program (CHIP) was introduced to address the dire need for more affordable homes. However, the current exemption of single unit neighborhoods (zoned R1) from this program means that 40-80% of land on the Westside is off-limits for any affordable housing incentives. This exclusion disproportionately impacts minority communities, concentrating affordable housing in specific areas while leaving large swathes of land in high-opportunity neighborhoods untouched.

We believe this approach is both unfair and shortsighted. R1 lots situated on main thoroughfares are ideal for lower-income, multi-family homes and should not be exempt from the CHIP. Including these areas in the program would distribute affordable housing more equitably across the city, ensuring that all Angelenos, regardless of their neighborhood, have access to affordable homes. In addition, family-sized multifamily homes are being replaced by smaller units, which although below market rate for their number of bedrooms, result in a severe increase on a per square foot rent basis. The result is that our families are being displaced. This uproots our long term residents and destabilizes our community. In addition, family sized homes are being rented out in co-living schemes that inflate prices several times over what is the current norm. We cannot ignore the reality that lower income households cannot relocate into homes hundreds of dollars beyond their original rent. In this context, relocation buyouts are one-way-tickets *out* of our community.

Thus, we specifically urge that you (i) motion for R1 lots on high-opportunity corridors, classified as Avenue-1 or larger, be included in CHIP, while R2 lots on Avenue-2 or smaller streets be exempt. These adjustment would help to spread the benefits of affordable housing throughout our city, rather than concentrating them in a few areas, and prevent displacement in pre-existing affordable homes. (ii) Evaluate affordable rent in the Renters Protection Ordinance on a per square foot basis. (iii) Incentivize extended tenant habitability programs that can maintain our families in their communities while new affordable homes, to which they would have a right to return, are built.

We ask LA City Planning and Councilman Kevin de Leon to consider the needs of all renters and tenants in Los Angeles, in calling for a more just, realistic, and inclusive housing policy.

Thank you for your attention to this critical issue.

-- America Gil  
[americag713@gmail.com](mailto:americag713@gmail.com)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf)





## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

angela liu <askangelaliu@gmail.com>

Fri, Sep 13, 2024 at 9:21 PM

Reply-To: angela liu <askangelaliu@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, jeff.khau@lacity.org

Dear L.A. City Planning and Councilwoman Traci Park,

I am a renter and stand in solidarity with the residents of Barrington Plaza. Less than 20% of 577 households survived the illegal eviction attempt, despite a battle won in court. Their experience of harassment and intimidation highlights the precarious situation of renters across Los Angeles, where affordable housing is increasingly scarce, and tenant protections are constantly under threat. This petition is on behalf of all renters who face similar uncertainties in an ever-tightening housing market. <a href="https://controller.lacity.gov/landings/evictions">Between February and December of 2023, the Los Angeles Housing Department received a total of **77,049** eviction notices.

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We believe this approach is both unfair and shortsighted. R1 lots situated on main thoroughfares are ideal for lower-income, multi-family homes and should not be exempt from the CHIP. Including these areas in the program would distribute affordable housing more equitably across the city, ensuring that all Angelenos, regardless of their neighborhood, have access to affordable homes. In addition, family-sized multifamily homes are being replaced by smaller units, which although below market rate for their number of bedrooms, result in a severe increase on a per square foot rent basis. The result is that our families are being displaced. This uproots our long term residents and destabilizes our community. In addition, family sized homes are being rented out in co-living schemes that inflate prices several times over what is the current norm. We cannot ignore the reality that lower income households cannot relocate into homes hundreds of dollars beyond their original rent. In this context, relocation buyouts are one-way-tickets *out* of our community.

Thus, we specifically urge that you (i) motion for R1 lots on high-opportunity corridors, classified as Avenue-1 or larger, be included in CHIP, while R2 lots on Avenue-2 or smaller streets be exempt. These adjustment would help to spread the benefits of affordable housing throughout our city, rather than concentrating them in a few areas, and prevent displacement in pre-existing affordable homes. (ii) Evaluate affordable rent in the Renters Protection Ordinance on a per square foot basis. (iii) Incentivize extended tenant habitability programs that can maintain our families in their communities while new affordable homes, to which they would have a right to return, are built.

We ask LA City Planning and Councilwoman Traci Park to consider the needs of all renters and tenants in Los Angeles, in calling for a more just, realistic, and inclusive housing policy.

Thank you for your attention to this critical issue.

-- angela liu  
[askangelaliu@gmail.com](mailto:askangelaliu@gmail.com)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf)





Housing Element <housingelement@lacity.org>

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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Antonio Guerrero** <antonioguerreroc@gmail.com>

Fri, Sep 13, 2024 at 11:33 PM

Reply-To: Antonio Guerrero <antonioguerreroc@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—  
Dear LA City Planning, Commissioners, and Councilman Marqueece Harris-Dawson,

I write to express deep frustration with the Citywide Housing Incentives Program (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing multifamily parcels will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. The interior residential areas of minority neighborhoods have been inequitably rezoned in prior housing cycles. Instead, we need to densify based on street width because our streets cross all neighborhoods and connect people to academic and employment opportunities. This approach must also bind the CHIP to a tree canopy standard for an environmentally just and climate resilient L.A.

I urge you to motion City Council, to include in the CHIP, R1 lots on streets classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller to reduce densification pressures in historic minority communities of color that lack the necessary regulatory protections. Moreover, zoning along larger streets, including R1s, provides the space we need to adhere to a 50% sidewalk canopy standard. Affordable housing need not compromise climate resiliency. Tree shade reduces surface temperatures between 22-54°F. They save lives.

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. While R1s on smaller streets provide private canopy, public canopy aligns with environmental justice because lots on broader streets, including R1s, are best equipped to handle both canopy and residential density.

LA can avoid an extreme and inequitable CHIP by incentivizing multifamily housing on R1 lots along opportunity corridors while supporting a public tree canopy standard for all.

Sincerely,

-- Antonio Guerrero  
[antonioguerreroc@gmail.com](mailto:antonioguerreroc@gmail.com)







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## Rezoning Comment [CPC-2023-7068-CA and CPC-2024-388-CA]

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**Cesar E Aranguri** <cesar.aranguri@law.nyu.edu>

Fri, Sep 13, 2024 at 3:24 PM

Reply-To: cesar.aranguri@law.nyu.edu

To: housingelement@lacity.org

I ask that the City Planning Department, City Planning Commission, and City Councilmembers, through the Citywide Housing Incentive Program (CHIP), fulfill our obligation to equitable development and creation of much needed affordable housing. In the Citywide Housing Incentive Program (CHIP) this can be accomplished by increasing the provision of deeply affordable units, (ALI, ELI, and VLI) in the incentive programs. These housing incentive programs, specifically the Mixed Income and Affordable Housing Incentive Programs, must apply across the City, including single family zoned areas.

Additionally, the City should utilize the Resident Protections Ordinance to strengthen provisions to protect tenants, and ensure that RSO units are not needlessly demolished. This includes stronger provisions in the RPO including local preference, enforcement of right to return, and a higher replacement ratio of RSO units with covenanted affordable units. These ordinances are a critical opportunity to fill gaps that exist in our affordable housing provision and tenant protections, and I ask that City Planning take every opportunity to expand equitable access to housing across the city for Angelenos.

These changes are essential to ensure that affordable housing production happens equitably and that it "Affirmatively Furthers Fair Housing:"

1. Expand the MIIP and AHIP to apply to single family zoned parcels.
2. Increase Affordability in Areas Experiencing Gentrification and Displacement Pressure.
3. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns.
4. Strengthen the relocation requirements of the Resident Protections Ordinance to ensure displaced households receive affordable replacement housing and a true opportunity to return. In addition, strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants.
5. Protect RSO by ending double counting of replacement units, and requiring a 2:1 replacement ratio with covenanted units, when demolished.





Housing Element <housingelement@lacity.org>

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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Connor Hurley** <rconnorhurley@gmail.com>

Fri, Sep 13, 2024 at 11:32 PM

Reply-To: Connor Hurley <rconnorhurley@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning, Commissioners, and Councilman Marqueece Harris-Dawson,

I write to express deep frustration with the Citywide Housing Incentives Program (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing multifamily parcels will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. The interior residential areas of minority neighborhoods have been inequitably rezoned in prior housing cycles. Instead, we need to densify based on street width because our streets cross all neighborhoods and connect people to academic and employment opportunities. This approach must also bind the CHIP to a tree canopy standard for an environmentally just and climate resilient L.A.

I urge you to motion City Council, to include in the CHIP, R1 lots on streets classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller to reduce densification pressures in historic minority communities of color that lack the necessary regulatory protections. Moreover, zoning along larger streets, including R1s, provides the space we need to adhere to a 50% sidewalk canopy standard. Affordable housing need not compromise climate resiliency. Tree shade reduces surface temperatures between 22-54°F. They save lives.

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. While R1s on smaller streets provide private canopy, public canopy aligns with environmental justice because lots on broader streets, including R1s, are best equipped to handle both canopy and residential density.

LA can avoid an extreme and inequitable CHIP by incentivizing multifamily housing on R1 lots along opportunity corridors while supporting a public tree canopy standard for all.

Sincerely,

-- Connor Hurley  
[rconnorhurley@gmail.com](mailto:rconnorhurley@gmail.com)





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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Fery Hejri <feryhejri@gmail.com>

Fri, Sep 13, 2024 at 8:36 PM

Reply-To: Fery Hejri <feryhejri@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, helen.campbell@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning and Councilwoman Eunisses Hernandez,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities.

This approach must also bind the CHIP to a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council, to include in the CHIP, R1 lots on high opportunity corridors classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller streets to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

LA cannot become affordable by providing a complete and total exemption to its largest residential zoning category. I urge you to prevent an extremely inequitable CHIP. Incentivize multifamily homes on R1 lots on opportunity corridors with a public tree canopy standard for all.

Sincerely,

-- Fery Hejri

[feryhejri@gmail.com](mailto:feryhejri@gmail.com)





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## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

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Leland Meade-Miller <leland@metaphorce.com>

Fri, Sep 13, 2024 at 6:10 PM

Reply-To: Leland Meade-Miller <leland@metaphorce.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, elizabeth.ene@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear L.A. City Planning, Commissioners, and Councilman Bob Blumenfield,

I am a renter and stand in solidarity with the residents of Barrington Plaza. Less than 20% of 577 households survived the illegal eviction attempt, despite a battle won in court. Their experience of harassment and intimidation highlights the precarious situation of renters across Los Angeles, where affordable housing is increasingly scarce, and tenant protections are constantly under threat. This petition is on behalf of all renters who face similar uncertainties in an ever-tightening housing market. <a href="https://controller.lacity.gov/landings/evictions">Between February and December of 2023, the Los Angeles Housing Department received a total of **77,049** eviction notices.

The Citywide Housing Incentives Program (CHIP) was introduced to address the dire need for more affordable homes. However, the current exemption of single unit neighborhoods (zoned R1) from this program means that 40-80% of land on the Westside is off-limits for any affordable housing incentives. This exclusion disproportionately impacts minority communities, concentrating affordable housing in specific areas while leaving large swathes of land in high-opportunity neighborhoods untouched.

We believe this approach is both unfair and shortsighted. R1 lots situated on main thoroughfares are ideal for lower-income, multi-family homes and should not be exempt from the CHIP. Including these areas in the program would distribute affordable housing more equitably across the city, ensuring that all Angelenos, regardless of their neighborhood, have access to affordable homes. In addition, family-sized multifamily homes are being replaced by smaller units, which although below market rate for their number of bedrooms, result in a severe increase on a per square foot rent basis. The result is that our families are being displaced. This uproots our long term residents and destabilizes our community. In addition, family sized homes are being rented out in co-living schemes that inflate prices several times over what is the current norm. We cannot ignore the reality that lower income households cannot relocate into homes hundreds of dollars beyond their original rent. In this context, relocation buyouts are one-way-tickets *out* of our community.

Thus, we specifically urge that you (i) motion for R1 lots on high-opportunity corridors, classified as Avenue-1 or larger, be included in CHIP, while R2 lots on Avenue-2 or smaller streets be exempt. These adjustment would help to spread the benefits of affordable housing throughout our city, rather than concentrating them in a few areas, and prevent displacement in pre-existing affordable homes. (ii) Evaluate affordable rent in the Renters Protection Ordinance on a per square foot basis. (iii) Incentivize extended tenant habitability programs that can maintain our families in their communities while new affordable homes, to which they would have a right to return, are built.

We ask LA City Planning and Councilman Bob Blumenfield to consider the needs of all renters and tenants in Los Angeles, in calling for a more just, realistic, and inclusive housing policy.

Thank you for your attention to this critical issue.

-- Leland Meade-Miller  
[leland@metaphorce.com](mailto:leland@metaphorce.com)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf)







Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Chris Kruszynski <pc37@mac.com>

Sat, Sep 14, 2024 at 3:07 PM

Reply-To: Chris Kruszynski <pc37@mac.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Chris Kruszynski  
[pc37@mac.com](mailto:pc37@mac.com)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Molly Fenton** <mollyfenton14@gmail.com>

Sat, Sep 14, 2024 at 3:29 PM

Reply-To: Molly Fenton <mollyfenton14@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning Commissioners and Councilwoman Traci Park,

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I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Molly Fenton  
[mollyfenton14@gmail.com](mailto:mollyfenton14@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Shane Mahdavi <shane.mahdavi@gmail.com>

Sat, Sep 14, 2024 at 6:11 AM

Reply-To: Shane Mahdavi <shane.mahdavi@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

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Sincerely,

-- Shane Mahdavi  
[shane.mahdavi@gmail.com](mailto:shane.mahdavi@gmail.com)





Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA

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**Al Limon** <al@3rdiqc.com>

Mon, Sep 16, 2024 at 2:18 PM

To: "housingelement@lacity.org" <housingelement@lacity.org>

: I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezone

Best,

Al Limón

Westcher resident







## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

chez stock <chezstock@gmail.com>

Mon, Sep 16, 2024 at 3:42 PM

Reply-To: chez stock <chezstock@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, Councilmember.Soto-Martinez@lacity.org, karen.mack@lacity.org,

maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear L.A. City Planning, Commissioners, and Councilman Hugo Soto-Martinez,

I am a renter and stand in solidarity with the residents of Barrington Plaza. Less than 20% of 577 households survived the illegal eviction attempt, despite a battle won in court. Their experience of harassment and intimidation highlights the precarious situation of renters across Los Angeles, where affordable housing is increasingly scarce, and tenant protections are constantly under threat. This petition is on behalf of all renters who face similar uncertainties in an ever-tightening housing market. Between February and December of 2023, the Los Angeles Housing Department received a total of **77,049** eviction notices.\*\*

The Citywide Housing Incentives Program (CHIP) was introduced to address the dire need for more affordable homes. However, the current exemption of single unit neighborhoods (zoned R1) from this program means that 40-80% of land on the Westside is off-limits for any affordable housing incentives. This exclusion disproportionately impacts minority communities, concentrating affordable housing in specific areas while leaving large swathes of land in high-opportunity neighborhoods untouched.

We believe this approach is both unfair and shortsighted. R1 lots situated on main thoroughfares are ideal for lower-income, multi-family homes and should not be exempt from the CHIP. Including these areas in the program would distribute affordable housing more equitably across the city, ensuring that all Angelenos, regardless of their neighborhood, have access to affordable homes. In addition, family-sized multifamily homes are being replaced by smaller units, which although below market rate for their number of bedrooms, result in a severe increase on a per square foot rent basis. The result is that our families are being displaced. This uproots our long term residents and destabilizes our community. In addition, family sized homes are being rented out in co-living schemes that inflate prices several times over what is the current norm. We cannot ignore the reality that lower income households cannot relocate into homes hundreds of dollars beyond their original rent. In this context, relocation buyouts are one-way-tickets *out* of our community.

Thus, we specifically urge that you (i) motion for R1 lots on high-opportunity corridors, classified as Avenue-1 or larger, be included in CHIP, while R2 lots on Avenue-2 or smaller streets be exempt. These adjustment would help to spread the benefits of affordable housing throughout our city, rather than concentrating them in a few areas, and prevent displacement in pre-existing affordable homes. (ii) Evaluate affordable rent in the Renters Protection Ordinance on a per square foot basis. (iii) Incentivize extended tenant habitability programs that can maintain our families in their communities while new affordable homes, to which they would have a right to return, are built. (iv) Incentivize a community land trust shared-equity program that would lead to ownership opportunities.

We ask LA City Planning and Councilman Hugo Soto-Martinez to consider the needs of all renters and tenants in Los Angeles, in calling for a more just, realistic, and inclusive housing policy.

Thank you for your attention to this critical issue.

-- chez stock

[chezstock@gmail.com](mailto:chezstock@gmail.com)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf) \*\*<https://controller.lacity.gov/landings/evictions>





## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

Michael Shuck <shuck.mike@gmail.com>

Mon, Sep 16, 2024 at 9:01 PM

Reply-To: Michael Shuck <shuck.mike@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, hakeem.parke-davis@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear L.A. City Planning, Commissioners, and Councilwoman Heather Hutt,

I am a renter and stand in solidarity with the residents of Barrington Plaza. Less than 20% of 577 households survived the illegal eviction attempt, despite a battle won in court. Their experience of harassment and intimidation highlights the precarious situation of renters across Los Angeles, where affordable housing is increasingly scarce, and tenant protections are constantly under threat. This petition is on behalf of all renters who face similar uncertainties in an ever-tightening housing market. Between February and December of 2023, the Los Angeles Housing Department received a total of **77,049** eviction notices.\*\*

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We believe this approach is both unfair and shortsighted. R1 lots situated on main thoroughfares are ideal for lower-income, multi-family homes and should not be exempt from the CHIP. Including these areas in the program would distribute affordable housing more equitably across the city, ensuring that all Angelenos, regardless of their neighborhood, have access to affordable homes. In addition, family-sized multifamily homes are being replaced by smaller units, which although below market rate for their number of bedrooms, result in a severe increase on a per square foot rent basis. The result is that our families are being displaced. This uproots our long term residents and destabilizes our community. In addition, family sized homes are being rented out in co-living schemes that inflate prices several times over what is the current norm. We cannot ignore the reality that lower income households cannot relocate into homes hundreds of dollars beyond their original rent. In this context, relocation buyouts are one-way-tickets *out* of our community.

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We ask LA City Planning and Councilwoman Heather Hutt to consider the needs of all renters and tenants in Los Angeles, in calling for a more just, realistic, and inclusive housing policy.

Thank you for your attention to this critical issue.

-- Michael Shuck  
[shuck.mike@gmail.com](mailto:shuck.mike@gmail.com)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf) \*\*<https://controller.lacity.gov/landings/evictions>





## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

Emma Engler <emma.n.engler@gmail.com>

Tue, Sep 17, 2024 at 12:20 PM

Reply-To: Emma Engler <emma.n.engler@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, jeff.khau@lacity.org

Dear L.A. City Planning and Councilwoman Traci Park,

I am a renter and stand in solidarity with the residents of Barrington Plaza. Less than 20% of 577 households survived the illegal eviction attempt, despite a battle won in court. Their experience of harassment and intimidation highlights the precarious situation of renters across Los Angeles, where affordable housing is increasingly scarce, and tenant protections are constantly under threat. This petition is on behalf of all renters who face similar uncertainties in an ever-tightening housing market. Between February and December of 2023, the Los Angeles Housing Department received a total of **77,049** eviction notices.

The Citywide Housing Incentives Program (CHIP) was introduced to address the dire need for more affordable homes. However, the current exemption of single unit neighborhoods (zoned R1) from this program means that 40-80% of land on the Westside is off-limits for any affordable housing incentives. This exclusion disproportionately impacts minority communities, concentrating affordable housing in specific areas while leaving large swathes of land in high-opportunity neighborhoods untouched.

We believe this approach is both unfair and shortsighted. R1 lots situated on main thoroughfares are ideal for lower-income, multi-family homes and should not be exempt from the CHIP. Including these areas in the program would distribute affordable housing more equitably across the city, ensuring that all Angelenos, regardless of their neighborhood, have access to affordable homes. In addition, family-sized multifamily homes are being replaced by smaller units, which although below market rate for their number of bedrooms, result in a severe increase on a per square foot rent basis. The result is that our families are being displaced. This uproots our long term residents and destabilizes our community. In addition, family sized homes are being rented out in co-living schemes that inflate prices several times over what is the current norm. We cannot ignore the reality that lower income households cannot relocate into homes hundreds of dollars beyond their original rent. In this context, relocation buyouts are one-way-tickets *out* of our community.

Thus, we specifically urge that you (i) motion for R1 lots on high-opportunity corridors, classified as Avenue-1 or larger, be included in CHIP, while R2 lots on Avenue-2 or smaller streets be exempt. These adjustment would help to spread the benefits of affordable housing throughout our city, rather than concentrating them in a few areas, and prevent displacement in pre-existing affordable homes. (ii) Evaluate affordable rent in the Renters Protection Ordinance on a per square foot basis. (iii) Incentivize extended tenant habitability programs that can maintain our families in their communities while new affordable homes, to which they would have a right to return, are built. (iv) Incentivize a community land trust shared-equity program that would lead to ownership opportunities.

We ask LA City Planning and Councilwoman Traci Park to consider the needs of all renters and tenants in Los Angeles, in calling for a more just, realistic, and inclusive housing policy.

Thank you for your attention to this critical issue.

-- Emma Engler  
[emma.n.engler@gmail.com](mailto:emma.n.engler@gmail.com)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf) \*\*<https://controller.lacity.gov/landings/evictions>





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## Rezoning Comment [CPC-2023-7068-CA and CPC-2024-388-CA]

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**Jess Zellinger** <jessicapzellinger@gmail.com>

Tue, Sep 17, 2024 at 7:15 PM

To: housingelement@lacity.org

I ask that the City Planning Department, City Planning Commission, and City Councilmembers, through the Citywide Housing Incentive Program (CHIP), fulfill our obligation to equitable development and creation of much needed affordable housing. In the Citywide Housing Incentive Program (CHIP) this can be accomplished by increasing the provision of deeply affordable units, (ALI, ELI, and VLI) in the incentive programs. These housing incentive programs, specifically the Mixed Income and Affordable Housing Incentive Programs, must apply across the City, including single family zoned areas.

Additionally, the City should utilize the Resident Protections Ordinance to strengthen provisions to protect tenants, and ensure that RSO units are not needlessly demolished. This includes stronger provisions in the RPO including local preference, enforcement of right to return, and a higher replacement ratio of RSO units with covenanted affordable units. These ordinances are a critical opportunity to fill gaps that exist in our affordable housing provision and tenant protections, and I ask that City Planning take every opportunity to expand equitable access to housing across the city for Angelenos.

These changes are essential to ensure that affordable housing production happens equitably and that it "Affirmatively Furthers Fair Housing:"

1. Expand the MIIP and AHIP to apply to single family zoned parcels.
2. Increase Affordability in Areas Experiencing Gentrification and Displacement Pressure.
3. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns.
4. Strengthen the relocation requirements of the Resident Protections Ordinance to ensure displaced households receive affordable replacement housing and a true opportunity to return. In addition, strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants.
5. Protect RSO by ending double counting of replacement units, and requiring a 2:1 replacement ratio with covenanted units, when demolished.







## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

Nicholas Kelly <nicholas.o.kelly@gmail.com>

Tue, Sep 17, 2024 at 12:37 PM

Reply-To: Nicholas Kelly <nicholas.o.kelly@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, Councilmember.Soto-Martinez@lacity.org, karen.mack@lacity.org,

maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear L.A. City Planning, Commissioners, and Councilman Hugo Soto-Martinez,

I am a renter and stand in solidarity with the residents of Barrington Plaza. Less than 20% of 577 households survived the illegal eviction attempt, despite a battle won in court. Their experience of harassment and intimidation highlights the precarious situation of renters across Los Angeles, where affordable housing is increasingly scarce, and tenant protections are constantly under threat. This petition is on behalf of all renters who face similar uncertainties in an ever-tightening housing market. Between February and December of 2023, the Los Angeles Housing Department received a total of **77,049** eviction notices.\*\*

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We ask LA City Planning and Councilman Hugo Soto-Martinez to consider the needs of all renters and tenants in Los Angeles, in calling for a more just, realistic, and inclusive housing policy.

Thank you for your attention to this critical issue.

-- Nicholas Kelly  
[nicholas.o.kelly@gmail.com](mailto:nicholas.o.kelly@gmail.com)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf) \*\*<https://controller.lacity.gov/landings/evictions>





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## Rezoning Comment [CPC-2023-7068-CA and CPC-2024-388-CA]

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**Michelle Rivera** <mrcrivera@formerstudents.ucdavis.edu>

Thu, Sep 19, 2024 at 3:27 PM

To: housingelement@lacity.org

I ask that the City Planning Department, City Planning Commission, and City Councilmembers, through the Citywide Housing Incentive Program (CHIP), fulfill our obligation to equitable development and creation of much needed affordable housing. In the Citywide Housing Incentive Program (CHIP) this can be accomplished by increasing the provision of deeply affordable units, (ALI, ELI, and VLI) in the incentive programs. These housing incentive programs, specifically the Mixed Income and Affordable Housing Incentive Programs, must apply across the City, including single family zoned areas.

Additionally, the City should utilize the Resident Protections Ordinance to strengthen provisions to protect tenants, and ensure that RSO units are not needlessly demolished. This includes stronger provisions in the RPO including local preference, enforcement of right to return, and a higher replacement ratio of RSO units with covenanted affordable units. These ordinances are a critical opportunity to fill gaps that exist in our affordable housing provision and tenant protections, and I ask that City Planning take every opportunity to expand equitable access to housing across the city for Angelenos.

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3. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns.
4. Strengthen the relocation requirements of the Resident Protections Ordinance to ensure displaced households receive affordable replacement housing and a true opportunity to return. In addition, strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants.
5. Protect RSO by ending double counting of replacement units, and requiring a 2:1 replacement ratio with covenanted units, when demolished.

Best,

Michelle Rivera





Housing Element <housingelement@lacity.org>

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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Adrienne Kuhre** <adrienne.motlagh@gmail.com>

Fri, Sep 20, 2024 at 9:49 AM

Reply-To: Adrienne Kuhre <adrienne.motlagh@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—  
Dear LA City Planning, Commissioners, and Councilman Marqueece Harris-Dawson,

I write to express deep frustration with the Citywide Housing Incentives Program (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing multifamily parcels will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. The interior residential areas of minority neighborhoods have been inequitably rezoned in prior housing cycles. Instead, we need to densify based on street width because our streets cross all neighborhoods and connect people to academic and employment opportunities. This approach must also bind the CHIP to a tree canopy standard for an environmentally just and climate resilient L.A.

I urge you to motion City Council, to include in the CHIP, R1 lots on streets classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller to reduce densification pressures in historic minority communities of color that lack the necessary regulatory protections. Moreover, zoning along larger streets, including R1s, provides the space we need to adhere to a 50% sidewalk canopy standard. Affordable housing need not compromise climate resiliency. Tree shade reduces surface temperatures between 22-54°F. They save lives.

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. While R1s on smaller streets provide private canopy, public canopy aligns with environmental justice because lots on broader streets, including R1s, are best equipped to handle both canopy and residential density.

LA can avoid an extreme and inequitable CHIP by incentivizing multifamily housing on R1 lots along opportunity corridors while supporting a public tree canopy standard for all.

Sincerely,

-- Adrienne Kuhre  
[adrienne.motlagh@gmail.com](mailto:adrienne.motlagh@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Alison Klurfeld** <afklurfeld@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:44 AM

Reply-To: afklurfeld@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,

Alison Klurfeld

Los Angeles, CA 90048-2207

[afklurfeld@gmail.com](mailto:afklurfeld@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Allison Lee <allee@everyactioncustom.com>

Fri, Sep 20, 2024 at 10:17 PM

Reply-To: [allee@stanfordalumni.org](mailto:allee@stanfordalumni.org)

To: [housingelement@lacity.org](mailto:housingelement@lacity.org)

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Allison Lee  
Los Angeles, CA 90034-3571  
[allee@stanfordalumni.org](mailto:allee@stanfordalumni.org)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Allison Mannos** <neoconliberalz@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:27 AM

Reply-To: neoconliberalz@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Allison Mannos  
Los Angeles, CA 90027-6925  
[neoconliberalz@gmail.com](mailto:neoconliberalz@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Amber Wheat** <arwheat@everyactioncustom.com>

Fri, Sep 20, 2024 at 10:50 PM

Reply-To: arwheat@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Amber Wheat  
Torrance, CA 90504-4902  
[arwheat@gmail.com](mailto:arwheat@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Andrew Crane** <andrew.acrane@everyactioncustom.com>

Fri, Sep 20, 2024 at 2:02 PM

Reply-To: andrew.acrane@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Andrew Crane  
Los Angeles, CA 90016-5106  
[andrew.acrane@gmail.com](mailto:andrew.acrane@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Andrew Menotti** <menotticesarini@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:58 AM

Reply-To: menotticesarini@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

Simply put, LA has a housing crisis. It is one of the worst in the United States. We have the most homeless people per capita of any city in America. And the reason people are homeless is because rent is so expensive, because there is not enough housing. Yes, some of the homeless are addicted to drugs and alcohol, and some are mentally ill. Homelessness is a multi-faceted problem. But one component of the solution is to build more housing. People are also addicted to drugs in Charleston, West Virginia. They actually have a higher incidence of opioid dependency than Los Angeles. But the rent there is cheap enough that those addicted to heroin and fentanyl can still afford to pay their rent. As such, they have a smaller homeless population per capita despite a larger problem with drug addiction per capita.

We need housing, and we need it everywhere. Every community is always going to fight more housing, so the only fair solution is for everyone to share in the increased density and the increase in housing. The same with homeless shelters and low income housing, they need to be in every single neighborhood so that everyone helps out our less fortunate Angelenos. That's why the single-family exemption is glaring loophole that must be ended.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Andrew Menotti

Sincerely,

Andrew Menotti

Los Angeles, CA 90045-1405

[menotticesarini@gmail.com](mailto:menotticesarini@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Andrew Wong** <andrew.wong45@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:10 AM

Reply-To: andrew.wong45@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Andrew Wong  
Pasadena, CA 91106-4915  
[andrew.wong45@gmail.com](mailto:andrew.wong45@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Andy Freeland** <andy@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:08 PM

Reply-To: andy@andyfreeland.net

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Andy Freeland

Los Angeles, CA 90015-2296

[andy@andyfreeland.net](mailto:andy@andyfreeland.net)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Anisa Khanmohamed <anisask@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:19 AM

Reply-To: anisask@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Anisa Khanmohamed  
Los Angeles, CA 90008-1635  
[anisask@gmail.com](mailto:anisask@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Ava Marinelli <admarinelli@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:20 PM

Reply-To: admarinelli@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Ava Marinelli  
Los Angeles, CA 90036-4583  
[admarinelli@gmail.com](mailto:admarinelli@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Billy Taylor** <billyocracy@everyactioncustom.com>

Fri, Sep 20, 2024 at 6:04 PM

Reply-To: billyocracy@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Billy Taylor  
Los Angeles, CA 90027-1315  
[billyocracy@gmail.com](mailto:billyocracy@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Brent Gaisford** <brentgaisford@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:12 AM

Reply-To: brentgaisford@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Brent Gaisford  
Los Angeles, CA 90029-2706  
[brentgaisford@gmail.com](mailto:brentgaisford@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Bret Contreras** <bretmattc@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:54 PM

Reply-To: bretmattc@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Bret Contreras

Long Beach, CA 90803-2202

[bretmattc@gmail.com](mailto:bretmattc@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Brett Hollenbeck** <brett.hollenbeck@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:07 AM

Reply-To: brett.hollenbeck@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Brett Hollenbeck  
Los Angeles, CA 90230-5155  
[brett.hollenbeck@gmail.com](mailto:brett.hollenbeck@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Caleb Schimke** <cschimke@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:44 AM

Reply-To: cschimke@live.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,

Caleb Schimke

Monterey Park, CA 91754-3222

[cschimke@live.com](mailto:cschimke@live.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Carey Bennett <careyjeanbennett@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:33 PM

Reply-To: careyjeanbennett@duck.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Carey Bennett  
Los Angeles, CA 90027-3025  
[careyjeanbennett@duck.com](mailto:careyjeanbennett@duck.com)





Housing Element <housingelement@lacity.org>

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## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Cecelia Wright** <cece18@netzero.net>

Fri, Sep 20, 2024 at 5:15 AM

Reply-To: Cecelia Wright <cece18@netzero.net>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, xavier.clark@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, councilmember.price@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning and Councilmember Price,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities.

This approach must also bind the CHIP to a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council, to include in the CHIP, R1 lots on high opportunity corridors classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller streets to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

LA cannot become affordable by providing a complete and total exemption to its largest residential zoning category. I urge you to prevent an extremely inequitable CHIP. Incentivize multifamily homes on R1 lots on opportunity corridors with a public tree canopy standard for all.

Sincerely,

-- Cecelia Wright  
[cece18@netzero.net](mailto:cece18@netzero.net)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Chase Andre** <chase.andre@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:40 AM

Reply-To: chase.andre@yahoo.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

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I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,  
Chase Andre  
Alhambra, CA 91801-5465  
[chase.andre@yahoo.com](mailto:chase.andre@yahoo.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Chris Tokita <christopher.tokita@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:00 PM

Reply-To: christopher.tokita@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I'm writing today in support of over 60 civic organizations, including Abundant Housing LA, to call for the inclusion of single-family zoned parcels in the various incentives outlined in the draft CHIP ordinance (CPC-2023-7068-CA). Allowing these parcels to qualify for the CHIP is a crucial step toward meeting LA's goal of producing nearly 500,000 new housing units, promoting equitable housing opportunities, and reducing displacement.

LA is in the midst of a significant housing shortage and crisis, with nearly half of all households struggling with rent or mortgage costs and more than one-third of renters spending half of their income on rent. While unsheltered homelessness has slightly decreased this year, we will continue to see persistently high rates of homelessness as long as housing remains unaffordable to a large portion of the city. Currently, LA's multifamily zoning and new development are disproportionately concentrated in lower-income and renter-heavy neighborhoods. The CHIP offers a chance to correct this imbalance and ensure all neighborhoods contribute their fair share. Unfortunately, as currently written, the ordinance does not expand multifamily housing to new areas, perpetuating inequitable land use patterns. That's why I stand alongside Abundant Housing LA in advocating for the inclusion of single-family zoned parcels in the CHIP programs.

The CHIP's approach to focusing housing near transit and high-opportunity corridors is commendable, and its aim to expedite projects is much needed. I also want to recognize the positive improvements made in the second and third revisions to the CHIP ordinance, including expanding the geography for the Opportunity Corridor Transition Area program and increasing FAR incentives to align with density and height incentives. However, the continued exemption of single-family areas is a significant shortcoming, limiting available sites for new housing, reinforcing segregation, and directing development towards multifamily parcels, increasing the risk of displacement. A blanket exemption for single-family zones is unsustainable and contradicts the city's obligation to Affirmatively Further Fair Housing.

Thankfully, City Planning has presented an opportunity to guide LA towards a future of housing abundance and equity. I urge you to amend the ordinance by adopting Exhibit D Option 1, which would extend eligibility to single-family zoned parcels in the CHIP's designated areas. According to City Planning, this change would unlock over 40,000 parcels for mixed-income development and over 60,000 parcels for 100% affordable development. This adjustment would boost the share of housing opportunities in affluent, historically exclusionary neighborhoods from 54% to 67%. Most importantly, these parcels carry a low displacement risk since they are predominantly homeowner-occupied. Additionally, I ask you to remove the complete exemption of the Coastal Zone from the CHIP, which lacks scientific justification and would continue to restrict access to climate-resilient coastal neighborhoods.

I appreciate City Planning's efforts in creating a solid framework for focusing new homes near transit and services, establishing streamlined processes, and legalizing apartments in single-family areas. Now, you have the opportunity to reverse historic segregation and expand access to opportunity by adopting Exhibit D Option 1 and opening up coastal areas. I strongly urge you to take this step, in line with Abundant Housing LA and its coalition partners.

Sincerely,

Sincerely,  
Chris Tokita  
Los Angeles, CA 90049-5743  
[christopher.tokita@gmail.com](mailto:christopher.tokita@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Christopher Nelson** <itoen90@everyactioncustom.com>

Fri, Sep 20, 2024 at 8:21 PM

Reply-To: itoen90@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

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I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,  
Christopher Nelson  
Los Angeles, CA 90012-3566  
[itoen90@gmail.com](mailto:itoen90@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Cipra Nemeth <cipran@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:28 AM

Reply-To: cipran@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,

Cipra Nemeth

Los Angeles, CA 90048-4612

[cipran@gmail.com](mailto:cipran@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Clayton Becker** <cnbecker14@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:08 AM

Reply-To: cnbecker14@live.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Clayton Becker  
Los Angeles, CA 90035-3659  
[cnbecker14@live.com](mailto:cnbecker14@live.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Daniel Bezinovich <dbezinovich@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:15 PM

Reply-To: dbezinovich@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,  
Daniel Bezinovich

Sincerely,  
Daniel Bezinovich  
Los Angeles, CA 90020-2713  
[dbezinovich@gmail.com](mailto:dbezinovich@gmail.com)





Housing Element <housingelement@lacity.org>

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## Rezoning Los Angeles - File # CPC-2023-7068-CA.

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**Darren Hallihan** <dhallihan@gmail.com>  
To: housingelement@lacity.org

Fri, Sep 20, 2024 at 8:09 AM

Good morning!

I am writing to express my support for draft #2 of the CHIP program and to advocate for the exemption of single-family, historic districts, and rent-stabilized housing from any proposed added density.

I fully endorse the rezoning of our commercial corridors while ensuring the protection of existing housing, including rent-stabilized units, historic districts, and both low-density multi-family and single-family zones.

Los Angeles stands at an exciting crossroads of progress, with the opportunity to create vibrant new communities without dismantling our cherished existing neighborhoods.

It is perplexing to consider why the city would choose to undermine established communities when it is entirely unnecessary. Such actions would waste valuable resources and funds, and jeopardize the neighborhoods where residents have invested their time and lives.

We know there are alternative options available to add density in suitable areas with the necessary infrastructure in place. The city must pursue this approach; otherwise, risk disregarding the will of the majority of constituents.

Thank you for your attention to this important matter.

Sincerely,  
Darren Hallihan  
Encino, CA





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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David Helps <davidrhhelps@everyactioncustom.com>

Fri, Sep 20, 2024 at 6:45 PM

Reply-To: davidrhhelps@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in support of legalizing new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

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Sincerely,

Sincerely,  
David Helps  
Los Angeles, CA 90019-6031  
[davidrhhelps@gmail.com](mailto:davidrhhelps@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**David Tran** <davidt964@everyactioncustom.com>

Fri, Sep 20, 2024 at 4:10 PM

Reply-To: davidt964@g.ucla.edu

To: housingelement@lacity.org

Dear Housing Element,

My name is David L. Tran, and I am a resident of Canoga Park in the San Fernando Valley.

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,  
David L. Tran  
8500 Browns Creek Lane  
Canoga Park, CA 91304

Sincerely,  
David Tran  
Canoga Park, CA 91304-2119  
[davidt964@g.ucla.edu](mailto:davidt964@g.ucla.edu)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Dominick Falzone** <dominickfalzone1212@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:26 PM

Reply-To: dominickfalzone1212@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Dominick Falzone  
Los Angeles, CA 90005-2060  
[dominickfalzone1212@gmail.com](mailto:dominickfalzone1212@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Emmett Florence** <emmettflorence@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:46 PM

Reply-To: emmettflorence@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

Increasing the housing supply via higher density, ESPECIALLY near public transit is an absolute must. Affordable housing and lower car dependency is the future LA needs and deserves!

Sincerely,  
Emmett Florence  
Los Angeles, CA 90012-5005  
[emmettflorence@gmail.com](mailto:emmettflorence@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Geoff Regalado** <gregalado74@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:43 PM

Reply-To: gregalado74@hotmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,

Geoff Regalado

Burbank, CA 91503-4183

[gregalado74@hotmail.com](mailto:gregalado74@hotmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**helen eigenberg** <hm.eigenberg@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:09 AM

Reply-To: hm.eigenberg@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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I live in Hancock Park, a single family zoned area. All neighborhoods need to join and build housing.  
Sincerely,

Helen Eigenberg  
611 Lillian Way  
LA 90004

Sincerely,  
helen eigenberg

Los Angeles, CA 90004-1107  
[hm.eigenberg@gmail.com](mailto:hm.eigenberg@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**J. Ross** <ross\_jay@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:43 AM

Reply-To: ross\_jay@hotmail.com

To: housingelement@lacity.org

Dear Housing Element,

I oppose upzoning or overlays for R1 and R2 areas that are proposed.

L.A. is already zoned for 11,000,000 persons. The Planning Dept won't tell you that. Ask them for that info before making any decisions.

Morrow's thesis is wrong, so don't use that as a guide. It does NOT count apartments that can be built in C zones by right, and he doesn't include density bonuses.

None of the pro-development groups will tell you this either -- they don't know what LA's current zoning capacity either.

There is no crisis for housing. There is a crisis for AFFORDABLE housing, and that can be solved only through more government rent subsidy or higher wages. Increasing supply will not create "trickle down" housing.

The CHIP has plenty of other overlays to increase 200,000 more housing units. No upzoning or R1 or R2 overlays are needed.

Use the options to build on public parking lots, churches, and commercial corridors. They provide all the zoning that you need.

Plenty of minorities in South LA, East LA and the northwest Valley cherish their quiet , pretty R1 neighborhoods (not only "wealthier" areas) and want to keep them.

50% of new house purchasers in LA are minorities, so there is no racist meme to preserving R1 and R2 neighborhoods.

Also, the Planning Dept has not confirmed that there is enough water, sewer, electric and other infrastructure available to build up R1 neighborhoods, which were planned for low density.

J. Ross

L.A. 90064

Sincerely,

J. Ross

Los Angeles, CA 90064-1103

[ross\\_jay@hotmail.com](mailto:ross_jay@hotmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Jacqueline Cochrane** <jackieco310@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:56 PM

Reply-To: jackieco310@aol.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Jacqueline Cochrane  
Redondo Beach, CA 90278-2045  
[jackieco310@aol.com](mailto:jackieco310@aol.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Jamie Chen** <cathayshu@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:22 PM

Reply-To: cathayshu@hotmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Jamie Chen  
Los Angeles, CA 90063-2017  
[cathayshu@hotmail.com](mailto:cathayshu@hotmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Jason Neidleman** <neidleman@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:58 PM

Reply-To: neidleman@hotmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,  
Jason Neidleman

Sincerely,  
Jason Neidleman  
Beverly Hills, CA 90212-4115  
[neidleman@hotmail.com](mailto:neidleman@hotmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Ji Son <kitanji09@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:09 AM

Reply-To: kitanji09@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Ji Son

Los Angeles, CA 90033-3116

[kitanji09@gmail.com](mailto:kitanji09@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Joe Goldman <jgoldmanca@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:06 AM

Reply-To: jgoldmanca@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Joe Goldman  
Los Angeles, CA 90049-4793  
[jgoldmanca@gmail.com](mailto:jgoldmanca@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Jordan Shalom** <jordanjshalom@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:16 PM

Reply-To: jordanjshalom@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Jordan Shalom  
Los Angeles, CA 90025-2767  
[jordanjshalom@gmail.com](mailto:jordanjshalom@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Joseph Botti <josephbotti01@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:13 AM

Reply-To: josephbotti01@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Joseph Botti  
Van Nuys, CA 91411-3235  
[josephbotti01@gmail.com](mailto:josephbotti01@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Joseph Gosling** <maxwellgosling@gmail.com>

Fri, Sep 20, 2024 at 10:37 AM

Reply-To: Joseph Gosling <maxwellgosling@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—  
Dear LA City Planning, Commissioners, and Councilman Marqueece Harris-Dawson,

I write to express deep frustration with the Citywide Housing Incentives Program (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing multifamily parcels will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. The interior residential areas of minority neighborhoods have been inequitably rezoned in prior housing cycles. Instead, we need to densify based on street width because our streets cross all neighborhoods and connect people to academic and employment opportunities. This approach must also bind the CHIP to a tree canopy standard for an environmentally just and climate resilient L.A.

I urge you to motion City Council, to include in the CHIP, R1 lots on streets classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller to reduce densification pressures in historic minority communities of color that lack the necessary regulatory protections. Moreover, zoning along larger streets, including R1s, provides the space we need to adhere to a 50% sidewalk canopy standard. Affordable housing need not compromise climate resiliency. Tree shade reduces surface temperatures between 22-54°F. They save lives.

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. While R1s on smaller streets provide private canopy, public canopy aligns with environmental justice because lots on broader streets, including R1s, are best equipped to handle both canopy and residential density.

LA can avoid an extreme and inequitable CHIP by incentivizing multifamily housing on R1 lots along opportunity corridors while supporting a public tree canopy standard for all.

Sincerely,

-- Joseph Gosling  
[maxwellgosling@gmail.com](mailto:maxwellgosling@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Joshua Gonzales** <joshua@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:51 PM

Reply-To: joshua@abundanthousingla.org

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Joshua Gonzales  
Los Angeles, CA 90006-5510  
[joshua@abundanthousingla.org](mailto:joshua@abundanthousingla.org)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Justin Ciccone** <justinchese@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:28 AM

Reply-To: justinchese@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Justin Ciccone  
Venice, CA 90291-4561  
[justinchese@gmail.com](mailto:justinchese@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Karen McCaw** <allenkaren4526@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:21 PM

Reply-To: allenkaren4526@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Karen McCaw

View Park, CA 90043-2012

[allenkaren4526@gmail.com](mailto:allenkaren4526@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Kevin Scott** <kevin.robert.scott@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:43 AM

Reply-To: kevin.robert.scott@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Kevin Scott  
Los Angeles, CA 90042-4610  
[kevin.robert.scott@gmail.com](mailto:kevin.robert.scott@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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KEVIN ZELAYA <kevv21189@everyactioncustom.com>

Fri, Sep 20, 2024 at 4:25 PM

Reply-To: kevv21189@gmail.com

To: housingelement@lacity.org

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Sincerely,

Sincerely,  
KEVIN ZELAYA  
Los Angeles, CA 90019-1812  
[kevv21189@gmail.com](mailto:kevv21189@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Lauren Borchard** <laurenborchard@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:11 AM

Reply-To: laurenborchard@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Lauren Borchard  
Los Angeles, CA 90036-2066  
[laurenborchard@gmail.com](mailto:laurenborchard@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Leah Herzberg <lkhfire@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:10 AM

Reply-To: lkhfire@aol.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Leah Herzberg

Encino, CA 91436-3222

[lkhfire@aol.com](mailto:lkhfire@aol.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Lisa Schneider** <lisaansell@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:52 AM

Reply-To: lisaansell@yahoo.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Lisa Schneider  
Beverly Hills, CA 90212-4235  
[lisaansell@yahoo.com](mailto:lisaansell@yahoo.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Liz Barillas** <trunkschan90@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:08 AM

Reply-To: trunkschan90@yahoo.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Liz Barillas

Glendale, CA 91201-1637

[trunkschan90@yahoo.com](mailto:trunkschan90@yahoo.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Madeline Prokop** <madeline.prokop@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:22 PM

Reply-To: madeline.prokop@lils.edu

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Madeline Prokop  
Los Angeles, CA 90015-4491  
[madeline.prokop@lils.edu](mailto:madeline.prokop@lils.edu)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Marc Silverman** <dhalgrn@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:37 PM

Reply-To: dhalgrn@pacbell.net

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Marc Silverman

Los Angeles, CA 90068-3071

[dhalgrn@pacbell.net](mailto:dhalgrn@pacbell.net)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Marek Slipski** <marek.slipski@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:55 AM

Reply-To: marek.slipski@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Marek Slipski  
Altadena, CA 91001-2953  
[marek.slipski@gmail.com](mailto:marek.slipski@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Mariana Mellor** <mcns.777@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:05 PM

Reply-To: mcns.777@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Mariana Mellor

Thousand Oaks, CA 91360-4250

[mcns.777@gmail.com](mailto:mcns.777@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Matthew Finlayson** <mattbnfin@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:33 PM

Reply-To: mattbnfin@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,  
Matthew Finlayson  
Santa Monica, CA 90404-4233  
[mattbnfin@gmail.com](mailto:mattbnfin@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Melanie myers** <melaniedavispghs60@everyactioncustom.com>

Fri, Sep 20, 2024 at 5:03 PM

Reply-To: melaniedavispghs60@hotmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Melanie myers  
Indio, CA 92201-0312  
[melaniedavispghs60@hotmail.com](mailto:melaniedavispghs60@hotmail.com)





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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Nannette Gueye** <Dancewithhim@att.net>

Fri, Sep 20, 2024 at 9:07 AM

Reply-To: Nannette Gueye <Dancewithhim@att.net>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning, Commissioners, and Councilman Marqueece Harris-Dawson,

I write to express deep frustration with the Citywide Housing Incentives Program (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing multifamily parcels will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. The interior residential areas of minority neighborhoods have been inequitably rezoned in prior housing cycles. Instead, we need to densify based on street width because our streets cross all neighborhoods and connect people to academic and employment opportunities. This approach must also bind the CHIP to a tree canopy standard for an environmentally just and climate resilient L.A.

I urge you to motion City Council, to include in the CHIP, R1 lots on streets classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller to reduce densification pressures in historic minority communities of color that lack the necessary regulatory protections. Moreover, zoning along larger streets, including R1s, provides the space we need to adhere to a 50% sidewalk canopy standard. Affordable housing need not compromise climate resiliency. Tree shade reduces surface temperatures between 22-54°F. They save lives.

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. While R1s on smaller streets provide private canopy, public canopy aligns with environmental justice because lots on broader streets, including R1s, are best equipped to handle both canopy and residential density.

LA can avoid an extreme and inequitable CHIP by incentivizing multifamily housing on R1 lots along opportunity corridors while supporting a public tree canopy standard for all.

Sincerely,

-- Nannette Gueye  
[Dancewithhim@att.net](mailto:Dancewithhim@att.net)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Nick Cron-DeVico** <nickcrobdevico@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:17 AM

Reply-To: nickcrobdevico@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Nick Cron-DeVico  
Los Angeles, CA 90039-2533  
[nickcrobdevico@gmail.com](mailto:nickcrobdevico@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Owen Reese <owenreese100@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:55 AM

Reply-To: owenreese100@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Owen Reese  
Los Angeles, CA 90026-2561  
[owenreese100@gmail.com](mailto:owenreese100@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Paul Moorman <pmoorman@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:16 AM

Reply-To: pmoorman@law.usc.edu

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,

Paul Moorman

West Hollywood, CA 90069-2913

[pmoorman@law.usc.edu](mailto:pmoorman@law.usc.edu)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Riley McNair** <rileymcnair@everyactioncustom.com>

Fri, Sep 20, 2024 at 2:22 PM

Reply-To: rileymcnair@ucla.edu

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,  
Riley McNair  
90024

Sincerely,  
Riley McNair  
Los Angeles, CA 90024-2373  
[rileymcnair@ucla.edu](mailto:rileymcnair@ucla.edu)





Housing Element <housingelement@lacity.org>

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## Request to CPC re: Citywide Housing Incentive Program (CHIP) Ordinance: CPC-2023-7068-CA

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Ron Prasanna <rangapras@gmail.com>

Fri, Sep 20, 2024 at 6:31 PM

To: Housing Element <housingelement@lacity.org>, cpc@lacity.org

Cc: Erika Cui <erika.cui@lacity.org>, Arthi Varma <arthi.varma@lacity.org>, Blair Smith <blair.smith@lacity.org>, mira prasanna <mira.prasannas@gmail.com>, matthew.glesne@lacity.org

Thanks Christine Bustillos !

### Dear CPC members and Planning Team:

First, thanks to everyone for their tireless efforts to provide much needed housing to Los Angeles.

Reading through EXHIBIT A.1: Citywide Housing Incentive Program Ordinance, making the requested modifications will help reduce Disparities in Density, FAR and Height between close neighbors living near Major Transit and help maximize the production of housing units, reduce animosity of living in a 2 story building surrounded by 7 or 8 story buildings of living in a low density building across a hyper dense building for example, and bring equity and harmony to those communities in Transit Oriented Areas. Find attached slides highlighting the issues faced and Requested Changes (copied below):

### Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

- 1) Award similar 'proximity' rights to Transit Oriented Incentive Area (TOIA) as awarded to Opportunity Corridors Incentive areas (OC)
- 2) Remove underlying exception of minimum of 5 for Transit Oriented Incentive Area (TOIA) as this exception is not required for Opportunity Corridors Incentive Area (OC)

I am available to present this to anyone in the team or at the Sept 26 CPC presentation. Please let me know.

Thank you very much.

regards,  
Ron Prasanna  
West LA

---

On Wed, Sep 18, 2024 at 10:04 AM Housing Element <housingelement@lacity.org> wrote:

Hi Ron,

Thank you for your email. Please note that the public comment period for the Housing Element Rezoning Program Ordinances, including the Citywide Housing Incentive Program (CHIP) Ordinance, Housing Element Sites and Minimum Density Ordinance, and Resident Protections Ordinance, closed on Monday, August 26, 2024 at 5:00p.m. Apologies for any misinformation or confusion about this date. At this time, any written comments with the applicable case number in the subject line may be submitted to [cpc@lacity.org](mailto:cpc@lacity.org) for consideration by the City Planning Commission. Please see below for case numbers associated with each draft ordinance.

Citywide Housing Incentive Program (CHIP) Ordinance: CPC-2023-7068-CA

Housing Element Sites and Minimum Density Ordinance: CPC-2024-387-CA

Resident Protections Ordinance: CPC-2024-388-CA

As a reminder, the above ordinances will be considered by the CPC on Thursday, September 26, 2024. To review the agenda for the upcoming CPC meeting, please click [here](#). To review City Planning's staff recommendation report and supporting materials, click [here](#).



Thank you,



**Housing Element Staff**  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



On Tue, Sep 17, 2024 at 11:39 AM Ron Prasanna <[rangapras@gmail.com](mailto:rangapras@gmail.com)> wrote:

Hi Erica: see email below from Rose Kato who is working closely with Cesar and helped run several petition campaigns in West LA.

Has the deadline for feedback been extended till Sept 20 as stated below ?

Also, the petitions need to have just the First Name, Last Name and Email address, with no physical address ? The reason I ask is the following petition drive to all the Council Members can be coming from people who are not living in that Council District. It could even come from out of state or out of the country (think BOTs).

Is there an address attached to a petition? If I click any of the links below, it only asks for Name and Email? Is there a way to ascertain that the Petitions are reasonably equally distributed across all council districts, to ensure proper representation across LA county?

Are these petitions public data? if so, I have SQL query skills to quickly analyze any repetition and zip code locations to assess the petitions are roughly equally distributed across all Council Districts, and prevent any smaller group from determining the positions of everyone in LA county.

In addition, Matthew Glesne was in a meeting where the preservation of Sawtelle JapanTown was pitched at a downtown meeting.. He may also know the background of this request and how it became LA County wide petition.

much regards and glad to help analyzing petitions for equitable distribution across Council Districts.

- Ron Prasanna

----- Forwarded message -----

From: R K <[rmkato1516@hotmail.com](mailto:rmkato1516@hotmail.com)>

Date: Fri, Sep 13, 2024 at 8:34 PM

Subject: NEW DEADLINE to LEVEL THE PLAYING FIELD - FRIDAY, SEPT 20

To: R K <[rmkato1516@hotmail.com](mailto:rmkato1516@hotmail.com)>

## **NEW DEADLINE to LEVEL THE PLAYING FIELD: FRIDAY, SEPT 20**

**WE ASK FOR YOUR SUPPORT of this petition that would equitably distribute density based on street width across LA...** that would relieve pressure for all of Sawtelle (and other historic ethnic minority neighborhoods) and would protect the R2s because those streets are Collector streets (even Sawtelle Blvd.).

This petition would help lighten the unfair burden placed on ethnic minority communities through the Citywide Housing Incentive Program (CHIP). It would make the Interim Control Ordinance (ICO) easier because the load would be reduced.

[https://planning.lacity.gov/odocument/a38fe378-2c4b-4260-807e-af66a053a95b/FD\\_CHIP\\_Fact\\_Sheet.pdf](https://planning.lacity.gov/odocument/a38fe378-2c4b-4260-807e-af66a053a95b/FD_CHIP_Fact_Sheet.pdf)

Citywide Housing Incentive Program's (CHIP) exempts R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 further drives displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to 'meet' the City's housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive

deed restrictions. Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities.

**This also proposes a 50% sidewalk tree canopy standard for a climate resilient L.A.**

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously shouldered environmental injustices. Tree shade reduces surface temperatures between 22-54°F. It save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. Preserve the existing canopy and expand tree coverage and affordable homes along our corridors.

- **CHIP pre-empts the Community Plan Updates and will densify non-R1 zones beyond what the Community Plan Updates envision by Feb. 2025\*. CHIP crushes historic ethnic minority communities WELL BEFORE Community Plan Updates ever happen.**
- **R1s got a TOTAL exemption from ED 1 and ALL of the CHIP—all other zoning categories are forced to shoulder the housing burden.**
- This petition removes the exemption from R1s on streets as big as Pico or larger in exchange for exemptions of R2s on streets as big as Barrington or smaller.
- **This petition would protect both R1s and R2s on smaller streets--but upzone them on the really large streets.**
- This petition would determine density by **STREET SIZE--NOT BY ZONING CATEGORY** alone.
- **It would mean historic ethnic neighborhoods get protected by Feb. 2025.**
- **It also asks for a 50% sidewalk tree canopy standard because setbacks are easier to do on wider streets.**

PLEASE urge City Council to motion to include in the CHIP, R1 lots on high opportunity corridors classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller streets to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

L.A. cannot become affordable by providing a complete and total exemption to its largest residential zoning category. Help prevent an extremely inequitable CHIP. **Incentivize multifamily homes on R1 lots on opportunity corridors with a public tree canopy standard for all.**

**This is a realistic compromise that would be better than dumping everything on the R2s and R3s on Collector streets. It asks L.A. City to zone based on the size of the street--not entirely on pre-existing zoning.**

**The goal is to exempt R2s on SMALL COLLECTOR streets by including every lot on LARGE corridors even R1s...**

**The CHIP deadline for comments has been extended to FRI, SEPT 20.**

**\* Each signed petition sends a powerful message to Mayor Karen Bass, each petitioner's Council District member and City Planning/Director Vince Bertoni.**

NOTE: For family, friends, etc. who reside in the other 14 Council Districts, petition links are listed below:

**Council District 1 - Councilmember Eunisses Hernandez**

<https://sawtellera.org/save-our-cd-1-l-a-environmentally-just-affordable-housing/>

**Council District 2 - Councilmember Paul Krekorian**

<https://sawtellera.org/save-our-cd-2-l-a-environmentally-just-affordable-housing/>

**Council District 3 - Councilmember Bob Blumenfield**

<https://sawtellera.org/save-our-cd-3-l-a-environmentally-just-affordable-housing/>

**Council District 4 - Councilmember Nithya Raman**

<https://sawteller.org/save-our-cd-4-l-a-environmentally-just-affordable-housing/>

**Council District 5 - Councilmember Katy Yaroslavsky**

<https://sawteller.org/save-our-cd-5-l-a-environmentally-just-affordable-housing/>

**Council District 6 - Councilmember Imelda Padilla**

<https://sawteller.org/save-our-cd-6-l-a-environmentally-just-affordable-housing/>

**Council District 7 - Councilmember Monica Rodriguez**

<https://sawteller.org/save-our-cd-7-l-a-environmentally-just-affordable-housing/>

**Council District 8 - Councilmember Marqueece Harris-Dawson**

<https://sawteller.org/save-our-cd-8-l-a-environmentally-just-affordable-housing/>

**Council District 9 - Councilmember Curren D. Price, Jr.**

<https://sawteller.org/save-our-cd-9-l-a-environmentally-just-affordable-housing/>

**Council District 10 - Councilmember Heather Hutt**

<https://sawteller.org/save-our-cd-10-l-a-environmentally-just-affordable-housing/>

**Council District 11 - Councilmember Traci Park**

<https://sawteller.org/save-our-cd-11-l-a-environmentally-just-affordable-housing/>

**Council District 12 - Councilmember John Lee**

<https://sawteller.org/save-our-cd-12-l-a-environmentally-just-affordable-housing/>

**Council District 13 - Councilmember Hugo Soto-Martinez**

<https://sawteller.org/save-our-cd-13-l-a-environmentally-just-affordable-housing/>

**Council District 14 - Councilmember Kevin de Leon**

<https://sawteller.org/save-our-cd-14-l-a-environmentally-just-affordable-housing/>

**Council District 15 - Councilmember Tim McOsker**

<https://sawteller.org/save-our-cd-15-l-a-environmentally-just-affordable-housing/>

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## 2 attachments



**Request CPC to Administer Similar Rights to Transit Oriented Area (T-1,2,3) as Opportunity Corridor I Areas (OC-1, 2, 3).pdf**

1424K



**EXHIBIT A.1 - Citywide Housing Incentive Program Ordinance.pdf**

3370K

## Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

- 1) Award **similar** 'proximity' rights to Transit Oriented Incentive Area (TOIA) as awarded to Opportunity Corridors Incentive areas (OC)
- 2) Remove underlying minimum of 5 for Transit Oriented Incentive Area (TOIA) as this requirement is not required for Opportunity Corridors Incentive Area (OC)

# TOPIC #1

Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

- 1) Award **similar** 'proximity' rights to Transit Oriented Incentive Area (TOIA) as awarded to Opportunity Corridors Incentive areas (OC)

# Sites Abutting, Across OC also get OC incentives, but this is not allowed for TOIA

- Exhibit A-1, Page 55, Item (c) (2), states in part “properties abutting, across the street or alley, or having a common corner with a site eligible for Opportunity Corridor Incentives shall also be eligible for the Opportunity Corridor incentives....”
  - The above creates equal or similar distribution of density in OC – similar rights based on ‘proximity’. OC also does not differentiate based on underlying zoning as long as it is not R1 or more restrictive. Therefore R2, RD3, RD2, RD1.5 all receive same incentives as R3 and above.
  - Item (c) (2) does **not** include Transit Oriented Areas (T-1, 2, 3). Therefore they do not get ‘proximity’ incentives and In addition Transit Oriented incentives are based on underlying zoning thus R2, RD3, RD2, RD1.5 do NOT receive same incentives as R3 and above. This creates ‘islands’, unequal distribution of density, spot zoning, in Transit Oriented Areas as described in the next slides.

Exhibit A.1 - CITYWIDE HOUSING INCENTIVE PROGRAM ORDINANCEPage 55

(c) **Eligibility.** To qualify for the provisions of this subdivision, a Project approved under the Mixed Income Incentive Program must satisfy all of the following eligibility requirements:

(1) Meet the definition of one of the following Project Types described in Table 12.22 A.38(c)(1)(i):

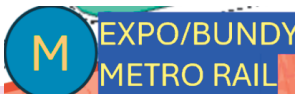
TABLE 12.22 A.38(c)(1)(i) Eligible Project Types and Total Units Required	
Project Type	Total Units Required
Mixed Income Incentive Project	Five or more
Opportunity Corridor Transition Area Incentive Project	Four or more
Type I Unified Adaptive Reuse Project <sup>1</sup>	Five or more

Footnote

<sup>1</sup> See LAMC 12.22 A.26(h)(1) for additional requirements associated with a Type I Unified Adaptive Reuse Project.

(2) Be located in and meet the requirements of a Transit Oriented Incentive Area, Opportunity Corridor Incentive Area, or an Opportunity Corridor Transition Incentive Area as described in Paragraphs (e), (f), and (g) below, except that properties abutting, across the street or alley, or having a common corner with a site eligible for Opportunity Corridor Incentives shall also be eligible for the Opportunity Corridor Incentives as described in paragraph (f) below.

# For Example, Density around Expo/Bundy Transit area (TOI)



2300 Block Wellesley Avenue (West):

- 1) 5 lots of R2 (10-16 density)
  - a) 140 unit density Across the street, Left, Right and Behind.
  - b) Surrounded by 140 units

This is one example. Many such Disparities may be found along the many Transit Stops across LA and can be avoided

Density for Units per 6250 Lot Size, FAR = 4.5, 200 sqft/DU = 140								
	West Centinela (HI)	East Centinela	West Wellesley	East Wellesley	West Amherst	East Amherst	Bundy West	Bundy East
2200 BLOCK	187	187	187	187	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
2300 BLOCK	187	140	10	140	140	140	140	140
	187	140	16	140	140	140	140	140
	187	140	16	140	140	140	140	140
	187	140	16	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140

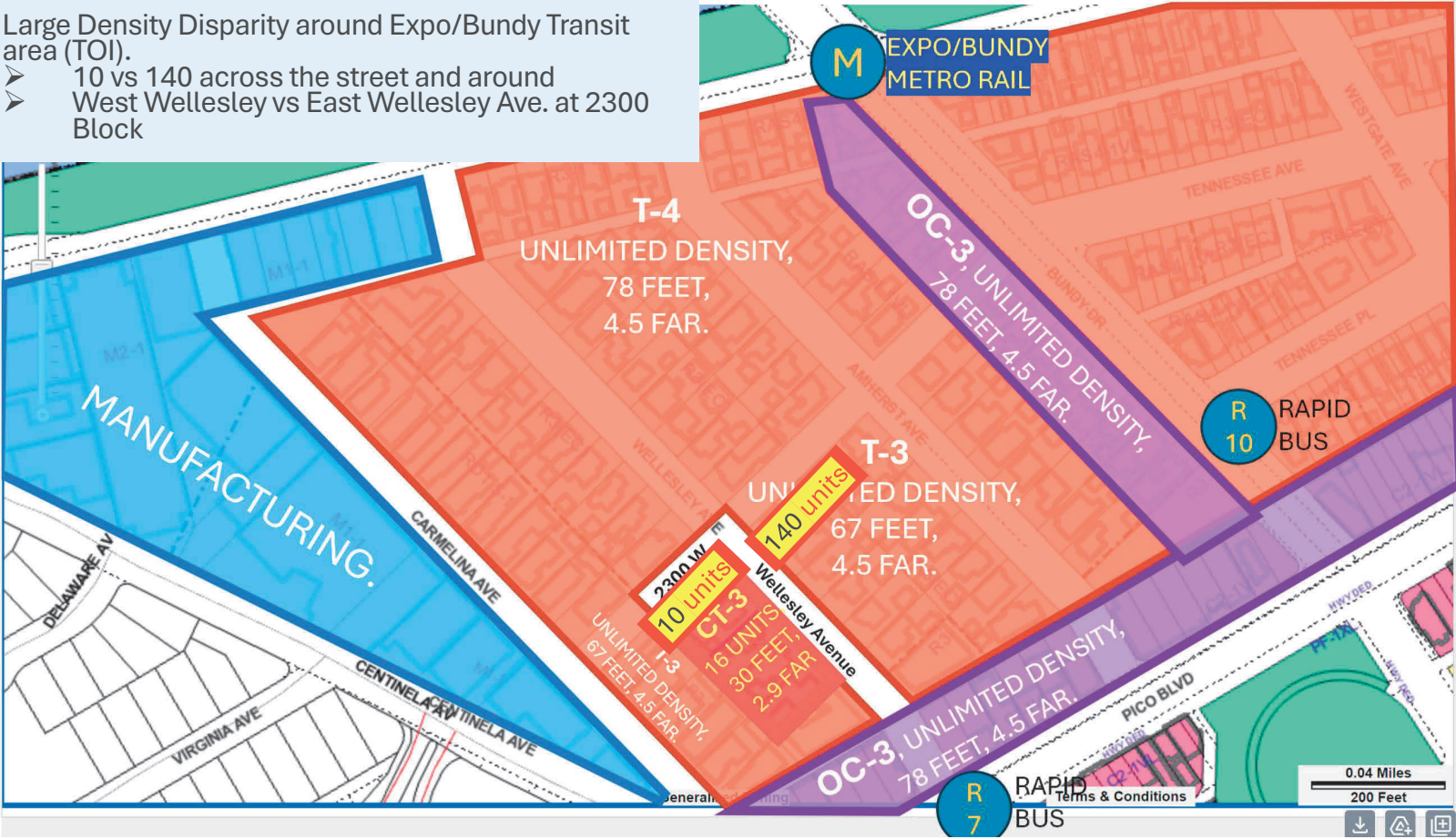
ALL LOTS In **YELLOW** Were R1s for over 80 years.

In 2018, They were upzoned to R3 and RAS4 in 2019 Expo-Line Transit Plan



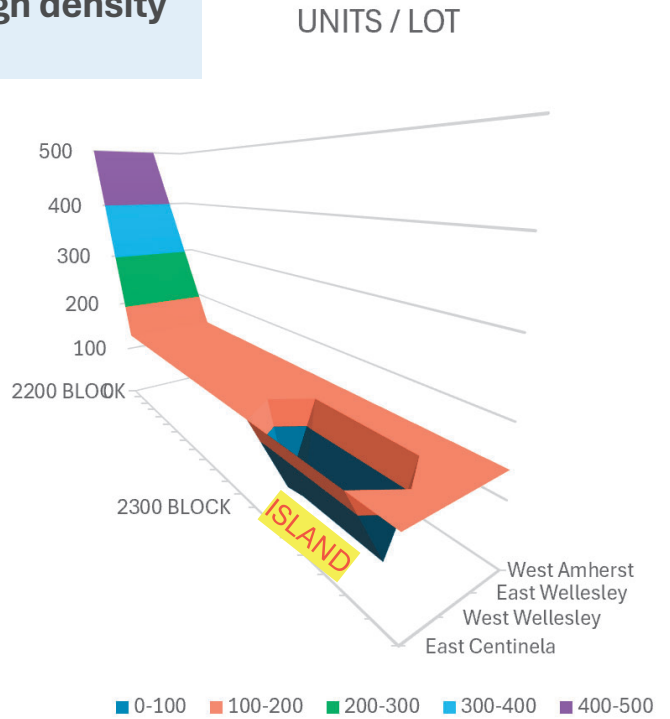
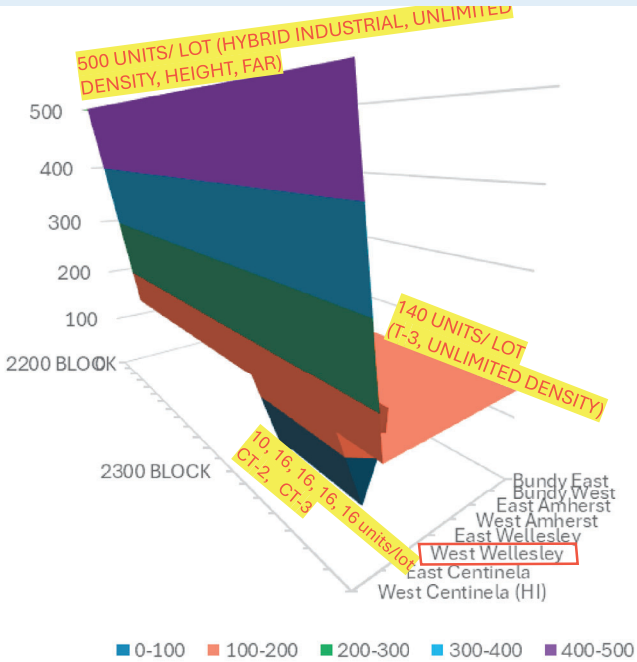
Large Density Disparity around Expo/Bundy Transit area (TOI).

- 10 vs 140 across the street and around West Wellesley vs East Wellesley Ave. at 2300 Block



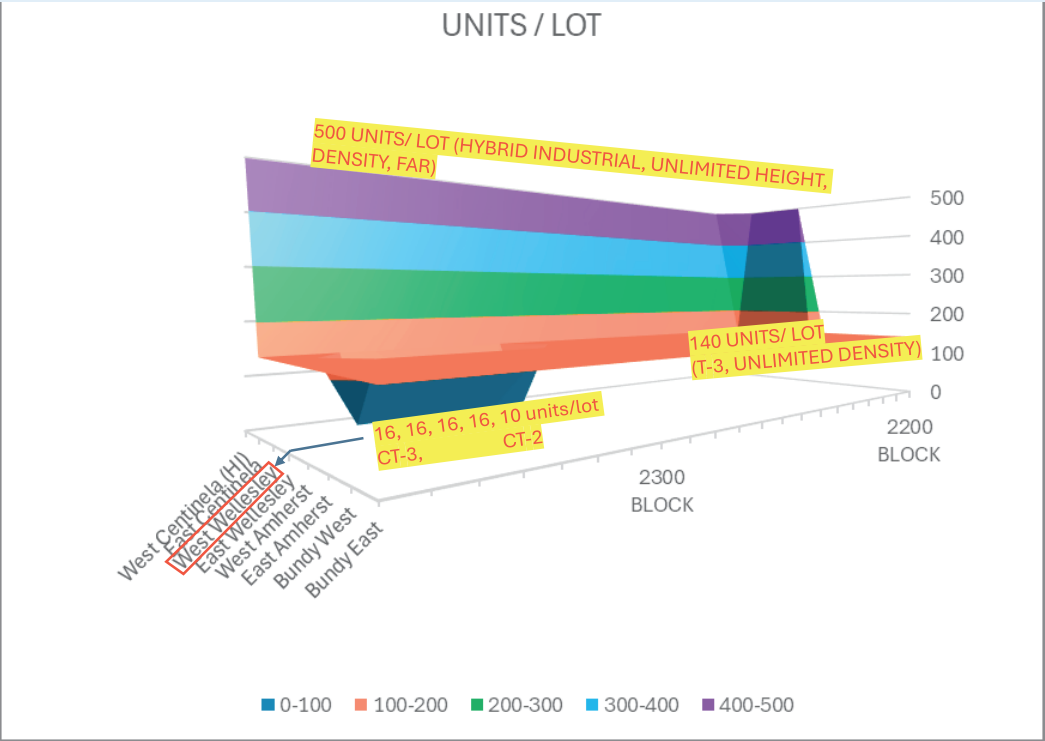


Island of Low density surrounded by Extremely High density (Disparity)



'ISLAND' of 5 R2/RD3 lots 10 units/lot surrounded by over 140 units per lot with R3, RAS4 and Hybrid Industrial (HI) zoning.

Island of Low density surrounded by Extremely High density (Disparity)



## TOPIC #2

Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

2) Remove underlying minimum of 5 for Transit Oriented Incentive Area (TOIA) as this requirement is not required for Opportunity Corridors Incentive Area (OC)

Transit Oriented Areas in  
High opportunity areas,  
Density is Limited only by  
floor area + get 33'  
additional height+ FAR 45%

Table 12.22 A.38(e)(2)(i)					
Eligibility Subarea	Density Bonus	Parking	Floor Area Ratio	Height	
	In each subarea, the maximum increase in the otherwise Maximum Allowable Residential Density shall be as follows:	In each subarea, the required parking ratio shall be as follows: <sup>1,2,6</sup>	In each subarea, the maximum allowable FAR shall be as follows: <sup>3,4</sup>	In each subarea, the maximum allowable height permitted shall be equal to the following: <sup>5</sup>	
T-1	Moderate and Lower Opportunity Areas: 100%	No parking minimum required. If parking is provided, up to 40% of spaces may be provided as compact vehicular spaces. Tandem parking may also be permitted so long as a 24-hour attendant is present on-site.	R - zones: 40% increase. C - zones: 3.25:1, or 40% increase, whichever is greater.	One additional story, up to 11 additional feet.	
	Higher Opportunity Areas: 120%		R - zones: 40% increase. C - zones: 4.2:1, or 45% increase, whichever is greater.		
T-2	Moderate and Lower Opportunity Areas: 110%		R - zones: 40% increase. C - zones: 4.2:1, or 50% increase, whichever is greater.	Two additional stories, up to 22 additional feet.	
	Higher Opportunity Areas: Limited by Floor Area		R - zones: 45% increase. C - zones: 4.5:1, or 50% increase, whichever is greater.		
T-3	Moderate and Lower Opportunity Areas: 120%		R - zones: 45% increase. C - zones: 4.5:1, or 50% increase, whichever is greater.	Three additional stories up to 33 additional feet.	
	Higher Opportunity Areas: Limited by Floor Area		R - zones: 50% increase. C - zones: 4.65:1, or 55% increase, whichever is greater.		

# But Exceptions for limiting density for sites less than base 5 units

## Section (e) (2)(i) Exceptions on Page 64

### Exceptions:

a. Sites with a Maximum Allowable Density of less than 5 units, shall be eligible for Density Bonus of:

- i. T-1: 60%
- ii. T-2: 70%
- iii. T-3: 80%

b. Sites with a Maximum Allowable Density of less than 5 units are not eligible to increase FAR or height.

But these Exceptions DO NOT exist for Opportunity Corridors

Exhibit A.1 - CITYWIDE HOUSING INCENTIVE PROGRAM ORDINANCEPage 64

Footnotes:  
1 Required automobile parking applies for all Residential Units in a Project (not just the restricted affordable units), inclusive of disabled and required guest parking, where applicable. All parking spaces provided shall comply with Subdivision 12.21 A.5 of the Code. Except that any combination of standard, compact or tandem spaces may be provided. Tandem parking spaces that do not comply with Subparagraph 12.21 A.5(h)(2) of the Code may be provided in any configuration as long as a parking attendant or an automated parking system is provided at all times.  
2 Pursuant to California Civil Code Section 1947.1, provided parking shall be sold or rented separately from the units in properties with 16 or more units, as verified by the Los Angeles Housing Department.  
3 The maximum increase in the allowable FAR permitted shall be equal to the table above, provided that any additional floor area provided through this Paragraph is utilized only by residential uses. Any nonresidential uses shall be limited to the FAR associated with a site's underlying zoning prior to the application of any Incentive.  
4 For the purpose of applying this incentive, commercial zones include Hybrid Industrial zones, Commercial Manufacturing zones and any defined area in a Specific Plan or overlay district that allows for both commercial uses and residential uses.  
5 The increase in height shall be applicable to a Project over the entire project site regardless of the number of underlying height limits. The height increase may be applied to the maximum allowable height in feet or stories permitted by the zone, including for mixed-use Projects.  
6 Consistent with California Government Code Section 65915(p)(4), required parking spaces provided allowable may be uncovered.

(i) Exceptions.  
a. Sites with a Maximum Allowable Residential Density of less than 5 units shall be eligible for the following Density Bonuses:  
i. T-1: 60%  
ii. T-2: 70%  
iii. T-3: 80%  
b. Sites with a Maximum Allowable Residential Density of less than 5 units, Designated Historic Resource(s), or Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code shall not be eligible for an incentive to increase allowable FAR or height above one additional story, up to 11 additional feet.

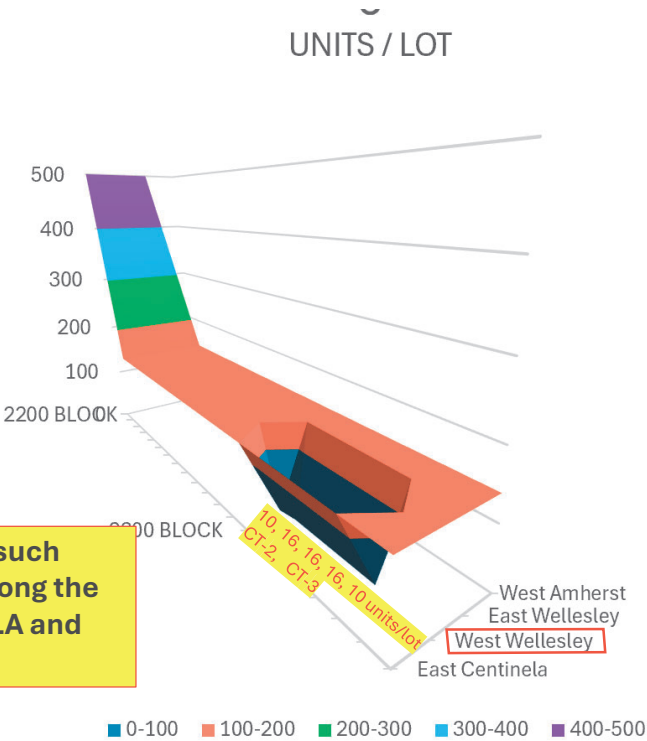
## Because these Exceptions (<5) DO NOT exist for Opportunity Corridors

- Opportunity corridors with R2, RD3, RD1.5, etc are treated equally and uniformly with respect to Density, FAR and Height as R3 and higher zoned areas.
- This Produces uniform density, FAR, Height application across multi-family lots, reducing Disparity.

Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

2) Remove underlying minimum of 5 for Transit Oriented Incentive Area (TOIA) as this requirement is not required for Opportunity Corridors Incentive Area (OC)

# Example of Disparity of density near Expo/Bundy Transit



This is one example. Many such Disparities may be found along the many Transit Stops across LA and can be avoided

## **EXHIBIT A.1:**

### **Citywide Housing Incentive Program Ordinance**

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CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA

For consideration by the City Planning Commission

September 26, 2024



## INTRODUCTION

This document is the third draft of the proposed Citywide Housing Incentive Program Ordinance to amend Chapter 1 and Chapter 1A of the Los Angeles Municipal Code. The proposed Citywide Housing Incentive Program Ordinance aims to Affirmatively Further Fair Housing by promoting housing development citywide and, in particular, increasing affordable housing in Higher Opportunity Areas<sup>1</sup>, where access to affordable housing is limited today. The draft Citywide Housing Incentive Program Ordinance proposes to do this through three distinct programs seen in Contents below. Note that this is a Clean version of the most recently revised draft. To review a strike-out version of this draft or the drafts released in March or June 2024, please visit:

<https://planning.lacity.gov/plans-policies/housing-element-rezoning-program#draft-ordinances>

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State Density Bonus Program	23
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Affordable Housing Incentive Program	88
Chapter 1A Amendments	119

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<sup>1</sup> More information on Higher Opportunity Areas can be found here:  
<https://planning.lacity.gov/plans-policies/community-plan-update/housing-element-rezoning-program-news/what-are-higher>

## ORDINANCE NO. \_\_\_\_\_

An ordinance amending Sections 12.03, 12.21, 12.22, and 12.24 of Article 2, Sections 13.09 and 13.15 of Article 3, Section 14.00 of Article 4, Section 14.5.4 of Article 4.5, Section 16.05 of Article 6, Section 19.01, 19.14, and 19.18 of Article 9 of Chapter 1; adding Section 11.5.15 to Article 1 of Chapter 1; amending Part 2B and Part 2C of Article 2, 8.1.1., 8.2.2., 8.2.3., 8.2.5., 8.2.6., 8.2.7., and 8.2.8 of Article 8, Sections 9.2.1., 9.3.1., 9.3.2., 9.3.3., and 9.4.1. of Article 9, Sections 13A.2.7., 13B.2.1., 13B.2.2., 13B.2.3., 13B.2.5., and 13B.3. of Article 13 of Chapter 1A; and amending 151.28 of Article 1 of Chapter 15 of the Los Angeles Municipal Code for the purpose of implementing the Citywide Housing Incentive Program.

**THE PEOPLE OF THE CITY OF LOS ANGELES  
DO ORDAIN AS FOLLOWS:**

Section 1. Section 11.5.15 is added to Chapter I of the Los Angeles Municipal Code to read:

- A. **Intent.** This Section is intended to:
1. Ensure that development in the city does not result in detrimental impacts to those residing or working in and around construction activities, and to abutting properties, and the public right-of-way, including the habitat, cultural resources, and historic or fragile buildings.
  2. Provide a mechanism for mitigation measures adopted pursuant to CEQA for city plans, policies, or regulations to be made enforceable on future development projects consistent with *CEQA Guidelines, Section 15162.4*.
  3. Provide a flexible mechanism to adopt and amend uniformly applicable development standards to allow streamlined environmental review, including pursuant to *CEQA Guidelines Section 15183.3*.
- B. **Applicability.** No building permit shall be issued by the Department of Building and Safety without the applicant demonstrating compliance with any regulations adopted by the Director of Planning under this Section to implement environmental protection measures.
- C. **Adoption and Maintenance of the Environmental Protection Measures Handbook.** The Director of Planning, as deemed necessary and appropriate, is authorized to prepare, maintain, amend, and adopt environmental protection measures to meet the intent of this Division, and to prepare, maintain, amend and adopt regulations to implement the environmental protection measures. The Director of Planning may, as deemed appropriate, use technical consultants or a consultant advisory panel to make recommendations on new environmental protection measures or updates to existing environmental protection measures.

- D. **Noncompliance.** Failure to comply with the environmental protection measures, regulations adopted pursuant to this Section, any condition or commitments made in compliance with the environmental protection measures or their implementing regulations, or any provision of this Section, is a violation of the code, subject to all available administrative, criminal and civil remedies for a violation of this Code. Additionally, upon verification of non-compliance, the City of Los Angeles may require as deemed necessary and appropriate the applicant or property owner to retain at its own expense an independent consultant, subject to the City of Los Angeles' approval, to ensure compliance with the environmental protection measures or regulations, and any conditions or commitments made in compliance with the environmental protection measures or regulations.

Section 2. Section 12.03 of Article 2 of Chapter 1 of the Los Angeles Municipal Code is amended to include the following definitions:

**Acutely Low Income.** Income level as defined in Section 50063.5 of the California Health and Safety Code as amended from time to time

**Area Median Income (AMI).** The median income in Los Angeles County as determined annually by the California Department of Housing and Community Development (HCD) or any successor agency, adjusted for household size.

**Coastal Zone.** The Coastal Zone, as defined in California Public Resources Code, Division 20 (commencing with Section 30000).

**Density Bonus.** A density increase over the otherwise Maximum Allowable Residential Density, as of the date of application by the applicant to the City.

**Designated Historic Resource.** A building, structure, object, landscaping element, or natural feature listed or designated as a historical resource, either individually, or as a contributor to a district, at the local, state, or national level. Including but not limited to a listing in the National Register of Historic Places or California Register of Historical Resources, or designation as a Historic-Cultural Monument or Historic Preservation Overlay Zone.

**Development Standard.** A site or construction condition as defined in California Government Code Section 65915(o)(2), or as amended.

**Extremely Low Income.** Income Level as defined in Section 50106 of the California Health and Safety Code.

**Neighborhood Retail and Service Uses.** Uses that involve business activity serving the general public, pursuant to LAMC Section 13.07 C, definitions of Neighborhood Retail and Neighborhood Services, including, but not limited to, retail, professional and personal services, hospitality, restaurants, and entertainment.

**High Quality Transit Service.** A transit route with 15 minutes or less service frequency during peak commute hours in one direction. For the purpose of determining service interval frequency, a bus route may include a combination of overlapping bus lines when part of a “colinear” or “family” line as determined in coordination with SCAG and local transit agencies, may be considered as one service route for service interval frequency.

**Higher Opportunity Areas.** High and Highest Resource Areas as defined and identified by the California Tax Credit Allocation Committee (TCAC).

**Housing Development.** As defined in subdivision (i) of Government Code Section 65915, or as amended, a development project with five or more Residential Units including mixed-use developments; and subdivisions or common interest developments as defined in Section 4100 of the Civil Code or as amended.

**Incentive.** A reduction in site development standards or a modification to zoning code requirements or architectural design requirements that results in identifiable and actual cost reductions to provide for affordable housing costs as defined in subdivision (k) of California Government Code Section 65915, or as amended.

**Lower Income.** Income level as defined in California Health and Safety Code Section 50079.5.

**Moderate and Lower Opportunity Areas.** Moderate Resource, Low Resource, and High-Poverty & Segregation Areas as defined and identified by the California Tax Credit Allocation Committee (TCAC).

**Major Transit Stop.** In addition to California Public Resources Code Section 21064.3, a site containing a rail or bus rapid transit station or the intersection of two or more bus routes with a service interval of 15 minutes or less during the morning and afternoon peak commute periods in either direction. The stations or bus routes may be existing, under construction or included in the most recent Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP). A bus route may include a combination of overlapping buses and may be considered as one service route for service interval frequency, when part of a “colinear”, “family”, or augmented line as determined in coordination with SCAG and transit agencies).

**Maximum Allowable Residential Density.** The greatest number of units allowed on a project site as defined in California Government Code Section 65915(o)(6), or as amended.

**Moderate Income.** Income level as defined in California Health and Safety Code Section 50093.

**One Hundred Percent Affordable Housing Project.** A Housing Development Project, as defined in California Government Code Section 65589.5, that involves the construction of, addition to, or remodeling of any building or buildings which results in the creation of five or more additional residential dwelling units or guest rooms, where all new dwelling units or guest rooms, exclusive of any manager's units, are restricted affordable for a term of at least 55 years for rental projects or at least 45 years for for-sale projects. With the exception of a manager's unit or units, or staff units for Projects utilizing California Government Code Section 65913.16, all units shall be affordable to lower income households earning up to 80 percent of the area median income, and rents or housing costs to the occupying residents do not exceed 30 percent of the maximum gross income, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD), or any successor agency, except that up to 20 percent of the units may be affordable to Moderate Income households earning up to 120 percent of the area median income, with rents or housing costs consistent with the rents and income ranges as defined by California Health and Safety Code Section 50052.5 or California Health and Safety Code Section 50053.

**Privately Owned Public Spaces (POPS).** An open space located on private property accessible to the public, such as a plaza, arcades, paseos, through block pedestrian connections, or open air concourses located in or around buildings. To ensure that such open spaces are available to the public, each space must meet the following criteria:

1. Open to the general public free of charge between sunrise and sunset, or during regular business hours, whichever is longer.
2. The publicly accessible open space shall be at a minimum, equal to, or greater than the common outdoor amenity space required by LAMC Section 12.21 G.2(a) and shall have at least one clear minimum dimension of 15 feet in any direction. Planters used for trees and landscaping may be located within the required 15 foot dimension provided that planters do not exceed a height of 42 inches.
3. Shall provide at least one tree (non-palm species) for every 1,000 square feet of POPS space.
4. At least one Privately Owned Public Space (POPS) sign shall be posted at every public entrance to the amenity space in accordance with the Public Amenity Space Sign Standards as established by the Director of Planning, and in accordance with LAMC Ch1A, Div. 4C.11. (Signs).
5. Provides at least three (3) ground floor pedestrian amenities as listed below:

- a. Movable seating/furniture
- b. At grade planting area
- c. Hydration station inclusive of a water fountain or bottle refill station
- d. Urban garden for community use
- e. Play and/or exercise equipment
- f. Running water elements
- g. Shade structures

**Residential Unit.** A dwelling unit or joint living and work quarters; a mobilehome, as defined in California Health and Safety Code Section 18008, or as amended; a mobile home lot in a mobilehome park, as defined in California Health and Safety Code Section 18214, or as amended; or a Guest Room or Efficiency Dwelling Unit provided that the unit is not located in a Transient Residential Use.

**Restricted Affordable Unit.** A Residential Unit for which rental or mortgage amounts are restricted so as to be affordable to and occupied by Acutely Low Income, Extremely Low, Very Low, Lower or Moderate Income households, as defined by the California Department of Housing and Community Development (HCD) or any successor agency. Affordable means that rents or housing expenses should not exceed requirements set forth in California Health and Safety Code Section 50052.5 for for-sale Residential Units, California Health and Safety Code Section 50053 for for-lease Residential Units, or by the California Tax Credit Allocation Committee.

**Sea Level Rise Area.** An area of the coast that is vulnerable to five feet of sea level rise, as determined by the National Oceanic and Atmospheric Administration, the Ocean Protection Council, the United States Geological Survey, the University of California, or as determined by a local coastal hazards vulnerability assessment.

**Specific Adverse Impact.** Per California Government Code Section 65589.5(d)(2), or as amended, a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.

**Surveyed Historic Resource.** Any building, structure, object, site, landscape, or natural feature identified through an Historic Resources Survey as eligible for listing as either an individual resource or as a contributor to an historic district under a local, state or federal designation program, including but not limited to



listing in the National Register of Historic Places or California Register of Historical Resources, or designation as a Historic-Cultural Monument or as an Historic Preservation Overlay Zone. This term does not include a non-contributor to an eligible historic district.

**Very High Fire Hazard Severity Zones.** Refer to LAMC Section 57.4911.1.1.

**Very Low Income.** Income level as defined in California Health and Safety Code Section 50105.

Section 3. Subdivision 4 of Subsection A of Section 12.21 of the Los Angeles Municipal Code is modified to read as follows:

4. Off-Street Automobile Parking Requirements. (Amended by Ord. No. 185,480, Eff. 5/9/18.) A garage or an off-street automobile parking area shall be provided in connection with and at the time of the erection of each of the buildings or structures hereinafter specified, or at the time such buildings or structures are altered, enlarged, converted or increased in capacity by the addition of dwelling units, guest rooms, beds for institutions, floor area or seating capacity. The parking space capacity required in said garage or parking area shall be determined by the amount of dwelling units, guest rooms, beds for institutions, floor area or seats so provided, and said garage or parking area shall be maintained thereafter in connection with such buildings or structures.

New or existing automobile parking spaces required by the Code for all uses may be replaced by bicycle parking at a ratio of one standard or compact automobile parking space for every four required or non-required bicycle parking spaces provided, so long as the number of compact stalls complies with Section 12.21 A.5.(c) of this Code. In cases where additional bicycle parking spaces are required as a result of an addition to an existing building, the maximum number of bicycle parking spaces eligible to be applied toward the required number of automobile parking spaces shall be calculated based on the total number of bicycle parking spaces provided for the existing building plus the number of bicycle parking spaces provided for the addition. Notwithstanding the foregoing, no more than 20 percent of the required automobile parking spaces for nonresidential uses shall be replaced at a site. Automobile parking spaces for nonresidential projects or buildings located within 1,500 feet of a major transit stop, as defined in Subdivision (b) of Section 21155 of the California Public Resources Code as that section may be amended from time to time, may replace up to 30 percent of the required automobile parking spaces with bicycle parking. For buildings with less than 20 required automobile parking spaces, those spaces may be replaced subject to the limits described in this Subdivision, not exceeding a total of four parking spaces replaced.

Residential buildings, including hotels, motels and apartment hotels, may replace 10 percent of the required automobile parking with bicycle parking. Automobile parking spaces for residential projects or buildings located within 1,500 feet of a major transit stop, as defined in Subdivision (b) of Section 21155 of the California Public Resources

Code, may replace up to 15 percent of the required automobile parking spaces with bicycle parking. If a residential building includes at least the minimum number of restricted affordable units to receive a density bonus ~~under Section 12.22 A.25,~~ pursuant to California Government Code Section 65915 (b) then up to 30 percent of the required automobile parking may be replaced. In such cases, the replacement of automobile parking with bicycle parking shall be implemented in lieu of the parking options in California Government Code Section 65915(p) Section 12.22 A.25(d).

Section 4. Paragraph e Subdivision 31 of Subsection E of Section 12.22 of the Los Angeles Municipal Code is modified to read as follows:

31. Procedures. Application for the TOC Incentives shall be made on a form provided by the Department of City Planning, and shall follow the procedures outlined in Los Angeles Municipal Code Section 13B.2.5 (Director Determination) of Chapter 1A of this Code 12.22 A.25(g).

Section 5. Subdivision 25 of Subsection A of Section 12.22 of Los Angeles Municipal Code is hereby amended to read as follows:-

See LAMC Section 12.22 A.37 (State Density Bonus Program).

**~~25. Affordable Housing Incentives – Density Bonus. (Amended by Ord. No. 179,681, Eff. 4/15/08.)~~**

- (a) **~~Purpose.~~** The purpose of this subdivision is to establish procedures for implementing State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, and to increase the production of affordable housing, consistent with City policies.
- (b) **~~Definitions.~~** Notwithstanding any provision of this Code to the contrary, the following definitions shall apply to this subdivision:

**~~Affordable Housing Incentives Guidelines~~** — the guidelines approved by the City Planning Commission under which Housing Development Projects for which a Density Bonus has been requested are evaluated for compliance with the requirements of this subdivision.

**~~Area Median Income (AMI)~~** — the median income in Los Angeles County as determined annually by the California Department of Housing and Community Development (HCD) or any successor agency, adjusted for household size.

**~~Density Bonus~~** — a density increase over the otherwise maximum allowable residential density under the applicable zoning ordinance and/or specific plan granted pursuant to this subdivision.



**~~Density Bonus Procedures~~** — procedures to implement the City's Density Bonus program developed by the Departments of Building and Safety, City Planning and Housing.

**~~Disabled Person~~** — a person who has a physical or mental impairment that limits one or more major life activities, anyone who is regarded as having that type of an impairment or, anyone who has a record of having that type of an impairment.

**~~Floor Area Ratio~~** — the multiplier applied to the total buildable area of the lot to determine the total floor area of all buildings on a lot.

**~~Housing Development Project~~** — the construction of five or more new residential dwelling units, the addition of five or more residential dwelling units to an existing building or buildings, the remodeling of a building or buildings containing five or more residential dwelling units, or a mixed use development in which the residential floor area occupies at least fifty percent of the total floor area of the building or buildings. For the purpose of establishing the minimum number of five dwelling units, Restricted Affordable Units shall be included and density bonus units shall be excluded.

**~~Incentive~~** — a modification to a City development standard or requirement of Chapter I of this Code (zoning).

**~~Income, Very Low, Low or Moderate~~** — annual income of a household that does not exceed the amounts designated for each income category as determined by HCD or any successor agency.

**~~Residential Hotel~~** — any building containing six or more Guest Rooms or Efficiency Dwelling Units, which are intended or designed to be used, or are used, rented, or hired out to be occupied, or are occupied for sleeping purposes by guests, so long as the Guest Rooms or Efficiency Dwelling Units are also the primary residence of those guests, but not including any building containing six or more Guest Rooms or Efficiency Dwelling Units, which is primarily used by transient guests who do not occupy that building as their primary residence.

**~~Residential Unit~~** — a dwelling unit or joint living and work quarters; a mobilehome, as defined in California Health and Safety Code Section 18008; a mobile home lot in a mobilehome park, as defined in California Health and Safety Code Section 18214; or a Guest Room or Efficiency Dwelling Unit in a Residential Hotel.

**~~Restricted Affordable Unit~~** — a residential unit for which rental or mortgage amounts are restricted so as to be affordable to and occupied by Very Low, Low or Moderate Income households, as determined by the Los Angeles Housing Department. **(Amended by Ord. No. 187,122, Eff. 8/8/21.)**

~~**Senior Citizens**—individuals who are at least 62 years of age, except that for projects of at least 35 units that are subject to this subdivision, a threshold of 55 years of age may be used, provided all applicable City, state and federal regulations are met.~~

~~**Senior Citizen Housing Development**—a Housing Development Project for senior citizens that has at least 35 units.~~

~~**Specific Adverse Impact**—a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.~~

~~**Transit Stop/Major Employment Center**—any one of the following:~~

- ~~(1) A station stop for a fixed transit guideway or a fixed rail system that is currently in use or whose location is proposed and for which a full funding contract has been signed by all funding partners, or one for which a resolution to fund a preferred alignment has been adopted by the Los Angeles County Metropolitan Transportation Authority or its successor agency; or~~
  - ~~(2) A Metro Rapid Bus stop located along a Metro Rapid Bus route; or, for a Housing Development Project consisting entirely of Restricted Affordable Units, any bus stop located along a Metro Rapid Bus route; or~~
  - ~~(3) The boundaries of the following three major economic activity areas, identified in the General Plan Framework Element: Downtown, LAX and the Port of Los Angeles; or~~
  - ~~(4) The boundaries of a college or university campus with an enrollment exceeding 10,000 students.~~
- ~~(c) **Density Bonus.** Notwithstanding any provision of this Code to the contrary, the following provisions shall apply to the grant of a Density Bonus for a Housing Development Project:~~

- ~~(1) **For Sale or Rental Housing with Low or Very Low Income Restricted Affordable Units.** A Housing Development Project that includes 10% of the total units of the project for Low Income households or 5% of the total units of the project for Very Low Income households, either in rental units or for sale units, shall be granted a minimum Density Bonus of 20%, which may be applied to any part of the Housing Development Project. The bonus may be increased according to the percentage of affordable housing units provided, as follows, but shall not exceed 35%:~~

<del>Percentage Low Income Units</del>	<del>Percentage Density Bonus</del>
<del>40</del>	<del>20</del>

41	21.5
42	23
43	24.5
44	26
45	27.5
46	29
47	30.5
48	32
49	33.5
20	35

Percentage Very Low Income Units	Percentage Density Bonus
5	20
6	22.5
7	25
8	27.5
9	30
10	32.5
11	35

~~(2) For Sale or Rental Senior Citizen Housing (Market Rate). A Senior Citizen Housing Development or a mobile home park that limits residency based on age requirements for housing for older persons pursuant to California Civil Code Sections 798.76 or 799.5 shall be granted a minimum Density Bonus of 20%.~~

~~(3) (Deleted by Ord. No. 181,142, Eff. 6/1/10.)~~

~~(4) A Common Interest Development That Includes Moderate Income Restricted Affordable Units. (Amended by Ord. No. 181,142, Eff. 6/1/10.) A common interest development as defined in Section 1351 of the Civil Code that includes at least 10% of its units for Moderate Income households shall be granted a minimum Density Bonus of 5%. The bonus may be increased according to the percentage of affordable housing units provided, as follows, but shall not exceed 35%:~~

Percentage Moderate Income Units	Percentage Density Bonus
10	5
11	6
12	7
13	8
14	9
15	10
16	11
17	12
18	13
19	14
20	15
21	16
22	17
23	18
24	19
25	20
26	21
27	22
28	23
29	24
30	25
31	26
32	27
33	28
34	29
35	30

36	34
37	32
38	33
39	34
40	35

- ~~(5) **Land Donation.** An applicant for a subdivision, parcel map or other residential development approval that donates land for housing to the City of Los Angeles satisfying the criteria of California Government Code Section 65915(h)(2), as verified by the Department of City Planning, shall be granted a minimum Density Bonus of 15%.~~
- ~~(6) **Child Care.** A Housing Development Project that conforms to the requirements of Subparagraphs (1), (2), (3), (4) or (5) of this paragraph and includes a child care facility located on the premises of, as part of, or adjacent to, the project, shall be granted either of the following:~~
- ~~(i) — an additional Density Bonus that is, for purposes of calculating residential density, an increase in the floor area of the project equal to the floor area of the child care facility included in the project.~~
  - ~~(ii) — An additional Incentive that contributes significantly to the economic feasibility of the construction of the child care facility.~~
- ~~(7) **Fractional Units.** In calculating Density Bonus and Restricted Affordable units, any number resulting in a fraction shall be rounded up to the next whole number.~~
- ~~(8) **Other Discretionary Approval.** Approval of Density Bonus units shall not, in and of itself, trigger other discretionary approvals required by the Code.~~
- ~~(9) **Other Affordable Housing Subsidies.** Approval of Density Bonus units does not, in and of itself, preclude projects from receipt of other government subsidies for affordable housing.~~
- ~~(10) **Additional Option for Restricted Affordable Units located near Transit Stop/Major Employment Center.** In lieu of providing the requisite number of Restricted Affordable Units in a Housing Development Project located in or within 1,500 feet of a Transit Stop/Major Employment Center that would otherwise be required under this subdivision, an applicant may opt to provide a greater number of smaller units, provided that:~~

- ~~(i) the total number of units in the Housing Development Project including Density Bonus units does not exceed the maximum permitted by this subdivision;~~
- ~~(ii) the square footage of the aggregate smaller Restricted Affordable units is equal to or greater than the square footage of the aggregate Restricted Affordable Units that would otherwise be required under this subdivision;~~
- ~~(iii) the smaller Restricted Affordable units are distributed throughout the building and have proportionally the same number of bedrooms as the market rate units; and~~
- ~~(iv) the smaller Restricted Affordable Units meet the minimum unit size requirements established by the Low Income Housing Tax Credit Program as administered by the California Tax Credit Allocation Committee (TCAC).~~
- ~~(11) **Common Interest Development with Low or Very Low Income restricted Affordable Units for Rent.** In a common interest development as defined in California Government Code Section 1351, such as a condominium, Restricted Affordable Units may be for sale or for rent.~~
- ~~(12) **Condominium Conversion.** A Housing Development Project that involves the conversion of apartments into condominiums and that includes 33 percent of its units restricted to households of Low or Moderate income or 15 percent of its units restricted to households of Very Low Income shall be granted a Density Bonus of 25 percent or up to three incentives as provided in Paragraph (c) of this subdivision.~~
- ~~(d) **Parking in a Housing Development Project.** Required parking spaces for a Housing Development Project that is for sale or for rent and qualifies for a Density Bonus and complies with this subdivision may be provided by complying with whichever of the following options requires the least amount of parking: applicable parking provisions of Section 12.21 A.4. of this Code, or Parking Option 1 or Parking Option 2, below. Required parking in a Housing Development Project that qualifies for a Density Bonus may be sold or rented separately from the dwelling units, so that buyers and tenants have the option of purchasing or renting a unit without a parking space. The separate sale or rental of a dwelling unit and a parking space shall not cause the rent or purchase price of a Restricted Affordable Unit (or the parking space) to be greater than it would otherwise have been.~~
- ~~(1) **Parking Option 1.** Required parking for all residential units in the Housing Development Project (not just the restricted units), inclusive of handicapped and guest parking, shall be reduced to the following requirements:~~

- ~~(i) For each Residential Unit of 0-1 bedroom: 1 on-site parking space.~~
- ~~(ii) For each Residential Unit of 2-3 bedrooms: 2 on-site parking spaces.~~
- ~~(iii) For each Residential Unit of 4 or more bedrooms: 2-1/2 on-site parking spaces.~~

~~(2) **Parking Option 2.** Required parking for the Restricted Affordable Units only shall be reduced as set forth in Subparagraphs (i) and (ii) below. Required parking for all other non-restricted units in the Housing Development Project shall comply with applicable provisions of Section 12.21 of this Code.~~

- ~~(i) One parking space per Restricted Affordable Unit, except:
 
  - ~~a. 0.5 parking space for each dwelling unit restricted to Low or Very Low Income Senior Citizens or Disabled Persons; and/or~~
  - ~~b. 0.25 parking space for each Restricted Affordable Unit in a Residential Hotel.~~~~
- ~~(ii) Up to 40% of the required parking for the Restricted Affordable Units may be provided by compact stalls.~~

~~(c) **Incentives.**~~

- ~~(1) In addition to the Density Bonus and parking options identified in Paragraphs (c) and (d) of this subdivision, a Housing Development Project that qualifies for a Density Bonus shall be granted the number of Incentives set forth in the table below.~~

<b>Number of Incentives</b>	<b>Required Percentage* of Units Restricted for Very Low Income Households</b>	<b>Required Percentage* of Units Restricted for Low Income Households</b>	<b>Required Percentage* of Units Restricted for Moderate Income Households (For Sale Only)</b>
One Incentive	5% or	10% or	10%
Two Incentives	10% or	20% or	20%
Three Incentives	15% or	30%	30%

~~\*Excluding Density Bonus Units~~

- ~~(2) To be eligible for any on-menu incentives, a Housing Development Project (other than an Adaptive Reuse project) shall comply with the following:~~

- ~~(i) The facade of any portion of a building that abuts a street shall be articulated with a change of material or with a break in plane, so that the facade is not a flat surface.~~
  - ~~(ii) All buildings must be oriented to the street by providing entrances, windows, architectural features and/or balconies on the front and along any street facing elevations.~~
  - ~~(iii) The Housing Development Project shall not be a contributing structure in a designated Historic Preservation Overlay Zone and shall not be on the City of Los Angeles list of Historical Cultural Monuments.~~
  - ~~(iv) The Housing Development Project shall not be located on a substandard street in a Hillside Area or in a Very High Fire Hazard Severity Zone as established in Section 57.4908 of this Code.~~
- ~~(f) **Menu of Incentives.** Housing Development Projects that meet the qualifications of Paragraph (e) of this subdivision may request one or more of the following Incentives, as applicable:~~
- ~~(1) **Yard/Setback.** Up to 20% decrease in the required width or depth of any individual yard or setback except along any property line that abuts an R1 or more restrictively zoned property provided that the landscaping for the Housing Development Project is sufficient to qualify for the number of landscape points equivalent to 10% more than otherwise required by Section 12.40 of this Code and Landscape Ordinance Guidelines "O."~~
  - ~~(2) **Lot Coverage.** Up to 20% increase in lot coverage limits, provided that the landscaping for the Housing Development Project is sufficient to qualify for the number of landscape points equivalent to 10% more than otherwise required by Section 12.40 of this Code and Landscape Ordinance Guidelines "O".~~
  - ~~(3) **Lot Width.** Up to 20% decrease from a lot width requirement, provided that the landscaping for the Housing Development Project is sufficient to qualify for the number of landscape points equivalent to 10% more than otherwise required by Section 12.40 of this Code and Landscape Ordinance Guidelines "O".~~
  - ~~(4) **Floor Area Ratio.**~~
    - ~~(i) A percentage increase in the allowable Floor Area Ratio equal to the percentage of Density Bonus for which the Housing Development Project is eligible, not to exceed 35%; or~~
    - ~~(ii) In lieu of the otherwise applicable Floor Area Ratio, a Floor Area Ratio not to exceed 3:1, provided the parcel is in a commercial zone in Height~~



~~District 1 (including 1VL, 1L and 1XL), and fronts on a Major Highway as identified in the City's General Plan, and~~

- ~~(iii) the Housing Development Project includes the number of Restricted Affordable Units sufficient to qualify for a 35% Density Bonus, and~~
- ~~(iv) 50% or more of the commercially zoned parcel is located in or within 1,500 feet of a Transit Stop/Major Employment Center.~~

~~A Housing Development Project in which at least 80% of the units in a rental project are Restricted Affordable Units or in which 45% of the units in a for-sale project are Restricted Affordable Units shall be exempt from the requirement to front on a Major Highway.~~

~~(g) **Height.** A percentage increase in the height requirement in feet equal to the percentage of Density Bonus for which the Housing Development Project is eligible. This percentage increase in height shall be applicable over the entire parcel regardless of the number of underlying height limits. For purposes of this subparagraph, Section 12.21.1 A.10. of this Code shall not apply.~~

~~(1) In any zone in which the height or number of stories is limited, this height increase shall permit a maximum of eleven additional feet or one additional story, whichever is lower, to provide the Restricted Affordable Units.~~

~~(i) No additional height shall be permitted for that portion of a of a building in a Housing Development Project that is located within fifteen feet of a lot classified in the R2 Zone.~~

~~(ii) For each foot of additional height the building shall be set back one horizontal foot.~~

~~(2) No additional height shall be permitted for that portion of a building in a Housing Development Project that is located within 50 feet of a lot classified in an R1 or more restrictive residential zone.~~

~~(3) No additional height shall be permitted for any portion of a building in a Housing Development Project located on a lot sharing a common lot line with or across an alley from a lot classified in an R1 or more restrictive zone. This prohibition shall not apply if the lot on which the Housing Development Project is located is within 1,500 feet of a Transit Stop but no additional height shall be permitted for that portion of a building in the Housing Development Project that is located within 50 feet of a lot classified in an R1 or more restrictive residential zone.~~

- ~~(4) **Open Space.** Up to 20% decrease from an open space requirement, provided that the landscaping for the Housing Development Project is sufficient to qualify for the number of landscape points equivalent to 10% more than otherwise required by Section 12.40 of this Code and Landscape Ordinance Guidelines “O”.~~
- ~~(5) **Density Calculation.** The area of any land required to be dedicated for street or alley purposes may be included as lot area for purposes of calculating the maximum density permitted by the underlying zone in which the project is located.~~
- ~~(6) **Averaging of Floor Area Ratio, Density, Parking or Open Space, and permitting Vehicular Access.** A Housing Development Project that is located on two or more contiguous parcels may average the floor area, density, open space and parking over the project site, and permit vehicular access from a less restrictive zone to a more restrictive zone, provided that:~~
- ~~(i) the Housing Development Project includes 11% or more of the units as Restricted Affordable Units for Very Low Income households, or 20% of the units for Low Income households, or 30% of the units for Moderate Income households; and~~
  - ~~(ii) the proposed use is permitted by the underlying zone(s) of each parcel; and~~
  - ~~(iii) no further lot line adjustment or any other action that may cause the Housing Development Project site to be subdivided subsequent to this grant shall be permitted.~~

~~(h) **Procedures.**~~

- ~~(1) **Density Bonus and Parking.** Housing Development Projects requesting a Density Bonus without any Incentives (which includes a Density Bonus with only parking requirements in accordance with Paragraphs (c) and (d) of this subdivision) shall be considered ministerial and follow the Affordable Housing Incentives Guidelines and the Density Bonus Procedures. No application for these projects need be filed with the City Planning Department.~~

~~(2) **Requests for Incentives on the Menu.**~~

- ~~(i) The applicant for Housing Development Projects that qualify for a Density Bonus and that request up to three Incentives on the Menu of Incentives in Paragraph (f) of this subdivision, and which require no other discretionary actions, the following procedures shall apply:~~

a. ~~**Application.** The request shall be made on a form provided by the Department of City Planning, as set forth in Section 11.5.7 B.2.(a) of this Code, accompanied by applicable fees.~~

b. ~~**Authority. (Amended by Ord. No. 182,106, Eff. 5/20/12.)** The Director shall be the initial decision maker for applications seeking on Menu incentives.~~

~~**EXCEPTION:** When the application is filed as part of a project requiring multiple approvals, the initial decision maker shall be as set forth in Section 12.36 of this Code; and when the application is filed in conjunction with a subdivision and no other approval, the Advisory Agency shall be the initial decision maker.~~

c. ~~**Action.** The Director shall approve a Density Bonus and requested Incentive(s) unless the Director finds that:~~

i. ~~The Incentive is not required in order to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5, or Section 50053 for rents for the affordable units; or~~

ii. ~~The Incentive will have a Specific Adverse Impact upon public health and safety or the physical environment or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the Specific Adverse Impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.~~

d. ~~**Transmittal of Written Decision.** Within three business days of making a decision, the Director shall transmit a copy by First Class Mail to the applicant and to all owners of properties abutting, across the street or alley from, or having a common corner with the subject property, and to the local Certified Neighborhood Council.~~

e. ~~**Effective Date of Initial Decision.** The Director's decision shall become effective after an elapsed period of 15 calendar days from the date of the mailing of the written decision unless an appeal is filed to the City Planning Commission.~~

~~f. **Appeals. (Amended by Ord. No. 182,106, Eff. 5/20/12.)** An applicant or any owner or tenant of a property abutting, across the street or alley from, or having a common corner with the subject property aggrieved by the Director's decision may appeal the decision to the City Planning Commission pursuant to applicable procedures set forth in Section 11.5.7 C.6. of this Code that are not in conflict with the provisions of this paragraph (g)(2)(i). The appeal shall include a filing fee pursuant to Section 19.01 B. of this Code. Before acting on any appeal, the City Planning Commission shall set the matter for hearing, with written notice of the hearing sent by First Class Mail at least ten days prior to the meeting date to: the applicant; the owner(s) of the property involved; and the interested parties who have requested notice in writing. The appeal shall be placed on the agenda for the first available meeting date of the City Planning Commission and acted upon within 60 days from the last day of the appeal period. The City Planning Commission may reverse or modify, in whole or in part, a decision of the Director. The City Planning Commission shall make the same findings required to be made by the Director, supported by facts in the record, and indicate why the Director erred making the determination.~~

**EXCEPTION:** ~~When the application is filed as part of a project requiring multiple approvals, the appeals procedures set forth in Section 12.36 of this Code shall govern. When the application is filed in conjunction with a Parcel Map and no other approval, the appeals procedures set forth in Section 17.54 of this Code shall govern. When the application is filed in conjunction with a tentative map and no other approval, the appeals procedures set forth in Section 17.06 A.3. of this Code shall govern, provided that such applications shall only be appealable to the Appeal Board, as defined in Section 17.02 of this Code, and shall not be subject to further appeal to the City's legislative body.~~

~~(ii) For Housing Development Projects that qualify for a Density Bonus and for which the applicant requests up to three Incentives listed in Paragraph (f), above, and that require other discretionary actions, the applicable procedures set forth in Section 12.36 of this Code shall apply:~~

~~a. The decision must include a separate section clearly labeled "Density Bonus/ Affordable Housing Incentives Program Determination".~~

- ~~b. The decision maker shall approve a Density Bonus and requested Incentive(s) unless the decision maker, based upon substantial evidence, makes either of the two findings set forth in Subparagraph (2)(i)(c), above.~~

~~(3) Requests for Waiver or Modification of any Development Standard(s) Not on the Menu.~~

- ~~(i) For Housing Development Projects that qualify for a Density Bonus and for which the applicant request a waiver or modification of any development standard(s) that is not included on the Menu of Incentives in Paragraph (f), above, and that are not subject to other discretionary applications, the following shall apply:~~

- ~~a. The request shall be made on a form provided by the Department of City Planning, accompanied by applicable fees, and shall include a pro forma or other documentation to show that the waiver or modification of any development standard(s) are needed in order to make the Restricted Affordable Units economically feasible.~~

- ~~b. **Notice and Hearing.** The application shall follow the procedures for conditional uses set forth in Section 12.24 D. of this Code. A public hearing shall be held by the City Planning Commission or its designee. The decision of the City Planning Commission shall be final.~~

- ~~c. The City Planning Commission shall approve a Density Bonus and requested waiver or modification of any development standard(s) unless the Commission, based upon substantial evidence, makes either of the two findings set forth in Subparagraph (g)(2)(i)c., above.~~

- ~~(ii) For Housing Development Projects requesting waiver or modification of any development standard(s) not included on the Menu of Incentives in Paragraph (f) above, and which include other discretionary applications, the following shall apply:~~

- ~~a. The applicable procedures set forth in Section 12.36 of this Code shall apply.~~

- ~~b. The decision must include a separate section clearly labeled "Density Bonus/ Affordable Housing Incentives Program Determination".~~

~~c. The decision maker shall approve a Density Bonus and requested waiver or modification of any development standard(s) unless the decision maker, based upon substantial evidence, makes either of the two findings set forth in Subparagraph (g)(2)(i)c., above.~~

~~(i) **Covenant.** Prior to issuance of a Building Permit, the following shall apply:~~

~~(1) For any Housing Development Project qualifying for a Density Bonus and that contains housing for Senior Citizens, a covenant acceptable to the Los Angeles Housing Department shall be recorded with the Los Angeles County Recorder, guaranteeing that the occupancy restriction to Senior Citizens shall be observed for at least 30 years from the issuance of the Certificate of Occupancy or a longer period of time if required by the construction or mortgage financing assistance program, mortgage assistance program, or rental subsidy program. **(Amended by Ord. No. 187,122, Eff. 8/8/21.)**~~

~~(2) For any Housing Development Project qualifying for a Density Bonus and that contains housing for Low or Very Low Income households, a covenant acceptable to the Los Angeles Housing Department shall be recorded with the Los Angeles County Recorder, guaranteeing that the affordability criteria will be observed for at least 30 years from the issuance of the Certificate of Occupancy or a longer period of time if required by the construction or mortgage financing assistance program, mortgage assistance program, or rental subsidy program. **(Amended by Ord. No. 187,122, Eff. 8/8/21.)**~~

~~(3) For any Housing Development Project qualifying for a Density Bonus and that contains housing for Moderate Income households for sale, a covenant acceptable to the Los Angeles Housing Department and consistent with the for sale requirements of California Government Code Section 65915(c)(2) shall be recorded with the Los Angeles County Recorder guaranteeing that the affordability criteria will be observed for at least ten years from the issuance of the Certificate of Occupancy. **(Amended by Ord. No. 187,122, Eff. 8/8/21.)**~~

~~(4) If the duration of affordability covenants provided for in this subdivision conflicts with the duration for any other government requirement, the longest duration shall control.~~

~~(5) Any covenant described in this paragraph must provide for a private right of enforcement by the City, any tenant, or owner of any building to which a covenant and agreement applies.~~

~~(j) **Fee Deferral.** At the option of the applicant, payment of fees may be deferred pursuant to Sections 19.01 O. and 19.05 A.1. of this Code.~~

~~(k) **Applicability.** To the extent permitted under applicable State law, if a conflict arises between the terms of this subdivision and the terms of the City's Mello Act Settlement Agreement, Interim Administrative Procedures for Complying with the Mello Act or any subsequent permanent Mello Ordinance, Procedures or Regulations (collectively "Mello Terms"), the Mello Terms preempt this subdivision.~~

Section 6. Subdivision 37 of Subsection A of Section 12.22 of the Los Angeles Municipal Code is added to read as follows:

#### **12.22 A.37 STATE DENSITY BONUS PROGRAM**

(a) **Purpose.** The purpose of this Subdivision is to establish procedures for the implementation of State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, and to increase the production of affordable housing, consistent with City policies.

(b) **Definitions.** The following definitions shall apply to this Subdivision:

**Disabled Veteran.** Disabled Veteran shall be as defined in Section 18541 of the California Government Code.

**Environmental Consideration Area.** Project sites that were previously used as a gas station, gas or oil well, or dry-cleaning facility, or Project sites located on or within 500 feet of a Hazardous Materials site (as listed on any of the following databases: State Water Resources Control Board Geotracker, DTSC EnviroStor or listed pursuant to Government Code Section 65962.5, DTSC Hazardous Waste Tracking System, LAFD Certified Unified Program Agency, Los Angeles County Fire Department Health Hazardous Materials Division, SCAQMD Facility Information Detail), or Project sites located on or within 500 feet of a Hazardous Materials site designated as a Resource Conservation and Recovery Act (RCRA) Small Quantity Generator or Large Quantity Generator (refer to US EPA Envirofacts database), or Project sites located in an Oil Drilling District (O), or Project sites located within the following buffers-of a property identified as having an oil well or an oil field by the California Geologic Energy Management Division: on or within 1,000 feet from an active oil well or field, on or within 200 feet from an idle oil well or field, and on or within 100 feet from a plugged oil well or field.

**Homeless Person.** Homeless Person as defined in the federal McKinney-Vento Homeless Assistance Act (42 U.S.C. Sec. 11301 et seq.).

**Lower Income Student.** A student who has a household income and asset level that does not exceed the level for Cal Grant A or Cal Grant B award recipients as set forth in paragraph (1) of subdivision (k) of Section 69432.7 of the Education Code, or as amended. The eligibility of a student to occupy a unit for lower



income students under this section shall be verified by an affidavit, award letter, or letter of eligibility provided by the institution of higher education in which the student is enrolled or by the California Student Aid Commission that the student receives or is eligible for financial aid, including an institutional grant or fee waiver from the college or university, the California Student Aid Commission, or the federal government.

**Senior Citizens.** Individuals who are at least 62 years of age, except that for projects of at least 35 units that are subject to this subdivision, a threshold of 55 years of age may be used, provided all applicable City, state and federal regulations are met.

**Senior Citizen Housing Development.** A Housing Development that has at least 35 dwelling units or guest rooms, as defined in Sections 51.3 and 51.12 of the Civil Code, or a mobilehome park that limits residency based on age requirements for housing for older persons pursuant to Section 798.76 or 799.5 of the Civil Code.

**Shared Housing Building.** A residential or mixed-use structure, with five or more shared housing units and one or more common kitchens and dining areas designed for permanent residence of more than 30 days by its tenants as defined in California Government Code Section 65915(o)(7)(A), or as amended.

**Shared Housing Unit.** A Residential Unit with one or more habitable rooms, not within another dwelling unit as defined in Government Code Section 65915(o)(7)(B) or as amended. Shared Housing Units shall be considered "Guest Rooms" for purposes of zoning and allowable density.

**Student Housing Development.** Student Housing Development shall be as defined in California Government Code Section 65915(b)(1)(F).

**Transitional Foster Youth.** Transitional Foster Youth shall be as defined in Section 66025.9 of the Education Code.

**Very Low Vehicle Travel Area.** Refer to California Government Code Section 65915 (o)(9).

(c) **Eligibility.** To qualify for the provisions of this Subdivision, a Housing Development must satisfy all of the following:

- (1) Meet the definition of a Housing Development or Shared Housing Building, with five or more Residential Units or Shared Housing Units including mixed-use developments. For the purpose of establishing the minimum number of five Residential Units or Shared Housing Units, Density Bonus units shall be excluded.



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- (2) Reserve a percentage of the Residential Units (excluding Residential Units added by a Density Bonus) provided in a Housing Development for:
  - (i) Restricted Affordable Units for at least one of the following income levels in Table 12.22 A.37(c)(2)(iii) below, or
  - (ii) Restricted Affordable Units for one of the Target Populations listed in Table 12.22 A.37(c)(2)(iii) below.

<b>TABLE 12.22 A.37(c)(2)(iii)</b> <b>Required Percentage of Restricted Affordable Units</b>	
Income Level	Minimum % of Residential Units Provided (Excluding Residential Units Added by a Density Bonus)
Very Low Income (For Rental or For Sale)	5
Low Income (For Rental or For Sale)	10
Moderate Income (For Sale)	10
Target Population	Minimum % of Residential Units Provided (Excluding Residential Units Added by a Density Bonus)
Senior Citizen	100 <sup>1</sup>
Transitional Foster Youth, Disabled Veteran, or Homeless Persons <sup>2</sup>	10
Lower Income Students <sup>3</sup>	20

## Footnotes

1 Senior Citizen Housing Development must comply with Sections 51.2 and 51.3 of the California Civil Code and all units provided in the resulting Senior Citizen Housing Development should be reserved for Senior Citizens regardless of the specifications stated in Table 12.22 A.37(c)(2)(iii).

2 Residential Units provided for Transitional Foster Youth, Disabled Veterans, or Homeless Persons in Table 12.22 A.37(c)(2)(iii) shall be provided as Very Low Income Restricted Affordable Units.

3 Residential Units provided for Lower Income Students shall be provided at an affordability level as specified in California Government Code Section 65915(b)(1)(F).

(3) The Housing Development does not require the demolition of a Designated Historic Resource, as demolition is defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code, and any proposed alteration to a Designated Historic Resource shall not be approved until a review has been completed by the Office of Historic Resources.

(4) Housing Developments located on project sites that meet the definition of an Environmental Consideration Area shall comply with all applicable standards

contained in the Environmental Protection Measures adopted pursuant to LAMC Section 11.5.15.

(d) **Procedures.** A Housing Development that meets the provisions of this Subdivision shall be reviewed pursuant to Procedures described in this Paragraph. Though an approval of a Density Bonus or Incentive pursuant to this Subdivision shall not, in and of itself, trigger a General Plan Amendment, Zone Change, Project Review or other discretionary review actions required by this Zoning Code, the applicable procedures set forth in LAMC Section 13A.2.10 (Multiple Approvals) of Chapter 1A of this Code shall apply for Housing Developments seeking other discretionary approvals in conjunction with an application requested pursuant to the procedures in Paragraph (d).

(1) **Los Angeles Department of Building and Safety Review.** Housing Developments seeking Base Incentives described in Paragraph (e) and/or Incentives listed on the Menu of Incentives described in LAMC Section 12.22 A.37(f)(2) shall be considered ministerial and processed by the Department of Building and Safety.

(i) Exception. Housing Developments requesting Incentives from the Menu of Incentives that cannot comply with the criteria established in LAMC Section 12.22 A.37(f)(1)(iii) shall comply with procedures set forth in LAMC Section 12.22 A.37(d)(2).

(2) **Expanded Administrative Review.** The following Housing Developments shall be ministerially reviewed by the Department of City Planning pursuant to Expanded Administrative Review, as set forth by the provisions of LAMC Section 13B.3.2 (Expanded Administrative Review) of Chapter 1A of this Code. As defined in this section, ministerial approval means an administrative process to approve a “use by right” as this term is defined in California Government Code Section 65583.2 (i). Housing Developments requesting waivers or reductions of Development Standards in addition to Incentives shall be subject to the Procedures described in LAMC Section 12.22 A.37(d)(3).

- (i) Housing Developments that request the Public Benefit Options described in Paragraph (g). Housing Developments that request only Public Benefit Options in addition to Incentives listed on the Menu of Incentives shall not be subject to any hearing procedures regardless of the provisions contained in LAMC Section 13B.3.2.D.
- (ii) Housing Developments that request Incentives not listed on the Menu of Incentives described in LAMC Section 12.22 A.37(f)(2). Housing Developments that request Incentives not listed on the Menu of Incentives may be subject to a public hearing as described in LAMC Section 13B.3.2.D.

(3) **City Planning Commission Review.** The following Housing Developments must file an application pursuant to the procedures set forth in LAMC Section 13B.2.3 (Class 3 Conditional Use Permit) of Chapter 1A of this Code. Notwithstanding the provisions set forth in Sec. 13B.2.3. of Chapter 1A, the decision of the City Planning Commission shall be final.

- (i) Housing Developments that request waivers or reductions of any Development Standards not listed on the Menu of Incentives described in LAMC Section 12.22 A.37(f)(2). Waivers or reductions of Development Standards shall be approved by the applicable decision-making authority unless that decision making authority finds that:
  - a. The Development Standard associated with a request for waiver(s) or reduction(s) in Development Standards will not have the effect of physically precluding the construction of a development meeting the Eligibility criteria described in Paragraph (c) at the densities or with the concessions or incentives permitted under Paragraph (e); or
  - b. The waivers or reductions of Development Standards would have a Specific Adverse Impact as defined in paragraph (2) of subdivision (d) of Section 65589.5, upon public health and safety or on a California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact without rendering the development unaffordable to low-income and moderate-income households; or
  - c. The waivers or reductions of Development Standards are contrary to state or federal law.
- (ii) In addition to the procedures set forth in LAMC Section 13B.2.3 of Chapter 1A of this Code, Housing Developments requesting Density Bonuses that exceed 50% or 88.75% dependent on the percentage of Restricted Affordable Units provided shall be subject to the requirements and findings set forth in LAMC 12.24 U.26.

(4) **One Hundred Percent Affordable Housing Projects.** One Hundred Percent Affordable Housing Projects shall be reviewed pursuant to LAMC Section 12.22 A.39.

- (5) **Other Discretionary Approvals.** Applicable procedures set forth in LAMC Section 13A.2.10 (Multiple Approvals) of Chapter 1A of this Code apply for Housing Developments seeking other discretionary approvals in conjunction with an application requested pursuant to the Procedures in Paragraph (d). Regardless of any other findings that may be applicable, the decision maker must approve the requested Base Incentives and Additional Incentives, either on or off the Menu of Incentives described in LAMC Section 12.22 A.37(f)(2), requested under this Subdivision unless the decision maker, based upon substantial evidence, determines that the Housing Development meets one or more of the criteria described in LAMC Section 12.22 A.37(f)(1)(ii).

- (e) **Base Incentives.** A Housing Development shall be granted any of the Base Incentives established in this Paragraph in exchange for the required minimum percentage of Restricted Affordable Units established in Paragraph (c) of this Subdivision. Projects that qualify for Base Incentives established in this Paragraph shall also be eligible for Additional Incentives pursuant to Paragraph (f) and Public Benefit Options pursuant to Paragraph (g) of this Subdivision unless otherwise stated.

(1) **Density.**

(i) **For Sale or Rental Housing with Very Low or Low Income Restricted Affordable Units and For Sale Housing with Moderate Income Units.**

For Sale or Rental Housing with Very Low or Low Income Restricted Affordable Units and For Sale Housing with Moderate Income units shall receive a Density Bonus as follows in Table 12.22 A.37(e)(1)(i)a but shall not exceed 50% unless seeking an Additional Density Bonus pursuant to Table 12.22 A.37(e)(1)(ii). Residential Units constructed as a result of a Density Bonus may be permitted in geographic areas of the Housing Development other than the areas where Restricted Affordable Units or units for a Target Population are located.

TABLE 12.22 A.37(e)(1)(i)a Required Percentage of Restricted Affordable Unit Set Asides - Density Bonuses			
Percentage of Density Bonus	Percentage of Very Low Income	Percentage of Low Income	Percentage of Moderate Income (For-Sale)
5	-	-	10
6	-	-	11
7	-	-	12
8	-	-	13
9	-	-	14
10	-	-	15
11	-	-	16
12	-	-	17
13	-	-	18

<b>TABLE 12.22 A.37(e)(1)(i)a</b> <b>Required Percentage of Restricted Affordable Unit Set Asides - Density Bonuses</b>			
<b>Percentage of Density Bonus</b>	<b>Percentage of Very Low Income</b>	<b>Percentage of Low Income</b>	<b>Percentage of Moderate Income (For-Sale)</b>
14	-	-	19
15	-	-	20
16	-	-	21
17	-	-	22
18	-	-	23
19	-	-	24
20	5	10	25
20.5	-	-	-
21	-	-	26
21.5	-	11	-
22	-	-	27
22.5	6	-	-
23	-	12	28
23.5	-	-	-
24	-	-	29
24.5	-	13	-
25	7	-	30
25.5	-	-	-
26	-	14	31
26.5	-	-	-
27	-	-	32
27.5	8	15	-
28	-	-	33



<b>TABLE 12.22 A.37(e)(1)(i)a</b> <b>Required Percentage of Restricted Affordable Unit Set Asides - Density Bonuses</b>			
<b>Percentage of Density Bonus</b>	<b>Percentage of Very Low Income</b>	<b>Percentage of Low Income</b>	<b>Percentage of Moderate Income (For-Sale)</b>
28.5	-	-	-
29	-	16	34
29.5	-	-	-
30	9	-	35
30.5	-	17	
31	-	-	36
31.5	-	-	-
32	-	18	37
32.5	10	-	-
33	-	-	38
33.5	-	19	-
34	-	-	39
34.5	-	-	-
35	11	20	40
38.75	12	21	41
42.5	13	22	42
46.25	14	23	43
50	15	24	44

(ii) **Additional Density Bonus.** A Housing Development that provides Restricted Affordable Units sufficient to qualify for a 50% Density Bonus may seek an additional Density Bonus pursuant to Table 12.22

A.37(e)(1)(ii)a provided that the resulting Housing Development does not restrict more than 50% of a Housing Development's overall Residential Units to Restricted Affordable Units. The Additional Density Bonus shall be calculated excluding any Density Bonus allowed by Table 12.22 A.37(e)(1)(i). The Additional Density Bonus shall also be calculated separately from the Density Bonus allowed by Table 12.22 A.37(e)(1)(i)a to account for the rounding of fractional numbers for both the Density Bonus and Additional Density Bonus pursuant to LAMC Section 12.22 A.37(h)(5).

<b>TABLE 12.22 A.37(e)(1)(ii)a Required Percentage of Restricted Affordable Unit Set Asides - Additional Density Bonuses</b>		
<b>Percentage of Density Bonus</b>	<b>Percentage of Very Low Income</b>	<b>Percentage of Moderate-Income</b>
20	5	5
22.5	-	6
23.75	6	-
25	-	7
27.5	7	8
30	-	9
31.25	8	-
32.5	-	10
35	9	11
38.75	10	12
42.5	-	13
46.25	-	14
50	-	15

- (iii) **Housing for Target Populations.** Housing Developments that provide Residential Units for a target population listed in Table 12.22 A.37(c)(2)(iii) shall receive a Density Bonus as follows in Table 12.22 A.37(e)(1)(iii)a. These Density Bonuses may be combined with a Density Bonus for Residential Units set aside as Restricted Affordable Units based on Table 12.22 A.37(e)(1)(i)a so long as the Restricted Affordable Units are set aside for the applicable Target Population.

<b>TABLE 12.22 A.37(e)(1)(iii)a Housing for Target Populations - Density Bonuses</b>	
<b>Target Population</b>	<b>Percentage of Density Bonus</b>
Senior Citizen	20%
Transitional Foster Youth/Disabled Veterans/Homeless Persons	20%
Lower Income Student Development	35%

Footnotes

1 Senior Citizen Housing Development must comply with Sections 51.2 and 51.3 of the California Civil Code.

- (iv) **Land Donation.** An applicant for a subdivision, parcel map or other residential development approval that donates land for housing to the City of Los Angeles satisfying the criteria of California Government Code Section 65915(g)(2), as verified by the Department of City Planning, shall be granted a minimum Density Bonus of 15% in addition to the Density Bonus sought pursuant to LAMC Section 12.22 A.37(e)(1), up to a combined maximum density increase of 35%. The Department of City Planning may create an Implementation Memorandum for the purpose of clarifying procedures associated with the implementation of Land Donations pursuant to California Government Code Section 65915(g).

(2) **Parking.** Housing Developments may reduce the number of required parking spaces set forth in Section 12.21 A.4 of this code as follows, pursuant to California Government Code Section 65915 (p):

(i) Parking shall not be required for Housing Developments located within one-half mile of a Major Transit Stop pursuant to California Government Code Section 65863.2.

(ii) Unless eligible for parking reductions pursuant to California Government Code Section 65863.2, a Housing Development may utilize the vehicular parking ratio described in Table 12.22 A.37(e)(2)(ii)a.

<b>TABLE 12.22 A.37(e)(2)(ii)a</b> <b>Vehicular Parking Ratio for Eligible Housing Developments</b>	
<b>Number of Bedrooms</b>	<b>Parking Spaces per Residential Unit Type</b>
Zero to one bedroom	1
Two to three bedrooms	1.5
Four and more bedrooms	2.5

(iii) Pursuant to California Civil Code Section 1947.1, provided parking shall be sold or rented separately from the Residential Units in Housing Developments with 16 or more units, as verified by the Los Angeles Housing Department.

(iv) Required automobile parking applies for all Residential Units in a Housing Development (not just the Restricted Affordable Units), inclusive of disabled and required guest parking, where applicable. All parking spaces provided shall comply with Subdivision 12.21 A.5 of the LAMC. Except that, consistent with California Government Code Section 65915(p)(4), any combination of standard, compact or tandem spaces may be provided. Tandem parking spaces that do not comply with Subparagraph 12.21 A.5(h)(2) of the LAMC may be provided in any configuration as long as a parking attendant or an automated parking system is provided at all times.

(v) Consistent with California Government Code Section 65915(p)(4), required parking spaces provided may be uncovered.

(f) **Additional Incentives.** A Housing Development shall be granted a number of Additional Incentives pursuant to the provisions of this Paragraph in addition to the Base Incentives established in LAMC Section 12.22 A.37(e).

(1) A Housing Development shall be eligible for Additional Incentives based on Table 12.22 A.37(f)(1)(i) below. A Housing Development may request Incentives listed in Paragraph (f)(2) or use an Incentive to seek a deviation from a Development Standard elsewhere in the LAMC or a Housing Development site's applicable zoning ordinance, specific plan, or overlay. Refer to Paragraph (d) for the approval Procedure that is consistent with the Housing Development's Incentive request.

<b>TABLE 12.22 A.37(f)(1)(i)</b> <b>Allowed Number of Additional Incentives</b>				
Level of Affordability	Required Percentage of Residential Units Provided (Excluding Units Added by a Density Bonus)			
	1 Incentive	2 Incentives	3 Incentives	4 Incentives <sup>1</sup>
Very Low Income (for rental or for sale)	5%	10%	15%	16%
Low Income (for rental or for sale)	10%	17%	24%	N/A*
Moderate Income (for sale)	10%	20%	30%	45%
Lower Income Student Housing	20%	20%	N/A	N/A

## Footnotes

<sup>1</sup> One Hundred Affordable Housing Projects shall be processed pursuant to LAMC Section 12.22 A.39.

(ii) Incentives allowed per Table 12.22 A.37(f)(1)(i) and requested pursuant to the applicable procedure in Paragraph (d) of this Subdivision shall be granted unless it is found, based upon substantial evidence, that:

- a. The Incentive does not result in identifiable and actual cost reductions, consistent with California Government Code Section 65915(k), to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5, or for rents for the targeted units to be set as specified in California Government Code Section 65915(c); or
- b. The Incentive will have a Specific Adverse Impact upon public health and safety or the physical environment or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the Specific Adverse Impact without rendering the development unaffordable to low-income and moderate-income households. Inconsistency with the zoning ordinance or general plan land use designation shall not constitute a Specific Adverse Impact upon the public health or safety; or
- c. The Incentive would be contrary to state or federal law.

(iii) To be eligible for the Menu of Incentives described in LAMC Section 12.22 A.37(f)(2) a Housing Development shall comply with the following:

- a. The Housing Development shall not be located in a Very High Fire Hazard Severity Zone, a Sea Level Rise Area, or the Coastal Zone.

(iv) Commercial Off-Site. Pursuant to California Government Code Section 65915.7, a commercial development may request one Incentive set forth in California Government Code Section 65915.7 (b) if the commercial developer directly contributes affordable housing, or enters into a contract for partnered housing described in 65915.7(c) with a housing developer to construct affordable housing. If a commercial developer partners with a housing developer, an agreement, subject to approval by the Department of City Planning, shall identify exactly how the commercial developer will contribute affordable housing. Housing constructed pursuant to this Subparagraph shall be constructed on the site of the commercial development or on a site that meets all of the following requirements:

- a. Located within the boundaries of the City of Los Angeles; and
- b. In close proximity to public amenities including schools and employment centers; and
- c. Located within one-half mile of a Major Transit Stop.

(2) **Menu of Incentives.** A Housing Development may elect to request one of the following incentives not to exceed the allowed number of incentives pursuant to Table 12.22 A.37(f)(1)(i). Each request from the Menu of Incentives shall constitute one Incentive request unless otherwise stated.

(i) **Yards.** Housing Developments may request a reduction of otherwise required yards as follows:

Yards/Setbacks	C Zones	<b>R Zones</b> (yard reductions for requests from the Menu of Incentives in R zones may be combined and require the use of only one incentive)
	In any Commercial zone, Housing Developments may utilize any or all of the yard requirements for the RAS3 zone per LAMC Section 12.10.5. Housing Developments on commercially zoned sites adjacent to properties zoned RD or more restrictive may provide a rear yard of not less than five feet.	<b>Front Yards.</b> Front yard reductions are limited to no more than the average of the front yards, regardless of a required Building Line, of adjoining buildings along the same street frontage. Or, if located on a corner lot or adjacent to a vacant lot, the front yard setback may align with the façade of the adjoining building along the same front lot line. If there are no adjoining buildings, no reduction is permitted.
		<b>Side and Rear Yards.</b> Up to 30% decrease in the required width or depth of any individual yard or setback.



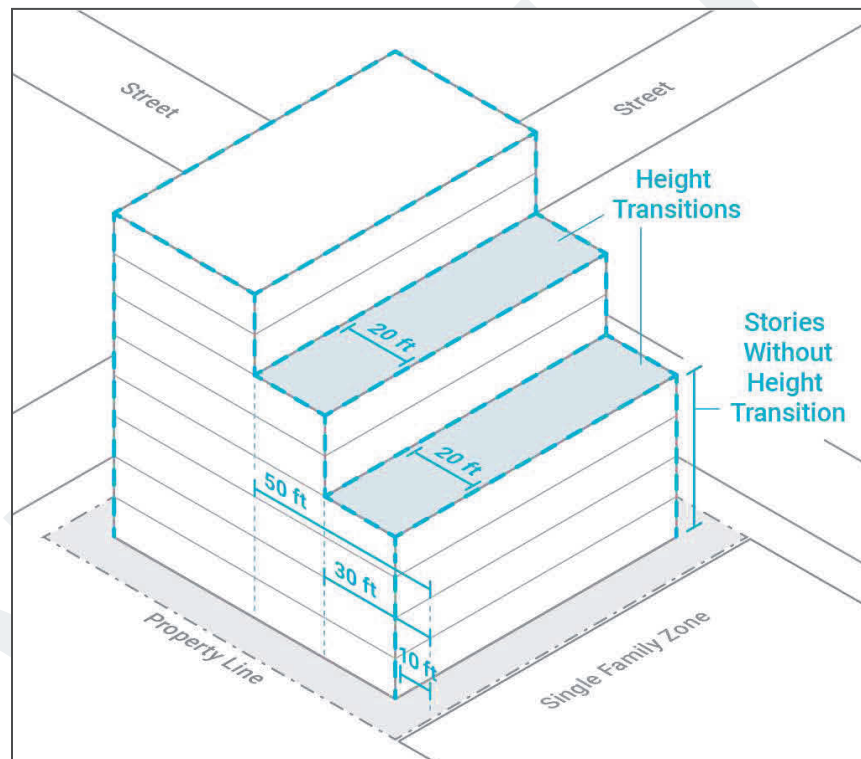
(ii) **Floor Area Ratio.** Housing Developments may request an increase in the otherwise allowed Floor Area Ratio (FAR) equal to the percentage of Density Bonus for which the Housing Development is eligible, not to exceed 35% or a maximum FAR of 3.0:1, whichever is greater, if located within a one-half mile radius (2,640 feet) of a Major Transit Stop. In a mixed-use development, the FAR bonus will apply only to the residential portion of the development and the nonresidential portion shall be limited to the FAR associated with a site's underlying zoning prior to the application of any Incentive.

a. **Exception.** Projects on lots zoned "RD" Restricted Density or more restrictive; or on lots with Designated Historic Resources, or Non-Contributing Elements as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code, shall not be eligible for an on-menu FAR incentive.

(iii) **Height.** A Housing Development may request a height increase to permit a maximum of eleven additional feet or one additional story, whichever is lower. This increase in height shall be applicable over the entire lot regardless of the number of underlying height limits, including Transitional Height or stepback requirements, except when the Transitional Height Incentive below is also requested. The height increase may be applied to the maximum allowable height in feet or stories permitted by the zone, including for mixed-use Housing Developments.

a. Notwithstanding Section 12.21.1, for Housing Developments where a rooftop deck is provided, roof structures for the housing of elevators and stairways may exceed the building height limit by up to seventeen feet in height on sites where the applicable Height District limits height to thirty feet or forty-five feet provided the proposed roof structure(s) is set back from the roof perimeter by five feet.

- (iv) **Transitional Height.** Housing Developments may select the following transitional height requirements in lieu of those found in Section 12.21.1.A.10 of this Code or any applicable transitional height limits in a Housing Development site's applicable zoning, Specific Plan, or overlay including any requirements for reduced building heights or setbacks when a building is adjoining a RW1 or more restrictive zone. Furthermore, Housing Developments adjoining an OS zone may utilize this incentive to be exempt from the transitional height requirements found in Section 12.21.1.A.10 of this Code or any applicable Specific Plan or Overlay for the portion of the Housing Development abutting the OS zone.



	Setback/Step Back Distance*
Side or Rear Setback	10-feet
4 Story Step-Back	30-feet
6 Story Step-Back	50-feet

\*Setback and Step-back is measured from the property line.

- (v) **Space Between Buildings and Passageways.** Housing Developments subject to the provisions set forth in LAMC Section 12.21 C.2 may request a reduction in space between buildings and passageways requirements as follows:
- a. Up to a 30% reduction in the space between buildings required pursuant to LAMC Section 12.21 C.2(a); and
  - b. Up to 50% reduction in the width of the passageway required pursuant to LAMC Section 12.21 C.2(b) or the space provided to meet a subject site's required side yard requirement, whichever provides a greater reduction. Passageways provided may extend from any public street adjacent to the Housing Developments site.
- (vi) **Lot Coverage.** Housing Developments may request up to a 20% increase in lot coverage limits, provided that the landscaping for the Housing Development meets a minimum of 30 points under the Landscape and Site Design Ordinance Section 12.40 of this Code, and the Landscape and Site Design Point System.
- (vii) **Lot Width.** Housing Developments may request up to a 25% decrease from a lot width requirement, provided that the landscaping for the Housing Development meets a minimum of 30 points under the Landscape and Site Design Ordinance Section 12.40 of this Code, and the Landscape and Site Design Point System.
- (viii) **Open Space.** In lieu of the open space calculations set forth in LAMC Section 12.21 G.2, Housing Developments requesting this incentive may calculate their usable open space requirement as 15% of the total lot area or 10% of the total floor area confined within the perimeter walls of the provided Residential Units, whichever is greater, provided that the overall design of the Housing Development meets a minimum of 30 points under the Landscape and Site Design Ordinance Section 12.40 of this Code, and the Landscape and Site Design Point System. Common Open Space shall constitute at least 50% of the usable open space calculated under this incentive and shall be provided as outdoor space and comply with applicable provisions of Section 12.21 G.2(a)(1-4). Usable open space provided as Private Open Space shall comply with Section 12.21 G.2(b).
- (ix) **Density Calculation.** The area of any land required to be dedicated for street or alley purposes may be included as lot area for purposes of calculating the maximum density permitted by the underlying zone in which the Housing Development is located.

(x) **Averaging of Floor Area Ratio, Density, Parking, or Open Space, and permitting Vehicular Access.** A Housing Development that is located on one or more contiguous lots, not separated by a street or alley, may average and permit the floor area, density, open space, and residential and commercial parking over the Housing Development site, and permit vehicular use and access between a less restrictive zone and a more restrictive zone, provided that:

- a. The proposed Housing Development includes the number of Restricted Affordable Units sufficient to qualify for a 35% Density Bonus; and
- b. No further lot line adjustment or any other action that may cause the Housing Development site to be subdivided subsequent to this grant shall be permitted; and
- c. The proposed use is permitted by the underlying zone(s) of each lot.

(xi) **Supplementary Parking Reductions.** An applicant may request the following reductions as a single incentive:

- a. **Commercial Parking.** Housing Developments may request to waive any requirement to provide new or maintain existing automobile parking spaces required by Chapter 1 of this Code associated with a commercial use that is proposed in conjunction with the Housing Developments.
- b. **General Parking Reduction.** Housing Developments located within one-half mile radius of a High Quality Transit Service may receive up to 50% reduction in required parking spaces pursuant to California Government Code Section 65915 (p)(5).

(xii) **P Zone.** In lieu of the limitations described in LAMC Section 12.12.1 and LAMC Section 12.12.1.5, in a P or PB zone a Project may include the uses and area standards permitted in the least restrictive adjoining zone. The phrase “adjoining zone” refers to the zones of properties abutting, across the street or alley from, or having a common corner with, the subject property.

(xiii) **Relief from a Development Standard.** A Housing Development may request up to 20% relief from a Development Standard contained in Chapter 1 of this Code, an Overlay, a Specific Plan, a Q Condition, or a D Condition. Housing Developments requesting this incentive must provide landscaping for the Housing Development that meets a minimum of 30 points under the Landscape and Site Design Ordinance Section 12.40 of this Code, and the Landscape and Site Design Point System. This incentive may be requested more than once, but shall require the use of an Incentive for each request.

a. **Exception.** This incentive shall not apply to standards that regulate FAR, Height, yards/setbacks, ground story requirements, signs, parking in front of buildings, or usable open space. This incentive shall not apply to a Designated Historic Resource(s), or a Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code.

(xiv) **Senior Independent Housing.** In lieu of otherwise applicable limitations, a Housing Development or Senior Citizen Housing Development that also meets the definition of Senior Independent Housing may be permitted in any zone that would otherwise allow a Housing Development. In addition, a Senior Independent Housing development that qualifies as a Shared Housing Building shall be treated the same as a Shared Housing Building.

- (g) **Public Benefit Options.** A Housing Development shall be granted any number of Public Benefit Options pursuant to the provisions described below in addition to the Base Incentives established in LAMC Section 12.22 A.37(e) and the Additional Incentives described in LAMC Section 12.22 A.37(f). Housing Developments located in Sea Level Rise Areas, Very High Fire Hazard Severity Zones, or the Coastal Zone shall not be eligible for the Public Benefit Option described in LAMC Section 12.22 A.37(g)(3) or LAMC Section 12.22 A.37(g)(4).

(1) **Child Care Facility.** A Housing Development that includes a Child Care Facility located on the premises of, as part of, or adjacent to, the Housing Development, and that complies with the requirements set forth in Government Code Section 65915(h)(2) shall be granted either of the following:

- (i) An additional Density Bonus that is, for purposes of calculating residential density, an increase in the floor area of the Housing Development equal to the floor area of the Child Care Facility included in the Housing Development; or
- (ii) An additional Incentive from the Menu of Incentives or not listed on the Menu of Incentives that contributes significantly to the economic feasibility of the construction of the Child Care Facility; or
- (iii) Notwithstanding the Public Benefit available under this Subparagraph, pursuant to California Government Code Section 65915(h)(3), a Density Bonus or Incentive for a Child Care Facility shall not be provided if it is found, based on substantial evidence, that the community has adequate Child Care Facilities.

(2) **Multi-Bedroom Units.** A Housing Development providing multi-bedroom units shall be granted one of the following so long as an affidavit declaring the qualifying multi-bedroom units will maintain the same bedroom count and will not be converted to additional Residential Units in the future is executed and recorded with the Department of City Planning:

- (i) A Housing Development that includes a minimum of 10% of Residential Units, including Residential Units added by a Density Bonus, as Residential Units with three bedrooms or more shall be granted additional Floor Area and Height in addition to what is available on the Menu of Incentives in LAMC Section 12.22 A.37(f)(2) as follows in Table 12.22 A.37(g)(3)(i)a; or

<b>TABLE 12.22 A.37(g)(3)(i)a Additional FAR and Height for Multi-Bedroom Units</b>		
Overall Residential Units (including Density Bonus Units)	Additional FAR	Additional Height (Stories)
0-30	0.5:1	1
31-50	1.0:1	1
51-75	1.5:1	2
75+	2.0:1	2

- (ii) A Housing Development shall be granted the following Floor Area and Height Incentives, as described in (a) and (b) below:
  - a. An exemption of the square footage of all Residential Units with three or more bedrooms from the floor area calculations of multi-bedroom units, and/or
  - b. An additional story of height beyond what is available in the applicable height incentive as listed for Additional Incentives in Paragraph (f), provided, the square footage of this additional story is limited to the square footage exempted as a result of applying 12.22 A.37(g)(4)(ii)(a) above.



- (3) **Surveyed Historic Resource Facade Rehabilitation.** Projects incorporating a Surveyed Historic Resource(s) into the Project design shall be granted additional Floor Area up to 1.0 FAR and 22 feet in height beyond what is available on the Menu of Incentives in LAMC Section 12.22 A.37(f)(2), provided all of the following standards are met:
- (i) The Project retains all street Fronting facades to a depth of 10-feet,
  - (ii) New Floor Area shall be setback behind the 10-foot retention area, except that open space, balconies, and non-habitable architectural projections may encroach on the 10-foot retention area. In instances where a lot contains dual-frontages, the setback shall be applied from both frontages, and
  - (iii) Rehabilitation of the facades is completed pursuant to the Secretary of the Interior's Standards for Rehabilitation to the satisfaction of the Office of Historic Resources.
- (h) **Program Standards.** The following program standards shall be applicable to any Housing Development that meets the eligibility criteria established in Paragraph (c) of this Subdivision.
- (1) **Other Density Bonus Programs.** Housing Developments seeking a Density Bonus pursuant to this Subdivision may not pursue a Density Bonus pursuant to the procedures of any other housing incentive program contained in this Code or in an Overlay or Specific Plan.
  - (2) **Calculating Maximum Allowable Residential Density.** Per Government Code Section 65915 (o)(6), a Housing Development shall calculate its Maximum Allowable Residential Density, before the application of a Density Bonus, using the maximum number of units allowed under a Housing Development site's applicable zoning ordinance, specific plan, overlay, or general plan land use designation, whichever is greater. If a range is permitted, the maximum number of units allowed by the specific zoning range, Specific Plan, or General Plan Land Use designation shall be applicable when determining a Housing Development's density prior to the application of a Density Bonus. Residential Units added using an incentive program contained in a specific plan or overlay shall not count toward a Housing Development's Maximum Allowable Residential Density.
  - (3) **Calculating Restricted Affordable Units.** The required number of Restricted Affordable Units shall be calculated based on the Residential Units (excluding Residential Units added by a Density Bonus) provided in a Housing Development.
  - (4) **Calculating a Density Bonus.** In addition to the provisions set forth in Section 12.22 A.37(h)(2), for the purposes of calculating a Density Bonus, the following shall apply:



- (i) Residential Units that comprise a Housing Development shall be on contiguous lots, not separated by a street or alley, that are the subject of a single development application, but do not need to be based on individual subdivision maps or lots.
- (ii) A Shared Housing Unit and its proportional share of associated common area facilities shall be considered a Guest Room pursuant to California Government Code Section 65915(o)(8)(B).
- (iii) An applicant for a Housing Development may have the ability to apply a lesser percentage of Density Bonus, including but not limited to, no Density Bonus.

**(5) Fractional Numbers.**

- (i) **Units.** For the purposes of this Subdivision, calculations for the following resulting in fractional numbers shall be rounded up to the next whole number:
  - a. Maximum Allowable Residential Density
  - b. Density Bonus units
  - c. Number of Restricted Affordable Units
  - d. Number of Replacement Housing Units
  - e. Vehicular Parking
  - f. Number of Multi-Bedroom Units provided pursuant to LAMC Section 12.22 A.37(g)(3)

- (6) Replacement Housing Units and Demolition Protections.** A Housing Development must meet any applicable housing replacement requirements and demolition protections of California Government Code Section 65915(c)(3) and LAMC Section 16.60, as verified by the Los Angeles Housing Department (LAHD) prior to the issuance of a building permit. Replacement Housing Units required pursuant to this Subdivision may count towards any Restricted Affordable Unit requirements.

- (7) **Standards for Restricted Affordable Units.** A Housing Development must meet the applicable requirements regarding the size, location, amenities and allocation of Restricted Affordable Units in LAMC Sections 16.61 B and 16.61 C and in any Implementation Memorandum, Technical Bulletin or User Guide prepared and adopted by the Los Angeles Housing Department or Department of City Planning.
- (8) **Rent Schedules.** Restricted Affordable Units required as part of a Housing Development shall be rented at rates not to exceed those specified in California Health and Safety Code 50052.5 for for-sale units or California Health and Safety Code Section 50053 for for-lease units.
- (9) **Implementation Memorandums, FAQs, Forms/Applications and User Guides.** The Director may prepare Implementation Memorandums, Technical Bulletins and/or User Guides for State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, for the purpose of providing additional information pertaining to this Subdivision and maintaining consistency with State Density Bonus Law.
- (10) **Covenants.** Prior to the issuance of a building permit for any Housing Development qualifying for a Density Bonus pursuant to the provisions of this Subdivision, covenants acceptable to the Los Angeles Housing Department and consistent with the requirements in this Subdivision and set forth in LAMC Section 16.61 shall be recorded with the Los Angeles County Recorder.
- (14) **Story.** A story shall be defined as 11-feet in height.

(i) **Relationship to Other Sections of the Los Angeles Municipal Code.** The following provisions shall govern the relationship to other sections of the Los Angeles Municipal Code for any Housing Development that meets the eligibility criteria established in Paragraph (c) of this Subdivision.

- (1) A Housing Development that meets the eligibility criteria established in Paragraph (c) and complies with the Procedures established in Paragraph (d) may exceed the use limitations that may apply to a Housing Development site.
- (2) If any of the Procedures described in Paragraph (d), Base Incentives described in Paragraph (e), Additional Incentives described in Paragraph (f), Public Benefit Options described in Paragraph (g), or waivers requested pursuant to LAMC Section 12.22 A.37(d)(3)(i) conflict with those of any otherwise applicable specific plan, overlay, supplemental use district, “Q” condition, “D” limitation, or citywide regulation established in Chapter 1 of this Code, including but not limited to the Ordinance Nos. listed below, this Subdivision shall prevail.

- (i) Alameda District Specific Plan (171,139)
- (ii) Avenue 57 Transit Oriented District (174,663)
- (iii) Bunker Hill Specific Plan (182,576)
- (iv) Century City North Specific Plan (156,122)
- (v) Century City West Specific Plan (186,370)
- (vi) Century City South Specific Plan (168,862)
- (vii) Coastal Bluffs Specific Plan (170,046)
- (viii) Coliseum District Specific Plan (185,042)
- (ix) Colorado Boulevard Specific Plan (178,098)
- (x) Cornfield Arroyo Seco Specific Plan (182,617)
- (xi) Crenshaw Corridor Specific Plan (184,795)
- (xii) Devonshire/Topanga Corridor Specific Plan (168,937)
- (xiii) Exposition Corridor Transit Neighborhood Plan (186,402)
- (xiv) Foothill Boulevard Corridor Specific Plan (170,694)
- (xv) Girard Tract Specific Plan (170,774)
- (xvi) Glencoe/Maxella Specific Plan (171,946)
- (xvii) Granada Hills Specific Plan (184,296)
- (xviii) Hollywoodland Specific Plan (168,121)
- (xix) Jordan Downs Urban Village Specific Plan (184,346)
- (xx) Los Angeles Airport/El Segundo Dunes Specific Plan (167,940)
- (xxi) Los Angeles International (LAX) Specific Plan (185,164)
- (xxii) Los Angeles Sports and Entertainment District Specific Plan (181,334)
- (xxiii) Loyola Marymount University Specific Plan (181,605)
- (xxiv) Mt. Washington/Glassell Park Specific Plan (168,707)
- (xxv) Mulholland Scenic Parkway Specific Plan (167,943)
- (xxvi) North Westwood Village Specific Plan (163,202)

- (xxvii) Oxford Triangle Specific Plan (170,155)
- (xxviii) Pacific Palisades Commercial Village and Neighborhood Specific Plan (184,371)
- (xxix) Paramount Pictures Specific Plan (184,539)
- (xxx) Park Mile Specific Plan (162,530)
- (xxxi) Playa Vista Area D Specific Plan (176,235)
- (xxxii) Ponte Vista at San Pedro Specific Plan (182,937 and 182,939)
- (xxxiii) Porter Ranch Land Use/Transportation Specific Plan (180,083)
- (xxxiv) Redevelopment Plans (186,325)
- (xxxv) San Vicente Scenic Corridor Specific Plan (173,381)
- (xxxvi) University of Southern California University Park Campus Specific Plan (182,343)
- (xxxvii) Valley Village Specific Plan (168,613)
- (xxxviii) Venice Coastal Zone Specific Plan (175,693)
- (xxxix) Ventura-Cahuenga Boulevard Corridor Specific Plan (174,052)
- (xl) Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan) (173,749)
- (xli) Warner Center 2035 Plan (182,766)
- (xlii) Westwood Community Multi-Family Specific Plan (163,203 and 163,186)
- (xlili) Westwood Village Specific Plan, Westwood Community Design Review Board Specific Plan (187,644)
- (xliv) Wilshire - Westwood Scenic Corridor Specific Plan (155,044)

- (j) **Interpretation Consistent with State Density Bonus Law.** This Subdivision is intended to be interpreted as consistent with State Density Bonus Law contained in California Government Code Sections 65915-65918. If at any time, this Subdivision becomes inconsistent with California Government Code Sections 65915-65918, the provisions of State Density Bonus Law shall apply.

Section 7. Subdivision 38 of Subsection A of Section 12.22 of the Los Angeles Municipal Code is added to read as follows:

#### **12.22 A.38 MIXED INCOME INCENTIVE PROGRAM**

(a) **Purpose.** The purpose of this subdivision is to establish specific incentives and procedures for the implementation of State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, and to increase the production of affordable housing near transit, in Higher Opportunity Areas, and on major corridors. In conjunction with the incentives granted by state law, this subdivision shall offer incentives and waivers or reductions of Development Standards for the purposes of increasing the feasibility of housing construction.

(b) **Definitions.** The following definitions shall apply to this Subdivision:

**Consolidated Development.** A residential or mixed use development that consists of multiple lots with the same owner or developer.

**Corridor.** A major street with Street Designations as designated in the Mobility Element of the General Plan, including Avenue I, Avenue II, Avenue III, Boulevard I, and Boulevard II.

**Direct Pedestrian Access.** A means of approaching or entering a lot from the public right-of-way as a pedestrian.

**Environmental Consideration Area.** As defined in LAMC Section 12.22 A.37 (b).

**Finished Floor Elevation.** The finished floor height associated with the ground story.

**Frequent Bus Service.** A bus route with 30 minute or less service frequency during Peak Commute Hours in at least one direction.

**Ground Floor Frontage.** The lowest story within a building which is accessible to the street, the floor level of which is within three feet above or below curb level, is parallel to or primarily facing any public street, and which is at least 15 feet in depth of the total depth of the structure.

**Market Tier.** Categories of residential market areas adopted by City Council resolution, as described in the Affordable Housing Linkage Fee Ordinance in LAMC Section 19.18 C.1, for the purposes of informing the amount of the Linkage Fee to be assessed for a given Project.

**Mixed Income Incentive Project.** A Project that involves the construction of, addition to, or remodeling of any building or buildings which results in the creation of five or more total residential units, including a mixed use development containing two-thirds of the square footage designated for Residential Units, and meets the eligibility criteria described in Paragraph (c) of LAMC Section 12.22 A.38.

**Opportunity Corridor Transition Area Incentive Project.** A Project, located within 750 feet of an Opportunity Corridor Incentive Area, that involves the construction of, addition to, or remodeling of any building or buildings which result in the creation of four or more total residential dwelling units.

**Peak Commute Hour.** Peak periods are considered to be between 6:00 to 9:00 AM and 3:00 to 7:00 PM.

**Rapid Bus.** A higher quality bus service that may include several key attributes, including full-time dedicated bus lanes, branded vehicles and defined stations, high frequency, limited stops at major intersections, intelligent transportation systems, and possible off-board fare collection and/or all door boarding. It includes, but is not limited to, Metro Bus Rapid Transit lines, Metro Rapid 700 lines, Metro NextGen Tier 1 lines that replaced Metro Rapid 700 lines, Metro G (Orange) and J (Silver Lines), Big Blue Rapid lines and the Rapid 6 Culver City bus. Rapid Bus lines do not need to meet the 15 minute average Peak Commute Hour headways if intersecting at a qualified Major Transit Stop.

**Total Units.** The total units in a project after a Density Bonus is awarded pursuant to this Subdivision.

(c) **Eligibility.** To qualify for the provisions of this subdivision, a Project approved under the Mixed Income Incentive Program must satisfy all of the following eligibility requirements:

- (1) Meet the definition of one of the following Project Types described in Table 12.22 A.38(c)(1)(i):

TABLE 12.22 A.38(c)(1)(i) Eligible Project Types and Total Units Required	
Project Type	Total Units Required
Mixed Income Incentive Project	Five or more
Opportunity Corridor Transition Area Incentive Project	Four or more
Type I Unified Adaptive Reuse Project <sup>1</sup>	Five or more

Footnote

<sup>1</sup> See LAMC 12.22 A.26(h)(1) for additional requirements associated with a Type I Unified Adaptive Reuse Project.

- (2) Be located in and meet the requirements of a Transit Oriented Incentive Area, Opportunity Corridor Incentive Area, or an Opportunity Corridor Transition Incentive Area as described in Paragraphs (e), (f), and (g) below, except that properties abutting, across the street or alley, or having a common corner with a site eligible for Opportunity Corridor Incentives shall also be eligible for the Opportunity Corridor Incentives as described in paragraph (f) below,
- (3) Reserve a percentage of the Project's Total Units for:
- (i) On Site Restricted Affordable Units in a Project for at least one of the following income levels, as defined on Table 12.22 A.38(c)(3)(iii) or by providing the combination of income levels as defined on 12.22 A.38(c)(3)(iv) Table, or
  - (ii) Restricted Affordable Units in a Opportunity Corridor Transition Area Incentive Project for at least one of the following income levels, as defined on Table 12.22 A.38(c)(3)(v) below.

<b>TABLE 12.22 A.38(c)(3)(iii)<sup>1</sup></b> <b>Single Affordability Options for Meeting Restricted Affordable Units</b>					
Market Tier	Incentive Program		Minimum Percent of Total Units Provided as Restricted Affordable Units		
	Transit Oriented Incentive Area	Opportunity Corridors Incentive Area	Income Level		
			Extremely Low Income (For Rental or For Sale)	Very Low Income (For Rental or For Sale)	Low Income (For Rental or For Sale)
Low and Medium Market Tiers	T1	OC-1	9%	12%	21%
	T2	OC-2	10%	14%	23%
	T3	OC-3	11%	15%	25%
High Medium and High Market Tiers	T1	OC-1	11%	14%	23%
	T2	OC-2	12%	16%	25%
	T3	OC-3	13%	17%	27%

## Footnote

1 A Type I Unified Adaptive Reuse Project shall provide Restricted Affordable Units in accordance with the project site's Market Tier location and Base Incentives used. Type I Unified Adaptive Reuse Projects that utilize Base Incentives contingent on a site's location in a Transit Oriented Incentive Area shall provide Restricted Affordable Units in conjunction with a site's applicable Transit Oriented Incentive Area Tier. Type I Unified Adaptive Reuse Projects that utilize Base Incentives contingent on a site's location in an Opportunity Corridor Incentive Area shall provide Restricted Affordable Units in conjunction with a site's applicable Opportunity Corridor. Restricted Affordable Units shall be provided and distributed throughout the entire Type I Unified Adaptive Reuse Project in compliance with LAMC 16.61 B.



<b>TABLE 12.22 A.38(c)(3)(iv)</b> <b>Mixed Affordability Options for Meeting Restricted Affordable Units</b>				
Opportunity Area	Minimum Percent of Total Units Provided as Restricted Affordable Units <sup>1</sup>			
	Income Level			
	Acutely Low Income (For Rental or For Sale)	Extremely Low Income (For Rental or For Sale)	Very Low Income (For Rental or For Sale)	Moderate Income (For Rental or For Sale)
<b>Moderate and Lower Opportunity Areas</b>	-	4% <sup>2</sup>	8%	-
<b>Higher Opportunity Areas</b>	4% <sup>2</sup>	4%	-	12%

Footnote:

<sup>1</sup> Provided at least one affordability income category is consistent with the minimum affordability requirements pursuant to California Government Code Sections 65915.

<sup>2</sup> Projects utilizing the combinations of mixed affordability described in Table 12.22 A.38(c)(3)(iv) to meet the required restricted affordable units must provide one 3-bedroom covenanted unit per Project.

<b>TABLE 12.22 A.38(c)(3)(v)</b>			
Incentive Program	Minimum Percent of Total Units Provided as Restricted Affordable Units <sup>1,2</sup>		
Corridor Transition Incentive Area	Income Level		
	Very Low Income (For Rental or For Sale)	Low Income (For Rental or For Sale)	Moderate Income (For Rental or For Sale)
CT-1A	—	—	1 unit
CT-1B, and CT-2	1 unit	1 unit	2 unit
CT-3	2 units	2 units	3 units

Footnote:

<sup>1</sup> For consolidated lots, the Project shall provide the same affordability as required per individual lot. For example, if a project consolidated two lots into one project using CT-2 incentives, the project would be required to provide either 2 Very Low Income or Low Income units, or 4 Moderate Income units.

<sup>2</sup> Provided at least one affordability income category is consistent with the minimum affordability requirements pursuant to California Government Code Sections 65915.

- (4) The Project site does not include any lots located in a single family or more restrictive zone (RW and more restrictive zone), or any lots located in a manufacturing zone that does not allow multi-family residential uses (M1, M2, and M3), including sites zoned CM, MR1, and MR2 with no residential uses permitted from an applicable planning overlay.
- (5) Projects located on sites that meet the definition of an Environmental Consideration Area shall comply with all applicable standards contained in the Environmental Protection Measures adopted pursuant to LAMC Section 11.5.15.
- (5) The Project site does not include any lots located within a Very High Fire Hazard Severity Zone (VHFHSZ), within the Coastal Zone, or within a Sea Level Rise Area. Except that a project site that is located within a VHFHSZ or Coastal Zone shall be eligible for Opportunity Corridor Incentives as defined in Paragraph (f), if properties are abutting, across the street or alley, or having a common corner with the subject property are not in a VHFHSZ or Coastal Zone, and is eligible for the Opportunity Corridor Incentives as described in paragraph (f) below.
- (6) The Project would not require the demolition of any of the following, as demolition is defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code.
  - (i) A Designated Historic Resource, or
  - (ii) Any Surveyed Historic Resource, eligible or architectural historic resource identified for any historic protection or special consideration or review by an applicable Overlay or Specific Plan including sites located in the South Los Angeles Community Plan Implementation Overlay (CPIO) Section 1-6.C.5.b, the Southeast Los Angeles CPIO Section 1-6.C.5.b, the West Adams CPIO Section 6.C.5.b, or the San Pedro CPIO Section 7.C.5.b, Westwood Village Specific Plan, Echo Park CDO District, or the North University Park Specific Plan.
- (7) A Project involving Designated Historic Resources shall be consistent with the Secretary of the Interior's Standards for Rehabilitation.
- (8) A Project shall not be located in the Boyle Heights Community Plan, the Harbor Gateway Community Plan, the Wilmington-Harbor City Community Plan, the Central City North Community Plan, the Central City Community Plan Areas, and the Cornfield Arroyo Seco Specific Plan.

(d) **Procedures.** A Project that meets the provisions of this Subdivision shall be reviewed pursuant to the Procedures, as set forth below. Though an approval of a Density Bonus or Incentive pursuant to this Subdivision shall not, in and of itself, trigger a General Plan Amendment, Zone Change, Project Review, the applicable procedures set forth in LAMC Section 13A.2.10 (Multiple Approvals) of Chapter 1A of this Code shall apply for Projects seeking other discretionary approvals in conjunction with an application requested pursuant to the Procedures in Paragraph (d).

(1) **Los Angeles Department of Building and Safety Review.** Projects seeking Base Incentives described in Paragraphs (e)(2), (f)(2) or (g)(2), and/or Incentives listed on the Menu of Incentives in Paragraph (h) shall be considered ministerial and processed by the Department of Building and Safety.

(2) **Expanded Administrative Review.** The following Projects shall be ministerially approved pursuant to Expanded Administrative Review, as set forth by the provisions of LAMC Section 13B.3.2 (Expanded Administrative Review) of Chapter 1A of this Code. As defined in this Subdivision, ministerial approval means an administrative process to approve a “use by right” as this term is defined in California Government Code Section 65583.2 (i):

(i) Projects that request the Public Benefit Options described in Paragraph (i). Housing Developments that request only Public Benefit Options in addition to Incentives listed on the Menu of Incentives shall not be subject to any hearing procedures regardless of the provisions contained in LAMC Section 13B.3.2.D.

(ii) Projects that request Incentives not listed on the Menu of Incentives described in LAMC Section 12.22 A.38(h)(2). Housing Developments that request Incentives not listed on the Menu of Incentives may be subject to a public hearing as described in LAMC Section 13B.3.2.D

a. Projects requesting Incentives not listed in Paragraph (h) shall be required to meet a minimum of 35 points under the Landscape and Site Design Ordinance.

b. **Exception.** Projects that request an Incentive not on or in excess of the Menu of Incentives for relief from Floor Area Ratio (FAR), Height, Open Space requirements, tree planting requirements, ground story requirements, and/or yards/setback requirements shall seek approval pursuant to the Procedures described in LAMC 12.22 A.37.

(3) **Director's Determination.** The Director of Planning shall review the following Projects pursuant to LAMC Section 13B.2.5 of Chapter 1A of this Code.

- (i) Projects requesting up to one waiver or reduction of any Development Standard not on the Menu of Incentives described in Paragraph (h). Waivers or reductions of any Development Standards shall be reviewed pursuant to the Findings described in LAMC Section 12.22 A.38(d)(3).

(4) **City Planning Commission Review.** The following Projects must file an application pursuant to LAMC Section 13B.2.3 (Class 3 Conditional Use Permit) of Chapter 1A of this Code. Notwithstanding the provisions set forth in Sec. 13B.2.3. of Chapter 1A, the decision of the City Planning Commission shall be final.

- (i) Projects that request more than one waiver or reduction of any Development Standards not on the Menu of Incentives described in Paragraph (h). Waivers or reduction of any Development Standards shall be reviewed pursuant to the Findings described in LAMC Section 12.22 A.38(d)(5).

(5) **Findings for Waivers or Reductions of Development Standards.** Waivers requested pursuant to the procedures described in this Paragraph shall be approved by the applicable decision-making authority unless that decision-making authority finds that:

- (i) The Development Standard associated with a request for waiver(s) or reduction(s) in Development Standards will not have the effect of physically precluding the construction of a development meeting the Eligibility criteria described in Paragraph (c) at the densities or with the concessions or incentives permitted under Paragraphs (e), (f), or (g); or
- (ii) The waivers or reductions of Development Standards would have a Specific Adverse Impact, as defined in paragraph (2) of subdivision (d) of Section 65589.5, upon public health and safety or on a California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact without rendering the development unaffordable to low-income and moderate-income households; or
- (iii) The waivers or reductions of Development Standards are contrary to state or federal law.

- (6) **Other Discretionary Approvals.** Applicable procedures set forth in LAMC Section 13A.2.10 (Multiple Approvals) of Chapter 1A of this Code apply for Projects seeking other discretionary approvals in conjunction with an application requested pursuant to the Procedures in Paragraph (d). Regardless of any other findings that may be applicable, the decision maker must approve the requested Base Incentives and Additional Incentives, either on or off the Menu of Incentives described in Paragraph (h), requested under this Subdivision unless the decision maker, based upon substantial evidence determines that the Project meets one or more of the criteria described in LAMC Section 12.22 A.38(h)(1).

**(e) Transit Oriented Incentive Area.**

- (1) **Eligibility.** Projects may seek Base Incentives according to the eligibility criteria for Transit Oriented Incentive Areas described below.
- (i) Each one-half mile radius (2,640 feet) around a Major Transit Stop, shall constitute a unique Transit Oriented Incentive Area.
  - (ii) Each lot within a Transit Oriented Incentive Area shall be determined to be in a specific subarea based on the shortest distance between any point on the lot and a qualified Major Transit Stop as delineated in Table 12.22 A.38(e)(1)(iv) below.
  - (iii) Each lot in a Transit Oriented Incentive Area shall be determined to be in a specific Transit Oriented Incentive Area (T-1 to T-3) based on the shortest distance between any point on the lot and a qualified Major Transit Stop.

Table 12.22 A.38(e)(1)(iv)			
Distance to Major Transit Stop	Eligibility Subarea		
Description	T-1	T-2	T-3
Two Regular Buses (intersection of two non Rapid Bus Lines each with at least 15 minute average peak headways)	<2640 feet	-	-
Regular plus Rapid Bus (intersection of a regular bus and a Rapid Bus line)	750 - < 2640 feet	<750 feet	-
Two Rapid Buses (intersection of two Rapid Bus lines)	1500-2640 feet	<1500 feet	-
Metrolink Rail Stations	750 - <2640 feet	<750 feet	-
Metro Rail Stations and Rapid Bus Transit Stations	-	≤ 2640 feet	<750 feet from intersection with another rail line or a Rapid Bus

(2) **Base Incentives.** Projects shall be granted Base Incentives established in Table 12.22 A.38(e)(2)(i), in exchange for the required minimum percentage of Restricted Affordable Units established in Paragraph (c) of this Subdivision. Projects that qualify for Base Incentives established in the table below shall also be eligible for Public Benefit Options listed in Paragraph (i) of this subdivision. For Type I Unified Adaptive Reuse Projects that meet the eligibility criteria established in LAMC 12.22 A.38(c), notwithstanding the Density Bonuses described in Table 12.22 A.38(e)(2)(i), the density shall be limited by floor area and Base Incentives for Parking, FAR, and Height shall only apply to the project's new construction.

Table 12.22 A.38(e)(2)(i)

Eligibility Subarea	Density Bonus	Parking	Floor Area Ratio (FAR)	Height
	In each subarea, the maximum increase in the otherwise Maximum Allowable Residential Density shall be as follows:	In each subarea, the required parking ratio shall be as follows: <sup>1 2 6</sup>	In each subarea, the maximum allowable FAR shall be as follows: <sup>3 4</sup>	In each subarea, the maximum allowable height permitted shall be equal to the following: <sup>5</sup>
T-1	Moderate and Lower Opportunity Areas: 100%	No parking minimum required. If parking is provided, up to 40% of spaces may be provided as compact vehicular spaces. Tandem parking may also be permitted so long as a 24-hour attendant is present on-site.	R - zones: 40% increase.	One additional story, up to 11 additional feet.
			C - zones: 3.25:1, or 40% increase, whichever is greater.	
	Higher Opportunity Areas: 120%		R - zones: 40% increase.	
			C - zones: 4.2:1, or 45% increase, whichever is greater.	
T-2	Moderate and Lower Opportunity Areas: 110%		R - zones: 40% increase.	Two additional stories, up to 22 additional feet.
			C - zones: 4.2:1, or 50% increase, whichever is greater.	
	Higher Opportunity Areas: Limited by Floor Area		R - zones: 45% increase.	
			C - zones: 4.5:1, or 50% increase, whichever is greater.	
T-3	Moderate and Lower Opportunity Areas: 120%		R - zones: 45% increase.	Three additional stories up to 33 additional feet.
			C - zones: 4.5:1, or 50% increase, whichever is greater.	
	Higher Opportunity Areas: Limited by Floor Area		R - zones: 50% increase.	
			C - zones: 4.65:1, or 55% increase, whichever is greater.	

**Footnotes:**

1 Required automobile parking applies for all Residential Units in a Project (not just the restricted affordable units), inclusive of disabled and required guest parking, where applicable. All parking spaces provided shall comply with Subdivision 12.21 A.5 of the Code. Except that any combination of standard, compact or tandem spaces may be provided. Tandem parking spaces that do not comply with Subparagraph 12.21 A.5(h)(2) of the Code may be provided in any configuration as long as a parking attendant or an automated parking system is provided at all times.

2 Pursuant to California Civil Code Section 1947.1, provided parking shall be sold or rented separately from the units in properties with 16 or more units, as verified by the Los Angeles Housing Department.

3 The maximum increase in the allowable FAR permitted shall be equal to the table above, provided that any additional floor area provided through this Paragraph is utilized only by residential uses. Any nonresidential uses shall be limited to the FAR associated with a site's underlying zoning prior to the application of any Incentive.

4 For the purpose of applying this incentive, commercial zones include Hybrid Industrial zones, Commercial Manufacturing zones and any defined area in a Specific Plan or overlay district that allows for both commercial uses and residential uses.

5 The increase in height shall be applicable to a Project over the entire project site regardless of the number of underlying height limits. The height increase may be applied to the maximum allowable height in feet or stories permitted by the zone, including for mixed-use Projects.

6 Consistent with California Government Code Section 65915(p)(4), required parking spaces provided allowable may be uncovered.

**(i) Exceptions.**

a. Sites with a Maximum Allowable Residential Density of less than 5 units shall be eligible for the following Density Bonuses:

i. T-1: 60%

ii. T-2: 70%

lii. T-3: 80%

b. Sites with a Maximum Allowable Residential Density of less than 5 units, Designated Historic Resource(s), or Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code shall not be eligible for an incentive to increase allowable FAR or height above one additional story, up to 11 additional feet.

c. In a Specific Plan or overlay district that has a FAR available through a development bonus or incentive program to provide affordable housing, a Project may utilize the Bonus FAR of the Specific Plan or overlay district in lieu of the FAR maximum described above in Table 12.22 A.38(e)(2)(i).



**(f) Opportunity Corridor Incentive Area.**

- (1) **Eligibility.** Projects may seek Base Incentives according to the eligibility criteria for Mixed Income Incentive Projects as described in Paragraph (c) and Opportunity Corridor Incentive Areas, described in Table 12.22 A.38(f)(1)(i), below.

Table 12.22 A.38(f)(1)(i)		
Eligibility Subarea	Corridor Requirements	Geographic Criteria
OC-1	Corridors with Frequent Bus Service	Higher Opportunity Areas
OC-2	Corridors with High Quality Transit Service	
OC-3	Corridors within one - half mile from Metro Rail Station or Portal and Rapid Bus Stop	

- (ii) **Corridor Access.** A Project must provide Direct Pedestrian Access to the eligible Opportunity Corridor.
- (iii) **Frontage.** Each eligible lot must provide a minimum 25-foot frontage along the eligible corridor, or be part of a Consolidated Development with a 25-foot frontage along the eligible corridor.
- (2) **Base Incentives.** A Project shall be granted Base Incentives established in this Paragraph as defined in Table 12.22 A.38(f)(2)(i) below, in exchange for the required minimum percentage of Restricted Affordable Units established in Paragraph 12.22 A.38(c)(3) of this Subdivision. Projects that qualify for Base Incentives established in the table below shall also be eligible for Public Benefit Options listed in Paragraph (i) of this subdivision. For Type I Unified Adaptive Reuse Projects that meet the eligibility criteria established in LAMC 12.22 A.38(c), the Base Incentives shall only apply to the project's new construction.

<b>Table 12.22 A.38(f)(2)(i)</b> <b>Opportunity Corridor Incentive Area Base Incentives</b>				
<b>Eligibility Subarea</b>	<b>Density Bonus</b>	<b>Parking</b>	<b>Floor Area Ratio</b>	<b>Height</b>
Description	In each subarea, the maximum increase in the otherwise Maximum Allowable Residential Density shall be as follows:	In each subarea, the required parking ratio shall be as follows: <sup>1 2 5</sup>	In each subarea, the maximum allowable FAR permitted shall be as follows <sup>3</sup> :	In each subarea, the maximum allowable height permitted shall be equal to the following: <sup>4</sup>
OC-1	Limited by Floor Area	No Parking required.	R - zones: 45% increase.	One additional story, up to 11 additional feet; or up to a maximum of 5 total stories, whichever is greater.
			C - zones: 4.5:1, or 50% increase, whichever is greater.	
OC-2			R - zones: 50% increase.	Two additional stories, up to 22 additional feet; or up to a maximum of 6 total stories, whichever is greater.
			C - zones: 4.65:1, or 55% increase, whichever is greater.	
OC-3			4.8:1, or 60% increase, whichever is greater.	Three additional stories, up to 33 additional feet; or up to a maximum of 7 total stories, whichever is greater.

## Footnotes:

1 Required automobile parking applies for all Residential Units in an Eligible Project (not just the restricted affordable units), inclusive of disabled and required guest parking, where applicable. All parking spaces provided shall comply with Subdivision 12.21 A.5 of the Code. Except that any combination of standard, compact or tandem spaces may be provided. Tandem parking spaces that do not comply with Subparagraph 12.21 A.5(h)(2) of the Code may be provided in any configuration as long as a parking attendant or an automated parking system is provided at all times.

2 Pursuant to California Civil Code Section 1947.1, provided parking shall be sold or rented separately from the units in properties with 16 or more units, as verified by the Los Angeles Housing Department.

3 The maximum increase in the allowable FAR permitted shall be equal to the table above, provided that any additional floor area provided through this Subdivision is utilized only by residential uses. Any nonresidential

uses shall be limited to the FAR associated with a site's underlying zoning prior to the application of any Incentive.

4 The increase in height shall be applicable to a Project over the entire project site regardless of the number of underlying height limits. The height increase may be applied to the maximum allowable height in feet or stories permitted by the zone, including for mixed-use Projects.

5 Consistent with California Government Code Section 65915(p)(4), required parking spaces provided may be uncovered.

**(ii) Exceptions.**

- a. Sites with Designated Historic Resource(s) or Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code shall not be eligible for an incentive to increase allowable FAR or height above one additional story, up to 11 additional feet.
- b. In a Specific Plan or overlay district that has a FAR available through a development bonus or incentive program to provide affordable housing, a Project may choose to utilize the Bonus FAR and affordability requirement of the Specific Plan or overlay district in lieu of the FAR maximum described above in Table 12.22 A.38(e)(2)(i).

**(g) Opportunity Corridor Transition Incentive Area.**

- (1) **Eligibility.** Projects may seek Base Incentives according to the eligibility criteria for Opportunity Corridor Transition Incentive Areas, described in Table 12.22 A.38(g)(1)(i), below.

Table 12.22 A.38(g)(1)(i)			
Eligibility Subarea	Site Requirements	Eligible Underlying Zones	Geographic Criteria
CT-1	Sites within 750 feet of the furthest property line of a lot from the corridor located within an Opportunity Corridor Incentive Area.	RD zones and R2 zones	Higher Opportunity Areas
CT-2	Sites within 500 feet of the furthest property line of a lot from the corridor located within an Opportunity Corridor Incentive Area.		
CT-3	Sites within 250 feet of the furthest property line of a lot from the corridor located within an Opportunity Corridor Incentive Area.		

- (i) **Property Line Measurement.** Distance measured from the Opportunity Corridor Incentive Area shall be measured from the rear property line of the eligible lot located within the Opportunity Corridor Incentive Area. Where a lot is a Reverse Corner Lot in an Opportunity Corridor Incentive Area, distance shall be measured from the property line parallel to the Opportunity Corridor. In the case that Opportunity Corridor sites are abutting or are consolidated, the buffer measurement will not be adjusted to accommodate the new rear property line of the consolidated site.

(ii) **Exceptions.**

- a. Sites with Designated Historic Resource(s), or Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code shall not be eligible for CT-3 incentives.

- (2) Projects utilizing the Opportunity Corridor Transition Incentive Area Base Incentives as defined in Paragraph (g)(3)(i) are not eligible to request waivers or reductions of any Development Standard. Opportunity Corridor Transition

Incentive Area Projects are not eligible to request Incentives on or off the Menu of Incentives.

- (3) **Base Incentives.** A Project shall be granted Base Incentives established in this Paragraph as defined in Table 12.22 A.38(g)(3)(i) below, in exchange for the required minimum percentage of Restricted Affordable Units established in Paragraph 12.22 A.38(c)(3) of this Subdivision.

<b>Eligibility Subarea</b>	<b>Density Bonus</b>	<b>Floor Ratio</b> (maximum permitted)	<b>Area</b>	<b>Parking</b>	<b>Height</b> (maximum permitted)
Description	In each subarea, the maximum Density shall be as follows:	For each subarea, the maximum FAR shall be equal to the following:		Required automobile parking for all Residential Units in a Project (not just the restricted affordable units), inclusive of disabled and required guest parking, where applicable, shall be as follows: <sup>1 3</sup>	In each subarea, the maximum allowable height permitted shall be as follows:
CT-1A <sup>2</sup>	4 units	1.15:1		No parking required.	2 stories
CT-1B <sup>2</sup>	5 units	1.30:1			
	6 units	1.45:1			
CT-2	7 units	1.60:1			3 stories
	8 units	1.75:1			
	9 units	1.90:1			
	10 units	2.0:1			
CT-3	11 units	2.15:1			
	12 units	2.30:1			
	13 units	2.45:1			
	14 units	2.60:1			
	15 units	2.75:1			
	16 units	2.90:1			

## Footnotes:

1 Pursuant to California Civil Code Section 1947.1, provided parking shall be sold or rented separately from the units in properties with 16 or more units, as verified by the Los Angeles Housing Department.

2 Sites are eligible for CT-1 site requirements from Table 12.22 A.38(g)(1)(i).

3 Consistent with California Government Code Section 65915(p)(4), required parking spaces provided may be uncovered.

(i) **Lot Requirements.** Projects are eligible for a reduction of otherwise required Lot standards, as part of a subdivision as follows:

- a. Minimum Lot Area: 600 square feet
- b. Minimum Lot Width: 15 feet
- c. Minimum Lot Access: A 3-foot pedestrian access easement may be provided in lieu of vehicular access requirements.

(ii) **Yards.** Projects are eligible for the reduction of otherwise required Yard standards, up to the following minimums:

- a. Front yard setback of 10 feet.
- b. Side yard setback of 4 feet, or 3 feet for a two-story structure.
- c. No interior side yard setback shall be required for buildings that are part of the same development.
- d. Rear yard setbacks of 4 feet, provided structures maintain a height of less than 26 feet within 15 feet of the rear property line.
- e. Alley setbacks of zero feet for structures that maintain a height of less than 26 feet in height for at least the first 15 feet from the alley.

(iii) **Multi-Bedroom Units.** A Project that includes a minimum of 40% of total Residential Units as 3-bedrooms or larger, shall be granted either additional Floor Area up to 0.5 FAR and an additional 11 feet in height.

(iv) **Spaces Between Buildings and Passageways.** Projects do not need to meet zoning requirements related to spaces between buildings or passageways pursuant to section 12.21 C.2.

(v) **Consolidated Development.** In the case that a Opportunity Corridor Transition Project consolidates multiple lots, the Density Bonuses established in Table 12.22 A.38(g)(3)(i) shall be available to each lot, however, FAR and height bonuses shall not exceed the maximum permitted Incentive Area in Table 12.22 A.38(g)(3)(i).

- a. For example, if two CT-1 lots are consolidated in one project, the project is eligible for up to 12 units, with 1.45:1 FAR maximum and a height maximum of 2 stories; or if two CT-2 lots are consolidated in one project, the project is eligible for up to 20 units, with a 2.0:1 FAR maximum and a height maximum of 3 stories.
- b. If a project consolidates two lots of differing incentive areas, for example CT-2 and CT-3, the incentives of the more intense incentive area shall be permitted.

(4) **Performance Standards.** Projects approved pursuant to this Subdivision shall meet the following performance standards, and no deviations from these standards shall be granted, except that any project resulting from the conversion of or an addition up to a maximum of 1,200 square feet to an existing structure need not comply with these standards.

(i) **Common Outdoor Open Space Standards.** Projects shall provide at-grade Common Outdoor Open Space that is accessible to all the residential tenants of a project. The Common Outdoor Open Space shall be open to the sky and have no structures that project into the area, except for Outdoor Amenity Space areas as provided in Sec. 12.21 B and except for Projections into Yards, as provided in Section 12.22 C.20(b). This common open space requirement shall supersede the per Residential Unit calculation of common open space in LAMC Section 12.21 G.2. In lieu of the provisions of LAMC Section 12.21 G.2, a project must meet at least one Common Outdoor Open Space typology from the menu listed in Table 12.22 A.38(g)(4)(ii), below.

- a. **Minimum Planting Area.** The Common Outdoor Open Space provided shall comply with the provisions of LAMC 12.21 G.2.(a).(3) regarding minimum planting area.

<b>Table 12.22 A.38(g)(4)(ii)</b> <b>Common Outdoor Open Space Types Menu</b>		
<b>Common Outdoor Open Space Typologies:</b>	<b>Dimension Requirements (minimum)</b>	<b>Standards</b>
Courtyard	<p>Courtyard width (minimum): 30% of lot width or 15 feet, whichever is greater</p> <p>Courtyard depth (minimum): 40% of lot depth (minimum)</p>	<p>Placement of courtyard shall comply with at least one of the following standards:</p> <ol style="list-style-type: none"> <li>1. The courtyard shall be oriented so that it and an existing open space courtyard on an adjacent lot work together to create the effect of one large open space.</li> <li>2. The courtyard shall be contiguous with the minimum front yard setback creating a deep combined courtyard or wide connection between two spaces.</li> <li>3. The courtyard shall be an internal courtyard, entirely contained onsite.</li> </ol>
Paseo	<p>Paseo width (minimum): 10% of lot width or 10 feet wide, whichever is greater</p> <p>Paseo depth (minimum): 60% of the lot depth</p>	<p>A Paseo shall be located between residential structures, perpendicular to the primary lot line. A Paseo shall have a minimum 4 foot wide pedestrian pathway accessible from the Ground Floor Frontage. A Paseo may be covered by architectural projections, but no structures or habitable space shall encroach on the Paseo.</p>
Rear Yard	<p>Rear Yard width (minimum): 50% of lot width</p> <p>Rear Yard depth (minimum): 10% of lot depth, or 15 feet, whichever is greater</p>	<p>Located adjacent to the rear property line</p>



(iii) **Entrances.**

a. **Street-Facing Entrance.** Each unit fronting a public street (provided there is no structure located between the lot line and unit) shall have an entrance facing the public street and one of the following entry features:

1. **Porch.** A wide, raised platform, projecting in front of a street-facing entrance, that is entirely covered but not enclosed. A porch shall have a minimum depth of four and one half feet, a minimum of 30% of the building width, and a finished floor elevation between two to five feet.
2. **Forecourt.** A yard screened with a short wall, fence or hedge that provides significant privacy for tenants located on the ground story, near sidewalk grade. A forecourt shall have a minimum depth of eight feet, a minimum width of 10 feet, required covered entrance, and a fence or wall height between two and one half to three feet and 6 inches.
3. **Recessed entry.** A space set behind the building face plane providing sheltered access to a street-facing entrance. A recessed entry shall have a depth between three to 15 feet minimum, and a maximum width of five feet, and a required covered entrance.



(iv) **Ground Floor External Entrances.** Ground floor external entrances to units not located on a street-fronting lot line, shall have an entrance oriented towards the open space when adjacent to the open space.

**(v) Parking Areas, Garages, and Carports****a. Location.**

1. No above-ground parking areas including parking structures and parking stalls, shall be allowed between a Ground Floor Frontage and public right-of-way.
2. New detached garages and carports shall be located behind the main building(s) facade, furthest from the Ground Floor Frontage Line.
3. Attached parking areas shall be located either underground (subterranean or semi-subterranean) or behind any main building(s).
4. Access driveways shall be provided from alleys when present and determined feasible by LADOT.

**(h) Additional Incentives.** In addition to the Base Incentives established in Paragraphs (e) and (f), Projects that satisfy eligibility criteria set forth in Paragraph (c) shall have the ability to select up to four Incentives from the Menu of Incentives provided in LAMC Section 12.22 A.38(h)(2) below or use an Incentive to seek a deviation from a Development Standard elsewhere in the LAMC. Refer to Paragraph (d) for the approval Procedure that is consistent with the Project's Incentive request. Projects utilizing the Opportunity Corridor Transition Incentive Area are not eligible for Incentives on or off the Menu of Incentives. For Type I Unified Adaptive Reuse Projects, Additional Incentives shall only apply to the project's new construction.

(1) A Project shall be eligible for up to four Additional Incentives. A Project may request Incentives listed in Paragraph (f)(2) or use an Incentive to seek a deviation from a Development Standard elsewhere in the LAMC or a Project site's applicable zoning ordinance, Specific Plan, or overlay. Refer to Paragraph (d) for the approval Procedure that is consistent with the Project's Incentive request.

(i) Incentives requested pursuant to the applicable procedure in Paragraph (d) of this Subdivision shall be granted unless it is found, based upon substantial evidence, that:

- a. The Incentive does not result in identifiable and actual cost reductions, consistent with California Government Code Section 65915(k), to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5, or for rents for the targeted units to be set as specified in California Government Code Section 65915(c); or

b. The Incentive will have a Specific Adverse Impact upon public health and safety or the physical environment or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the Specific Adverse Impact without rendering the development unaffordable to low-income and moderate-income households. Inconsistency with the zoning ordinance or general plan land use designation shall not constitute a Specific Adverse Impact upon the public health or safety; or

c. The Incentive would be contrary to state or federal law.

(2) Menu of Incentives. A Project may elect to request one of the following incentives not to exceed the allowed number of incentives pursuant to Paragraph (h)(1) above. Each request from the Menu of Incentives shall constitute one Incentive request unless otherwise stated.

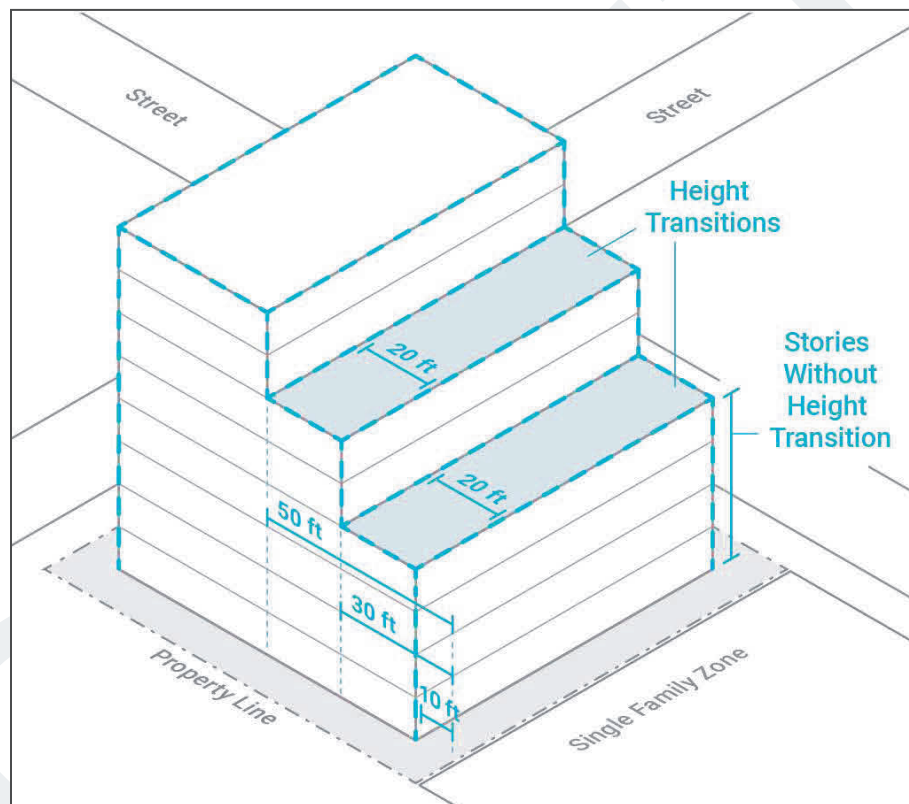
(i) **Yards.** Projects may request a reduction of otherwise required yards as follows:

Yards/Setbacks	C Zones	<b>R Zones</b> (yard reductions for requests from the Menu of Incentives in R zones may be combined and require the use of only one incentive)
	In any Commercial zone, Eligible Projects may utilize any or all of the yard requirements for the RAS3 zone per LAMC Section 12.10.5. Projects on commercially zoned sites adjacent to properties zoned RD or more restrictive may provide a rear yard of not less than five feet.	<b>Front Yards.</b> Front yard reductions are limited to no more than the average of the front yards, regardless of a required Building Line, of adjoining buildings along the same street frontage. If located on a corner lot or adjacent to a vacant lot, the front yard setback may align with the façade of the adjoining building along the same front lot line. If there are no adjoining buildings, no reduction is permitted. If a Project occupies all the lots on an entire street frontage, a reduction to the front yard is permitted so long as it is to the same dimension as a corresponding increase to the rear yard.
		<b>Side and Rear Yards.</b> Up to 30% decrease in the required width or depth of any individual yard or setback.

- (ii) **Ground Floor Height.** Projects involving the construction of a new building or additions may receive up to a 20% reduction in any Ground Floor Height restrictions contained in an Overlay, Specific Plan, Q condition or D condition.

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- (iii) **Transitional Height.** Projects may select the following transitional height requirements in lieu of those found in Section 12.21.1.A.10 of this Code or any applicable transitional height limits in a Project site's applicable zoning, Specific Plan, or overlay including any requirements for reduced building heights or stepbacks when a building is adjoining a RW1 or more restrictive zone. Furthermore, Projects adjoining an OS zone may utilize this incentive to be exempt from the transitional height requirements found in Section 12.21.1.A.10 of this Code or any applicable Specific Plan or Overlay for the portion of the Project abutting the OS zone.



	Setback/Step Back Distance*
Side or Rear Setback	10-feet
4 Story Step-Back	30-feet
6 Story Step-Back	50-feet

\*Setback and Step-back is measured from the property line.

- (iv) **Space Between Buildings and Passageways.** Projects subject to the provisions set forth in LAMC Section 12.21 C.2 may request a reduction in space between buildings and passageways requirements as follows:

- a. Up to a 30% reduction in the space between buildings required pursuant to LAMC Section 12.21 C.2(a); and
  - b. Up to 50% reduction in the width of the passageway required pursuant to LAMC Section 12.21 C.2(b) or the space provided to meet a subject site's required side yard requirement, whichever provides a greater reduction. Passageways provided may extend from any public street adjacent to the project site.
- (v) **Lot Coverage.** Projects may request up to a 20% increase in lot coverage limits, provided that the landscaping for the Project meets a minimum of 30 points under the Landscape and Site Design Ordinance of Section 12.40 of this Code, and the Landscape and Site Design Point System.
- (vi) **Lot Width.** Projects may request up to a 25% decrease from a lot width requirement, provided that the landscaping for the Project meets a minimum of 30 points under the Landscape and Site Design Ordinance of Section 12.40 of this Code, and the Landscape and Site Design Point System.
- (vii) **Open Space.** In lieu of the open space calculations set forth in LAMC Section 12.21 G.2, Projects may calculate their usable open space requirement as 15% of the total lot area or 10% of the total floor area confined within the perimeter walls of the provided Residential Units, whichever is greater, provided that the overall design of the Project meets a minimum of 30 points under the Landscape and Site Design Ordinance pursuant to Section 12.40 of this Code, and the Landscape and Site Design Point System. Common Open Space shall constitute at least 50% of the usable open space calculated under this incentive and shall be provided as outdoor space and comply with applicable provisions of Section 12.21 G.2(a)(1-4). Usable open space provided as Private Open Space shall comply with Section 12.21 G.2(b).
- (viii) **Density Calculation.** The area of any land required to be dedicated for street or alley purposes may be included as lot area for purposes of calculating the maximum density permitted by the underlying zone in which the Project is located.

- (ix) **Averaging of Floor Area Ratio, Density, Parking or Open Space, and permitting Vehicular Access.** A Project that is located on one or more contiguous lots, not separated by a street or alley, may average and permit the floor area, density, open space and residential and commercial parking over the project site, and permit vehicular use and access between a less restrictive zone and a more restrictive zone, provided that:
- a. No further lot line adjustment or any other action that may cause the Project site to be subdivided subsequent to this grant shall be permitted; and
  - b. The proposed use is permitted by the underlying zone(s) of each lot.
- (x) **P Zone.** In lieu of the limitations described in LAMC Section 12.12.1 and LAMC Section 12.12.1.5, in a P or PB zone, a Project may include the uses and area standards permitted in the least restrictive adjoining zone. The phrase “adjoining zone” refers to the zones of properties abutting, across the street or alley from, or having a common corner with, the subject property.
- (xi) **Relief from a Development Standard.** A Project may request up to 20% relief from a Development Standard contained in Chapter 1 of this Code, an Overlay, a Specific Plan, a Q Condition, or a D Condition. Projects requesting this incentive must provide landscaping for the Project that meets a minimum of 30 points under the Landscape and Site Design Ordinance of Section 12.40 of this Code, and the Landscape and Site Design Point System. This incentive may be requested more than once but shall require the use of an Incentive for each request.
- a. **Exception.** This incentive shall not apply to standards that regulate FAR, Height, yards/setbacks, ground story requirements, signs, parking in front of buildings, or usable open space. This incentive shall not apply to a Designated Historic Resource(s), or Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code.

(i) **Public Benefit Options.** Per Paragraphs (e)(2) or (f)(2), all Projects that qualify for the Base Incentives contained in this subdivision shall be eligible for one or more of the following Public Benefit Options. Projects utilizing the Opportunity Corridor Transition Incentive Area are not eligible for Public Benefit Options. Projects may utilize more than one Public Benefit Option if eligible, and development incentives granted in exchange for Public Benefits may be stacked. These Public Benefit Options may be combined with the Additional Incentives pursuant to Paragraph (h). If a Project includes five of the following Public Benefit Options, they shall receive an additional 11 feet in height.

(1) **Child Care Facility.** A Project that includes a Child Care Facility located on the premises of, as part of, or adjacent to, the project, shall be granted either of the following:

- (i) An additional Density Bonus that is, for purposes of calculating residential density, an increase in the floor area of the project equal to the floor area of the Child Care Facility included in the project; or
- (ii) An additional Incentive from the Menu of Incentives or not listed on the Menu of Incentives that contributes significantly to the economic feasibility of the construction of the Child Care Facility. Projects that utilize this incentive may request an additional 11 feet in height.



(2) **Multi-Bedroom Units.** A Project providing multi-bedroom units shall be granted one of the following so long as an affidavit declaring the qualifying multi-bedroom units will maintain the same bedroom count and will not be converted to additional Residential Units in the future is executed and recorded with the Department of City Planning:

(i) A Project that includes a minimum of 10% of Total Units as Residential Units with three bedrooms or more shall be granted additional Floor Area and Height as follows in Table 12.22 A.38(i)(2)(i)a in addition to what is available in the applicable FAR and Height incentive as listed for Base Incentives in Table 12.22 A.38(e)(2)(i) or Table 12.22 A.38(f)(2)(i); or

<b>TABLE 12.22 A.38(i)(2)(i)a</b> <b>Additional FAR and Height for Multi-Bedroom Units</b>		
Overall Residential Units (including Density Bonus Units)	Additional FAR	Additional Height (Stories)
0-30	0.5:1	1
31-50	1.0:1	1
51-75	1.5:1	2
75+	2.0:1	2

(ii) A Project shall be granted the following:

- a. An exemption of the square footage of all Residential Units with three or more bedrooms from the floor area calculations of family size units.
- b. An additional story of height beyond what is available in the applicable height incentive as listed for Base Incentives in Table 12.22 A.38(e)(2)(i) or Table 12.22 A.38(f)(2)(i). The square footage of this additional story shall be limited to the square footage exempted as a result of applying 12.22 A.38(g)(2)(ii)(a).

(3) **Preservation of Trees.** An additional 11 feet of height may be awarded for projects that maintain existing mature, Significant Trees (any tree that measures 12 inches or more in diameter at four and one-half feet above the average natural grade at the base of the tree and/or is more than 35 feet in height), as verified by a focused Tree Report prepared by a certified arborist. A covenant shall be filed with Los Angeles Department of Building and Safety that requires the tree to be

maintained for at least 15 years unless a certified arborist certifies that the tree is dead, dying, or dangerous to public health.

- (4) **Land Donation.** An applicant for a subdivision, parcel map or other residential development approval that donates land for housing to the City of Los Angeles satisfying the criteria of California Government Code Section 65915(g), as verified by the Department of City Planning, shall be granted a Density Bonus of 15%. Provided developments are otherwise consistent with (insert small lot design standards). The Department of City Planning may adopt administrative guidelines for the purpose of clarifying procedures associated with the implementation of Land Donations pursuant to California Government Code Section 65915(g).
- (5) **Active Ground Floor Exemption from Calculation of Floor Area.** Active uses, up to 1,500 square feet, located on the ground story shall be exempt from the calculation of floor area.
- (i) For the purposes of exempting active uses on the ground story from calculating floor area, active space shall be designed and intended for Neighborhood Retail and Service Uses. Areas for circulation, storage, mechanical equipment, parking, lobbies, mailrooms, laundry rooms, utilities, and waste collection shall not account for more than 15% of an area designated as an active use.
  - (ii) Projects utilizing this option shall provide a ground story transparency of a minimum of 60% along the building Frontage.
  - (iii) Projects utilizing this option shall provide a ground floor entrance at minimum every 50 feet along the front property line that provides both ingress and egress pedestrian access to the ground story of the building.
- (6) **Privately Owned Public Space.** Projects that provide 4% of buildable lot area that is dedicated as Privately Owned Public Space above the Project site's required Common Outdoor Open Space shall be eligible for zero rear yard setback and shall be eligible to utilize the Modification of Development Standard for site landscaping as described in LAMC Section 12.22 A.38 (h)(2)(xi).
- (7) **Surveyed Historic Resource Facade Rehabilitation.** Projects incorporating a Surveyed Historic Resource(s) into the Project design shall be granted additional Floor Area up to 1.0 FAR and 22 feet in height beyond what is available in the applicable height incentive as listed for Base Incentives in Table 12.22 A.38(e)(2)(i) or Table 12.22 A.38(f)(2)(i), provided all of the following standards are met:
- (i) The Project retains all street Fronting facades to a depth of 10-feet,

(ii) New Floor Area shall be setback behind the 10-foot retention area, except that open space, balconies, and non-habitable architectural projections may encroach on the 10-foot retention area. In instances where a lot contains dual-frontages, the setback shall be applied from both frontages, and

(iii) Rehabilitation of the facades is completed pursuant to the Secretary of the Interior's Standards for Rehabilitation to the satisfaction of the Office of Historic Resources.

(j) **Program Standards.** The following program standards shall be applicable to any Project that meets the eligibility criteria established in Paragraphs (e), (f), and (g) of this subdivision.

(1) **Other Density Bonus Programs.** Projects seeking a Density Bonus pursuant to this Subdivision may not pursue a Density Bonus pursuant to the procedures of any other housing incentive program contained in the LAMC or in an Overlay or Specific Plan.

(2) **Calculating Maximum Allowable Residential Density.** The Maximum Allowable Residential Density of a Project site shall be calculated pursuant to Government Code Section 65915(o)(6), before the application of a Density Bonus, using the maximum number of units allowed under a Project site's applicable zoning ordinance, specific plan, overlay, or general plan land use designation, whichever is greater. If a range is permitted, the maximum number of units allowed by the specific zoning range, specific plan, or general plan land use designation shall be applicable when determining a Project site's density prior to the application of a Density Bonus.

(3) **Calculating Restricted Affordable Units.** The required number of Restricted Affordable Units shall be calculated based on a Project's Total Units and shall include any unit added by a Density Bonus awarded pursuant to this subdivision.

(4) **Calculating a Density Bonus.** For the purposes of calculating a Density Bonus, the following shall apply:

(i) Residential Units that comprise a Project shall be on contiguous lots, not separated by a street or alley, that are the subject of a single development application, but do not need to be based on individual subdivision maps or lots.

(ii) An applicant for a Project may have the ability to apply a lesser percentage of Density Bonus, including but not limited to, no Density Bonus.

(5) **Fractional Numbers.**

(i) **Units.** For the purposes of this Subdivision, calculations for the following resulting in fractional numbers shall be rounded up to the next whole number:

- a. Maximum Allowable Residential Density
- b. Density Bonus units
- c. Number of Restricted Affordable Units
- d. Number of Replacement Housing Units
- e. Vehicular Parking
- f. Number of Multi-Bedroom Units provided pursuant to LAMC Section 12.22 A.38(i)(2)

(6) **Multiple Lots.** A building that crosses one or more lots is eligible for the Transit Oriented Incentive Area or Opportunity Corridor Incentive Area that corresponds to the lot with the highest incentive area permitted in Table 12.22 A.38(e)(1)(iv) or Table 12.22 A.38(f)(1)(i).

(7) **Update Frequency.** The Director shall have the authority to issue updated eligibility maps on an annual basis in order to align with updated zoning and geographic data updates, including updates to Resource Areas as defined and identified by the California Tax Credit Allocation Committee (TCAC) and updates to the locations of major transit stops.

(8) **Updates to Community Plans, Specific Plans, Transit Neighborhood Plans and Overlays.** Community Plans, Specific Plans, Transit Neighborhood Plans and Overlays with sites eligible for this Subdivision shall meet at minimum the Base Incentives and percentage of set-aside affordable units for every lot eligible in the Mixed Income Incentive Programs. In the case that a Community Plan Update, Specific Plan, Transit Neighborhood Plan, or Overlay proposes to exceed the development incentives or set-aside percentages as set forth in the Mixed Income Incentive Program, the Community Plan, Specific Plan, Transit Neighborhood Plan, or Overlay may supercede the Transit-Oriented Incentive Area program. If these provisions are met, Community Plans and Overlay Plans shall not be subject to the Update Frequency provisions of Subparagraph 7 of Paragraph (j) above.

(i) **Exception.** In the case that a Community Plan, Specific Plan, Transit Neighborhood Plan, or Overlay assigns a site a zone that does not match the minimum Base Incentives for every lot eligible for the Transit-Oriented Incentive Area program, the Plan shall be required to demonstrate that the zoning action does not result in the net loss of residential capacity.

- (9) **Request for a Lower Eligibility Subarea.** Even though a project site may be eligible for a certain Transit Oriented Incentive Area or Opportunity Corridor Incentive Area, an applicant may choose to select a lower Transit Oriented Incentive Area or Opportunity Corridor Incentive Area within the applicable market tier by providing the percentage of Restricted Affordable Housing Units required for any lower Transit Oriented Incentive Area or Opportunity Corridor Incentive Area and be limited to the incentives available for the lower Transit Oriented Incentive Area or Opportunity Corridor Incentive Area.
- (10) **Replacement Housing Units.** A Project approved under this subdivision must meet any applicable housing replacement requirements and demolition protections of California Government Code Section 65915(c)(3) and LAMC Section 16.60, as verified by the Los Angeles Housing Department (LAHD) prior to the issuance of a building permit. Replacement Housing Units required pursuant to this Subparagraph may count towards any Restricted Affordable Unit requirements.
- (11) **Standards for Restricted Affordable Units.** Projects must meet the applicable requirements regarding the size, location, amenities and allocation of Restricted Affordable Units in LAMC Section 16.61 B and C and in any Implementation Memorandum, Technical Bulletin or User Guide prepared and adopted by the Los Angeles Housing Department or Department of City Planning.
- (12) **Rent Schedules.** Restricted Affordable Units required as part of a Project shall be rented at rates not to exceed those specified in California Health and Safety Code 50052.5 for for-sale units or California Health and Safety Code Section 50053 for for-lease units. Restricted Affordable Units associated with One Hundred Percent Affordable Housing Projects shall comply with the definition set forth in LAMC Section 12.03.
- (13) **Implementation Memorandums, FAQs, Forms/Applications and User Guides.** The Director may prepare Implementation Memorandums, FAQs, Forms/Applications and/or User Guides for State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, for the purpose of providing additional information pertaining to this Subdivision and maintaining consistency with State Density Bonus Law.

- (14) **Covenants.** Prior to the issuance of a building permit for any Project qualifying for a Density Bonus pursuant to the provisions of this Subdivision, covenants acceptable to the Los Angeles Housing Department and consistent with the requirements in this Subdivision and set forth in LAMC Section 16.61 shall be recorded with the Los Angeles County Recorder.
- (15) **Story.** A story shall be defined as 11-feet in height.
- (k) **Relationship to Other Sections of the Los Angeles Municipal Code.** The following provisions shall govern the relationship to other sections of the Los Angeles Municipal Code for any Project that meets the eligibility criteria established in Paragraph (c) of this Subdivision.
- (1) A Project that meets the eligibility criteria established in Paragraph (c) and complies with the Procedures established in Paragraph (d) may exceed the use limitations that may apply to a Project site.
- (2) If any of the Procedures described in Paragraph (d), Base Incentives described in Paragraphs (e), (f), and (g), Additional Incentives described in Paragraph (h), Public Benefit options described in Paragraph (i), or waivers requested pursuant to LAMC Section 12.22 A.38(d)(4) conflict with those of any otherwise applicable specific plan, overlay, supplemental use district, “Q” condition, “D” limitation, or citywide regulation established in Chapter 1 of this Code, including but not limited to the Ordinance Nos. listed below, this Subdivision shall prevail.
- (i) Alameda District Specific Plan (171,139)
  - (ii) Avenue 57 Transit Oriented District (174,663)
  - (iii) Bunker Hill Specific Plan (182,576)
  - (iv) Century City North Specific Plan (156,122)
  - (v) Century City West Specific Plan (186,370)
  - (vi) Century City South Specific Plan (168,862)
  - (vii) Coastal Bluffs Specific Plan (170,046)
  - (viii) Coliseum District Specific Plan (185,042)
  - (ix) Colorado Boulevard Specific Plan (178,098)
  - (x) Cornfield Arroyo Seco Specific Plan (182,617)
  - (xi) Crenshaw Corridor Specific Plan (184,795)
  - (xii) Devonshire/Topanga Corridor Specific Plan (168,937)
  - (xiii) Exposition Corridor Transit Neighborhood Plan (186,402)
  - (xiv) Foothill Boulevard Corridor Specific Plan (170,694)
  - (xv) Girard Tract Specific Plan (170,774)
  - (xvi) Glencoe/Maxella Specific Plan (171,946)
  - (xvii) Granada Hills Specific Plan (184,296)
  - (xviii) Hollywoodland Specific Plan (168,121)
  - (xix) Jordan Downs Urban Village Specific Plan (184,346)



- (xx) Los Angeles Airport/El Segundo Dunes Specific Plan (167,940)
- (xxi) Los Angeles International (LAX) Specific Plan (185,164)
- (xxii) Los Angeles Sports and Entertainment District Specific Plan (181,334)
- (xxiii) Loyola Marymount University Specific Plan (181,605)
- (xxiv) Mt. Washington/Glassell Park Specific Plan (168,707)
- (xxv) Mulholland Scenic Parkway Specific Plan (167,943)
- (xxvi) North Westwood Village Specific Plan (163,202)
- (xxvii) Oxford Triangle Specific Plan (170,155)
- (xxviii) Pacific Palisades Commercial Village and Neighborhood Specific Plan (184,371)
- (xxix) Paramount Pictures Specific Plan (184,539)
- (xxx) Park Mile Specific Plan (162,530)
- (xxxi) Playa Vista Area D Specific Plan (176,235)
- (xxxii) Ponte Vista at San Pedro Specific Plan (182,937 and 182,939)
- (xxxiii) Porter Ranch Land Use/Transportation Specific Plan (180,083)
- (xxxiv) Redevelopment Plans (186,325)
- (xxxv) San Vicente Scenic Corridor Specific Plan (173,381)
- (xxxvi) University of Southern California University Park Campus Specific Plan (182,343)
- (xxxvii) Valley Village Specific Plan (168,613)
- (xxxviii) Venice Coastal Zone Specific Plan (175,693)
- (xxxix) Ventura-Cahuenga Boulevard Corridor Specific Plan (174,052)
- (xl) Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan) (173,749)
- (xli) Warner Center 2035 Plan (182,766)
- (xlii) Westwood Community Multi-Family Specific Plan (163,203 and 163,186)
- (xlili) Westwood Village Specific Plan, Westwood Community Design Review Board Specific Plan (187,644)
- (xliv) Wilshire - Westwood Scenic Corridor Specific Plan (155,044)

(l) **Interpretations Consistent with State Density Bonus Law.** This Subdivision is intended to be interpreted as consistent with State Density Bonus Law contained in California Government Code Sections 65915-65918. If at any time, this Subdivision becomes inconsistent with California Government Code Sections 65915-65918, the provisions of State Density Bonus Law shall apply.

Section 8. Subdivision 39 of Subsection A of Section 12.22 of the Los Angeles Municipal Code is added to read as follows:

### **12.22 A.39 AFFORDABLE HOUSING INCENTIVE PROGRAM**

(a) **Purpose.** The purpose of this Subdivision is to establish procedures for implementing State Density Bonus requirements as set forth in California Government Code Sections 65915-65918 for affordable housing projects, including Priority Housing Projects, and to increase the production of affordable housing citywide with tailored application for sites on parking (P) zones, public facility (PF) zones, and sites owned by Public Agencies, Faith-Based Organizations and nonprofit Community Land Trusts and Cooperatives. In conjunction with the incentives granted by state law, this subdivision shall offer incentives and waivers or reductions of Development Standards for the purposes of increasing the feasibility of affordable housing construction.

(b) **Definitions.** The following definitions shall apply to this Subdivision:

**Environmental Consideration Area.** As defined in LAMC Section 12.22 A.37.

**Faith-Based Organization Project.** A housing project located on land owned entirely, whether directly or through a wholly owned company or corporation, by a Religious Institution at the time of project filing, developed by or in partnership with a Qualified Developer. This includes ownership through an affiliated or associated nonprofit public benefit corporation organized pursuant to the Nonprofit Corporation Law (Part 2 [commencing with Section 5110] of Division 2 of Title 1 of the Corporations Code).

**General Commercial Uses.** Uses that involve business activity serving the general public, including retail, professional and personal services, hospitality, and entertainment.

**Moderate Opportunity Areas.** Moderate Resource Areas and areas experiencing moderate rates of rapid change as defined and identified by the California Tax Credit Allocation Committee (TCAC).

**Public Agency.** Refer to California Government Code Section 20056.

**Public Land Project.** A housing project located in a Public Facility (PF) Zone and/or located on lots owned by a Public Agency.

**Qualified Developer.** The same meaning as California Government Code Section 65913.16.(b)(9) exclusive of (D). For purposes of this Subdivision, a Qualified Developer shall also include a Community Development Financial Institution (CDFI) identified on the United States Department of the Treasury's list of Certified CDFIs at the time of project filing, provided the CDFI maintains a



non-profit status pursuant to Section 501(c)(3) of the United States Internal Revenue Code.

**Religious Institution.** Refer to California Government Code Section 65913.16.(b)(10).

**Sea Level Rise Area** As defined in LAMC Section 12.22 A.38 (b).

**Shared Equity Project.** A housing project located on land owned by a Community Land Trust as defined in the California Revenue and Taxation Code Section 402.1(a)(11)(C)(ii), or a Limited-equity Housing Cooperative or Workforce Housing Cooperative Trust as defined in Section 817 of The California Civil Code, except that Residential Units, in addition to being sold or rented to income qualified persons, may also be held by the non-profit corporation for the purpose of making Lower Income units financially stable. The land must be owned by the Community Land Trust, Limited-equity Housing Cooperative or Workforce Housing Cooperative Trust at the time of project filing through the issuance of a Certificate of Occupancy.

**Total Units.** The total units in a project after a Density Bonus is awarded pursuant to this subdivision.

**Very Low Vehicle Travel Area.** Refer to California Government Code Section 65915 (o)(9).

(c) **Eligibility Criteria.** To qualify for the provisions of this Subdivision, an Affordable Housing Incentive Project (Project) must satisfy the following eligibility requirements:

- (1) A Project meeting the definition of a One Hundred Percent Affordable Housing Project, Public Land Project, Shared Equity Project, or a Faith Based Organization Project with five or more Total Units.
- (2) Reserve a percentage of the Project's Total Units for at least one of the following income levels or target populations, as defined on Table 12.22 A.39(c)(2).

TABLE 12.22 A.39(c)(2)(i) Required Percentage of Restricted Affordable Units	
Project Type	Minimum % of Total Units that are Restricted Affordable Units <sup>1</sup>
One Hundred Percent Affordable Housing Project	100% <sup>1</sup>
Public Land Project	100% <sup>2</sup>
Faith-Based Organization Project	80% <sup>3</sup>
Shared Equity Project	80% <sup>4</sup>

## Footnotes:

1 Per GCS 65915(b)(1)(G), a One Hundred Percent Affordable Housing Project must reserve all units (including units provided as a result of a Density Bonus), excluding a manager's unit or units, for lower income households earning up to 80 percent of the area median income, and rents or housing costs to the occupying residents do not exceed 30 percent of the maximum gross income, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD), or any successor agency except that 20 percent of the units may be affordable to Moderate Income households, as defined in California Health and Safety Code Section 50053, or as amended.

2 Provided at least one affordability income category is consistent with the minimum affordability requirements pursuant to California Government Code Section 65915.

3 A Faith Based Organization Project must reserve ~~up to~~ 20 percent of Total Units (including units provided as a result of a Density Bonus), excluding a manager's unit or units, for households earning up to 120 percent of the area median income, as defined in California Health and Safety Code Section, or as amended. Remaining Restricted Affordable Units may use rents or housing costs so the occupying residents do not exceed 30 percent of the maximum gross income, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD). 20 percent of Total Units may be unrestricted.

4 A Shared Equity Project must reserve 20 percent of Total Units (including units provided as a result of a Density Bonus), excluding a manager's unit or units, for households earning up to 120 percent of the area median income, as defined in California Health and Safety Code Section 50053, or as amended. Remaining Restricted Affordable Units may use rents or housing costs so the occupying residents do not exceed 30 percent of the maximum gross income, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD). 20 percent of Total Units may be unrestricted.

- (3) The One Hundred Percent Affordable Housing Project site shall not include any lots located in a single family or more restrictive residential zone (RW and more restrictive zone), if a Project's Maximum Allowable Residential Density is less than 5 units. A Shared Equity Project site shall not include lots located in a single family or more restrictive residential zone (RW and more restrictive).
- (4) Faith-Based Organization Projects utilizing land purchased by a Religious Institution after January 1st, 2024, shall not include any lots located in a single family or more restrictive residential zone (RW and more restrictive) unless the filing Religious Institution owns a lot with an existing Church or House of Worship located within 528 feet of the Project site.
- (5) The Faith-Based Organization Project, Shared Equity Project, or a One Hundred Percent Affordable Project with Maximum Allowable Residential Density of less than 5 units, site shall not include any lots located in a manufacturing zone that does not allow multi-family residential uses (M1, M2, M3), including sites zoned CM, MR1, and MR2 with no residential uses permitted from an applicable planning overlay.

- (6) The Faith-Based Organization Project, Shared Equity Project, or a One Hundred Percent Affordable Project with a Maximum Allowable Residential Density of less than 5 units, shall not include any lots located in a Very High Fire Hazard Severity Zone (VHFHSZ), the Coastal Zone, or a Sea Level Rise Area.
- (7) A Faith-Based Organization Project or Shared Equity Project may be located on a lot with a Surveyed Historic Resource, that is classified as a historical resource, as defined by Public Resources Code Section 21084.1 as determined by the Office of Historic Resources. Provided that:
  - (i) If proposed alterations to a Surveyed Historic Resource do not meet the Secretary of the Interior's Standards for Rehabilitation to the satisfaction of the Office of Historic Resources, the Discretionary Procedure pursuant to Section 12.22.A.39(d)(3) shall be followed; and
  - (ii) The Faith-Based Organization Project or Shared Equity Project does not require Demolition as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code a Surveyed Historic Resource.
- (8) The Project does not require the demolition of a Designated Historic Resource, as demolition is defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code , and any proposed alteration to a Designated Historic Resource shall not be approved until a review has been completed by the Office of Historic Resources.
- (9) The following shall apply to a Type I Unified Adaptive Reuse Project, as defined in LAMC 12.22 A.26(h)(1), that meets the definition of a One Hundred Percent Affordable Housing Project, Public Land Project, Faith-Based Organization Project, or a Shared Equity Project, and that complies with the criteria for Eligibility associated with the corresponding project type:
  - (i) The portion of the Type I Unified Adaptive Reuse Project consisting of new construction may be eligible for Base Incentives, Additional Incentives, and Public Benefits Options in LAMC 12.22 A.39 for the respective project type definition unless otherwise stated; and
  - (ii) The Type I Unified Adaptive Reuse Project shall comply with the Procedures set forth in LAMC 12.22 A.39(d) based on the corresponding project type definition and associated project request.
- (10) Projects located on project sites that meet the definition of an Environmental Consideration Area shall comply with all applicable standards contained in the Environmental Protection Measures adopted pursuant to LAMC Section 11.5.15.

(d) **Procedures.** A Project that meets the provisions of this Subdivision shall be reviewed pursuant to Procedures, as set forth below. Though an approval of a Density Bonus or Incentive pursuant to this Subdivision shall not, in and of itself, trigger a General Plan Amendment, Zone Change, Project Review or other discretionary review actions required by this Zoning Code, the applicable procedures set forth in LAMC Section 13A.2.10 (Multiple Approvals) of Chapter 1A of this Code shall apply for Projects seeking other discretionary approvals in conjunction with an application requested pursuant to the procedures in Paragraph (d).

(1) **Los Angeles Department of Building and Safety Review.** A Project seeking Base Incentives described in Paragraph (e) and/or Incentives listed on the Menu of Incentives in Paragraph (f) shall be considered ministerial and processed by the Department of Building and Safety.

(i) **Exceptions.**

a. Faith-Based Organization Projects and Shared Equity Projects with Surveyed Historic Resources shall seek approval pursuant to Subparagraph (2) of Paragraph (d).

(2) **Expanded Administrative Review.** The following Projects shall be ministerially approved pursuant to Expanded Administrative Review, as set forth by the provisions of LAMC Section 13B.3.2 (Expanded Administrative Review) of Chapter 1A of this Code. As defined in this Subdivision, ministerial approval means an administrative process to approve a “use by right” as this term is defined in California Government Code Section 65583.2 (i).

(i) Projects that request the Public Benefit Options described in Paragraph (g). Projects that request only Public Benefit Options in addition to Incentives listed on the Menu of Incentives shall not be subject to any hearing procedures regardless of the provisions contained in LAMC Section 13B.3.2.D.

(ii) Projects seeking Incentives not listed on the Menu of Incentives described in Paragraph (f) pursuant to California Government Code Section 65915(e).

(iii) Projects that request waivers or reductions of any Development Standards not listed on the Menu of Incentives described in LAMC Section 12.22 A.39(f)(2). Waivers or reductions of any Development Standard shall be reviewed pursuant to the Findings described in LAMC Section 12.22 A.39(d)(5).

(vi) Faith Based Organization Projects and Shared Equity Projects with Surveyed Historic Resources.

(vii) Projects requesting Incentives from the Menu of Incentives that cannot comply with the criteria established in LAMC Section 12.22 A.39(f)(1)(ii) shall be subject to the Public Hearing procedures described in LAMC Section 13B.3.2.D of Chapter 1A of this Code in addition to the general procedures described in LAMC Section 13B.3.2 (Expanded Administrative Review) of Chapter 1A of this Code.

(3) **Director's Determination.** The Director of Planning shall review the following Projects pursuant to LAMC Section 13B.2.5 of Chapter 1A of this Code:

(i) Projects requesting up to three waivers or reduction of any Development Standards, pursuant to California Government Code Section 65915. Waivers or reductions of any Development Standards shall be reviewed pursuant to the Findings described in LAMC Section 12.22 A.39(d)(5).

(4) **City Planning Commission Review.** The following Projects must file an application pursuant to LAMC Section 13B.2.3 of Chapter 1A of this Code. Notwithstanding the provisions set forth in Sec. 13B.2.3 (Class 3 Conditional Use Permit) of Chapter 1A , the decision of the City Planning Commission shall be final.

(i) A Project that requests more than three waivers or reductions of Development Standards pursuant to California Government Code Section 65915. Waivers or reductions of any Development Standards shall be reviewed pursuant to the Findings described in LAMC Section 12.22 A.39(d)(5).

(5) **Findings for Waivers or Reductions of Development Standards.** Waivers requested pursuant to the Procedures described in this Paragraph shall be approved by the applicable decision-making authority unless that decision-making authority finds that:

- (i) The Development Standard associated with a request for waiver(s) or reduction(s) in Development Standards will not have the effect of physically precluding the construction of a development meeting the Eligibility criteria described in Paragraph (c) at the densities or with the concessions or incentives permitted under Paragraph (e) or Paragraph (f); or
- (ii) The waivers or reductions of Development Standards would have a Specific Adverse Impact, as defined in paragraph (2) of subdivision (d) of Section 65589.5, upon public health and safety or on a California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the Specific Adverse Impact without rendering the development unaffordable to low-income and moderate-income households; or
- (iii) The waivers or reductions of Development Standards are contrary to state or federal law.

(6) **Other Discretionary Approvals.** Applicable procedures set forth in LAMC Section 13A.2.10 (Multiple Approvals) of Chapter 1A of this Code apply for a Project seeking other discretionary approvals in conjunction with an application requested pursuant to the Procedures in Paragraph (d). Regardless of any other findings that may be applicable, the decision-maker must approve the requested Base Incentives and Additional Incentives, either on or off the Menu of Incentives described in LAMC Section 12.22 A.39(f)(2), requested under this Subdivision unless the decision-maker, based upon substantial evidence, determines that the Project meets one or more of the criteria described in LAMC Section 12.22 A.37(f)(1)(i).

(e) **Base Incentives.** A Project that meets the eligibility criteria established in Paragraph (c) may utilize Base Incentives described in this Paragraph, in exchange for the required minimum percentage of Restricted Affordable Units established in Paragraph (c) of this Subdivision. A Project that qualifies for Base Incentives established in the table below shall also be eligible for Public Benefit Options listed in subparagraph (g).

<b>TABLE 12.22 A.39(e)(i) Base Incentives</b>				
<b>Eligibility Subarea</b>	<b>Density Bonus</b>	<b>Parking</b>	<b>Floor Area Ratio (FAR)</b>	<b>Height</b>
Description	In each Subarea, the maximum increase in the otherwise Maximum Allowable Residential Density shall be as follows:	In each Subarea, the required shall be as follows: <sup>1,2</sup>	In each Subarea, the maximum increase in the allowable FAR permitted shall be as follows <sup>3</sup> :	In each Subarea, the maximum increase in the allowable height permitted shall be equal to the following: <sup>4</sup>
Citywide	Any Density Bonus provided by California Government Code Section 65915. <sup>5</sup>	0.5 Parking Spaces per Unit. <sup>5</sup>	Sites with a Maximum Allowable Residential Density of less than 5 units: The maximum FAR shall be equal to 1.5:1  Otherwise: 3.0:1, or a 35% increase, whichever is greater.	Sites with a Maximum Allowable Residential Density of less than 5 units: Bonus of up to 11' or 1 story, whichever is greater.  Otherwise: Bonus of 22' or 2 stories, whichever is greater.
Lots located within a half mile of a Major Transit Stop or Very Low Vehicle Travel Area <sup>6</sup>	Limited by Floor Area	No minimum parking required. <sup>7</sup>	Sites with a Maximum Allowable Residential Density of less than 5 units: The maximum FAR shall be equal to 2.0:1  Otherwise: 4.5:1, or a 50% increase, whichever is greater.	Sites with a Maximum Allowable Residential Density of less than 5 units: Bonus of up to 11' or 1 story, whichever is greater.  Otherwise: bonus of 33' or 3 stories, whichever is greater.
Higher Opportunity or Moderate Opportunity Area	Limited by Floor Area	No minimum parking required.  Required parking for current or proposed nonresidential uses may be reduced by 25%	Sites with a Maximum Allowable Residential Density of less than 5 units: The maximum FAR shall be equal to 2.5:1  Otherwise: 4.65:1, or a 55% increase, whichever is greater.	Sites with a Maximum Allowable Residential Density of less than 5 units: Bonus of up to 11' or 1 story, whichever is greater.  Otherwise: bonus of 33' or 3 stories, whichever is greater.



## Footnotes:

1 Required automobile parking applies for all Residential Units in a Project (not just the restricted affordable units), inclusive of disabled and required guest parking, where applicable. All parking spaces provided shall comply with LAMC Section 12.21 A.5. Except that any combination of standard, compact or tandem spaces may be provided. Tandem parking spaces that do not comply with LAMC Section 12.21 A.5(h)(2) may be provided in any configuration as long as a parking attendant or an automated parking system is provided at all times. Consistent with California Government Code Section 65915(p)(4), required parking spaces provided may be uncovered.

2 For consistency with California Government Code Section 65913.6, parking that was previously required under a Conditional Use Permit ~~in~~ pursuant to LAMC Section 12.24 for an existing "church" or "house of worship" use, or that would be required as part of a Conditional Use Permit for a proposed "church" or "house of worship" use, shall be reduced by 50%. California Government Code Section 65913.6 does not apply to Projects within half a mile of a Major Transit Stop or to Projects located on a lot within one block of a car share vehicle.

3 Provided that any additional floor area provided through this Subdivision is utilized only by residential uses. Any nonresidential uses shall be limited to the FAR associated with a site's underlying zoning prior to the application of any Incentive.

4 The increase in height shall be applicable to a Project over the entire project site regardless of the number of underlying height limits. The height increase may be applied to the maximum allowable height in feet or stories permitted by the zone, including for mixed-use Projects.

5 No parking shall be required for a Project meeting the criteria of California Government Code Section 65915(p)(3). No minimum parking is required for Faith-Based Organization Project if there is a car share vehicle within one block of the lot.



(2) **Automobile Parking Zones.** In lieu of the limitations described in LAMC Section 12.12.1 and LAMC Section 12.12.1.5, in a P or PB zone, a Project may establish Maximum Allowable Residential Density, uses and area standards permitted in the least restrictive adjoining zone.

(i) **Lots with Dual Zoning.** In cases where a lot contains split zoning with a P or PB Zone, the entire lot may utilize the least restrictive adjoining zone.

(3) **Public Land Project.** In lieu of the requirements in LAMC Section 12.24 U.21 and 12.04.09 B.9, a Public Land Project may either:

(i) Establish Maximum Allowable Residential Density, uses, and area standards as permitted in the least restrictive adjoining zone. Regardless of adjacent zoning, all Public Land Projects shall be granted a base Floor Area Ratio of 3.0:1 and a base height of three stories or 33 feet whichever is greater; or

(ii) Where specifically authorized through a resolution of City Council, a Public Land Project, shall be permitted to have multi-family residential uses and shall not be limited to the use and zoning requirements of the underlying zoning, Specific Plan or General Plan.

(4) **Exceptions.**

(i) A One Hundred Percent Affordable Housing Project with five or more units prior to the issuance of a Density Bonus pursuant to section (i) of California Government Code Sections 65915-65918 shall not be eligible for the FAR and Parking Incentives indicated in Table 12.22.A.39(e)(1) and shall be limited to the Density Bonus, Parking, and Height Incentives for projects meeting the eligibility criteria of 65915(b)(1)(G) set forth in California Government Code Section 65915 if any of the following is applicable:

- a. The Project is located in a Very High Fire Hazard Severity Zone, the Coastal Zone, or a Sea Level Rise Area; or
- b. The Project is located in a manufacturing zone that does not allow multi-family residential uses (M1, M2, M3) or is located in a hybrid industrial zone (CM, MR1, MR2) with residential use restrictions from an applicable planning overlay.
- c. The Project is located in a single-family or more restrictive residential zone (RW or more restrictive).

- (ii) In a Specific Plan or overlay district that has FAR available through a development bonus or incentive program to provide affordable housing, a Project may utilize the Bonus FAR of the Specific Plan or overlay district in lieu of the FAR maximum described in table 12.22 A.39(e)(1).
- (iii) A Shared Equity Project shall be limited to the low density base incentives indicated in Table 22.A.39(e)(1) for a site with a Maximum Allowable Residential Density less than 5 units, regardless of the underlying Maximum Allowable Residential Density or zoning of the Project site.
- a. **Measure ULA Exception.** A Shared Equity Project receiving funding from a program established under Ordinance 187692 (Measure ULA) shall be eligible for incentives as determined by the Project site's Maximum Allowable Residential Density.

(f) **Additional Incentives.** A Project shall be granted a number of Additional Incentives pursuant to the provisions described below in addition to the Base Incentives established in Paragraph (e).

(1) A Project shall be eligible for up to five Additional Incentives. A Project may request Incentives listed in Paragraph (f)(2) or use an Incentive to seek a deviation from a Development Standard elsewhere in the LAMC or a Project site's applicable zoning ordinance, specific plan, or overlay. Refer to Paragraph (d) for the approval Procedure that is consistent with the Project's Incentive request.

(i) Incentives requested pursuant to the applicable procedure in Paragraph (d) of this Subdivision shall be granted unless it is found, based upon substantial evidence, that:

- a. The Incentive does not result in identifiable and actual cost reductions, consistent with California Government Code Section 65915(k), to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5, or for rents for the targeted units to be set as specified in California Government Code Section 65915(c); or
- b. The Incentive will have a Specific Adverse Impact upon public health and safety or the physical environment or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the Specific Adverse Impact without rendering the development unaffordable to low-income and moderate-income households. Inconsistency with the zoning ordinance or general plan land use designation shall not constitute a Specific Adverse Impact upon the public health or safety; or
- c. The Incentive would be contrary to state or federal law.

(ii) To be eligible for the Menu of Incentives described in LAMC Section 12.22 A.39(f)(2) a Project shall comply with all of the following:

- a. The Project shall not be located in a Very High Fire Hazard Severity Zone, Sea Level Rise Area or the Coastal Zone.
- b. The Project would not require the Demolition, as Demolition is defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code, of a Designated Historic Resource, or any Surveyed Historic Resource, eligible or architectural historic resource identified for any historic protection or special consideration or review by an applicable Overlay or Specific Plan including sites located in the South Los Angeles Community Plan Implementation Overlay

(CPIO) Section 1-6.C.5.b, the Southeast Los Angeles CPIO Section 1-6.C.5.b, the West Adams CPIO Section 6.C.5.b, or the San Pedro CPIO Section 7.C.5.b, Westwood Village Specific Plan, Echo Park CDO District, or the North University Park Specific Plan.

- c. The Project shall not include any lots located in a manufacturing zone that does not allow multi-family residential uses (M1, M2, M3) or lots located in a hybrid industrial zone (CM, MR1, MR2) with residential use restrictions from an applicable planning overlay, except for Public Land Projects.

(2) **Menu of Incentives.** A Project may elect to request any of the following incentives not to exceed the allowed number of incentives pursuant to Subparagraph (f)(1) above. Each request from the Menu of Incentives shall constitute one Incentive request unless otherwise stated.

(i) **Yards.** Projects contained in this subdivision may request a reduction of otherwise required yards as follows:

<b>Yards/ Setbacks</b>	<b>C Zones</b>	<b>R Zones</b> (yard reductions in R zones may be combined and require the use of only one incentive)
	In any Commercial zone, a Project may utilize any or all of the yard requirements for the RAS3 zone per LAMC Section 12.10.5. Projects on commercially zoned sites adjacent to properties zoned RD or more restrictive may provide a rear yard of not less than five feet.	<p><b>Front Yards.</b> Front yard reductions are limited to no more than the average of the front yards, regardless of a required Building Line, of adjoining buildings along the same street frontage. Or, if located on a corner lot or adjacent to a vacant lot, the front yard setback may align with the façade of the adjoining building along the same front lot line. If there are no adjoining buildings, no reduction is permitted. If a Project occupies all the lots on an entire street frontage, a reduction to the front yard is permitted so long as it is to the same dimension as a corresponding increase to the rear yard.</p> <p><b>Side and Rear Yards.</b> Up to 30% decrease in the required width or depth of any individual yard or setback.</p>

- (ii) **Transitional Height.** No otherwise applicable requirement for transitional height including Section 12.21.1 A.10., or any applicable transitional height limits in a Project site's applicable zoning, Specific Plan, or overlay, including any requirements for reduced building heights when a building is adjoining a more restrictive zone, shall need to be met for projects eligible for the Base Incentives contained in this subdivision.
- (iii) **Ground Floor Activation.** Where nonresidential Floor Area is required by a zoning ordinance, Specific Plan, Community Plan Implementation Overlay, Pedestrian Overlay Zone, or other set of Development Standards, including to meet the definition of a Mixed Use Project in LAMC Section 13.09 B.3, that requirement may be reduced by 50 percent and be satisfied by residential lobbies, community rooms, resident amenities spaces, child care centers, supportive services areas, common open space or use whose primary purpose is to provide services and assistance to residents of the building or the general public.
- (iv) **Ground Floor Height.** Projects eligible for the base incentives contained in this subdivision may request a 30% reduction in any ground floor height requirement.
- (v) **Commercial Parking.** Projects may request to waive any requirement to provide new or maintain existing automobile parking spaces associated with a commercial use that is proposed in conjunction with the Project.
- (vi) **Space Between Buildings and Passageways.** Projects subject to the provisions set forth in LAMC Section 12.21 C.2 may request a reduction in space between buildings and passageways requirements as follows:
  - a. Up to a 30% reduction in the space between buildings required pursuant to LAMC Section 12.21 C.2(a).
  - b. Up to 50% reduction in the width of the passageway required pursuant to LAMC Section 12.21 C.2(b) or the space provided to meet a subject site's side yard requirement, whichever provides a greater reduction. Passageways provided may extend from any public street adjacent to the project site.
- (vii) **Lot Coverage.** Up to 20% increase in lot coverage limits, provided that the landscaping for the Project meets a minimum of 30 points under the Landscape and Site Design Ordinance, Section 12.40 of this Code, and the Landscape and Site Design Point System.

- (viii) **Lot Width.** Up to 25% decrease from a lot width requirement, provided that the landscaping for the Project meets a minimum of 30 points under the Landscape and Site Design Ordinance, Section 12.40 of this Code, and the Landscape and Site Design Point System.
- (ix) **Open Space.** In lieu of the open space calculations set forth in LAMC Section 12.21 G.2, A Project requesting this incentive may calculate its usable open space requirement as 15 of the total lot area or 10 of the total floor area confined within the perimeter walls of the provided Residential Units, whichever is greater, provided that the overall design of the Project meets a minimum of 30 points under the Landscape and Site Design Ordinance, Section 12.40 of this Code, and the Landscape and Site Design Point System. Common Open Space shall constitute at least 50% of the usable open space calculated under this incentive and shall be provided as outdoor space and comply with applicable provisions of Section 12.21 G.2(a)(1-4). Usable open space provided as Private Open Space shall comply with Section 12.21 G.2(b).
- (x) **Density Calculation.** The area of any land required to be dedicated for street or alley purposes may be included as lot area for purposes of calculating the maximum density permitted by the underlying zone in which the Project is located.
- (xi) **Averaging of Floor Area Ratio, Density, Parking or Open Space, and permitting Vehicular Access.** A Project that is located on two or more contiguous lots, not separated by a street or alley, may average and permit the floor area, density, open space, and residential and commercial parking over the project site, and permit vehicular use and access between a less restrictive zone and a more restrictive zone, provided that:
- a. No further lot line adjustment or any other action that may cause the Project to be subdivided subsequent to this grant shall be permitted; and
  - b. The proposed use is permitted by the underlying zone(s) of each lot.

(xii) **Relief from a Development Standard.** A Project may request up to 20% relief from a Development Standard contained in Chapter 1 of this Code, an Overlay, a Specific Plan, a Q Condition, or a D Condition. Projects requesting this incentive must provide landscaping for the Projects that meets a minimum of 30 points under the Landscape and Site Design Ordinance, Section 12.40 of this Code, and the Landscape and Site Design Point System. This incentive may be requested more than once, but shall require the use of an Incentive for each request.

a. **Exception.** This incentive shall not apply to standards that regulate FAR, Height, yards/setbacks, signs, parking in front of buildings, or usable open space. This incentive shall not apply to a Designated Historic Resource(s), or a Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code.

(xiii) **Lot Requirements.** Faith Based Organization Projects and Shared Equity Projects on sites with a Maximum Allowable Residential Density of less than 5 units are eligible for a reduction of otherwise required Lot standards, as part of a subdivision as follows:

- a. Minimum Lot Area: 600 square feet
- b. Minimum Lot Width: 15 feet
- c. Minimum Lot Access: A 3-foot pedestrian access easement may be provided in lieu of vehicular access requirements.

(xiv) **Yards.** Faith Based Projects and Shared Equity Projects on sites with a Maximum Allowable Residential Density of less than 5 units are eligible for the reduction of otherwise required Yard standards, up to the following minimums:

- a. Front yard reductions are limited to no more than the average of the front yards, regardless of a required Building Line, of adjoining buildings along the same street frontage. Or, if located on a corner lot or adjacent to a vacant lot, the front yard setback may align with the façade of the adjoining building along the same front lot line. If there are no adjoining buildings, no reduction is permitted. If a Project occupies all the lots on an entire street frontage, a reduction to the front yard is permitted so long as it is to the same dimension as a corresponding increase to the rear yard.
- b. Side yard setback of 4 feet, or 3 feet for a two-story structure.
- c. No interior side yard setback shall be required for buildings that are part of the same development.
- d. Rear yard setbacks of 4 feet, provided structures maintain a height of less than 26 feet within 15 feet of the rear property line.



- e. Alley setbacks of zero feet for structures that maintain a height of less than 26 feet in height for at least the first 15 feet from the alley.

(xv) **Spaces Between Buildings and Passageways.** A Faith Based Organization Project or Shared Equity Project on sites with a Maximum Allowable Residential Density of less than 5 units does not need to meet zoning requirements related to spaces between buildings or passageways pursuant to section 12.21 C.2.

- (g) **Public Benefits Options.** A Project that qualifies for the Base Incentives contained in this Subdivision shall be eligible for one or more of the following Public Benefit Options. Projects may utilize more than one Public Benefit Option if eligible, and bonuses granted in exchange for Public Benefits may be stacked. These Public Benefit Options may be combined with the Additional Incentives granted pursuant to Paragraph (h). If a Project includes 5 of the following Public Benefit Options, they shall receive an additional 11 feet in height. Projects located in Very High Fire Hazard Severity Zones, Coastal Zones or Sea Level Rise Areas shall only be eligible for Public Benefit Options listed in 12.22 A.39(g)(1) or 12.22 A.39(g)(4).

- (1) **Child Care Facility.** A Project that includes a Child Care Facility located on the premises of, as part of, or adjacent to, the Project, shall be granted either of the following:

- (i) An additional Density Bonus that is, for purposes of calculating residential density, an increase in the Floor Area of the project equal to the Floor Area of the Child Care Facility included in the Project.
- (ii) An additional Incentive from the Menu of Incentives or not listed on the Menu of Incentives that contributes significantly to the economic feasibility of the construction of the Child Care Facility. A Project that utilizes this incentive may request an additional 11 feet in height.

(2) **Multi-Bedroom Units.** A Project providing multi-bedroom units shall be granted one of the following so long as an affidavit declaring the qualifying multi-bedroom units will maintain the same bedroom count and will not be converted to additional Residential Units in the future is executed and recorded with the Department of City Planning:

- (i) A Project that includes a minimum of 10% of the Total Units, as Residential Units with three bedrooms or more shall be granted additional Floor Area and Height in addition to what is available on the Base Incentives in LAMC Section 12.22 A.39(e) as follows in Table 12.22 A.39(g)(2)(i)a; or

<b>TABLE 12.22 A.39(g)(2)(i)a Additional FAR and Height for Multi-Bedroom Units</b>		
Overall Residential Units (including Density Bonus Units)	Additional FAR	Additional Height (Stories)
0-30	0.5:1	1
31-50	1.0:1	1
51-75	1.5:1	2
75+	2.0:1	2

- (ii) A Project shall be granted the following:
- An exemption of the square footage of all Residential Units with three or more bedrooms from the floor area calculations of family size units.
  - An additional story of height beyond what is available in the applicable height incentive as listed for Base Incentives in Paragraph (e). The square footage of this additional story shall be limited to the square footage exempted as a result of applying 12.22 A.39(g)(2)(ii)(a).

- (3) **Preservation of Trees.** Additional 11 feet of height may be awarded for Projects that maintain existing mature, Significant Trees (any tree that measures 12 inches or more in diameter at four and one-half feet above the average natural grade at the base of the tree and/or is more than 35 feet in height), as verified by a focused Tree Report prepared by a certified arborist. A covenant shall be filed with Los Angeles Department of Building and Safety that requires the tree to be maintained for at least 15 years unless a certified arborist certifies that the tree is dead, dying or dangerous to public health.
- (4) **Land Donation.** An applicant for a subdivision, parcel map or other residential development approval that donates land for housing to the City of Los Angeles satisfying the criteria of California Government Code Section 65915(g), as verified by the Department of City Planning, shall be granted a minimum Density Bonus of 15%. The Department of City Planning may adopt administrative guidelines for the purpose of clarifying procedures associated with the implementation of Land Donations pursuant to California Government Code Section 65915(g).
- (5) **Active Ground Floor Exemption from Calculation of Floor Area.** Active uses, up to 1,500 square feet, located on the ground story shall be exempt from the calculation of floor area.
- (i) For the purposes of exempting active uses on the ground story from calculating floor area, active space shall be designed and intended for Neighborhood Retail and Service Uses. Areas for circulation, storage, mechanical equipment, parking, lobbies, mailrooms, laundry rooms, utilities, and waste collection shall not account for more than 15% of an area designated as an active use.
  - (ii) Projects utilizing this option shall provide a ground story transparency of a minimum of 60% along the building Frontage.
  - (iii) Projects utilizing this option shall provide a ground floor entrance at minimum every 50 feet along the front property line that provides both ingress and egress pedestrian access to the ground story of the building.
- (6) **Privately Owned Public Space.** Projects that provide 4% of buildable lot area that is dedicated as Privately Owned Public Space above the Project site's required Common Outdoor Open Space, the Project shall be eligible for zero rear yard setback and shall be eligible to utilize the Modification of Development Standard for site landscaping as described in Paragraph (f)(2)(xii).

- (7) **Surveyed Historic Resource Facade Rehabilitation.** Projects incorporating a Surveyed Historic Resource(s) into the Project design shall be granted additional Floor Area up to 1.0 FAR and 22 feet in height beyond what is available in the applicable height incentive as listed for Base Incentives in Table 12.22 A.39(e)(2)(i), provided all of the following standards are met:

- (i) The Project retains all street Fronting facades to a depth of 10-feet,
- (ii) New Floor Area shall be setback behind the 10-foot retention area, except that open space, balconies, and non-habitable architectural projections may encroach on the 10-foot retention area. In instances where a lot contains dual-frontages, the setback shall be applied from both frontages, and
- (iii) Rehabilitation of the facades is completed pursuant to the Secretary of the Interior's Standards for Rehabilitation to the satisfaction of the Office of Historic Resources.

- (h) **Program Standards.** The following program standards shall be applicable to any Project that meets the eligibility criteria established in Paragraph (c) of this subdivision.

- (1) **Other Density Bonus Programs.** Projects seeking a Density Bonus pursuant to this Subdivision may not pursue a Density Bonus pursuant to the procedures of any other housing incentive program contained in the LAMC or in an Overlay or Specific Plan.
- (2) **Calculating Maximum Allowable Residential Density.** The Maximum Allowable Residential Density of a Project site shall be calculated pursuant to Government Code Section 65915(o)(6), before the application of a density bonus, using the maximum number of units allowed under a project site's applicable zoning ordinance, specific plan, or general plan land use designation, whichever is greater. If a range is permitted, the maximum number of units allowed by the specific zoning range, specific plan, or general plan land use designation shall be applicable when determining a Project site's density prior to the application of a density bonus. A Project in a P or PB zone shall calculate Maximum Allowable Residential Density using additional provisions pursuant to Subparagraph (2) of LAMC 12.22.A.39(e), and a Public Land Project shall calculate Maximum Allowable Residential Density using additional provisions pursuant to Subparagraph (3) of LAMC 12.22.A.39(e).
- (3) **Calculating Restricted Affordable Units.** The required number of Restricted Affordable Units shall be calculated based on the Total Units of a Project.
- (4) **Calculating a Density Bonus.** For the purposes of calculating a Density Bonus, the following shall apply:

- (i) Residential Units that comprise a Project shall be on contiguous lots, not separated by a street or alley, that are the subject of a single development application, but do not need to be based on an individual subdivision maps or lots.
- (ii) An applicant for a Project may always have the ability to apply a lesser percentage of Density Bonus, including but not limited to, no Density Bonus.

**(5) Fractional Numbers.**

- (i) Units. For the purposes of this Subdivision, calculations for the following resulting in fractional numbers shall be rounded up to the next whole number:
  - a. Maximum Allowable Residential Density
  - b. Density Bonus Units
  - c. Number of Restricted Affordable Units
  - d. Number of Replacement Housing Units
  - e. Vehicular Parking
  - f. Number of Multi-Bedroom Units provided pursuant to LAMC Section 12.22 A.39(g)(2)

- (6) Replacement Housing Units and Demolition Protections.** A Project approved under this subdivision must meet any applicable housing replacement requirements and demolition protections of California Government Code Section 65915(c)(3) and LAMC Section 16.60, as verified by the Los Angeles Housing Department (LAHD) prior to the issuance of a building permit. Replacement Housing Units required pursuant to this Subdivision may count towards any Restricted Affordable Unit requirements.

- (7) Standards for Restricted Affordable Units.** A Project must meet the applicable requirements regarding the size, location, amenities and allocation of Restricted Affordable Units in LAMC Section 16.61 B and C and in any Implementation Memorandum, Technical Bulletin or User Guide prepared and adopted by the Los Angeles Housing Department or Department of City Planning.

- (8) **Implementation Memorandums, FAQs, Forms/Applications and User Guides.** The Director may prepare Implementation Memorandums, FAQs, Forms/Applications and/or User Guides for State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, for the purpose of providing additional information pertaining to this Subdivision and maintaining consistency with State Density Bonus Law.
- (9) **Covenants.** Prior to the issuance of a building permit for any Project qualifying for a Density Bonus pursuant to the provisions of this Subdivision, covenants acceptable to the Los Angeles Housing Department and consistent with the requirements in this Subdivision and set forth in LAMC Section 16.61 shall be recorded with the Los Angeles County Recorder. For Shared Equity Projects covenants shall restrict the resale of the property to Community Land Trusts, Limited Equity Housing Cooperatives, Workforce Housing Cooperative Trusts, or nonprofit affordable housing corporations pursuant to Section 501(c)(3) of the United States Internal Revenue Code.
- (10) **Interpretation Consistent with State Density Bonus Law.** This Subdivision is intended to be interpreted as consistent with State Density Bonus Law contained in California Government Code Sections 65915-65918. If at any time, this Subdivision becomes inconsistent with California Government Code Sections 65915-65918, the provisions of State Density Bonus Law shall apply.
- (11) **Update Frequency.** The Director shall have the authority to issue updated eligibility maps on an annual basis in order to align with updated zoning and geographic data updates, including updates to Resource Areas as defined and identified by the California Tax Credit Allocation Committee (TCAC) and updates to the locations of Very Low Vehicle Travel Areas and Major Transit Stops.
- (12) **Adjoining Zone.** Refers to the zones of properties abutting, across the street or alley from, or having a common corner with, the subject property.
- (13) **Income Limits, For-sale Costs, and Rent Schedules.** Restricted Affordable Units required as part of a One Hundred Percent Affordable Housing Project, Public Land Project, Faith-Based Organization Project, or Shared Equity Project shall meet the income limit, for-sale cost and rent schedule requirements specified for these Projects in footnotes (1) (2) (3) and (4) of Table A.39(c)(2)(i).
- (14) **Story.** A story shall be defined as 11-feet in height.

(i) **Relationship to Other Sections of the Los Angeles Municipal Code.** The following provisions shall govern the relationship to other sections of the Los Angeles Municipal Code for any Project that meets the eligibility criteria established in Paragraph (c) of this Subdivision.

- (1) A Project that meets the eligibility criteria established in Paragraph (c) and complies with the Procedures established in Paragraph (d) may exceed the use limitations that may apply to a Project site.
- (2) If any of the Procedures described in Paragraph (d), Base Incentives described in Paragraph (e), Additional Incentives described in Paragraph (f), Public Benefit Options described in Paragraph (g), or waivers requested pursuant to LAMC Section 12.22 A.39(d)(2) or LAMC Section 12.22 A.39(d)(4) conflict with those of any otherwise applicable specific plan, overlay, supplemental use district, “Q” condition, “D” limitation, or citywide regulation established in Chapter 1 of this Code, including but not limited to the Ordinance Nos. listed below, this Subdivision shall prevail.

- (i) Alameda District Specific Plan (171,139)
- (ii) Avenue 57 Transit Oriented District (174,663)
- (iii) Bunker Hill Specific Plan (182,576)
- (iv) Century City North Specific Plan (156,122)
- (v) Century City West Specific Plan (186,370)
- (vi) Century City South Specific Plan (168,862)
- (vii) Coastal Bluffs Specific Plan (170,046)
- (viii) Coliseum District Specific Plan (185,042)
- (ix) Colorado Boulevard Specific Plan (178,098)
- (x) Cornfield Arroyo Seco Specific Plan (182,617)
- (xi) Crenshaw Corridor Specific Plan (184,795)
- (xii) Devonshire/Topanga Corridor Specific Plan (168,937)
- (xiii) Exposition Corridor Transit Neighborhood Plan (186,402)
- (xiv) Foothill Boulevard Corridor Specific Plan (170,694)
- (xv) Girard Tract Specific Plan (170,774)
- (xvi) Glencoe/Maxella Specific Plan (171,946)
- (xvii) Granada Hills Specific Plan (184,296)
- (xviii) Hollywoodland Specific Plan (168,121)
- (xix) Jordan Downs Urban Village Specific Plan (184,346)
- (xx) Los Angeles Airport/El Segundo Dunes Specific Plan (167,940)
- (xxi) Los Angeles International (LAX) Specific Plan (185,164)
- (xxii) Los Angeles Sports and Entertainment District Specific Plan (181,334)
- (xxiii) Loyola Marymount University Specific Plan (181,605)
- (xxiv) Mt. Washington/Glassell Park Specific Plan (168,707)
- (xxv) Mulholland Scenic Parkway Specific Plan (167,943)
- (xxvi) North Westwood Village Specific Plan (163,202)



- (xxvii) Oxford Triangle Specific Plan (170,155)
- (xxviii) Pacific Palisades Commercial Village and Neighborhood Specific Plan (184,371)
- (xxix) Paramount Pictures Specific Plan (184,539)
- (xxx) Park Mile Specific Plan (162,530)
- (xxxi) Playa Vista Area D Specific Plan (176,235)
- (xxxii) Ponte Vista at San Pedro Specific Plan (182,937 and 182,939)
- (xxxiii) Porter Ranch Land Use/Transportation Specific Plan (180,083)
- (xxxiv) Redevelopment Plans (186,325)
- (xxxv) San Vicente Scenic Corridor Specific Plan (173,381)
- (xxxvi) University of Southern California University Park Campus Specific Plan (182,343)
- (xxxvii) Valley Village Specific Plan (168,613)
- (xxxviii) Venice Coastal Zone Specific Plan (175,693)
- (xxxix) Ventura-Cahuenga Boulevard Corridor Specific Plan (174,052)
- (xl) Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan) (173,749)
- (xli) Warner Center 2035 Plan (182,766)
- (xlii) Westwood Community Multi-Family Specific Plan (163,203 and 163,186)
- (xlili) Westwood Village Specific Plan, Westwood Community Design Review Board Specific Plan (187,644)
- (xliv) Wilshire - Westwood Scenic Corridor Specific Plan (155,044)

(j) **Interpretations Consistent with State Density Bonus Law.** This Subdivision is intended to be interpreted as consistent with State Density Bonus Law contained in California Government Code Sections 65915-65918. If at any time, this Subdivision becomes inconsistent with California Government Code Sections 65915-65918, the provisions of State Density Bonus Law shall apply.



Section 9. Subdivision 26 of Subsection U of Section 12.24 of the Los Angeles Municipal Code is amended as follows:

**Density Bonus for a Housing Development in Which the Density Increase Is Greater than the Maximum Permitted in Section ~~12.22 A.25~~ 12.22 A.37. (Amended by Ord. No. 185,373, Eff. 2/26/18.)**

- (a) In addition to the findings set forth in LAMC Section 13B.2.3. (Class 3 Conditional Use Permit) of Chapter 1A of this Code, the City Planning Commission shall find that:
- (1) the project is consistent with and implements the affordable housing provisions of the Housing Element of the General Plan;
  - (2) the project contains the requisite number of Restricted Affordable Units ~~sufficient to qualify for a 88.75% or 100% Density Bonus pursuant to 12.22 A.37~~, based on the number of Residential Units units permitted by the maximum allowable density provided, excluding Residential Units added by a Density Bonus, on the date of application, as follows:
    - (i) ~~a. 25~~ 44% Very Low Income Units for a 88.75 ~~35~~% density increase; or
    - (ii) ~~b. 24~~ 20% Low Income Units for a 50 ~~35~~% density increase; or
    - (iii) ~~c. 44~~ 40% Moderate Income Units for a 50 ~~35~~% density increase in for-sale projects.

The project may then be granted an additional Density Bonus ~~density increases~~ beyond 50 ~~100~~ 35% ~~or 88.75%~~ by providing additional affordable housing units in the following manner:

- ~~a.—d.~~ (iv) For every additional 1% set aside of Very Low Income Units, the project is granted an additional 2.5% density increase; or
- ~~b.—e.~~ (v) For every additional 1% set aside of Low Income Units, the project is granted an additional 1.5% density increase; or

- e.— f.— (vi) For every additional 1% set aside of Moderate Income Units in for-sale projects, the project is granted an additional 1% density increase; or
- d.—g.— (vii) In calculating the density increase and Restricted Affordable Units, each component of any density calculation, including the calculation of Maximum Allowable Residential Density, base density and bonus density, resulting in fractional units shall be separately rounded up to the next whole number.
- (3) the project meets any applicable dwelling unit replacement requirements and demolition protections of California Government Code Section 65915(c)(3) and LAMC Section 16.60 as verified by the Los Angeles Housing Department (LAHD). Replacement housing units required pursuant to these sections may count towards any On-Site Restricted Affordable Unit requirement;
- (4) the project meets the requirements for projects including affordable housing in LAMC Section 16.61 B and C.
- (5) ~~(4)~~ the project's Restricted Affordable Units are subject to a recorded affordability restriction of 55 years or 99 years longer pursuant to LAMC Section 16.61 A from the issuance of the Certificate of Occupancy, recorded in a covenant acceptable to the Los Angeles Housing Department, and subject to fees as set forth in Section 19.14 of the Los Angeles Municipal Code; and **(Amended by Ord. No. 187,122, Eff. 8/8/21.)**
- ~~—(5)— the project addresses the policies and standards contained in the City Planning Commission's Affordable Housing Incentives Guidelines.~~

Section 10. Paragraph e of Subdivision 3 of Subsection E of Section 13.09 of the Los Angeles Municipal Code is modified to read as follows:

- e. Affordable Housing. The transit facility and Central Parking Structure incentives set forth above shall not be combined with the parking reduction provided for affordable housing as set forth in Section ~~42.22 A.25(d)(2)~~ 12.22 A.37, 12.22 A.38, or 12.22 A.39.

Section 11. Subdivision 1 of Subsection E of Section 13.15 of the Los Angeles Municipal Code is modified to read as follows:

1. An MPR District shall not authorize any of the strategies listed above, except for the strategies described in subsections D.5. and D.6., for any lot that contained a residential use subject to the Rent Stabilization Ordinance, or that contained any Restricted Affordable units, ~~as defined in Section 12.22 A.25.(b) of the Code,~~ within the five years preceding the adoption of the MPR District. Required parking on such properties, however, may be reduced pursuant to Section ~~12.22 A.25.~~ 12.22 A.37, 12.22 A.38, or 12.22 A.39. of the Code, or pursuant to any other applicable affordable housing incentive program.

Section 12. Subdivision 2 of Subsection E of Section 13.15 of the Los Angeles Municipal Code is modified to read as follows:

2. Minimum parking requirements for multi-residential uses in an MPR district shall be less restrictive for projects that qualify for a density bonus under Section ~~12.22 A.25~~ 12.22 A.37, 12.22 A.38, or 12.22 A.39. of the Code.

Section 13. Subdivision 2 of Subsection A of Section 14.00 of the Los Angeles Municipal Code is modified to read as follows:

2. Density increase for a Housing Development to provide for additional density in excess of that permitted in Section ~~12.22 A.25~~ 12.22 A.37, 12.22 A.38, or 12.22 A.39. (Subdivision Title Amended by Ord. No. 179,681, Eff. 4/15/08.)

Section 14. Sub-subparagraph i of Subparagraph 4 of Paragraph d of Subdivision 10 of Subsection A of Section 14.00 of the Los Angeles Municipal Code is modified to read as follows:

i. Parking may be recalculated for all units in the project (not just the restricted units) using ~~Parking Option 1 in LAMC Section 12.22 A.25(d)~~ Table 12.22 A.37(e)(2)(iii) in Section 12.22 A.37.

Section 15. Sub-subparagraph ii of Subparagraph 4 of Paragraph d of Subdivision 10 of Subsection A of Section 14.00 of the Los Angeles Municipal Code is modified to read as follows:

ii. Parking may be calculated by maintaining all existing parking and providing additional parking just for the newly legalized unit(s) in accordance with ~~Parking Option 2 in LAMC Section 12.22 A.25(d)~~ Table 12.22 A.37(e)(2)(iii) in Section 12.22 A.37 as long as one Restricted Affordable Unit or dwelling unit for Low Income individuals who are 62 years of age or more, or who has a physical or mental impairment that limits one or more major life activities is provided for each legalized unit; or

Section 16. Subparagraph 1 of Paragraph b of Subdivision 13 of Subsection A of Section 14.00 of the Los Angeles Municipal Code is modified to read as follows:

1. Other Affordable Housing Incentive Programs. Except as described in Paragraph (f), applicants for other affordable housing incentive programs, including, but not limited to, the Floor Area Bonus for the Greater Downtown Housing Incentive Area in Section 12.22 A.29.; the Density Bonus provisions in Section ~~12.22 A.25~~ 12.22 A.37, 12.22 A.38, 12.22 A.39.; the Transit Oriented Communities Affordable Housing Incentive Program in Section 12.22 A.31.; or affordable housing incentive provisions in Community Plan Implementation Overlays (CPIOs) ~~community plan implementation overlays (CIPOs)~~, shall not also be eligible for a Qualified Permanent Supportive Housing Project approval at the same location.

Section 17. Sub-subparagraph ii of Subparagraph 2 of Paragraph d of Subdivision 13 of Subsection A of Section 14.00 of the Los Angeles Municipal Code is modified to read as follows:

ii. For Qualified Permanent Supportive Housing Projects located within one-half (1/2) mile of ~~a Transit Stop~~ a Rapid Bus, as defined in Section 12.22 A.38(b) ~~Section 12.22 A.25(b)~~, High Quality Transit Service, or of a Major Transit Stop as defined in Section 21155(b) of the Public Resources Code, no more than one-half (1/2) parking space shall be required for each income-restricted Dwelling Unit or Guest Room not occupied by the Target Population. Otherwise, no more than one (1) parking space shall be required for each income-restricted Dwelling Unit or Guest Room not occupied by the Target Population.

Section 18. Paragraph f of Subdivision 13 of Subsection A of Section 14.00 of the Los Angeles Municipal Code modified to read as follows:

f. Request for Additional Waivers. The City may not apply a development standard that will physically preclude the construction of the Qualified Permanent Supportive Housing Project. Applicants may request additional waivers pursuant to the discretionary review procedures described in Section ~~12.22 A.25(g)(3)~~ 12.22 A.37(d)(3) of this Code. The applicant shall not be required to provide a pro forma or other documentation to show

that the waiver or modification of any development standard(s) is needed in order to make the Qualified Permanent Supportive Housing Project economically feasible, but must provide reasonable documentation of its eligibility for the requested waiver. Additional waivers shall not be used to exempt compliance with the performance standards described in Paragraph (g).

Section 19. Subdivision 5 of Subsection A of Section 14.5.4 of the Los Angeles Municipal Code is modified to read as follows:

5. Residential Projects that exceed the number of dwelling units or Floor Area permitted by the zoning or the Community Plan as a result of a density or Floor Area bonus received pursuant to Sections ~~12.22 A.25, 12.22 A.37, 12.22 A.38, 12.22 A.39,~~ 12.22 A.29., 12.24 U.26. or 12.24 U.27. of this Code.

Section 20. Subdivision 4 of Subsection B of Section 14.5.4 of the Los Angeles Municipal Code is modified to read as follows:

4. Residential Projects that exceed the number of dwelling units or Floor Area permitted by the zoning or the Community Plan as a result of a density or Floor Area bonus received pursuant to Sections ~~12.22 A.25, 12.22 A.37, 12.22 A.38, 12.22 A.39,~~ 12.22 A.29., 12.24 U.26. or 12.24 U.27. of this Code.

Section 21. Subdivision 11 of Subsection D of Section 16.05 of the Los Angeles Municipal Code is added to read as follows:

11. A Housing Development that provides Restricted Affordable Units consistent with the affordability requirements set forth in LAMC Section 19.18 B.2(b) in lieu of the Linkage Fee that may otherwise be required pursuant to LAMC Section 19.18.

Section 22. Subsection M of Section 19.01 of the Los Angeles Municipal code is modified to read as follows:

Type of Application	Base Fee*
Application for a Density Bonus <u>in conjunction with:</u> <u>Up to one waiver of a development standard under the Mixed Income Incentive Program; or</u>  <u>Up to three waivers of a development standard under the Affordable Housing Incentive Program including a request for one or more Incentives included in the Menu of Incentives</u> ( <del>Section 12.22 A.25.(g)(2)</del> Section 12.22 A.38(d)(3); Section 12.22 A.39(d)(3); Section 13B.2.5.)	\$9,459
Application for a Density Bonus <u>in conjunction with:</u> <u>Waivers under the State Density Bonus Program;</u>  <u>More than one waiver under the Mixed Income Incentive Program; or</u>  <u>More than three waivers under the Affordable Housing Incentive Program including a request for one or more Incentives not included in the Menu of Incentives</u> ( <del>Section 12.22 A.25.(g)(3)</del> Section 12.22 A.37(d)(3); Section 12.22 A.38(d)(4); Section 12.22 A.39(d)(4); Section 13B.2.3.)	\$24,349
Application for a Density Bonus in excess of that permitted by Section 12.22 A.3725. (Section 12.24 U.26.; Section 13B.2.3)	\$24,359

Section 23. Subsection A of Section 19.14 of the Los Angeles Municipal Code is modified to read as follows:

A. Unless a fee Exemption pursuant to Section 19.14(b) applies, the following fees shall be charged and collected by the Los Angeles Housing Department (Department) for the preparation, enforcement, monitoring, and associated work relating to the affordable housing covenants ~~described in Sections 12.22 A.25(h)(1) through (3), required by~~ Sections 12.22 A.37, 12.22 A.38, 12.22 A.39, 12.22 A.29.(d)(1) through (2), and 14.00 A.10.(c)(2) of this Code. (Amended by Ord. No. 187,122, Eff. 8/8/21.)

Section 24. Paragraph b of Subdivision 2 of Subsection C of Section 19.18 of the Los Angeles Municipal Code is modified to read as follows:

b. Any for-sale or rental housing development containing restricted affordable units where at least 40% of the total units or guest rooms are dedicated for moderate income households, or at least 20% of the total units or guest rooms are dedicated for low income households, or at least 11% of the total units or guest rooms are dedicated for very low income households, or at least 8% of the total units or guest rooms are

dedicated for extremely low income households, for at least 55 years, where a covenant has been made with the Los Angeles Housing Department and required covenant and monitoring fees have been paid, or any Mixed Income Incentive Project consistent with LAMC Section 12.22 A.38. Such a covenant shall also subject projects using this exemption to the replacement policies in Government Code Section 65915(c)(3), as that section may be amended from time to time, and to LAHD fees related to housing replacement determinations pursuant to state law, as set forth in this Code. For the purposes of this section, total units includes any units added by a density bonus or other land use incentive, consistent with the affordability levels defined in Government Code Section 65915, as that section may be amended from time to time.

Section 25. Paragraph b of Subdivision 4 of Subsection C of Section 19.18 of the Los Angeles Municipal Code is modified to read as follows:

b. Affordable Housing Units. Any Restricted Affordable Units ~~as defined in Section 12.22 A.25 of this Code~~ may be subtracted from the total number of dwelling units or guest rooms in a building in determining the required Linkage Fee.

Section 26. Part 2B and Part 2C of Article 2 (Form) of Chapter 1A of the Los Angeles Municipal Code are amended as follows:

*[Language in Development. Intent: Provide revisions to Part 2B and Part 2C of Article 2 (Form)]*

Section 27. Sections 8.1.1, 8.2.2, 8.2.3, 8.2.5, 8.2.6, 8.2.7, and 8.2.8 of Article 8 (Specific Plans, Supplemental and Special Districts) of Chapter 1A of the Los Angeles Municipal Code are amended as follows:

*[Language in Development. Intent: Provide revisions to 8.1.1, 8.2.2, 8.2.3, 8.2.5, 8.2.6, 8.2.7, and 8.2.8 of Article 8 (Specific Plans, Supplemental and Special Districts)]*

Section 28. Sections 9.2.1, 9.3.1, 9.3.2, 9.3.3, and 9.4.1 of Article 9 (Public Benefit Programs) of Chapter 1A of the Los Angeles Municipal Code are amended to read as follows:

*[Language in Development. Intent: Provide revisions to Sections 9.2.1, 9.3.1, 9.3.2, 9.3.3, and 9.4.1 of Article 9 (Public Benefit Programs)]*



Section 29. Section 13B.3.2. Expanded Administrative Review within Division 13B.3. of Part B. of the Table of Contents of Article 13 of Chapter 1A of the Los Angeles Municipal Code is added as follows:

<b>Div. 13A.1. Authorities . . . . .</b>	<b>13-5</b>
Sec. 13A.1.1. Mayor . . . . .	13-5
Sec. 13A.1.2. City Council. . . . .	13-5
Sec. 13A.1.3. City Planning Commission . . . . .	13-6
Sec. 13A.1.4. Area Planning Commission . . . . .	13-8
Sec. 13A.1.5. Cultural Heritage Commission . . . . .	13-12
Sec. 13A.1.6. Director of Planning . . . . .	13-13
Sec. 13A.1.7. Zoning Administrator. . . . .	13-14
Sec. 13A.1.8. Department of Building and Safety . . . . .	13-16
Sec. 13A.1.9. Advisory Agency . . . . .	13-17
Sec. 13A.1.10. Subdivision Committee . . . . .	13-17
Sec. 13A.1.11. Design Review Board. . . . .	13-17
Sec. 13A.1.12. Historic Preservation Overlay Zone (HPOZ) Board . . . . .	13-19
<b>Div. 13A.2. General Procedural Elements . . . . .</b>	<b>13-20</b>
Sec. 13A.2.1. Applicability . . . . .	13-20
Sec. 13A.2.2. Process Elements. . . . .	13-21
Sec. 13A.2.3. Applications. . . . .	13-25
Sec. 13A.2.4. Notice of Public Hearing. . . . .	13-26
Sec. 13A.2.5. Decisions . . . . .	13-29
Sec. 13A.2.6. Transfer of Jurisdiction. . . . .	13-31
Sec. 13A.2.7. Scope of Decision . . . . .	13-31
Sec. 13A.2.8. Appeals . . . . .	13-34
Sec. 13A.2.9. Permits Issued in Error. . . . .	13-37
Sec. 13A.2.10. Multiple Approvals . . . . .	13-38
<b>Div. 13B.1. Legislative Action . . . . .</b>	<b>13-45</b>
Sec. 13B.1.1. General Plan Adoption/Amendment . . . . .	13-45
Sec. 13B.1.2. Specific Plan Adoption/Amendment . . . . .	13-51
Sec. 13B.1.3. Zoning Code Amendment . . . . .	13-56
Sec. 13B.1.4. Zone Change . . . . .	13-59
Sec. 13B.1.5. Guidelines or Standards Adoption/Amendment . . . . .	13-70
Sec. 13B.1.6. Land for Public Use. . . . .	13-72
<b>Div. 13B.2. Quasi-Judicial Review. . . . .</b>	<b>13-75</b>
Sec. 13B.2.1. Class 1 Conditional Use Permit . . . . .	13-75
Sec. 13B.2.2. Class 2 Conditional Use Permit . . . . .	13-81



<b>Div. 13B.3. Ministerial Action. . . . .</b>	<b>13-106</b>
Sec. 13B.3.1. Administrative Review . . . . .	13-106
Sec. 13B.3.2. Expanded Administrative Review . . . . .	13-107
<b>Div. 13B.4. Specific Plan Implementation . . . . .</b>	<b>13-108</b>
Sec. 13B.4.1. General Provisions . . . . .	13-108
Sec. 13B.4.2. Project Compliance . . . . .	13-110
Sec. 13B.4.3. Project Compliance (Design Review Board) . . . . .	13-113
Sec. 13B.4.4. Project Adjustment . . . . .	13-120
Sec. 13B.4.5. Project Exception. . . . .	13-124
Sec. 13B.4.6. Specific Plan Interpretation . . . . .	13-130
<b>Div. 13B.5. Quasi-Judicial Relief. . . . .</b>	<b>13-133</b>
Sec. 13B.5.1. Alternative Compliance . . . . .	13-133
Sec. 13B.5.2. Adjustment . . . . .	13-136
Sec. 13B.5.3. Variance . . . . .	13-140
Sec. 13B.5.4. Modification of Entitlement . . . . .	13-148
Sec. 13B.5.5. Reasonable Accommodation . . . . .	13-151
<b>Div. 13B.6. Non-Compliance. . . . .</b>	<b>13-155</b>
Sec. 13B.6.1. Evaluation of Non-Compliance . . . . .	13-155
Sec. 13B.6.2. Nuisance Abatement/Revocation. . . . .	13-159
<b>Div. 13B.7. Division of Land . . . . .</b>	<b>13-168</b>
Sec. 13B.7.1. General Provisions . . . . .	13-168
Sec. 13B.7.2. Parcel Map Exemption/Lot Line Adjustment. . . . .	13-171
Sec. 13B.7.3. Tentative Tract Map. . . . .	13-173
Sec. 13B.7.4. Final Tract Map . . . . .	13-184
Sec. 13B.7.5. Preliminary Parcel Map. . . . .	13-188
Sec. 13B.7.6. Final Parcel Map . . . . .	13-196
Sec. 13B.7.7. Private Street Map . . . . .	13-200
Sec. 13B.7.8. Subdivision Appeal . . . . .	13-204
<b>Div. 13B.8. Historic Preservation . . . . .</b>	<b>13-206</b>
Sec. 13B.8.1. General Provisions . . . . .	13-206
Sec. 13B.8.2. Historic Preservation Overlay Zone Designation . . . . .	13-217
Sec. 13B.8.3. Preservation Plan Adoption/Amendment . . . . .	13-223
Sec. 13B.8.4. Review of Conforming Work . . . . .	13-227

Sec. 13B.8.5. Certificate of Appropriateness (Construction, Addition, Alteration, or Reconstruction)	13-232
Sec. 13B.8.6. Certificate of Appropriateness (Demolition, Removal, or Relocation)	13-238
Sec. 13B.8.7. Certificate of Compatibility for Non-Contributing Elements	13-244
<b>Div. 13B.9. Coastal Development</b>	<b>13-250</b>
Sec. 13B.9.1. Coastal Development Permit (Pre-Certification)	13-250
Sec. 13B.9.2. Coastal Development Permit (Post-Certification)	13-262
<b>Div. 13B.10. Department of Building and Safety</b>	<b>13-285</b>
Sec. 13B.10.1. General Provisions	13-285
Sec. 13B.10.2. Appeals From LADBS Determinations	13-288
Sec. 13B.10.3. Annual Inspection Monitoring (Auto Dismantling Yards, Junk Yards, Scrap Metal or Recycling Materials Processing Yards, Recycling Collection and/or Buyback Centers, Recycling Materials Sorting Facilities, Cargo Container Storage Yards, And Collection Bins)	13-292
Sec. 13B.10.4. Annual Inspection Monitoring (Automotive Repair Garage and Used Vehicle Sales Areas)	13-297
<b>Div. 13B.11. California Environmental Quality Act (CEQA) Provisions</b>	<b>13-303</b>
Sec. 13B.11.1. Environmental Review Procedures	13-303
<b>Div. 13C.1. Definitions</b>	<b>13-318</b>



Section 30. Table 2 - Process Summary of Subsection A (Overview) of Section 13A.2.2. (Process Elements) of Article 13 (Administration) of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

Entitlement Review	Ministerial	Director	Zoning Administrator	Subdivision Committee	City Engineer	Hearing Officer	Area Planning Commission	City Planning Commission	City Council	Mayor	Design Review Board	HPOZ Board	Cultural Heritage Commission
Legislative Action													
General Plan Adoption / Amendment		R †						[R] †	[D] †	R/ SV †			
Specific Plan Adoption / Amendment		R						[R] †	[D] †	SV †			
Zoning Code Amendment		R						[R] †	D †	SV †			
Zone Change		R					[R]	[R]* †	[D] †	SV †			
Guidelines of Standards Adoption/ Amendment								[D]					
Land for Public Use								R	D				
Quasi-Judicial Review													
Class 1 Conditional Use Permit			<D>				[A]						
Class 2 Conditional Use Permit			D †				[A] †						
Class 3 Conditional Use Permit		[R] †						[D] †	[A]				
Project Review		<D>					[A]						
Director Determination		D					[A]	[A]					
Ministerial Action													
Administrative Review		D											
Expanded Administrative Review		<D>											
Specific Plan Implementation													
Project Compliance		<D>					[A]						
Project Compliance (Design Review Board)		D					[A]				[R]		
Project Adjustment		<D>					[A]						
Project Exception							[D]		[A]				

Specific Plan Interpretation	<D>				[A]	[A]						
Quasi-Judicial Relief												
Alternative Compliance	D				[A]							
Adjustment	<D>				[A]							
Variance		[D] †			[A] †		[A]					
Modification of Entitlement	↔				↔					↔		
Reasonable Accommodation	D						[A]					
Non-Compliance												
Evaluation of Non-Compliance			[D]		[A]	[D]	[A]					
Nuisance Abatement/Revocation			[D]				[A] †					
Division of Land												
Parcel Map Exemption/ Lot Line Adjustment	D				[A]	[A]						
Tentative Tract Map	[D]		R		[A]	[A]						
Final Tract Map				C			D					
Preliminary Parcel Map	[D]		R		[A]	[A]						
Final Parcel Map				C			D					
Private Street Map	<D>		R		[A]	[A]						
Subdivision Appeal					[D]	[D]						
Historic Preservation												
Historic Preservation Overlay Zone Designation						[R]	[D]				C	
Preservation Plan Adoption / Amendment	R			[R] †		[D]					[R]	
Review of Conforming Work	D										D	
Certificate of Appropriateness (Construction, Addition, Alteration, or Reconstruction)	D				[A]						[R]	
Certificate of Appropriateness (Demolition, Removal, or Relocation)					D		[A]				[R]	
Certificate of Compatibility for Non-Contributing Elements	D				[A]						[R]	
Coastal Development												
Coastal Development Permit (Pre-Certification)	↔				↔					↔		

Coastal Development Permit (Post-Certification)	<D>			<D>		[A]						
Department of Building and Safety												
Appeals from LADBS Determination	<D>					[A]	[A]					
California Environmental Quality Act (CEQA) Provisions												
CEQA Appeal								D				

**Key**

C Certification  
R Review & Recommendation  
D Decision or Acceptance  
SV Signature / Veto

A Appeal  
[ ] Public Hearing

< > Public Hearing optional or waivable

‡ Optional or where directed by decision

**Blank Cell** Not required

† Required by City Charter

**Italics** Action only under certain conditions (such as project size, delegation or transfer from another agency, etc.)

↔ Varies with underlying process

\* If filed by application and CPC recommends disapproval, its decision is appealable to CC.

Section 31. Table 4 - Summary of Notice Requirements of Subsection F (Notice Requirements of Each Process) of Section 4 (Notice of Public Hearing) of Division 13A.2. (General Procedural Elements) of Part A (General Administrative Provisions) of Article 13 of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

Action	Reference	Publication	Mail	Posting
<b>Legislative Action</b>	<b>Div. 13B.1.</b>			
General Plan Adoption / Amendment	Sec. 13B.1.1.	■	■	●
Specific Plan Adoption / Amendment	Sec. 13B.1.2.	■	●	●
Zoning Code Amendment	Sec. 13B.1.3.	■		
Zone Change	Sec. 13B.1.4.	■	●	●
Guidelines or Standards Adoption / Amendment	Sec. 13B.1.5.	■		
Land for Public Use	Sec. 13B.1.6.			
<b>Quasi-Judicial Review</b>	<b>Div. 13B.2.</b>			
Class 1 Conditional Use Permit	Sec. 13B.2.1.		■	■
Class 2 Conditional Use Permit	Sec. 13B.2.2.	■	■	■
Class 3 Conditional Use Permit	Sec. 13B.2.3.	■	■	■
Project Review	Sec. 13B.2.4.		■	
Director Determination	Sec. 13B.2.5.		○	○
<b>Ministerial Action</b>	<b>Div. 13B.3.</b>			
Administrative Review	Sec. 13B.3.1.			
Expanded Administrative Review	Sec. 13B.3.2.		■	■
<b>Specific Plan Implementation</b>	<b>Div. 13B.4.</b>			
Project Compliance	Sec. 13B.4.2.		○	
Project Compliance (Design Review Board)	Sec. 13B.4.3.		■	■
Project Adjustment	Sec. 13B.4.4.		○	
Project Exception	Sec. 13B.4.5.	■	■	■
Specific Plan Interpretation	Sec. 13B.4.6.		○	
<b>Quasi-Judicial Relief</b>	<b>Div. 13B.5.</b>			
Alternative Compliance	Sec. 13B.5.1.		○	
Adjustment	Sec. 13B.5.2.		■	■
Variance	Sec. 13B.5.3.		■	■
Modification of Entitlement	Sec. 13B.5.4.		◆	◆
Reasonable Accommodation	Sec. 13B.5.5.	○	○	○
<b>Non-Compliance</b>	<b>Div. 13B.6.</b>			
Evaluation of Non-Compliance	Sec. 13B.6.1.		■	■
Nuisance Abatement/Revocation	Sec. 13B.6.2.		■	■
<b>Division of Land</b>	<b>Div. 13B.7.</b>			
Parcel Map Exemption/Lot Line Adjustment	Sec. 13B.7.2.			
Tentative Tract Map	Sec. 13B.7.3.	■	■	■



Tentative Tract Map	Sec. 13B.7.3.	■	■	■
Final Tract Map	Sec. 13B.7.4.			
Preliminary Parcel Map	Sec. 13B.7.5.	■	■	■
Final Parcel Map	Sec. 13B.7.6.			
Private Street Map	Sec. 13B.7.7.		■	■
Subdivision Appeal	Sec. 13B.7.8.		■	
Historic Preservation	Div. 13B.8.			
Historic Preservation Overlay Zone Designation	Sec. 13B.8.2.	■	■	●
Preservation Plan Adoption or Amendment	Sec. 13B.8.3.		■	
Review of Conforming Work	Sec. 13B.8.4.			
Certificate of Appropriateness (Construction, Addition, Alteration, or Reconstruction)	Sec. 13B.8.5.		■	■
Certificate of Appropriateness (Demolition, Removal, or Relocation)	Sec. 13B.8.6.		■	■
Certificate of Compatibility for Non-Contributing Elements	Sec. 13B.8.7.		■	■
Coastal Development	Div. 13B.9.			
Coastal Development Permit (Pre-Certification)	Sec. 13B.9.1		■	◆
Coastal Development Permit (Post-Certification)	Sec. 13B.9.2		■	◆
Department of Building and Safety	Div. 13B.10			
Appeals from LADBS Determinations	Sec. 13B.10.2		■	
California Environmental Quality Act (CEQA) Provisions	Div. 13B.11			
CEQA Appeal	Sec. 13B.11.1		■	

Key: ■ = initial decision ● site specific only (not City-initiated) ○ = appeal only

◆ = varies with underlying application

Section 32. Table 5 - Classifications of Actions for Multiple Approvals of Paragraph 2 (Terms) of Subsection A (Applicability) of Section 10 (Multiple Approvals) of Division 13A.2. (General Procedural Elements) of Part A (General Administration Provisions) of Section of Article 13 of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

Action	Reference	Legislative	Quasi-judicial	Subdivision	Ministerial
<b>Legislative Action</b>	<b>Div. 13B.1.</b>				
General Plan Adoption / Amendment	Sec. 13B.1.1.	■			
Specific Plan Adoption / Amendment	Sec. 13B.1.2.	■			
Zoning Code Amendment	Sec. 13B.1.3.	■			
Zone Change	Sec. 13B.1.4.	■			
Guidelines or Standards Adoption/Amendment	Sec. 13B.1.5.	■			
Land for Public Use	Sec. 13B.1.6.	■			
<b>Quasi-Judicial Review</b>	<b>Div. 13B.2.</b>				
Class 1 Conditional Use Permit	Sec. 13B.2.1.		■		
Class 2 Conditional Use Permit	Sec. 13B.2.2.		■		
Class 3 Conditional Use Permit	Sec. 13B.2.3.		■		
Project Review	Sec. 13B.2.4.		■		
Director Determination	Sec. 13B.2.5.		■		
<b>Ministerial Action</b>	<b>Div. 13B.3.</b>				
Administrative Review	Sec. 13B.3.1.				—
Expanded Administrative Review	Sec. 13B.2.2				—
<b>Specific Plan Implementation</b>	<b>Div. 13B.4.</b>				
Project Compliance	Sec. 13B.4.2.		■		
Project Compliance (Design Review Board)	Sec. 13B.4.3.		■		
Project Adjustment	Sec. 13B.4.4.		■		
Project Exception	Sec. 13B.4.5.		■		
Specific Plan Interpretation	Sec. 13B.4.6.		—		
<b>Quasi-Judicial Relief</b>	<b>Div. 13B.5.</b>				
Alternative Compliance	Sec. 13B.5.1.		■		
Adjustment	Sec. 13B.5.2.		■		
Variance	Sec. 13B.5.3.		■		
Modification of Entitlement	Sec. 13B.5.4.		■		
Reasonable Accommodation	Sec. 13B.5.5.		—		
<b>Non-Compliance</b>	<b>Div. 13B.6.</b>				
Evaluation of Non-Compliance	Sec. 13B.6.1.		—		
Nuisance Abatement/Revocation	Sec. 13B.6.2.		—		
<b>Division of Land</b>	<b>Div. 13B.7.</b>				
Parcel Map Exemption/Lot Line Adjustment	Sec. 13B.7.2.			—	
Tentative Tract Map	Sec. 13B.7.3.			■	
Final Tract Map	Sec. 13B.7.4.			—	



Final Tract Map	Sec. 13B.7.4.			—	
Preliminary Parcel Map	Sec. 13B.7.5.			■	
Final Parcel Map	Sec. 13B.7.6.			—	
Private Street Map	Sec. 13B.7.7.			■	
Subdivision Appeal	Sec. 13B.7.8.			—	
Historic Preservation	Div. 13B.8.				
Historic Preservation Overlay Zone Designation	Sec. 13B.8.2.	—			
Preservation Plan Adoption / Amendment	Sec. 13B.8.3.	■			
Review of Conforming Work	Sec. 13B.8.4.				—
Certificate of Appropriateness (Construction, Addition, Alteration, or Reconstruction)	Sec. 13B.8.5.		■		
Certificate of Appropriateness (Demolition, Removal, or Relocation)	Sec. 13B.8.6.		■		
Certificate of Compatibility for Non-Contributing Elements	Sec. 13B.8.7.		■		
Coastal Development	Div. 13B.9.				
Coastal Development Permit (Pre-Certification)	Sec. 13B.9.1		■		
Coastal Development Permit (Post-Certification)	Sec. 13B.9.2		■		
Department of Building and Safety	Div. 13B.10				
Appeals from LADBS Determinations	Sec. 13B.10.2		—		
Annual Inspection Monitoring (Recycling)	Sec. 13B.10.3		—		
Annual Inspection Monitoring (Automotive)	Sec. 13B.10.4		—		
California Environmental Quality Act (CEQA) Provisions	Div. 13B.11.				
CEQA Appeal	Sec. 13B.11.1.		—		

Key: ■ = qualifies for multiple approval — = varies with underlying application

Section 33. Paragraph (C) of Section 13A.2.7. (Scope of Decision) of Article 13 (Administration) of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

#### C. Utilizing the Grant

1. A discretionary project approval is considered utilized after it has been effectuated by the Department of City Planning and a building permit has been issued by the Department of Building and Safety. Utilization of a grant must occur no later than 3 years from the last date an action can be effectuated. An approval not requiring building permits from the Department of Building and Safety is considered utilized when compliance with all conditions of approval have been demonstrated, appropriate fees paid, plans stamped and authorization has been obtained from the Department of City Planning.
2. Exceptions
  - a. Religious and Institutional Uses  
Where a lot or lots have been approved for use as a governmental enterprise, religious use, hospital, educational institution or private school,

including elementary and high schools, no time limit to utilize the privileges shall apply provided that all of the following conditions are met:

- i. The property involved is acquired or legal proceedings for its acquisition are commenced within one year of the effective date of the decision approving the conditional use.
  - ii. A sign is immediately placed on the property indicating its ownership and the purpose to which it is to be developed, as soon as legally possible after the effective date of the decision approving the conditional use. This sign shall have a surface area of at least 20 square feet.
  - iii. The sign is maintained on the property and in good condition until the conditional use privileges are utilized.
- b. Affordable Housing Projects
- A six-year time limit to utilize the privileges shall apply where a lot or lots have been approved for housing that includes 100% restricted Affordable Units, exclusive of a manager's unit or units, as defined in ~~Sec. 12.22 A.25(b) (Exceptions: Affordable Housing Incentives – Density Bonus; Definitions)~~ *Sec. 12.03 (Definitions) of Chapter 1 (General Provisions and Zoning)* of this Code.

Section 34. Paragraph (D) of Section 13B.2.1 (Class 1 Conditional Use Permit) of Article 13 (Administration) of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

DG. Decision

1. General Procedures  
See *Sec. 13A.2.5. (Decisions)*.
2. Decision Maker  
The Zoning Administrator is the initial decision maker.
3. Public Hearing
  - a. The Zoning Administrator shall set the matter for public hearing, giving notice in the manner specified in Subsection C. (Notice) of this Section.
  - b. The Zoning Administrator may conduct the hearing or designate a Hearing Officer to conduct the hearing.
4. Decision
  - a. The Zoning Administrator shall render the initial decision within 75 days of the date the application is deemed complete.
  - b. If the Zoning Administrator fails to make a timely decision, the applicant may file a request for transfer of jurisdiction to the Area Planning Commission pursuant to *Sec. 13A.2.6. (Transfer of Jurisdiction)*.

## 5. Conditions of Approval and inspections

- a. In approving a project, the decision maker may impose conditions related to the interests addressed in the findings set forth in Subsection E. (Standards for Review and Required Findings) of this Section.
- b. The decision may state that the height and area regulations required by other provisions of this Chapter and *Chapter 1 (General Provisions and Zoning)* shall not apply to the conditional use approved. ~~If the Density Bonus is increased beyond the maximum allowed as defined in Sec. 12.22 A.37 (State Density Bonus Program), the development project must also contain the requisite number of Restricted Affordable Units as set forth in Sec. 12.24 U.26. (a)(1) – (5) (Density Bonus for a Housing Development in Which the Density increase is Greater than the Maximum Permitted in Sec. 12.22 A.3725) of this Code.~~
- c. The Department shall have the authority to conduct inspections to verify compliance with any and all conditions imposed on any conditional use or other similar Quasi-judicial approval granted pursuant to this Section. Clearance, monitoring and inspection fees shall be paid by the business operator or property owner to the Department in accordance with the fee schedule in *Article 9 (Fees) of Chapter 1 (General Provisions and Zoning)*.
- d. If, upon inspection, the Department finds that the applicant has failed to comply with conditions of any conditional use or other similar Quasi-judicial approval granted pursuant to this Section, the Department shall give notice to the business operator or property owner to correct the specific deficiencies and the time in which to complete the correction. Evidence of compliance shall be submitted to the Department within the specified correction period. If the deficiencies are not corrected within the time prescribed by the Department, revocation proceedings pursuant to *Sec. 13B.6.1. (Evaluation of Non-Compliance)* or *Sec. 13B.6.2. (Nuisance Abatement/Revocation)* may commence.

Section 35. Paragraph (D) of Section 13B.2.2 (Class 2 Conditional Use Permit) of Article 13 (Administration) of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

D. Decision

1. General Procedures

See *Sec. 13A.2.5. (Decisions)*.

2. Decision Maker

The Zoning Administrator is the initial decision maker.

3. Public Hearing

a. Upon receipt of a complete application, the Zoning Administrator shall set the matter for public hearing, giving notice in the manner specified in Subsection C. (Notice) of this Section.

b. The Zoning Administrator may conduct the hearing or designate a Hearing Officer to conduct the hearing.

4. Decision

a. The Zoning Administrator shall render the initial decision within 75 days of the date the application is deemed complete.

b. If the Zoning Administrator fails to make a timely decision, the applicant may file a request for transfer of jurisdiction to the Area Planning Commission pursuant to *Sec. 13A.2.6. (Transfer of Jurisdiction)*.

5. Conditions of Approval and inspections

a. In approving a project, the decision maker may impose conditions related to the interests addressed in the findings set forth in Subsection E. (Standards for Review and Required Findings) of this Section.

b. The decision may state that the height and area regulations required by other provisions of this Chapter and *Chapter 1 (General Provisions and Zoning)* shall not apply to the conditional use approved. ~~If the Density Bonus is increased beyond the maximum allowed as defined in Sec. 12.22 A.37 (Affordable Housing incentives – Density Bonus), the development project must also contain the requisite number of Restricted Affordable Units as set forth in Sec. 12.24 U.26. (a)(1) – (5) (Density Bonus for a Housing Development in Which the Density increase is Greater than the Maximum Permitted in Sec. 12.22 A.3725) of this Code.~~

c. The Department shall have the authority to conduct inspections to verify compliance with any and all conditions imposed on any conditional use or other similar Quasi-judicial approval granted pursuant to this Section.

Clearance, monitoring and inspection fees shall be paid by the business operator or property owner to the Department in accordance with the fee schedule in *Article 9 (Fees) of Chapter 1 (General Provisions and Zoning)*.

- d. If, upon inspection, the Department finds that the applicant has failed to comply with conditions of any conditional use or other similar Quasi-judicial approval granted pursuant to this Section, the Department shall give notice to the business operator or property owner to correct the specific deficiencies and the time in which to complete the correction. Evidence of compliance shall be submitted to the Department within the specified correction period. If the deficiencies are not corrected within the time prescribed by the Department, revocation proceedings pursuant to *Sec. 13B.6.1. (Evaluation of Non-Compliance)* or *Sec. 13B.6.2. (Nuisance Abatement/Revocation)* may commence.

6. Transmittal

The Zoning Administrator shall transmit a copy of the written findings and decision to the applicant, to all owners of properties abutting, across the street or alley from, or having a common corner with, the subject property and all persons who filed a written request for the notice with the Zoning Administrator.

Section 36. Paragraph (D) of Section 13B.2.3 (Class 3 Conditional Use Permit) of Article 13 (Administration) of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

D. Decision

1. General Procedures

See *Sec. 13A.2.5. (Decisions)*.

2. Decision Maker

The City Planning Commission is the initial decision maker.

3. Public Hearing

- a. Upon receipt of a complete application, the City Planning Commission shall set the matter for public hearing, giving notice in the manner specified in Subsection C. (Notice) of this Section.
- b. The City Planning Commission may conduct the hearing itself or designate the Director to conduct the hearing.

4. Decision

- a. If the Director conducts the public hearing, the Director shall transmit its findings and recommendation to the City Planning Commission.

- b. After the Director or City Planning Commission's hearing is closed, the City Planning Commission shall render the initial decision at a public meeting.
  - c. The City Planning Commission shall render the initial decision within 75 days of the date the application is deemed complete.
  - d. If the City Planning Commission fails to make a timely decision, the applicant may file a request for transfer of jurisdiction to the City Council pursuant to *Sec. 13A.2.6. (Multiple Approvals)*.
5. Conditions of Approval and inspections
- a. In approving a project, the decision maker may impose conditions related to the interests addressed in the findings set forth in Subsection E. (Standards for Review and Required Findings) of this Section.
  - b. The decision may state that the height and area regulations required by other provisions of this Chapter and *Chapter 1 (General Provisions and Zoning)* shall not apply to the conditional use approved. If the Density Bonus is increased beyond the maximum allowed as defined in ~~Sec. 12.22 A. 25 (Affordable Housing Incentives – Density Bonus)~~, Sec. 12.22 A.37 (State Density Bonus Program), the development project must also contain the requisite number of Restricted Affordable Units as set forth in *Sec. 12.24 U.26. (a)(1) - (5) (Density Bonus for a Housing Development in Which the Density Increase is Greater than the Maximum Permitted in Sec. 12.22 A.2537)* of this Code.
  - c. The Department shall have the authority to conduct inspections to verify compliance with any and all conditions imposed on any conditional use or other similar Quasi-judicial approval granted pursuant to this Section. Clearance, monitoring, and inspection fees shall be paid by the business operator or property owner to the Department in accordance with the fee schedule in *Article 9 (Fees) of Chapter 1 (General Provisions and Zoning)*.
  - d. If, upon inspection, the Department finds that the applicant has failed to comply with conditions of any conditional use or other similar Quasi-judicial approval granted pursuant to this Section, the Department shall give notice to the business operator or property owner to correct the specific deficiencies and the time in which to complete the correction. Evidence of compliance shall be submitted to the Department within the specified correction period. If the deficiencies are not corrected within the time prescribed by the Department, revocation proceedings pursuant to *Sec. 13B.6.1. (Evaluation of Non-Compliance)* or *Sec. 13B.6.2. (Nuisance Abatement/Revocation)* may commence.

#### 6. Transmittal

The City Planning Commission shall transmit a copy of the written findings and decision to the applicant, to all owners of properties abutting, across the street or alley from, or having a common corner with the subject property and all persons who filed a written request for the notice.

Section 37. Paragraph (G) of Section 13B.2.5 of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

#### G. Appeals

##### 1. General Procedures

See Sec. 13A.2.8. (Appeals).

##### 2. Decision Maker

a. The Area Planning Commission is the appellate decision maker.

b. ~~On-Menu Density Bonus~~ Density Bonus

The City Planning Commission is the appellate decision maker for projects seeking approval pursuant to Sec. 12.22 A.37(d)(5)(iii) (State Density Bonus Program), Sec. 12.22 A.38(d)(3) (Mixed Income Incentive Program), or Sec. 12.22 A.39(d)(3) (Affordable Housing Incentive Program) ~~(Sec. 12.22 A.25. (Affordable Housing Incentives — Density Bonus))~~ of Chapter 1 (General Provisions and Zoning).

##### 3. Filing

a. An applicant or any other person aggrieved by the Director's decision may file an appeal.

b. ~~On-Menu Density Bonus~~ Density Bonus

An applicant or any owner or tenant of a property abutting, across the street or alley from, or having a common corner with the subject property aggrieved by the Director's decision may file an appeal on projects seeking approval pursuant to Sec. 12.22 A.37(d)(5)(iii) (State Density Bonus Program), Sec. 12.22 A.38(d)(3) (Mixed Income Incentive Program), or Sec. 12.22 A.39(d)(3) (Affordable Housing Incentive Program) ~~Sec. 12.22 A.25. (Affordable Housing Incentives — Density Bonus)~~ of Chapter 1 (General Provisions and Zoning).

##### 4. Appellate Decision

a. Before acting on any appeal, the Area Planning Commission shall set the matter for hearing, giving notice in the manner specified in Subsection C. (Notice) of this Section.



- b. The Area Planning Commission shall act within 75 days after the expiration of the appeal period.

5. Exception

- a. When the application is filed as part of a project requiring multiple approvals, the appeals procedures set forth in LAMC Section 13A.2.10. (Multiple Approvals) of this Code shall govern.
- b. When the application is filed in conjunction with a Parcel Map and no other approval, the appeals procedures set forth in LAMC Section 13B.7.8. (Subdivision Appeal) of this Code shall govern.
- c. When the application is filed in conjunction with a Tentative Map and no other approval, the appeals procedures set forth in LAMC Section 13B.7.3.G. (Tentative Tract Map; Appeals) of this Code shall govern, provided that such applications shall only be appealable to the Appeal Board, as defined in Div. 13C.1. (Administration Definitions) of this Code, and shall not be subject to further appeal to the City's legislative body.



Section 38. A new Section 2. is added to Division 13B.3. of Article 13 (Administration) of Chapter 1A of the Los Angeles Municipal Code as follows:



A. Applicability

1. This Section applies where any provision of this Code requires an Expanded Administrative Review.

B. Initiation

1. An application for an Expanded Administrative Review is filed with the Department.
2. An Expanded Administrative Review is initiated as required in order to obtain a building permit.

## C. Notice

## 1. Notice of Public Hearing

The following notice is required for the public informational hearing on the decision, if held.

Type of Notice	When	Where/To Whom/Additional Requirements
Mail	24 days	<ul style="list-style-type: none"> <li>• The applicant;</li> <li>• The owner(s) of the property involved;</li> <li>• The owners and tenants of all property within 300 feet of the boundary of the subject site;</li> <li>• The Certified Neighborhood Council representing the area in which the property is located; and</li> <li>• Interested parties who have requested in writing to be notified</li> </ul>
Posting	10 days	<ul style="list-style-type: none"> <li>• The applicant will post notice in a conspicuous place on the property</li> </ul>

## D. Review

## 1. The Department shall determine compliance with the applicable regulations and standards for projects requiring an Administrative Review.

## 2. Clearance

Clearance shall be issued as required pursuant to the applicable ordinance or building permit requirement.

## 3. Public Hearing

If the matter has a significant effect on neighboring properties, or if required where any provision of this Code requires an Expanded Administrative Review and a public hearing, the Department may require a public hearing in the manner specified in Subsection C.

## E. Criteria for Compliance Review

The Department shall review the application for compliance with the applicable regulations and standards of this Code or the applicable specific plan or overlay, including the zoning standards, established development standards, and any supplemental use regulations.

F. Scope of Action

After the Expanded Administrative Review determines that the application is in compliance with the applicable regulations and standards, the following actions must comply with the approved plans:

1. The erection, enlargement or maintenance of buildings;
2. Any development or construction work; or
3. Issuance of a grading, building, demolition, or change of use permit.

G. Appeals

There is no appeal.

H. Modification Procedures

1. Modifications Equal to or Less than 10%

- a. Projects approved pursuant to this Section may seek a modification to modify conditions of approval for the original action prior to the issuance of the Certificate of Occupancy.
- b. For purposes of this Section, a “modification” means any changes in the proposed physical development or related conditions of approval that were approved in the original action by no more than 10%.
- c. A modification does not include the granting of any new rights or increased or additional incentives, nor does it include the granting of any new deviation from zoning regulations in this Chapter or Chapter 1 (General Provisions and Zoning).
- d. An application for a Modification pursuant to this Section shall be filed with the Department before the original action expires and include development plans showing the requested modifications.
- e. In approving a modification pursuant to this section, the Department shall review the application for compliance with the applicable regulations and standards of this Code or the applicable specific plan or overlay, including the zoning standards, established development standards, and any supplemental use regulations

2. Modifications Greater than 10%

Any request for a modification that exceeds the 10% limitation will not be processed as a modification of the original action under this Subdivision and shall instead require a filing of a new Expanded Administrative Review Application pursuant to this Section.

Section 39. Subsection B of Section 151.28 of Chapter 15 of the Los Angeles Municipal Code is modified to read as follows:

Units that are used to qualify for a density bonus pursuant to the provisions of either California Government Code Section 65915 or Los Angeles Municipal Code Section ~~12.22 A.25~~, 12.22 A.37, 12.22 A.38, or 12.22 A.39, or are used to satisfy any inclusionary zoning or replacement affordable housing requirement, or are used to qualify for any other public benefit or incentive, may be used to qualify as replacement affordable housing units pursuant to the provisions of this subsection.

Section 40. **SEVERABILITY.** If any portion, subsection, sentence, clause or phrase of this ordinance is for any reason held by a court of competent jurisdiction to be invalid such a decision shall not affect the validity of the remaining portions of this ordinance. The City Council hereby declares that it would have passed this ordinance and each portion or subsection, sentence, clause and phrase herein, irrespective of the fact that any one or more portions, subsections, sentences, clauses or phrases be declared invalid.





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Ryan Metheny** <ryan.metheny1@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:57 PM

Reply-To: ryan.metheny1@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,  
Ryan Metheny  
Los Angeles, CA 90042-3935  
[ryan.metheny1@gmail.com](mailto:ryan.metheny1@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Ryan Rubin** <rubinryand@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:06 AM

Reply-To: rubinryand@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

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I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,  
Ryan Rubin  
Los Angeles, CA 90042-3135  
[rubinryand@gmail.com](mailto:rubinryand@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Scott Korinke** <shkbarca@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:19 PM

Reply-To: shkbarca@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

Hope your day is going well, and thank you for reading my comment. This has been an impressive and worthwhile process - I'm excited to see the final!!

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

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Sincerely,

Sincerely,

Scott Korinke

West Hollywood, CA 90046-4561

[shkbarca@gmail.com](mailto:shkbarca@gmail.com)





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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Soyoung Yim** <syim415@gmail.com>

Fri, Sep 20, 2024 at 10:36 AM

Reply-To: Soyoung Yim <syim415@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

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Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. While R1s on smaller streets provide private canopy, public canopy aligns with environmental justice because lots on broader streets, including R1s, are best equipped to handle both canopy and residential density.

LA can avoid an extreme and inequitable CHIP by incentivizing multifamily housing on R1 lots along opportunity corridors while supporting a public tree canopy standard for all.

Sincerely,

-- Soyoung Yim  
[syim415@gmail.com](mailto:syim415@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Stacey Slevcove** <sslevcove@everyactioncustom.com>

Fri, Sep 20, 2024 at 5:13 PM

Reply-To: sslevcove@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Stacey Slevcove  
Long Beach, CA 90802-3776  
[sslevcove@gmail.com](mailto:sslevcove@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Tami Kagan-Abrams** <tami@everyactioncustom.com>

Fri, Sep 20, 2024 at 2:27 PM

Reply-To: tami@abramsgroup.org

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Tami Kagan-Abrams  
Los Angeles, CA 90046-1634  
[tami@abramsgroup.org](mailto:tami@abramsgroup.org)







Housing Element <housingelement@lacity.org>

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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Tanisha Thomas** <tanishathomas@hotmail.com>

Fri, Sep 20, 2024 at 8:09 PM

Reply-To: Tanisha Thomas <tanishathomas@hotmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

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-- Tanisha Thomas  
[tanishathomas@hotmail.com](mailto:tanishathomas@hotmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Thomas Valet <tj.valet@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:49 PM

Reply-To: tj.valet@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,

Thomas Valet

Marina Del Rey, CA 90292-5185

[tj.valet@gmail.com](mailto:tj.valet@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Tracey Alexander Ettinger <traceylalexander@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:10 PM

Reply-To: traceylalexander@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Tracey Alexander Ettinger  
Pacific Palisades, CA 90272-3834  
[traceylalexander@gmail.com](mailto:traceylalexander@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Varesh Prasad <varesh.prasad@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:17 AM

Reply-To: varesh.prasad@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Varesh Prasad

Los Angeles, CA 90038-4377

[varesh.prasad@gmail.com](mailto:varesh.prasad@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Verity Freebern** <verityfreebern@everyactioncustom.com>

Fri, Sep 20, 2024 at 8:33 PM

Reply-To: verityfreebern@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Verity Freebern

Los Angeles, CA 90065-3146

[verityfreebern@gmail.com](mailto:verityfreebern@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Victor Tran** <victortran3052@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:04 PM

Reply-To: victortran3052@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Victor Tran

Los Angeles, CA 90025-4011

[victortran3052@gmail.com](mailto:victortran3052@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Violet Carne** <zayquana@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:11 AM

Reply-To: zayquana@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Violet Carne  
Los Angeles, CA 90006-5312  
[zayquana@gmail.com](mailto:zayquana@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Virginia Kuhn <virginiakuhn@gmail.com>

Fri, Sep 20, 2024 at 8:37 AM

Reply-To: Virginia Kuhn <virginiakuhn@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—  
Dear LA City Planning, Commissioners, and Councilman Marqueece Harris-Dawson,

I write to express deep frustration with the Citywide Housing Incentives Program (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing multifamily parcels will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. The interior residential areas of minority neighborhoods have been inequitably rezoned in prior housing cycles. Instead, we need to densify based on street width because our streets cross all neighborhoods and connect people to academic and employment opportunities. This approach must also bind the CHIP to a tree canopy standard for an environmentally just and climate resilient L.A.

I urge you to motion City Council, to include in the CHIP, R1 lots on streets classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller to reduce densification pressures in historic minority communities of color that lack the necessary regulatory protections. Moreover, zoning along larger streets, including R1s, provides the space we need to adhere to a 50% sidewalk canopy standard. Affordable housing need not compromise climate resiliency. Tree shade reduces surface temperatures between 22-54°F. They save lives.

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. While R1s on smaller streets provide private canopy, public canopy aligns with environmental justice because lots on broader streets, including R1s, are best equipped to handle both canopy and residential density.

LA can avoid an extreme and inequitable CHIP by incentivizing multifamily housing on R1 lots along opportunity corridors while supporting a public tree canopy standard for all.

Sincerely,

-- Virginia Kuhn  
[virginiakuhn@gmail.com](mailto:virginiakuhn@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**William Scalia** <william@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:08 AM

Reply-To: william@williamscalia.net

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
William Scalia  
Los Angeles, CA 90066-4212  
[william@williamscalia.net](mailto:william@williamscalia.net)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Alex Dobbs <alex.dobbs@everyactioncustom.com>

Sat, Sep 21, 2024 at 8:55 AM

Reply-To: alex.dobbs@scene8.net

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Alex Dobbs  
Los Angeles, CA 90022-2514  
[alex.dobbs@scene8.net](mailto:alex.dobbs@scene8.net)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Carolina Goodman** <dgcg2@everyactioncustom.com>

Sat, Sep 21, 2024 at 4:18 PM

Reply-To: dgcg2@sbcglobal.net

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Carolina Goodman  
Sherman Oaks, CA 91401-5741  
[dgcg2@sbcglobal.net](mailto:dgcg2@sbcglobal.net)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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David Barboza <dejaybe@everyactioncustom.com>

Sat, Sep 21, 2024 at 7:39 AM

Reply-To: dejaybe@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
David Barboza  
Whittier, CA 90602-1353  
[dejaybe@gmail.com](mailto:dejaybe@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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David Welch <dwelch@everyactioncustom.com>

Sat, Sep 21, 2024 at 12:41 PM

Reply-To: dwelch@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

David Welch

North Hollywood, CA 91601-3542

[dwelch@gmail.com](mailto:dwelch@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Graham Messadieh <squigleyg@everyactioncustom.com>

Sat, Sep 21, 2024 at 5:17 PM

Reply-To: squigleyg@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Graham Messadieh

North Hollywood, CA 91606-4871

[squigleyg@gmail.com](mailto:squigleyg@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

---

John McHugh <northpk@everyactioncustom.com>

Sat, Sep 21, 2024 at 7:53 AM

Reply-To: northpk@gmail.com

To: housingelement@lacity.org

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Sincerely,

Sincerely,  
John McHugh  
Los Angeles, CA 90026-6002  
[northpk@gmail.com](mailto:northpk@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Joshua Ray <j1.9ray@everyactioncustom.com>

Sat, Sep 21, 2024 at 10:40 AM

Reply-To: j1.9ray@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Joshua Ray  
Los Angeles, CA 90018-5002  
[j1.9ray@gmail.com](mailto:j1.9ray@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Justin Jones** <justinj1@everyactioncustom.com>

Sat, Sep 21, 2024 at 3:28 AM

Reply-To: justinj1@hotmail.com

To: housingelement@lacity.org

Dear Housing Element,

You dont need to go after single family neighborhoods. Not for a while. FIRST YOU NEED A VACANCY/DERELICTION TAX ON THE THOUSANDS OF ACRES OF COMMERCIAL LOTS THAT SIT UNUSED. FORCE THEM TO BUILD HOUSING ON THOSE LOTS. thanks

Sincerely,

Justin Jones

Los Angeles, CA 90031-2965

[justinj1@hotmail.com](mailto:justinj1@hotmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Lama Gyatso** <LamaJigmeG@everyactioncustom.com>

Sat, Sep 21, 2024 at 1:23 PM

Reply-To: LamaJigmeG@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Lama Gyatso  
Burbank, CA 91505-3298  
[LamaJigmeG@gmail.com](mailto:LamaJigmeG@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Leonora Camner <leonorasc@everyactioncustom.com>

Sat, Sep 21, 2024 at 1:27 PM

Reply-To: leonorasc@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Leonora Camner

Santa Monica, CA 90403-4331

[leonorasc@gmail.com](mailto:leonorasc@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Leslie Harada <lh1018185@gmail.com>

Sat, Sep 21, 2024 at 4:27 PM

Reply-To: Leslie Harada <lh1018185@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—  
Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Leslie Harada  
[lh1018185@gmail.com](mailto:lh1018185@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Mariana Morales** <Marianam1027@everyactioncustom.com>

Sat, Sep 21, 2024 at 4:21 PM

Reply-To: Marianam1027@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Mariana Morales  
Alhambra, CA 91801-4389  
[Marianam1027@gmail.com](mailto:Marianam1027@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Mary C <emailparty28@gmail.com>

Sat, Sep 21, 2024 at 12:39 AM

Reply-To: Mary C <emailparty28@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

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-- Mary C  
[emailparty28@gmail.com](mailto:emailparty28@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Robert Wong** <Robnako@gmail.com>

Sat, Sep 21, 2024 at 8:14 AM

Reply-To: Robert Wong <Robnako@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

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-- Robert Wong  
[Robnako@gmail.com](mailto:Robnako@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Samantha Seminario-Burns** <samanthaseminario@everyactioncustom.com>

Sat, Sep 21, 2024 at  
3:23 AM

Reply-To: samanthaseminario@gmail.com

To: housingelement@lacity.org

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Sincerely,

Sincerely,

Samantha Seminario-Burns

Los Angeles, CA 90063-4029

[samanthaseminario@gmail.com](mailto:samanthaseminario@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Aida Ashouri <aashouri@everyactioncustom.com>

Sun, Sep 22, 2024 at 5:24 PM

Reply-To: aashouri@msn.com

To: housingelement@lacity.org

Dear Housing Element,

Stop perpetuating exclusionary zoning! According to the law you shouldn't be allowed any HUD funding if you are blocking housing being built. I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

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Sincerely,

Sincerely,

Aida Ashouri

Manhattan Beach, CA 90266-3107

[aashouri@msn.com](mailto:aashouri@msn.com)





Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA CHIP June 2024 draft

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**Carol Williams** <carolw825@att.net>

Sun, Sep 22, 2024 at 3:35 PM

To: housingelement@lacity.org

Cc: councilmember.park@lacity.org

PLEASE ADD THIS EMAIL TO PUBLIC RECORD:

On July 25, 2024, City Planning held a public hearing to accept comments on proposed revisions to the Proposed Housing Element and Citywide Housing Incentive Program (CHIP).

I cannot support CHIP as proposed because it unfairly burdens Ladera with housing density that is inconsistent with the rest of Westchester/Playa, similar to the Land Use Plan. Moreover, it does not protect single-family homes, historic sites, or Rent Stabilized Units, and it completely overlooks available sites in CD 11 that are ideally situated for high-density housing (the Westchester/Veterans Metro Station is just one example) in favor of shoehorning high-density housing in the midst of a thriving, diverse single-family home community. And let's be very clear: once our vibrant, long-standing, SFR community is gone, we will never be able to get it back.

Ladera is extraordinarily diverse, and many of the residents have chosen to make their homes here precisely because it is zoned R-1. There are numerous strategic and sensible locations for the creation of high-density housing that would not entail the disruption of this established residential community.

Regards,

Sent from my iPhone





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Claire O'Hanlon <charm@everyactioncustom.com>

Sun, Sep 22, 2024 at 5:18 PM

Reply-To: charm@manyquarks.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,

Claire O'Hanlon

Venice, CA 90291-6104

[charm@manyquarks.com](mailto:charm@manyquarks.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Katherine Bachelor** <Katebachelor@everyactioncustom.com>

Sun, Sep 22, 2024 at 5:02 PM

Reply-To: Katebachelor@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Katherine Bachelor  
Sherman Oaks, CA 91403-2500  
[Katebachelor@gmail.com](mailto:Katebachelor@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Lama Gyatso** <LamaJigmeG@everyactioncustom.com>

Sun, Sep 22, 2024 at 1:47 PM

Reply-To: LamaJigmeG@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Lama Gyatso  
Burbank, CA 91505-3298  
[LamaJigmeG@gmail.com](mailto:LamaJigmeG@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Michael Shure <mashure@gmail.com>

Sun, Sep 22, 2024 at 7:33 PM

Reply-To: Michael Shure <mashure@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Michael Shure  
[mashure@gmail.com](mailto:mashure@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Samuel Shapiro-Kline** <sshapirokline@everyactioncustom.com>

Sun, Sep 22, 2024 at 1:46 PM

Reply-To: sshapirokline@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,

Samuel Shapiro-Kline

Santa Monica, CA 90403-3449

[sshapirokline@gmail.com](mailto:sshapirokline@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Tanner Vandenbosch** <tannerjv01@everyactioncustom.com>

Sun, Sep 22, 2024 at 10:58 AM

Reply-To: tannerjv01@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Tanner Vandenbosch  
Los Angeles, CA 90034-5160  
[tannerjv01@gmail.com](mailto:tannerjv01@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Terry Trieu <ttrieu@everyactioncustom.com>

Sun, Sep 22, 2024 at 7:01 PM

Reply-To: ttrieu@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Terry Trieu  
Los Angeles, CA 90045-2051  
[ttrieu@gmail.com](mailto:ttrieu@gmail.com)





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## CHIP Public Comment

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**DongWan Kim** <kdwnnn@gmail.com>

Mon, Sep 23, 2024 at 11:28 AM

To: housingelement@lacity.org

Cc: mpatino@saje.net

Dear Los Angeles City Planning Department staff,

I am a Resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Citywide Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in building affordable housing in our city and I also believe that we need to ensure that affordable housing production is done equitably and that it "Affirmatively Furthers Fair Housing". I have the following recommendations in order to improve the ordinances proposed.

1. Protect the City's rent-stabilized housing stock by requiring 2:1 replacement of demolished RSO units
2. Replacement Units Should Be Counted in Addition to Affordable Set-Aside Requirement.
3. Encourage deeply affordable units by adding "Acutely Low Income" incentives
4. Expand the MIIP and AHIP to apply to single family zoned parcels
5. Specify and strengthen the relocation requirements of the Resident Protections Ordinance to ensure displaced households receive affordable replacement housing and a true opportunity to return
6. Strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants
7. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns

Sincerely,

Andy Kim





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Anita Lin <anita@everyactioncustom.com>

Mon, Sep 23, 2024 at 10:45 AM

Reply-To: anita@activesgv.org

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,

Anita Lin

El Monte, CA 91733-2163

[anita@activesgv.org](mailto:anita@activesgv.org)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Ann Kaneko <annkaneko@gmail.com>

Mon, Sep 23, 2024 at 1:55 PM

Reply-To: Ann Kaneko <annkaneko@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Ann Kaneko

[annkaneko@gmail.com](mailto:annkaneko@gmail.com)







Housing Element <housingelement@lacity.org>

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## CHIP Public Comment

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**Brady Collins** <brady@kiwa.org>

To: housingelement@lacity.org

Cc: mpatino@saje.net

Mon, Sep 23, 2024 at 11:28 AM

Dear Los Angeles City Planning Department staff,

I am a Resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Citywide Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in building affordable housing in our city and I also believe that we need to ensure that affordable housing production is done equitably and that it "Affirmatively Furthers Fair Housing". I have the following recommendations in order to improve the ordinances proposed.

1. Protect the City's rent-stabilized housing stock by requiring 2:1 replacement of demolished RSO units
2. Replacement Units Should Be Counted in Addition to Affordable Set-Aside Requirement.
3. Encourage deeply affordable units by adding "Acutely Low Income" incentives
4. Expand the MIIP and AHIP to apply to single family zoned parcels
5. Specify and strengthen the relocation requirements of the Resident Protections Ordinance to ensure displaced households receive affordable replacement housing and a true opportunity to return
6. Strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants
7. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns

Sincerely,

Brady

Sent from my iPhone





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

---

**Courtney Miles** <CAliciaMiles@everyactioncustom.com>

Mon, Sep 23, 2024 at 11:13 AM

Reply-To: CAliciaMiles@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,  
Courtney Miles  
Gardena, CA 90249-2325  
[CAliciaMiles@gmail.com](mailto:CAliciaMiles@gmail.com)





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## CHIP Public Comment

---

**Hannah Cornfield** <cornfieldh@gmail.com>  
To: housingelement@lacity.org

Mon, Sep 23, 2024 at 11:30 AM

Dear Los Angeles City Planning Department staff,

I am a Resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Citywide Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in building affordable housing in our city and I also believe that we need to ensure that affordable housing production is done equitably and that it "Affirmatively Furthers Fair Housing". I have the following recommendations in order to improve the ordinances proposed.

1. Protect the City's rent-stabilized housing stock by requiring 2:1 replacement of demolished RSO units
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6. Strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants
7. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns

Sincerely,  
Hannah Cornfield





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## CHIP Public Comment

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**Jason J Cohn** <jason@kiwa.org>  
To: housingelement@lacity.org  
Cc: mpatino@saje.net

Mon, Sep 23, 2024 at 11:28 AM

Dear Los Angeles City Planning Department staff,

I am a Resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Citywide Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in building affordable housing in our city and I also believe that we need to ensure that affordable housing production is done equitably and that it "Affirmatively Furthers Fair Housing". I have the following recommendations in order to improve the ordinances proposed.

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6. Strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants
7. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns

Sincerely,  
Jason Cohn







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## CHIP Public Comment

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**jin kim** <martinjinkim2@gmail.com>  
To: housingelement@lacity.org  
Cc: mpatino@saje.net

Mon, Sep 23, 2024 at 11:30 AM

Dear Los Angeles City Planning Department staff,

I am a Resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Citywide Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in building affordable housing in our city and I also believe that we need to ensure that affordable housing production is done equitably and that it "Affirmatively Furthers Fair Housing". I have the following recommendations in order to improve the ordinances proposed.

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6. Strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants
7. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns

Sincerely,





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## CHIP Comentario Publico

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**Leticia Choi** <leti@kiwa.org>  
To: housingelement@lacity.org  
Cc: mpatino@saje.net

Mon, Sep 23, 2024 at 1:27 PM

Al personal del Departamento de Planificación de la Ciudad de Los Ángeles,

Soy residente de la ciudad de Los Ángeles y le escribo para brindar mis recomendaciones para el Programa de incentivos de vivienda para la ciudad de Los Angeles (CHIP) y en la Ordenanza de Protección de Habitantes. Creo firmemente en la construcción de viviendas asequibles en nuestra ciudad y también creo que debemos garantizar que la producción de viviendas asequibles se realice de manera equitativa y que promueva afirmativamente la vivienda justa. Tengo las siguientes recomendaciones para mejorar las ordenanzas propuestas.

1. Proteger las unidades de viviendas bajo la ordenanza de estabilización de renta de la ciudad exigiendo el reemplazo 2:1 de las unidades "RSO" demolidas.
2. Las unidades de reemplazo deben ser contadas aparte de las unidades requeridas.
3. Fomentar unidades profundamente asequibles agregando incentivos para "ingresos agudamente bajos"
4. Ampliar el MIIP y el AHIP para aplicar a parcelas zonificadas unifamiliares
5. Especificar y fortalecer los requisitos de reubicación de la Ordenanza de Protección de Residentes para garantizar que los hogares desplazados reciban viviendas de reemplazo asequibles y una verdadera oportunidad de regresar.
6. Fortalecer los sistemas de comunicación con los inquilinos para garantizar que las unidades recientemente desarrolladas lleguen a sus ocupantes previstos.
7. Requerir un estudio ambiental sólido y participación pública.

Estimadamente,



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## CHIP Public Comment

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**Leticia Choi** <leti@kiwa.org>  
To: housingelement@lacity.org  
Cc: mpatino@saje.net

Mon, Sep 23, 2024 at 1:27 PM

To the Staff of the Los Angeles City Planning Department,

I am a resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in the construction of affordable housing in our city and also believe that we must ensure that the production of affordable housing is done in an equitable manner and affirmatively furthers fair housing. I have the following recommendations to improve the proposed ordinances.

1. Protect housing units under the City's rent stabilization ordinance by requiring 2:1 replacement of demolished "RSO" units.
2. Replacement units should be counted separately from the required units.
3. Encourage deeply affordable units by adding incentives for "acutely low income"
4. Expand the MIIP and AHIP to apply to single-family zoned parcels
5. Specify and strengthen the Resident Protection Ordinance's relocation requirements to ensure displaced households receive affordable replacement housing and a real opportunity to return.
6. Strengthen tenant communication systems to ensure newly developed units reach their intended occupants.
7. Require a robust environmental study and public participation.





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## CHIP Public Comment

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**Michelle Matt** <mmatt25@icloud.com>

Mon, Sep 23, 2024 at 11:27 AM

To: housingelement@lacity.org

Cc: mpatino@saje.net

Dear Los Angeles City Planning Department staff,

I am a Resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Citywide Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in building affordable housing in our city and I also believe that we need to ensure that affordable housing production is done equitably and that it "Affirmatively Furthers Fair Housing". I have the following recommendations in order to improve the ordinances proposed.

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Sincerely,







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## CHIP Public Comment

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**Tara Stone** <tarastone144@gmail.com>  
To: housingelement@lacity.org

Mon, Sep 23, 2024 at 1:28 PM

Dear Los Angeles City Planning Department staff,

I am a Resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Citywide Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in building affordable housing in our city and I also believe that we need to ensure that affordable housing production is done equitably and that it "Affirmatively Furthers Fair Housing". I have the following recommendations in order to improve the ordinances proposed.

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7. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns

Sincerely,  
Tara Stone



Housing Element &lt;housingelement@lacity.org&gt;

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## CHIP Comentario Publico

---

**Ale Campillo** <ale@kiwa.org>

Wed, Sep 18, 2024 at 4:01 PM

To: housingelement@lacity.org

Al personal del Departamento de Planificación de la Ciudad de Los Ángeles,

Soy residente de la ciudad de Los Ángeles (CD1) y le escribo para brindar mis recomendaciones para el Programa de incentivos de vivienda para la ciudad de Los Angeles (CHIP) y en la Ordenanza de Protección de Habitantes. Creo firmemente en la construcción de viviendas asequibles en nuestra ciudad y también creo que debemos garantizar que la producción de viviendas asequibles se realice de manera equitativa y que promueva afirmativamente la vivienda justa. Tengo las siguientes recomendaciones para mejorar las ordenanzas propuestas.

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7. Requerir un estudio ambiental sólido y participación pública.

Estimadamente,

Ale Andres Campillo



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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

---

Joey Gawor <jcgawor@everyactioncustom.com>

Mon, Sep 23, 2024 at 5:13 PM

Reply-To: jcgawor@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Joey Gawor  
Los Angeles, CA 90027-4417  
[jcgawor@gmail.com](mailto:jcgawor@gmail.com)



Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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**Alison Schur** <aschur@me.com>  
To: housingelement@lacity.org

Tue, Aug 27, 2024 at 10:04 PM

Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

Sent from my iPhone





Housing Element &lt;housingelement@lacity.org&gt;

---

**Re: CPC-2023-7068-CA**

---

**Anne Billingsley** <annebillingsley@ca.rr.com>  
To: housingelement@lacity.org

Tue, Aug 27, 2024 at 9:26 PM

Save Our Single Family, Historic & RSO Homes!

Re: CPC-2023-7068-CA

Dear Housing Element Team of the Planning Department,

I support the CHIP Ordinance / House Element June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Housing from being rezoned.

I am aware of the need for and support the creation of more affordable housing in Los Angeles.

I appreciate and support the thoughtful changes made, after the solicitation of public input, to the Housing Element, that protect single-family neighborhoods and focuses development in areas already zoned for increased density and along the hundreds of miles of underutilized commercial corridors in each of our communities. I acknowledge the collaborative work that led to these revisions including the recent decision which adheres to state-mandated time-of-ownership limits on development by Faith Based Organizations.

I oppose any revision to the June 2024 version of the Housing Element that would undo the protections afforded single-family neighborhoods, HPOZs and RSO housing from being up-zoned.

Thank you,

Anne Billingsley MD

330 S Las Palmas Ave

Los Angeles, CA 90020









**ari coine** <noreply@jotform.com>  
to me ▾

Fri, Sep 20, 7:12 PM (3 days ago)



### **Urgent Community Concern: Increased Density Proposal**

To the Los Angeles Planning Department,I am opposed to increased density in single-family neighborhoods and the construction of tall buildings adjacent to single-family properties. This increased density would be harmful to our communities.

Sincerely,

ari coine

[aricoine@gmail.com](mailto:aricoine@gmail.com)





Housing Element &lt;housingelement@lacity.org&gt;

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## HPOZ

---

**Audrey Moruzzi** <audreymoruzzi@gmail.com>  
To: housingelement@lacity.org

Tue, Aug 27, 2024 at 4:56 PM

Dear Housing Element Team of the Planning Department,

I support the CHIP Ordinance/Housing Element June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Housing from being rezoned.

Of course I am aware of the need for and support the creation of more affordable housing in Los Angeles.

I appreciate and support the thoughtful changes made, after the solicitation of public input, to the Housing Element, that protect single-family neighborhoods and focus development in areas already zoned for increased density and along the hundreds of miles of underutilized commercial corridors in each of our communities.

I acknowledge the collaborative work that led to these revisions including the recent decision which adheres to state-mandated time-of-ownership limits on development by Faith Based Organizations.

I oppose any revision to the June 2024 version of the Housing Element that would undo the protections afforded single-family neighborhoods, HPOZs and RSO housing from being up-zoned.

Thank you.

Audrey Moruzzi

[1350 N Orange Grove Ave](#)

[Spaulding Square](#) HPOZ

Sent from my iPhone





Housing Element &lt;housingelement@lacity.org&gt;

## CHIP R1s on Avenue-I or larger [CPC-2023-7068-CA, CPC-2024-387-CA]

Azalia Dou &lt;azaliadev@gmail.com&gt;

Tue, Aug 27, 2024 at 5:26 AM

Reply-To: Azalia Dou &lt;azaliadev@gmail.com&gt;

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org

<p dir="ltr">尊敬的洛杉磯市規劃部及市議員Traci Park,

<p dir="ltr">我寫信是為了表達對於城市住房激勵計劃（Citywide Housing Incentives Program CHIP）的深切不滿。它排除了所有的R-1（single unit lots, Residential Zone 1 單一單位地）既然是住房激勵計劃，想要建造更多住房，新增建築物，然而卻不顧這些R-1位於寬大街道上，或者狹窄街道上。譬如：位於寬大街道上屬於R1, Avenue-1（如Pico Blvd）。CHIP它排除所有R1，因而，此時此刻，我們發現 R1.5, R2, 在小街道上迅速的被開發，而且快速地建造高密度低收入住宅公寓(high density affordable housing)。這種做法，祇顧幾十年前的土地分類 分區方法，卻不顧街道大小，是狹隘且偏頗的。這本質上是不公正的，因為，這些基於幾十年前的土地分類，分區，直接延續了"種族排他性契約限制"。相反的，洛杉磯必須在所有社區的寬闊大街道上，無例外地，進行密集開發低收入住宅公寓，才是正確的城市住房激勵計劃。<p dir="ltr">我們需要CHIP 城市住房激勵計劃 沿高工作機會走廊，建造高密度，低收入住宅公寓，**包括 R1**。這一措施還必須將CHIP，與50%的行人道樹冠標準相結合，以種樹的樹蔭來降低溫度，減緩地球暖化，建立氣候適應力強的洛杉磯。那些經歷過熱，熱島效應的社區，往往是以前承受過舊有的土地分類，不公正的分區方法的脆弱社區。。樹蔭可以將地表溫度降低 22-54°F，對於減緩全球暖化，和拯救生命，至關重要。寬闊大街道上的地區，包括 R1 地段，最能同時容納樹冠和高密度低收入住宅公寓。我們必須保護現有的樹冠，同時沿著寬闊大街道走廊擴展樹蔭覆蓋，並提供經濟適用房，高密度低收入住宅公寓。<p dir="ltr">我敦促您向市議會提出異議，將高工作機會走廊上屬於 Avenue-1 或更大範疇的 R1 地段納入 CHIP，並豁免 Avenue-2 或小街道上的 R2 地段，以減少歷史上紅線社區的人口密度壓力，和樹冠損失風險。洛杉磯必須保持其多元文化的歷史。洛杉磯不可能通過，完全豁免R1，其最多數的住宅分區(R1)類別，來實現開發，建造，高密度低收入住宅公寓。。我敦促您，盡全力強烈地抗議，防止一個極不公平的（Citywide Housing Incentives Program CHIP）CHIP 計劃。<p dir="ltr">謹上，-- Azalia Dou  
[azaliadev@gmail.com](mailto:azaliadev@gmail.com)





Housing Element &lt;housingelement@lacity.org&gt;

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## Re: I OPPOSE All Three Draft Ordinances of Housing Element of General Plan Rezoning Program

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Planning SouthLA &lt;planning.southla@lacity.org&gt;

Tue, Aug 27, 2024 at 4:12 PM

To: Bill Evashwick &lt;bevashwick@yahoo.com&gt;, Planning South LA &lt;planning.southla@lacity.org&gt;, housingelement@lacity.org

Good Afternoon,

Questions and comments on the Citywide Housing Incentive Program Ordinance can be submitted to:  
[housingelement@lacity.org](mailto:housingelement@lacity.org).

South Los Angeles Development Services Center

On Sun, Aug 25, 2024 at 12:18 PM 'Bill Evashwick' via Planning South LA <[planning.southla@lacity.org](mailto:planning.southla@lacity.org)> wrote:

Dear Los Angeles City Planning Department: I OPPOSE the above draft ordinances. Here's why:

1. Our neighborhoods are already crowded enough. The idea of "Minimum Density" is simply a way for developers to make more money.
2. The city's infrastructure is already pushed to the limit. We don't need more housing.
3. L.A.'s population is declining. We don't need more giant apartment buildings

Bill Evashwick









Carol Selimah Nemoy <noreply@jotform.com>

to me ▾

Aug 27, 2024, 9:36 AM



### **Urgent Community Concern: Increased Density Proposal**

To the Los Angeles Planning Department, I am opposed to increased density in single-family neighborhoods and the construction of tall buildings adjacent to single-family properties. This increased density would be harmful to our communities.

Sincerely,

Carol Selimah Nemoy

[selimahn@yahoo.com](mailto:selimahn@yahoo.com)





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## Strengthen the CHIP ordinance to boost housing production in LA!

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**Christopher Rhie** <chris.rhie@everyactioncustom.com>

Tue, Aug 27, 2024 at 1:31 PM

Reply-To: chris.rhie@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write to you to express my deep frustration that the revision of the Citywide Housing Incentive Program (CHIP) Ordinance continues to exclude single family zone parcels - 72% of the city - from the proposed incentive programs. The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also appreciate certain revisions City Planning has made to the ordinance, including wider geographic eligibility for the Opportunity Corridor Transition Areas. Unfortunately, the most substantial changes in the latest draft add new restrictions across the multiple programs and geographies in the ordinance. Overall, the revised CHIP ordinance would make it even more difficult to accommodate an additional 200,000 new homes, equitably distribute new housing across the city, and prevent displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for key changes to the CHIP.

Specifically, I urge the City to allow all CHIP incentive programs in single-family zones. Making single-family zoned parcels in highest and high opportunity areas eligible for incentive programs is of particular importance, as these areas are rich in jobs, public investments, and services, and have historically excluded Angelenos of color and lower income Angelenos. I appreciate that City Planning has made improvements to the Opportunity Corridor Transition Area program, but please go further by eliminating the CT-1 and CT-2 subareas and expanding CT-3 to at least a quarter-mile from the rear property lines of parcels abutting the corridors.

Not only does the revised ordinance fail to make meaningful improvements on housing equity; the revision actively makes the ordinance less equitable by completely exempting the Coastal Zone from the Mixed Income Incentive Program and adding new limitations to incentives in historic districts. Furthermore, the rolling back of unlimited density incentives in the upper tiers of the Transit Oriented Incentive Area program, and FAR and height incentives for the State Density Bonus Program will drive further displacement as a greater number of existing multifamily parcels will need to be redeveloped to meet the need for more housing.

The rezoning program offers a once in a generation opportunity for the city to build a future where all Angelenos enjoy access to opportunity and are able to live in the neighborhoods of their choice. I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles - near transit and in high opportunity communities - and for creating new streamlined processes to deliver new housing. But walling off single family neighborhoods from these programs reinforces exclusionary zoning and hobbles their effectiveness. I stand with Abundant Housing LA in urging the City of Los Angeles to undo these historic wrongs.

Sincerely,

Sincerely,  
Christopher Rhie  
Los Angeles, CA 90041-3497  
[chris.rhie@gmail.com](mailto:chris.rhie@gmail.com)





Housing Element <housingelement@lacity.org>

Re: Urgent Community Concern: Increased Density Proposal -

David Kervella <davidkervella@gmail.com>  
To: Housing Element <housingelement@lacity.org>

Tue, Aug 27, 2024 at 1:07 PM

Hello,

I am sorry you are experiencing challenges with your system. In responding to the survey, I declared that I am opposing the proposal to increase the density of our neighborhoods. Please do not increase the density as it is already overpopulated as is.

I am happy to provide more information if needed.

Thank you,

David

On Mon, Aug 26, 2024 at 12:23 PM Housing Element <housingelement@lacity.org> wrote:  
Hello,

Thank you for your email. We are unable to view your comment in the format it was delivered. Please re-send your comment as a response to this email thread, and we will ensure that it is added to the appropriate case file and taken into consideration as we continue to refine our draft ordinances. If you have any questions, please let us know.

Thank you,



**Housing Element Staff**  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



On Sat, Aug 24, 2024 at 4:06 PM David Kervella <noreply@jotform.com> wrote:



Urgent Community Concern: Increased Density Proposal

Name	David Kervella
E-mail	davidkervella@gmail.com









Housing Element &lt;housingelement@lacity.org&gt;

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## MIRACLE MILE REZONIING

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**Delane Vaughn** <vaughndelane5@gmail.com>

Tue, Aug 27, 2024 at 7:21 AM

To: housingelement@lacity.org

Case File CPC -2023-7068-CA.

Dear Planning Department,

I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single - family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

I have lived in this neighborhood for over 40 years. It's called Miracle Mile for a reason. Because it is truly a special and unique place to live.

Please save Single Family, RSO's and Historic Neighborhoods. They are some of LAs greatest assets and the reason people move to and to stay

in LA. By rezoning underutilized adjacent commercial corridors to allow for more housing we can create vibrant neighborhoods/communities for everyone.

without destroying what we already have. Data shows that we can protect our existing residential and historic areas and still meet affordable housing needs.

Our communities have worked hard to show where more housing could be added in each neighborhood. Answering the Mayor's call to solve the housing crisis.

I strongly recommend that the city Council approve the current Planning Department's proposed revisions to the Housing Element and CHIP program.

Thank-you

Roy Vaughn  
5569 West Olympic Blvd.

Miracle Mile Neighbor  
.





Housing Element <housingelement@lacity.org>

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## Keep single family neighborhoods

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**DonMar** <donmar395@gmail.com>

Tue, Aug 27, 2024 at 9:42 AM

To: housingelement@lacity.org

I'm a resident of Shadow Hills (Sunland), CA.

Re: Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned for higher density."

Don Dunham,  
Esq.  
Tel. 818 446-0457





Housing Element <housingelement@lacity.org>

Re: Urgent Community Concern: Increased Density Proposal -

Donna Reilly <1darrick@mindspring.com>  
To: Housing Element <housingelement@lacity.org>

Tue, Aug 27, 2024 at 11:12 AM

Mu husband, George and I are completely against denser housing. Keep Valley Village clean from developers. Thank you.

On 8/26/2024 12:13 PM, Housing Element wrote:

Hello,

Thank you for your email. We are unable to view your comment in the format it was delivered. Please re-send your comment as a response to this email thread, and we will ensure that it is added to the appropriate case file and taken into consideration as we continue to refine our draft ordinances. If you have any questions, please let us know.

Thank you,



**Housing Element Staff**  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



On Mon, Aug 26, 2024 at 11:40 AM Donna Reilly <noreply@jotform.com> wrote:



Urgent Community Concern: Increased Density Proposal

Name	Donna Reilly
E-mail	1darrick@mindspring.com





Housing Element &lt;housingelement@lacity.org&gt;

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**Re: CPC-2023-7068-CA**

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**Sean Silva** <sean.silva@lacity.org>

Tue, Aug 27, 2024 at 9:11 AM

To: Linda Reynolds &lt;LReyn@outlook.com&gt;, Housing Element &lt;housingelement@lacity.org&gt;

Hi Linda,

Thanks for your email and for your engagement.

The [Housing Element Rezoning Program draft ordinances](#), which include the Citywide Housing Incentive Program (CHIP) Ordinance, Housing Element Sites and Minimum Density Ordinance, and Resident Protections Ordinance, are managed by the Housing Element team. I've copied them here so they can record your comments.

Please don't hesitate to reach out with any further questions, comments, or concerns.

All the best,  
Sean

**Sean Silva** | Deputy, Venice | Planning Liaison**Office of Councilwoman Traci Park** ★ 11th District**WESTCHESTER:** 7166 W. Manchester Ave, LA, CA 90045

(310) 568-8772 TEL |



\*PLEASE NOTE: E-mail correspondence with the Office of Councilwoman Traci Park may be subject to public disclosure under the California Public Records Act. (including attachments) \*

On Mon, Aug 26, 2024 at 1:03 PM Linda Reynolds &lt;LReyn@outlook.com&gt; wrote:

Sean Silva,

We support more housing and we support it on our commercial corridors. We have enough capacity to build all the housing we need by just staying on these commercial corridors which run through all our high resource communities. We can create housing for people in all our communities while protecting all the housing that already exists. We support Draft #2 of the CHIP program case file CPC-2023-7068-CA.

Sincerely,

Linda Reynolds

[7001 W 83<sup>rd</sup> St.](#)

LA CA 90045









Housing Element &lt;housingelement@lacity.org&gt;

---

**Re: Urgent Community Concern: Increased Density Proposal -**

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**Lori Endara** <lori.endara@gmail.com>

Tue, Aug 27, 2024 at 7:08 AM

To: Housing Element &lt;housingelement@lacity.org&gt;

Hello

My comment was in response to offering other ideas to increase living options other than saturating existing residential neighborhoods.

The suggestion was to consider converting vacant commercial properties in neighborhoods into personal dwellings (apartments, condo, bungalos).

So many businesses are closing and staying vacant for quite sometime. Incent owners to be a different type of landlord.

Thank you

**Lori Endara**

818-209-7003

---

**From:** christine.bustillos@lacity.org <christine.bustillos@lacity.org> on behalf of Housing Element <housingelement@lacity.org>

**Sent:** Monday, August 26, 2024 12:24 PM

**To:** lori.endara@gmail.com <lori.endara@gmail.com>

**Subject:** Re: Urgent Community Concern: Increased Density Proposal -

Hello,

Thank you for your email. We are unable to view your comment in the format it was delivered. Please re-send your comment as a response to this email thread, and we will ensure that it is added to the appropriate case file and taken into consideration as we continue to refine our draft ordinances. If you have any questions, please let us know.

Thank you,

**Housing Element Staff****Los Angeles City Planning**

200 N. Spring St., Room 750

Los Angeles, CA. 90012

Planning4LA.org

T: (213) 978-1302



On Sat, Aug 24, 2024 at 5:15 PM Lori Endara <[noreply@jotform.com](mailto:noreply@jotform.com)> wrote:



## Urgent Community Concern: Increased Density Proposal

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Name	Lori Endara
E-mail	<a href="mailto:lori.endara@gmail.com">lori.endara@gmail.com</a>

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Housing Element <housingelement@lacity.org>

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## Protect single-family neighborhoods

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**MARGARET HEALY** <thehealyfamily1@verizon.net>

Tue, Aug 27, 2024 at 11:20 AM

To: housingelement@lacity.org

To : Housing Element Members  
Mayor Karen Bass  
CM Katy Yaroslavsky

Dear Housing Element Staff, Mayor Bass and Councilmember Yaroslavsky,

My family and I are strongly in favor of protecting our single-family from upzoning, and instead concentrating development on commercial corridors.

Future consideration of residential area upzoning and special circumstances need to be addressed as part of the community planning process, not the Housing Element.

Thank you for your attention to our input on this.

Sincerely,  
Margaret and Charles Healy  
2370 Midvale Ave.  
Los Angeles, CA 90064





Housing Element <housingelement@lacity.org>

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**re: Council File #CPC-2023-7068-CA Please END EXCLUSIONARY single-family ZONING!**

---

**Marilyn Wells** <mtwdemille@gmail.com>

Tue, Aug 27, 2024 at 9:50 AM

To: housingelement@lacity.org

Dear City Planning --

As you know, 72% of Los Angeles is zoned for single family housing while over 80% of Angelenos are renters.

To end our homeless crisis we need to build more affordable multifamily housing.

I strongly support building in Transit Oriented Communities (TOC) adjacent to single family zones. We need more density to house our workforce, seniors on fixed incomes and young adults.

If we don't increase our affordable housing stock, we will not put an end to our housing shortage.

All Angelenos need housing that is affordable, where children can go to good schools and have access to parks. Our workforce is the unique cornerstone that provides the stability of life in Los Angeles.

Thank you.

Marilyn Wells  
90004

Marilyn

Stories From The Frontline  
<https://www.storiesfrontline.org/>







Housing Element &lt;housingelement@lacity.org&gt;

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**CHIP R1s on Avenue-I or larger [CPC-2023-7068-CA, CPC-2024-387-CA]**

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**Migoto Megumi** <migotomegumi@gmail.com>

Tue, Aug 27, 2024 at 5:18 AM

Reply-To: Migoto Megumi &lt;migotomegumi@gmail.com&gt;

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org

<p dir="ltr">尊敬的洛杉磯市規劃部及市議員Traci Park,

<p dir="ltr">我寫信是為了表達對於城市住房激勵計劃（Citywide Housing Incentives Program CHIP）的深切不滿。它排除了所有的R-1（single unit lots, Residential Zone 1 單一單位地）既然是住房激勵計劃，想要建造更多住房，新增建築物，然而卻不顧這些R-1位於寬大街道上，或者狹窄街道上。譬如：位於寬大街道上屬於R1, Avenue-1（如Pico Blvd）。CHIP它排除所有R1，因而，此時此刻，我們發現 R1.5, R2, 在小街道上迅速的被開發，而且快速地建造高密度低收入住宅公寓(high density affordable housing)。這種做法，祇顧幾十年前的土地分類 分區方法，卻不顧街道大小，是狹隘且偏頗的。這本質上是不公正的，因為，這些基於幾十年前的土地分類，分區，直接延續了"種族排他性契約限制"。相反的，洛杉磯必須在所有社區的寬闊大街道上，無例外地，進行密集開發低收入住宅公寓，才是正確的城市住房激勵計劃。<p dir="ltr">我們需要CHIP 城市住房激勵計劃 沿高工作機會走廊，建造高密度，低收入住宅公寓，**包括 R1**。這一措施還必須將CHIP，與50%的行人道樹冠標準相結合，以種樹的樹蔭來降低溫度，減緩地球暖化，建立氣候適應力強的洛杉磯。那些經歷過熱，熱島效應的社區，往往是以前承受過舊有的土地分類，不公正的分區方法的脆弱社區。。樹蔭可以將地表溫度降低 22-54°F，對於減緩全球暖化，和拯救生命，至關重要。寬闊大街道上的地區，包括 R1 地段，最能同時容納樹冠和高密度低收入住宅公寓。我們必須保護現有的樹冠，同時沿著寬闊大街道走廊擴展樹蔭覆蓋，並提供經濟適用房，高密度低收入住宅公寓。<p dir="ltr">我敦促您向市議會提出異議，將高工作機會走廊上屬於 Avenue-1 或更大範疇的 R1 地段納入 CHIP，並豁免 Avenue-2 或小街道上的 R2 地段，以減少歷史上紅線社區的人口密度壓力，和樹冠損失風險。洛杉磯必須保持其多元文化的歷史。洛杉磯不可能通過，完全豁免R1，其最多數的住宅分區(R1)類別，來實現開發，建造，高密度低收入住宅公寓。。我敦促您，盡全力強烈地抗議，防止一個極不公平的（Citywide Housing Incentives Program CHIP）CHIP 計劃。<p dir="ltr">謹上， -- Migoto Megumi  
[migotomegumi@gmail.com](mailto:migotomegumi@gmail.com)





Housing Element &lt;housingelement@lacity.org&gt;

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**Re: Urgent Community Concern: Increased Density Proposal -**

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**Nancy Gowani** <nancyg900@gmail.com>

Tue, Aug 27, 2024 at 2:00 AM

To: Housing Element &lt;housingelement@lacity.org&gt;

Hello:

Density in suburban areas is a very dangerous idea. People buying homes in the suburbs are usually older and have worked many years to move to a quiet and safe area.

Density causes parking wars and fighting. These areas were designed with a certain number of people in mind. Having people live on top of each other in these areas will wipe out the middle class living conditions. Which are conditions that many of us dream of for years. Not only is the Density a cause for parking wars, fighting and unsafe streets; but higher Density leads to higher crime rates. We would be ruining living conditions for many people and it is not fair. Many of us who fight Density have worked decades, day in and day out in rain, illness and while having family issues. We saved for years to get a semblance of peace, quiet and guaranteed parking spaces even if we come home from work late at night. We don't have to circle searching for a parking space and parking a half a block or more.

Please, please do not ruin the daily lives of thousands of hard working citizens who have followed all the rules of society. They do not deserve to be punished because someone thought thus would solve the overpopulation problem. It is a horrible and punitive idea. Thank you for taking the time to read this. Respectfully, Nancy Gowani

On Mon, Aug 26, 2024, 12:19 PM Housing Element &lt;housingelement@lacity.org&gt; wrote:

Hello,

Thank you for your email. We are unable to view your comment in the format it was delivered. Please re-send your comment as a response to this email thread, and we will ensure that it is added to the appropriate case file and taken into consideration as we continue to refine our draft ordinances. If you have any questions, please let us know.

Thank you,



**Housing Element Staff**  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



On Sat, Aug 24, 2024 at 12:48 AM Nancy Gowani &lt;noreply@jotform.com&gt; wrote:



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**Urgent Community Concern: Increased Density Proposal**

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Name	Nancy Gowani
E-mail	<a href="mailto:nancyg900@gmail.com">nancyg900@gmail.com</a>

---





Housing Element <housingelement@lacity.org>

---

## case file CPC-2023-7068-CA

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milehi4@gmail.com <milehi4@gmail.com>

Tue, Aug 27, 2024 at 2:40 PM

To: housingelement@lacity.org

Cc: Blair.smith@lacity.org, Matthew.glesne@lacity.org, Shana.bonstin@lacity.org, Kevin.keller@lacity.org, Councilmember.park@lacity.org, Sean.silva@lacity.org, Jeff.khau@lacity.org

We support more housing and we support it on our commercial corridors. We have enough capacity to build all the housing we need by just staying on these commercial corridors which run through all our high resource communities. We can create housing for people in all our communities while protecting all the housing that already exists. We support Draft #2 of the CHIP program case file CPC-2023-7068-CA.

Sincerely,

Peter Denvir



Housing Element <housingelement@lacity.org>

---

## case file CPC-2023-7068-CA

---

**Sean Silva** <sean.silva@lacity.org>

Wed, Aug 28, 2024 at 10:01 AM

To: milehi4@gmail.com

Cc: housingelement@lacity.org, Blair.smith@lacity.org, Matthew.glesne@lacity.org, Shana.bonstin@lacity.org, Kevin.keller@lacity.org, Councilmember.park@lacity.org, Jeff.khau@lacity.org

Good morning Peter,

Thanks for including us on this email to the Housing Element team.

I see you've already written to the Housing Element team directly, but should you write to us directly with any concerns in the future, we will relay them directly to the appropriate team as well.

All the best,  
Sean



**Sean Silva** | Deputy, Venice | Planning Liaison

**Office of Councilwoman Traci Park** ★ 11th District

**WESTCHESTER:** 7166 W. Manchester Ave, LA, CA 90045

(310) 568-8772 TEL |



\*PLEASE NOTE: E-mail correspondence with the Office of Councilwoman Traci Park may be subject to public disclosure under the California Public Records Act. (including attachments) \*

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

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## case file CPC-2023-7068-CA

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**Housing Element** <housingelement@lacity.org>

Fri, Sep 6, 2024 at 5:18 PM

To: milehi4@gmail.com

Cc: Sean Silva <sean.silva@lacity.org>, Blair.smith@lacity.org, Matthew.glesne@lacity.org, Shana.bonstin@lacity.org, Kevin.keller@lacity.org, Councilmember.park@lacity.org, Jeff.khau@lacity.org

Hello,

Thank you for your comment on the draft Citywide Housing Incentive Program (CHIP) Ordinance. Your comment will be added to our case file and taken into consideration as we continue to refine our draft ordinance.

For more information on the Housing Element Rezoning Program, please visit our [website](#), and/or join our [listserv](#), if you have not already, to stay informed.

Thank you,



LOS ANGELES  
CITY PLANNING

**Housing Element Staff**

**Los Angeles City Planning**

200 N. Spring St., Room 750

Los Angeles, CA. 90012

Planning4LA.org

T: (213) 978-1302



[Quoted text hidden]





Housing Element <housingelement@lacity.org>

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## case file CPC-2023-7068-CA

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**Peter Denvir** <milehi4@gmail.com>

Fri, Sep 6, 2024 at 5:37 PM

To: Housing Element <housingelement@lacity.org>

Cc: Sean Silva <sean.silva@lacity.org>, Blair.smith@lacity.org, Matthew.glesne@lacity.org, Shana.bonstin@lacity.org, Kevin.keller@lacity.org, Councilmember.park@lacity.org, Jeff.khau@lacity.org

Thank you for the update.

[Quoted text hidden]





Housing Element <housingelement@lacity.org>

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## STRONGLY OPPOSING RE-ZONING OF SINGLE FAMILY NEIGHBORHOODS

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**Selimah Nemoy** <selimah@yahoo.com>

Tue, Aug 27, 2024 at 9:39 AM

To: "housingelement@lacity.org" <housingelement@lacity.org>

As a homeowner since 1940 in the Valley Village 91602 zip code, I strongly oppose rezoning and densifying single-family neighborhoods.

Carol Selimah Nemoy







Housing Element &lt;housingelement@lacity.org&gt;

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## I OPPOSE All Three Draft Ordinances of Housing Element of the General Plan Rezoning Program

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Sharron Walters &lt;swchic@msn.com&gt;

Tue, Aug 27, 2024 at 12:08 PM

To: "housingelement@lacity.org" &lt;housingelement@lacity.org&gt;, "media@gtInc.org" &lt;media@gtInc.org&gt;

Dear Los Angeles City Planning Department,

I OPPOSE the above draft ordinances. Here's why:

### **I live in the community an**

**I did not want to live in an area with high rises.****Our parking is already strained, and don't know where you are planning to park the people that work there.****It will block the sun from our neighborhood and houses, that we didn't buy into when we moved there.****It will cause a traffic nightmare with the already crowded streets.****It will negatively impact our neighborhood and turn it into an ultra urban area.**

Sincerely,

**Sharron Walters****Clybourn and N.Valley property owner**





Sonyia Eshaya <noreply@jotform.com>  
to me ▾

Aug 27, 2024, 9:48 AM ☆ ↶ ⋮

**Urgent Community Concern: Increased Density Proposal**

To the Los Angeles Planning Department,I am opposed to increased density in single-family neighborhoods and the construction of tall buildings adjacent to single-family properties. This increased density would be harmful to our communities.

Sincerely,

Sonyia Eshaya

[sonyara30@gmail.com](mailto:sonyara30@gmail.com)







Housing Element &lt;housingelement@lacity.org&gt;

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**CHIP R1s on Avenue-I or larger [CPC-2023-7068-CA, CPC-2024-387-CA]**

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Tara chu &lt;tamesisliu@gmail.com&gt;

Tue, Aug 27, 2024 at 5:33 AM

Reply-To: Tara chu &lt;tamesisliu@gmail.com&gt;

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org

—

&lt;p dir="ltr"&gt;尊敬的洛杉磯市規劃部及市議員Traci Park,

<p dir="ltr">我寫信是為了表達對於城市住房激勵計劃（Citywide Housing Incentives Program CHIP）的深切不滿。它排除了所有的R-1（single unit lots, Residential Zone 1 單一單位地）既然是住房激勵計劃，想要建造更多住房，新增建築物，然而卻不顧這些R-1位於寬大街道上，或者狹窄街道上。譬如：位於寬大街道上屬於R1, Avenue-1（如Pico Blvd）。CHIP它排除所有R1，因而，此時此刻，我們發現 R1.5, R2, 在小街道上迅速的被開發，而且快速地建造高密度低收入住宅公寓(high density affordable housing)。這種做法，祇顧幾十年前的土地分類 分區方法，卻不顧街道大小，是狹隘且偏頗的。這本質上是不公正的，因為，這些基於幾十年前的土地分類，分區，直接延續了"種族排他性契約限制"。相反的，洛杉磯必須在所有社區的寬闊大街道上，無例外地，進行密集開發低收入住宅公寓，才是正確的城市住房激勵計劃。<p dir="ltr">我們需要CHIP 城市住房激勵計劃 沿高工作機會走廊，建造高密度，低收入住宅公寓，**包括 R1**。這一措施還必須將CHIP，與50%的行人道樹冠標準相結合，以種樹的樹蔭來降低溫度，減緩地球暖化，建立氣候適應力強的洛杉磯。那些經歷過熱，熱島效應的社區，往往是以前承受過舊有的土地分類，不公正的分區方法的脆弱社區。。樹蔭可以將地表溫度降低 22-54°F，對於減緩全球暖化，和拯救生命，至關重要。寬闊大街道上的地區，包括 R1 地段，最能同時容納樹冠和高密度低收入住宅公寓。我們必須保護現有的樹冠，同時沿著寬闊大街道走廊擴展樹蔭覆蓋，並提供經濟適用房，高密度低收入住宅公寓。<p dir="ltr">我敦促您向市議會提出異議，將高工作機會走廊上屬於 Avenue-1 或更大範疇的 R1 地段納入 CHIP，並豁免 Avenue-2 或小街道上的 R2 地段，以減少歷史上紅線社區的人口密度壓力，和樹冠損失風險。洛杉磯必須保持其多元文化的歷史。洛杉磯不可能通過，完全豁免R1，其最多數的住宅分區(R1)類別，來實現開發，建造，高密度低收入住宅公寓。。我敦促您，盡全力強烈地抗議，防止一個極不公平的（Citywide Housing Incentives Program CHIP）CHIP 計劃。<p dir="ltr">謹上，-- Tara chu  
[tamesisliu@gmail.com](mailto:tamesisliu@gmail.com)





Housing Element &lt;housingelement@lacity.org&gt;

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**Re: Comm8unity Plan Update**

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**Sean Silva** <sean.silva@lacity.org>

Tue, Aug 27, 2024 at 9:11 AM

To: William Capone &lt;williamcapone0531@outlook.com&gt;

Cc: Housing Element &lt;housingelement@lacity.org&gt;

Hi William,

Thanks for your email and for your engagement.

The [Housing Element Rezoning Program draft ordinances](#), which include the Citywide Housing Incentive Program (CHIP) Ordinance, Housing Element Sites and Minimum Density Ordinance, and Resident Protections Ordinance, are managed by the Housing Element team. I've copied them here so they can record your comments.

Please don't hesitate to reach out with any further questions, comments, or concerns.

All the best,  
Sean

**Sean Silva** | Deputy, Venice | Planning Liaison**Office of Councilwoman Traci Park** ★ **11th District****WESTCHESTER:** 7166 W. Manchester Ave, LA, CA 90045

(310) 568-8772 TEL |



\*PLEASE NOTE: E-mail correspondence with the Office of Councilwoman Traci Park may be subject to public disclosure under the California Public Records Act. (including attachments) \*

On Sun, Aug 25, 2024 at 4:52 PM William Capone <[williamcapone0531@outlook.com](mailto:williamcapone0531@outlook.com)> wrote:

Sean

We support more housing and we support it on our commercial corridors. We have enough capacity to build all the housing we need by just staying on these commercial corridors which run through all our high resource communities. We can create housing for people in all our communities while protecting all the housing that already exists. We support Draft #2 of the CHIP program case file CPC-2023-7068-CA.

Respectfully

William Capone

310-686-2766 Cell / Text

[williamcapone0531@outlook.com](mailto:williamcapone0531@outlook.com)





Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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**Catherine Musicant** <musicant@icloud.com>

Wed, Aug 28, 2024 at 4:52 PM

To: housingelement@lacity.org

Stop changes to R1

Case file CPC-2023-7068-CA

I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

Catherine Musicant  
10322 La Grange Ave  
Los Angeles 90025





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Alice Miketa <alkeets2125@gmail.com>

Thu, Aug 29, 2024 at 9:15 AM

Reply-To: Alice Miketa <alkeets2125@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org

—

Dear LA City Planning and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the R1 exemption. These small streets are home to most of our mature tree canopy.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors, and exempts both R1 and R2 lots on Avenue-2 or smaller streets to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Alice Miketa

[alkeets2125@gmail.com](mailto:alkeets2125@gmail.com)







Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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**Kathleen Edwards** <mskbelle@gmail.com>

Thu, Aug 29, 2024 at 4:32 PM

To: housingelement@lacity.org

Re: Case file CPC-2023-7068-CA:

I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

Kathleen Edwards  
19211 Nashville St.  
Northridge, CA 91326





Housing Element <housingelement@lacity.org>

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**. Re: CPC--2023-7068-CA**

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**Lionel Chetwynd** <lionel@chetwyndproductions.com>  
To: HousingElement@lacity.org

Thu, Aug 29, 2024 at 2:34 PM

To: L.A. Planning Dept

I strongly support Los Angeles keeping Draft #2 of the Housing Element in place! DRAFT #2 provides a SUPERIOR Housing Element plan which provides AMPLE DENSITY OPPORTUNITIES TO MEET L.A.'s HOUSING NEEDS AND STATE MANDATES WITHOUT DESTROYING SINGLE FAMILY NEIGHBORHOODS! This is a QUALITY OF LIFE issue for thousands of families in single family neighborhoods! Research and detailed information was previously provided to the City Planning Dept. from UnitedNeighbors and other community groups that clearly illustrates there is NO NEED to destroy family neighborhoods in order to provide ample new housing (with added benefit of being along EXISTING CORRIDORS OF MASS TRANSIT!). KEEP DRAFT #2

Thank you!

H.L.Chetwynd,

Sherman Oaks 91423





Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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loretaazarian@gmail.com <loretaazarian@gmail.com>

Thu, Aug 29, 2024 at 8:22 AM

To: housingelement@lacity.org

Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

Sent from my iPhone





Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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**Louise Zutler** <lzutler@icloud.com>

Thu, Aug 29, 2024 at 5:41 PM

To: housingelement@lacity.org

Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

Sent from my iPhone







Housing Element <housingelement@lacity.org>

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## August Steurer's Comments on the Proposed CHIP ordinance

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**August Steurer** <augustinca@mac.com>  
To: housingelement@lacity.org

Fri, Aug 30, 2024 at 10:21 AM

Please include my comments in your final reviews of the CHIP ordinance.



**CHIP Comment Letter from August Steurer.pdf**  
59K

August Steurer  
1122 6<sup>th</sup> St #208  
Santa Monica, CA 90403

August 25<sup>th</sup>, 2024

Los Angeles Department of City Planning  
200 N. Spring Street, Room 525  
Los Angeles, CA 90012

Re: Comments on Draft Citywide Housing Incentive Program (CHIP) Ordinance

Dear City Planners,

As a veteran of Los Angeles urban planning with 20 years of involvement (through local employment) in the Woodland Hills-Warner Center Neighborhood Council, 8 years on the Warner Center Specific Plan Advisory Committee, multiple terms on the Ventura/Cahuenga Boulevards Corridor Specific Plan Review Board, and 18 years on the PlanCheckNC steering committee, I write to express significant concerns about the draft Citywide Housing Incentive Program (CHIP) ordinance.

**1. Insufficient Community Engagement:** The lack of meaningful neighborhood council involvement has resulted in grossly inadequate analysis of properties regarding proposed densities and bonuses. Given the city's history of infrequent plan revisions, we cannot afford such a potentially damaging approach. Future planning efforts must work more closely with the community to avoid unintended consequences.

**2. Site-Specific Feasibility:** The blanket upzoning approach fails to account for infrastructure limitations, parking constraints, and site-specific issues. For example, many lots along Ventura Boulevard are inadequately sized or topographically challenged to support the proposed densities, often abutting hillside ridges. Many sites are right against the high-fire risk zones and decreased separation of structures is concerning. Counting density increases for these properties without considering feasibility or lot consolidation is misleading and potentially harmful. If CHIP cannot be customized, the underlying zoning must have greater open space requirement to compensate for CHIP relaxations.

**3. West Valley Climate Considerations:** The West Valley's designation as a high-resource zone ignores climate suitability for affordability. Woodland Hills experiences temperature extremes, routinely exceeding 100°F in summer, with a few days over 115°, and being one of the coldest areas in winter. These conditions will significantly impact energy costs and water costs, diminishing the area's suitability for affordable housing when considering the total cost of living.

**4. Faith-based Development:** The constraints on this are inadequate for urban planning. Many properties are not located at major intersections where the density should be, and without the necessary transit and local amenities, a 500-foot radius for density development creates a ghetto.

**5. Jobs-Housing Imbalance:** Los Angeles has failed to make the West Valley a jobs magnet. Despite appearing as a high-resource area on paper, the only significant growth has been in

housing. For 20 years, Warner Center has developed major housing projects, but only housing by consuming commercial. The Warner Center Specific Plans have not delivered on job creation promises, except retail jobs through the Westfield Mall's expansion.

**6. Preserving Single-Family Neighborhoods:** Wholesale inclusion of all single-family zones in CHIP would have severe negative consequences. Single-family homes remain a vital housing option for many families and a pathway to generational wealth. Surveys show that most renters aspire to own single-family homes. Removing single-family homes from the market decreases their affordability for families who want this existing housing type. We should not increase the unaffordability of one housing type to improve the affordability of another kind when there are alternatives. We should maintain the vast majority of single-family zoning, limiting strategic upzoning to locations that can support walkable communities. CHIP in single-family neighborhoods will reduce the opportunity of home ownership.

**7. Gentrification Risks:** Blanket upzoning of single-family areas could lead to more gentrification. Flippers will buy affordable homes and upgrade them for higher resale prices in response to decreasing SFD availability in high-resource areas. I recommend banning CHIP in SFD zones, limiting them to ADUs and maybe duplexes, and implementing strong anti-displacement provisions.

**8. Holistic Planning Approach:** CHIP focuses myopically on increasing density without considering other crucial planning needs. A comprehensive approach must address quality of life factors such as parks, jobs, and community services. This ordinance, as it stands, is inadequate urban planning that ignores the problems it causes without proposing mitigations.

**9. Infrastructure and Services:** The ordinance must include mechanisms to fund necessary infrastructure improvements alongside new development. It currently fails to mandate sufficient parks or address potential traffic issues, particularly in areas like Ventura Boulevard where increased density could impact hillside residents' access and emergency evacuation routes.

**10. Transit-Oriented Limitations:** While focusing on density near transit is positive, we must ensure transit service levels can support the proposed growth. Include better minimum service frequency requirements before allowing maximum density bonuses. Be aware that relying on significant density increases near transit may lead to overcrowding, potentially disincentivizing transit use. Moreover, transit-oriented development without job creation near transit stations encourages long-distance commutes. My concern is that creating transit-oriented communities will exceed our capability to add transit capacity. Mass-transit development is taking decades while increased density may not.

**11. Design Standards:** Implement strong design standards for larger buildings to help them integrate visually, especially in formerly single-family areas. Consider incentivizing Mass Timber construction for faster, more cost-effective, and greener building. Use lot size to determine appropriate building types and mandate features like courtyards on large lots rather than using them as incentives.

**12. Affordability and Quality of Life:** Strengthen affordability requirements to ensure density bonuses translate to meaningful affordable housing production. However, reducing setbacks and

open space is counterproductive, especially in the West Valley climate. Available amenities such as markets, parks, personal services, and medical resources are necessary for true affordability.

**13. Streetscapes and frontages:** No mention is made of addressing streetscape requirements for the long term. More attention must be given to maintaining adequate space for the changing mobility needs of higher future densities. CHIP is not synchronized with the mobility element. The community plans will not necessarily provide the frontage space for the increased density, and they don't cover the streetscape, which is not addressed by the mobility element sufficiently to be successful.

**14. Jobs-Housing Balance:** Incorporate more stringent incentives for mixed-use development that includes job-creating commercial spaces. The West Valley needs local job growth to match housing increases, rather than relying on jobs in distant areas like El Segundo and Culver City.

**15. Monitoring and Adjustment:** Include clear provisions to monitor the ordinance's impacts over time and make data-driven adjustments as needed.

**16. Minimum Density Requirements:** Implement minimum density requirements in strategic locations to support local businesses and create vibrant, walkable communities. Mixed-use developments require multiple blocks of high-density buildings to thrive, which is challenging to achieve along linear commercial corridors.

**15. Warner Center Concerns:** Including CHIP in Warner Center undermines the existing Warner Center 2035 Plan, which already allows for significant density and height. CHIP incentives may defeat the plan's intentions for quality urban design and work-life balance. The affordable housing achieved so far has come at the cost of breaking specific plan requirements, resulting in monotonous 6-story developments with no connectivity or commercial space.

**16. The Futility of CHIP:** Our housing deficit is so bad that it deters people from staying in LA. The "hole" is so deep that a systemic thinker will realize we cannot dig our way out of the affordability issue. We will not meet the demand for affordability until way in the future. It's just like expanding freeways induces additional traffic. The more housing we build will induce more influx back to LA, but we most likely cannot ever increase production quickly enough, for various reasons, to keep up with induced demand. For Los Angeles, with the practical constraints, like city limits and topography, combined with climate desirability, we will always have an affordability problem.

In conclusion, while increasing affordable housing is crucial, CHIP's current approach is overly simplistic and potentially harmful. A more nuanced, context-sensitive strategy is necessary to balance housing production with sustainable community development. I urge you to revise this ordinance substantially, taking a holistic view of urban planning rather than focusing solely on density increases.

I appreciate your consideration. I look forward to seeing a more comprehensive and thoughtful approach to housing and community development in Los Angeles.

Sincerely,

August Steurer





Housing Element <housingelement@lacity.org>

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## Save our R1 neighborhpods ,at least for 2028 olympics

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**Larry Boring** <larrydaleb1@gmail.com>  
To: housingelement@lacity.org

Fri, Aug 30, 2024 at 1:54 PM







Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Alyssa Leiva** <alyssaleiva.81@gmail.com>

Sat, Aug 31, 2024 at 3:04 PM

Reply-To: Alyssa Leiva <alyssaleiva.81@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Alyssa Leiva

[alyssaleiva.81@gmail.com](mailto:alyssaleiva.81@gmail.com)





Housing Element <housingelement@lacity.org>

---

## More trees throughout the city

---

ellen ellencolley.com <ellen@ellencolley.com>

Sat, Aug 31, 2024 at 10:36 AM

To: "housingelement@lacity.org" <housingelement@lacity.org>

Hello,

My key concern for our city is the rising heat, and the dwindling water supply.

We can help both the most efficiently by several simple methods:

1: having porous, light colored surfaces on all paved areas to capture rainfall into the aquifer instead of letting it run off, and the light color will reflect the sun's heat instead of absorbing it.

2: The city must forbid black buildings, which are far too numerous these days, and are absorbing high amounts of sunlight and heat, and require excessive use of electricity to cool. Light colored buildings stay cooler and require less energy to cool them.

As many trees as possible need to be planted throughout the city to keep the city cool, prevent rain runoff, prevent mudslides, convert carbon dioxide and carbon monoxide into oxygen, and additionally reduce crime, as studies have shown that streets in poor neighborhoods noticed significantly reduced crime when the streets had many trees planted along them.

Please enact these measures as soon as possible, to keep our communities safe and livable.

Thank you.

Sincerely

Ellen Colley

Get [Outlook for iOS](#)





Housing Element <housingelement@lacity.org>

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## Density housing project

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**Jayne Campbell** <viardotmezzo@gmail.com>  
To: HousingElement@lacity.org

Sat, Aug 31, 2024 at 8:29 AM

To: L.A. Planning Dept.  
Re: CPC--2023-7068-CA  
[HousingElement@lacity.org](mailto:HousingElement@lacity.org)

I strongly support Los Angeles keeping Draft #2 of the Housing Element in place! DRAFT #2 provides a SUPERIOR Housing Element plan which provides AMPLE DENSITY OPPORTUNITIES TO MEET L.A.'s HOUSING NEEDS AND STATE MANDATES WITHOUT DESTROYING SINGLE FAMILY NEIGHBORHOODS!

This is a QUALITY OF LIFE issue for thousands of families in single family neighborhoods! Research and detailed information was previously provided to the City Planning Dept. from UnitedNeighbors and other community groups that clearly illustrates there is NO NEED to destroy family neighborhoods in order to provide ample new housing (with added benefit of being along EXISTING CORRIDORS OF MASS TRANSIT!). KEEP DRAFT #2

Thank you!  
Dr. Jayne Campbell  
3625 Longview Valley Rd  
Sherman Oaks, Ca 91423

(Note: For any questions or comments, please click on my name and send a PM.) Thanks!  
Jayne E Campbell DMA  
Emeritus Member  
National Association of Teachers of Singing  
"Dwell in possibility"  
—Emily Dickinson





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

---

Jina Park <mrsjinapark@gmail.com>

Sat, Aug 31, 2024 at 10:04 PM

Reply-To: Jina Park <mrsjinapark@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Jina Park  
[mrsjinapark@gmail.com](mailto:mrsjinapark@gmail.com)







Housing Element <housingelement@lacity.org>

---

## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

---

Nicholas Negroponte <nn@mit.edu>

Sat, Aug 31, 2024 at 12:19 PM

Reply-To: Nicholas Negroponte <nn@mit.edu>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

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Sincerely,

-- Nicholas Negroponte  
[nn@mit.edu](mailto:nn@mit.edu)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

---

**Dakota Peterson** <tika.rose.peterson@gmail.com>

Mon, Sep 2, 2024 at 7:31 PM

Reply-To: Dakota Peterson <tika.rose.peterson@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

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Sincerely,

-- Dakota Peterson  
[tika.rose.peterson@gmail.com](mailto:tika.rose.peterson@gmail.com)





Housing Element <housingelement@lacity.org>

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## CPC-2023-7068-CA Save Our Neighborhoods, Multit Family RSO and Historic Districts!

---

Andrew Jebb <ajebb@nashentertainment.com>

Tue, Sep 3, 2024 at 10:31 AM

To: Housing Element <housingelement@lacity.org>, brian setzer <brian.setzer@gmail.com>

Re: **CPC-2023-7068-CA**

Dear Housing Element Team of the Planning Department,

I support the CHIP Ordinance / House Element June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Housing from being rezoned.

I am aware of the need for and support the creation of more affordable housing in Los Angeles.

I appreciate and support the thoughtful changes made, after the solicitation of public input, to the Housing Element, that protect single-family neighborhoods and focuses development in areas already zoned for increased density and along the hundreds of miles of underutilized commercial corridors in each of our communities. I acknowledge the collaborative work that led to these revisions including the recent decision which adheres to state-mandated time-of-ownership limits on development by Faith Based Organizations.

I oppose any revision to the June 2024 version of the Housing Element that would undo the protections afforded single-family neighborhoods, HPOZs and RSO housing from being up-zoned.

Thank you,

Andrew Jebb

[Quoted text hidden]

|





Housing Element <housingelement@lacity.org>

---

## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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**Mark Leos** <markleos@aol.com>

Tue, Sep 3, 2024 at 1:22 PM

To: housingelement@lacity.org

Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.







Housing Element <housingelement@lacity.org>

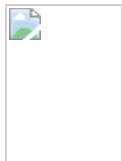
---

## Fwd: A PERSONAL NOTE From Nancy at SOHA re CPC - 2023 - 7068 - CA - Housing Element

---

**Matthew Glesne** <matthew.glesne@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Wed, Sep 4, 2024 at 10:58 AM



**Matthew Glesne**

Preferred Pronouns: He, Him, His

Senior City Planner

**Los Angeles City Planning**

200 N. Spring St., Room 750

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-2666



----- Forwarded message -----

From: **Flora Melendez** <flora.melendez@lacity.org>

Date: Wed, Sep 4, 2024 at 7:55 AM

Subject: Fwd: A PERSONAL NOTE From Nancy at SOHA re CPC - 2023 - 7068 - CA - Housing Element

To: Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>

CC: Jenna Monterrosa <jenna.monterrosa@lacity.org>, Arthi Varma <arthi.varma@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie



**Flora (Angie) Melendez**

Pronouns: She, Hers, Her

Executive Administrative Assistant III

**Los Angeles City Planning**

200 N. Spring St., Room 525

Los Angeles, CA 90012

T: (213) 978-1271 | F: (213) 978-1275

planning.lacity.gov



----- Forwarded message -----

From: **Nancy Sogoian** <[cellbroker@sbcglobal.net](mailto:cellbroker@sbcglobal.net)>

Date: Tue, Sep 3, 2024 at 5:37 PM

Subject: A PERSONAL NOTE From Nancy at SOHA re CPC - 2023 - 7068 - CA - Housing Element

To: [vince.bertoni@lacity.org](mailto:vince.bertoni@lacity.org) <[vince.bertoni@lacity.org](mailto:vince.bertoni@lacity.org)>

Hello Vince!

Hope this message finds you doing well. Do you remember me and the spontaneous laugh we shared when you came to speak at SOHA (Sherman Oaks Homeowners Assoc.)? I came over to welcome you and proceeded to bungle a compliment that came out like bungled flirting ...?!?

Next we saw each other, I was with then-Councilperson David Ryu outside the Council chamber after a PLUM meeting. You greeted me warmly with a smile and a hug. It's been too long and so much has happened since!

In our first conversation at SOHA, you told me about your own hard-fought efforts on behalf of your community, including going door-to-door, opposing a neighborhood development issue. And thus you could relate to what it's like to champion protections for one's community...

I'm writing to express my deep concern regarding CPC-2023-7068. Having been a longtime SOHA Board Member, I'm very familiar with the extensive research and thorough and excellent report submitted to your Planning Department by United Neighbors. As you're aware, it clearly and precisely pinpointed **plentiful** locations where there is more than enough capacity citywide to fulfill State housing mandates - *without destroying single family neighborhoods*. The United Neighbors' findings show we can deliver needed new housing WITHOUT DESTROYING EXISTING NEIGHBORHOODS. And undoubtedly, it's a quality of life issue for Los Angeles communities.

**We support your revised DRAFT #2 --**

There is NO legitimate reason or need to change the City's position away from the exemption of single family neighborhoods from the Housing Element!

Additionally, placing new housing on corridors along **existing** mass transit is hugely beneficial to residents (and to city transit goals!). This virtually on-doorstep mass transit does NOT (and will never) exist within single family neighborhoods!

Vince, please remember your own deeply-felt community efforts and KEEP Draft #2 in force!

Sending you my sincere thanks and warm good wishes, and hope to see you again soon,

Nancy Sogoian  
818-906-7500





Housing Element <housingelement@lacity.org>

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## Fwd: Community Impact Statement - Submission Details

---

**D. Henderson** <denzel.henderson@lacity.org>

Wed, Sep 4, 2024 at 8:20 AM

To: Planning Housing Policy <planning.housingpolicy@lacity.org>, Housing Element <housingelement@lacity.org>, Planning Liaison <planning.liaison@lacity.org>

----- Forwarded message -----

From: **Jacob Wasserman** <jacobnwwnc@gmail.com>

Date: Thu, Aug 29, 2024 at 10:14 AM

Subject: Fwd: Community Impact Statement - Submission Details

To: <denzel.henderson@lacity.org>

-----  
Jacob Wasserman  
Board member, Worker Seat and Secretary  
North Westwood Neighborhood Council  
<jacobnwwnc@gmail.com>  
Pronouns: he/him/his

----- Forwarded message -----

From: **Jacob Wasserman** <jacobnwwnc@gmail.com>

Date: Thu, Aug 29, 2024 at 10:11 AM

Subject: Fwd: Community Impact Statement - Submission Details

To: <planning.liaison@lacity.org>

-----  
Jacob Wasserman  
Board member, Worker Seat and Secretary  
North Westwood Neighborhood Council  
<jacobnwwnc@gmail.com>  
Pronouns: he/him/his

----- Forwarded message -----

From: **Jacob Wasserman** <jacobnwwnc@gmail.com>

Date: Thu, Aug 22, 2024 at 8:25 PM

Subject: Fwd: Community Impact Statement - Submission Details

To: <planning.liaison@lacity.org>, <chris.galindo@lacity.org>

-----  
Jacob Wasserman  
Board member, Worker Seat and Secretary  
North Westwood Neighborhood Council  
<jacobnwwnc@gmail.com>  
Pronouns: he/him/his

----- Forwarded message -----

From: **LA City SNow** <[cityoflaprod@service-now.com](mailto:cityoflaprod@service-now.com)>

Date: Mon, Mar 11, 2024 at 11:24 AM

Subject: Community Impact Statement - Submission Details

To: <[CPC@lacity.org](mailto:CPC@lacity.org)>

A Neighborhood Council Community Impact Statement (CIS) has been successfully submitted to your Commission or City Council. We provided information below about CISs and attached a copy of the CIS.

We encourage you to reach out to the Community Impact Statement Filer to acknowledge receipt and if this Community Impact Statement will be scheduled at a future meeting. Neighborhood Council board members are volunteers and it would be helpful if they received confirmation that you received their CIS.

The CIS process was enabled by the Los Angeles Administrative Code §Section 22.819. It provides that, "a Neighborhood Council may take a formal position on a matter by way of a Community Impact Statement (CIS) or written resolution." NCs representatives also testify before City Boards and Commissions on the item related to their CIS. If the Neighborhood Council chooses to do so, the Neighborhood Council representative must provide the Commission with a copy of the CIS or resolution sufficiently in advance for review, possible inclusion on the agenda, and posting on the Commission's website. Any information you can provide related to your agenda setting schedule is helpful to share with the NC.

If the CIS or resolution pertains to a matter *listed on the Commission's agenda*, during the time the matter is heard, the designated Neighborhood Council representative should be given an opportunity to present the Neighborhood Council's formal position. We encourage becoming familiar with the City Council's rules on the subject. At the Chair's discretion, the Neighborhood Council representative may be asked to have a seat at the table (or equivalent for a virtual meeting) typically reserved for City staff and may provide the Neighborhood Council representative more time than allotted to members of the general public. They are also permitted up to five (5) minutes of time to address the legislative body. If the CIS or resolution pertains to a matter *not listed on the agenda*, the designated Neighborhood Council representative may speak during General Public Comments.

We share this information to assist you with the docketing neighborhood council items before your board/commission. If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at [empowerla@lacity.org](mailto:empowerla@lacity.org).

\*\*\*\*\* This is an automated response, please DO NOT reply to this email. \*\*\*\*\*

#### Contact Information

Neighborhood Council: North Westwood

Name: Jacob Wasserman

Email: [jacobnwwnc@gmail.com](mailto:jacobnwwnc@gmail.com)

The Board approved this CIS by a vote of: Yea(17) Nay(0) Abstain(0) Ineligible(0) Recusal(0)

Date of NC Board Action: 03/06/2024

Type of NC Board Action: For

#### Impact Information

Date: 03/11/2024

Update to a Previous Input: No

Directed To: City Planning Commission

Council File Number: 21-1230-S2

Agenda Date:

Item Number:

Summary: The North Westwood Neighborhood Council supports the framework of the Livable Communities Initiative (LCI), Program #131 in Los Angeles' Housing Element, as a way to create high-quality, lower-cost homes and home ownership opportunities in walkable, 15-minute communities near transit that do not have on-site parking. We support creating safe mobility for vulnerable road users and residents who cannot drive or choose not to drive as a way to create equitable access to transportation for all, as well as to address California's goals for air quality, climate emissions, and reduction in vehicle miles traveled. We ask the City Council to pass an ordinance implementing LCI. One viable option is a Livable Communities Overlay, facilitating mid-scale transit-oriented development, incentivizing the creation of housing units where they do not currently exist, and promoting development that enhances commercial, mixed uses. The ordinance should follow the motion's call for by-right, objective zoning and design standards that include, as appropriate, waivers or reductions of setback, unit-floor-area, and other development standards; a minimum density requirement to promote multifamily, mixed-use development; provisions to encourage greater lot density, such as allowing for shared housing or increasing floor area ratio allowances; and the elimination of parking minimums. We also support the framework of single-staircase reform/point access blocks to facilitate courtyard buildings with ample air and light.

Additionally, we support the creation of standard plans—streamlined, pre-approved off-the-shelf architectural plans that are an option for property owners and builders, promoting efficient infill projects without the need for lot assembly and extensive entitlement processes.

Ref:MSG9970786



**CIS\_Livable Cities Initiative.pdf**

137K



## - COMMUNITY IMPACT STATEMENT -

Council File: [21-1230-S2](#)

Title: Livable Communities Initiative / Transit-Rich Corridors / Analogous Citywide Regulations / Mid-Scale Development

Position: For

### Summary:

The North Westwood Neighborhood Council supports the framework of the Livable Communities Initiative (LCI), Program #131 in Los Angeles' Housing Element, as a way to create high-quality, lower-cost homes and home ownership opportunities in walkable, 15-minute communities near transit that do not have on-site parking. We support creating safe mobility for vulnerable road users and residents who cannot drive or choose not to drive as a way to create equitable access to transportation for all, as well as to address California's goals for air quality, climate emissions, and reduction in vehicle miles traveled.

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Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

---

**Andrea Cross** <andreakcross9@gmail.com>

Thu, Sep 5, 2024 at 4:19 PM

To: housingelement@lacity.org

Case file CPC-2023-7068-CA:

I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

Andrea Cross

[andreakcross9@gmail.com](mailto:andreakcross9@gmail.com)

Miracle Mile Neighborhood





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

---

Jeffery Cole <jeff.john.cole@gmail.com>

Sat, Sep 7, 2024 at 8:34 PM

Reply-To: Jeffery Cole <jeff.john.cole@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

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Sincerely,

-- Jeffery Cole

[jeff.john.cole@gmail.com](mailto:jeff.john.cole@gmail.com)





Housing Element <housingelement@lacity.org>

---

## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

---

Junsuke Sato <junsuke@junsukesato.com>

Sat, Sep 7, 2024 at 2:27 PM

Reply-To: Junsuke Sato <junsuke@junsukesato.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

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Sincerely,

-- Junsuke Sato

[junsuke@junsukesato.com](mailto:junsuke@junsukesato.com)





Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft

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**Wendy Kurtzman** <wendykurtzman@gmail.com>

Sat, Sep 7, 2024 at 2:06 PM

To: housingelement@lacity.org

Case file CPC-2023-7068-CA: I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.







Housing Element <housingelement@lacity.org>

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## Letter in support of Draft #2 of June 2024 CHIP Ordinance

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**Brentwood Homeowners Association** <info@brentwoodhomeowners.org>

Mon, Sep 9, 2024 at 5:12 PM

To: housingelement@lacity.org

Cc: vince.bertoni@lacity.org, traci.park@lacity.org, star.parsamyan@lacity.org, marian.ensley@lacity.org

Attached please find our letter in support of Draft #2 of the June 2024 CHIP Ordinance.

Thank you.

Thelma Waxman  
President

**Brentwood Homeowners Association PO Box 49427 Los Angeles, CA 90049**



**BHA Letter in support of Draft 2.pdf**

493K



PO Box 49427 ■ Los Angeles, California 90049 ■ (424) BHA-8765 ■ [info@brentwoodhomeowners.org](mailto:info@brentwoodhomeowners.org)

September 9, 2024

Email: [housingelement@lacity.org](mailto:housingelement@lacity.org)

RE: Case file CPC-2023-7068-CA

Dear Planning Department Housing Element Team:

The Brentwood Homeowners Association (BHA) is registering its support of Draft # 2 of the June 2024 CHIP Ordinance. BHA represents approximately 4,500 homeowners and condo residents living west of the 405, north of San Vicente Boulevard and east of Canyon View Drive in the 90049 zip code.

We support more housing for Los Angeles and believe we have enough capacity, primarily on our commercial corridors, to create housing in all communities while protecting the housing that already exists. It has been shown that we have capacity to build the needed housing by staying on these commercial corridors which run through all of our high resource communities.

Too many commercial corridors remain blighted and underutilized, lacking economic benefit to the neighborhoods surrounding them. We believe Draft #2 offers a blueprint that can transform these corridors into vibrant districts in high resource areas. There is no need to upzone our neighborhoods given the flight of business from our commercial corridors since 2020.

In addition, the City owns 7,508 properties that could provide additional opportunities for housing. Former Controller Ron Galperin identified these properties that can be seen on the interactive map developed by his technology and innovation team. Another 6,000 plus properties are owned by the county, state, LAUSD, Metro and the federal government within the City. Every possibility should be explored.

Support single family neighborhoods and revitalize our commercial districts for a win-win solution.

Respectfully,

*Thelma Waxman*

Thelma Waxman  
President

cc: Mayor Karen Bass  
Councilwoman Traci Park, CD 11  
Director of Planning Vince P. Bertoni





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Javier Muinos <javieritomu@hotmail.com>

Mon, Sep 9, 2024 at 1:32 PM

Reply-To: Javier Muinos <javieritomu@hotmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Javier Muinos

[javieritomu@hotmail.com](mailto:javieritomu@hotmail.com)





Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA

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**Sharon Mastropietro Malone** <sharonmastro@me.com>

Mon, Sep 9, 2024 at 9:35 AM

To: housingelement@lacity.org

Case file CPC-2023-7068-CA:

Dear Planning Department,

I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned.

Please save Single Family, RSO's and Historic Neighborhoods. They are some of the City's greatest assets and the reason people move to and stay in Los Angeles. By rezoning underutilized adjacent commercial corridors to allow for more housing we can create vibrant communities for everyone, without destroying what we already have. Data shows that we can protect our existing residential and historic areas and still meet affordable housing needs. Many of our communities have worked hard to show where more housing could be added in each of their neighborhoods, answering the Mayor's call to solve the housing crisis by having "skin-in-the-game". I strongly recommend that the City Council approve the current Planning Department's proposed revisions to the Housing Element and CHIP program.

Sharon Mastropietro  
940 South Genesee Ave  
Miracle Mile Neighborhood

email: [sharonmastro@me.com](mailto:sharonmastro@me.com)







Housing Element <housingelement@lacity.org>

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## Protect single-family tracts

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**Evelyn Luner** <evelyn@luner.net>

Mon, Sep 9, 2024 at 6:09 PM

To: "housingelement@lacity.org" <housingelement@lacity.org>, "contactcd4@lacity.org" <contactcd4@lacity.org>

We support the June 2024 draft of the Housing Element Chip program (CPC-2023-7068-CA) that protects single-family neighborhoods, historic districts, and rent stabilized housing. We support the draft that adds more density on our commercial corridors and protects existing neighborhoods. It will, as well, direct housing density towards available public transportation.

Stephen J. Luner, Evelyn J. Luner 13000 Hesby Street, Sherman Oaks,  
CA 91423 818-231-7210





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## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

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America Gil <americag713@gmail.com>

Fri, Sep 13, 2024 at 5:50 PM

Reply-To: America Gil <americag713@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, steven.bautista@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear L.A. City Planning, Commissioners, and Councilman Kevin de Leon,

I am a renter and stand in solidarity with the residents of Barrington Plaza. Less than 20% of 577 households survived the illegal eviction attempt, despite a battle won in court. Their experience of harassment and intimidation highlights the precarious situation of renters across Los Angeles, where affordable housing is increasingly scarce, and tenant protections are constantly under threat. This petition is on behalf of all renters who face similar uncertainties in an ever-tightening housing market. <a href="https://controller.lacity.gov/landings/evictions">Between February and December of 2023, the Los Angeles Housing Department received a total of **77,049** eviction notices.

The Citywide Housing Incentives Program (CHIP) was introduced to address the dire need for more affordable homes. However, the current exemption of single unit neighborhoods (zoned R1) from this program means that 40-80% of land on the Westside is off-limits for any affordable housing incentives. This exclusion disproportionately impacts minority communities, concentrating affordable housing in specific areas while leaving large swathes of land in high-opportunity neighborhoods untouched.

We believe this approach is both unfair and shortsighted. R1 lots situated on main thoroughfares are ideal for lower-income, multi-family homes and should not be exempt from the CHIP. Including these areas in the program would distribute affordable housing more equitably across the city, ensuring that all Angelenos, regardless of their neighborhood, have access to affordable homes. In addition, family-sized multifamily homes are being replaced by smaller units, which although below market rate for their number of bedrooms, result in a severe increase on a per square foot rent basis. The result is that our families are being displaced. This uproots our long term residents and destabilizes our community. In addition, family sized homes are being rented out in co-living schemes that inflate prices several times over what is the current norm. We cannot ignore the reality that lower income households cannot relocate into homes hundreds of dollars beyond their original rent. In this context, relocation buyouts are one-way-tickets *out* of our community.

Thus, we specifically urge that you (i) motion for R1 lots on high-opportunity corridors, classified as Avenue-1 or larger, be included in CHIP, while R2 lots on Avenue-2 or smaller streets be exempt. These adjustment would help to spread the benefits of affordable housing throughout our city, rather than concentrating them in a few areas, and prevent displacement in pre-existing affordable homes. (ii) Evaluate affordable rent in the Renters Protection Ordinance on a per square foot basis. (iii) Incentivize extended tenant habitability programs that can maintain our families in their communities while new affordable homes, to which they would have a right to return, are built.

We ask LA City Planning and Councilman Kevin de Leon to consider the needs of all renters and tenants in Los Angeles, in calling for a more just, realistic, and inclusive housing policy.

Thank you for your attention to this critical issue.

-- America Gil  
[americag713@gmail.com](mailto:americag713@gmail.com)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf)





## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

angela liu <askangelaliu@gmail.com>

Fri, Sep 13, 2024 at 9:21 PM

Reply-To: angela liu <askangelaliu@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, jeff.khau@lacity.org

Dear L.A. City Planning and Councilwoman Traci Park,

I am a renter and stand in solidarity with the residents of Barrington Plaza. Less than 20% of 577 households survived the illegal eviction attempt, despite a battle won in court. Their experience of harassment and intimidation highlights the precarious situation of renters across Los Angeles, where affordable housing is increasingly scarce, and tenant protections are constantly under threat. This petition is on behalf of all renters who face similar uncertainties in an ever-tightening housing market. <a href="https://controller.lacity.gov/landings/evictions">Between February and December of 2023, the Los Angeles Housing Department received a total of **77,049** eviction notices.

The Citywide Housing Incentives Program (CHIP) was introduced to address the dire need for more affordable homes. However, the current exemption of single unit neighborhoods (zoned R1) from this program means that 40-80% of land on the Westside is off-limits for any affordable housing incentives. This exclusion disproportionately impacts minority communities, concentrating affordable housing in specific areas while leaving large swathes of land in high-opportunity neighborhoods untouched.

We believe this approach is both unfair and shortsighted. R1 lots situated on main thoroughfares are ideal for lower-income, multi-family homes and should not be exempt from the CHIP. Including these areas in the program would distribute affordable housing more equitably across the city, ensuring that all Angelenos, regardless of their neighborhood, have access to affordable homes. In addition, family-sized multifamily homes are being replaced by smaller units, which although below market rate for their number of bedrooms, result in a severe increase on a per square foot rent basis. The result is that our families are being displaced. This uproots our long term residents and destabilizes our community. In addition, family sized homes are being rented out in co-living schemes that inflate prices several times over what is the current norm. We cannot ignore the reality that lower income households cannot relocate into homes hundreds of dollars beyond their original rent. In this context, relocation buyouts are one-way-tickets *out* of our community.

Thus, we specifically urge that you (i) motion for R1 lots on high-opportunity corridors, classified as Avenue-1 or larger, be included in CHIP, while R2 lots on Avenue-2 or smaller streets be exempt. These adjustment would help to spread the benefits of affordable housing throughout our city, rather than concentrating them in a few areas, and prevent displacement in pre-existing affordable homes. (ii) Evaluate affordable rent in the Renters Protection Ordinance on a per square foot basis. (iii) Incentivize extended tenant habitability programs that can maintain our families in their communities while new affordable homes, to which they would have a right to return, are built.

We ask LA City Planning and Councilwoman Traci Park to consider the needs of all renters and tenants in Los Angeles, in calling for a more just, realistic, and inclusive housing policy.

Thank you for your attention to this critical issue.

-- angela liu  
[askangelaliu@gmail.com](mailto:askangelaliu@gmail.com)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf)





Housing Element <housingelement@lacity.org>

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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Antonio Guerrero** <antonioguerreroc@gmail.com>

Fri, Sep 13, 2024 at 11:33 PM

Reply-To: Antonio Guerrero <antonioguerreroc@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning, Commissioners, and Councilman Marqueece Harris-Dawson,

I write to express deep frustration with the Citywide Housing Incentives Program (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing multifamily parcels will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. The interior residential areas of minority neighborhoods have been inequitably rezoned in prior housing cycles. Instead, we need to densify based on street width because our streets cross all neighborhoods and connect people to academic and employment opportunities. This approach must also bind the CHIP to a tree canopy standard for an environmentally just and climate resilient L.A.

I urge you to motion City Council, to include in the CHIP, R1 lots on streets classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller to reduce densification pressures in historic minority communities of color that lack the necessary regulatory protections. Moreover, zoning along larger streets, including R1s, provides the space we need to adhere to a 50% sidewalk canopy standard. Affordable housing need not compromise climate resiliency. Tree shade reduces surface temperatures between 22-54°F. They save lives.

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. While R1s on smaller streets provide private canopy, public canopy aligns with environmental justice because lots on broader streets, including R1s, are best equipped to handle both canopy and residential density.

LA can avoid an extreme and inequitable CHIP by incentivizing multifamily housing on R1 lots along opportunity corridors while supporting a public tree canopy standard for all.

Sincerely,

-- Antonio Guerrero  
[antonioguerreroc@gmail.com](mailto:antonioguerreroc@gmail.com)







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## Rezoning Comment [CPC-2023-7068-CA and CPC-2024-388-CA]

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**Cesar E Aranguri** <cesar.aranguri@law.nyu.edu>

Fri, Sep 13, 2024 at 3:24 PM

Reply-To: cesar.aranguri@law.nyu.edu

To: housingelement@lacity.org

I ask that the City Planning Department, City Planning Commission, and City Councilmembers, through the Citywide Housing Incentive Program (CHIP), fulfill our obligation to equitable development and creation of much needed affordable housing. In the Citywide Housing Incentive Program (CHIP) this can be accomplished by increasing the provision of deeply affordable units, (ALI, ELI, and VLI) in the incentive programs. These housing incentive programs, specifically the Mixed Income and Affordable Housing Incentive Programs, must apply across the City, including single family zoned areas.

Additionally, the City should utilize the Resident Protections Ordinance to strengthen provisions to protect tenants, and ensure that RSO units are not needlessly demolished. This includes stronger provisions in the RPO including local preference, enforcement of right to return, and a higher replacement ratio of RSO units with covenanted affordable units. These ordinances are a critical opportunity to fill gaps that exist in our affordable housing provision and tenant protections, and I ask that City Planning take every opportunity to expand equitable access to housing across the city for Angelenos.

These changes are essential to ensure that affordable housing production happens equitably and that it "Affirmatively Furthers Fair Housing:"

1. Expand the MIIP and AHIP to apply to single family zoned parcels.
2. Increase Affordability in Areas Experiencing Gentrification and Displacement Pressure.
3. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns.
4. Strengthen the relocation requirements of the Resident Protections Ordinance to ensure displaced households receive affordable replacement housing and a true opportunity to return. In addition, strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants.
5. Protect RSO by ending double counting of replacement units, and requiring a 2:1 replacement ratio with covenanted units, when demolished.





Housing Element <housingelement@lacity.org>

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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Connor Hurley** <rconnorhurley@gmail.com>

Fri, Sep 13, 2024 at 11:32 PM

Reply-To: Connor Hurley <rconnorhurley@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning, Commissioners, and Councilman Marqueece Harris-Dawson,

I write to express deep frustration with the Citywide Housing Incentives Program (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing multifamily parcels will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. The interior residential areas of minority neighborhoods have been inequitably rezoned in prior housing cycles. Instead, we need to densify based on street width because our streets cross all neighborhoods and connect people to academic and employment opportunities. This approach must also bind the CHIP to a tree canopy standard for an environmentally just and climate resilient L.A.

I urge you to motion City Council, to include in the CHIP, R1 lots on streets classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller to reduce densification pressures in historic minority communities of color that lack the necessary regulatory protections. Moreover, zoning along larger streets, including R1s, provides the space we need to adhere to a 50% sidewalk canopy standard. Affordable housing need not compromise climate resiliency. Tree shade reduces surface temperatures between 22-54°F. They save lives.

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. While R1s on smaller streets provide private canopy, public canopy aligns with environmental justice because lots on broader streets, including R1s, are best equipped to handle both canopy and residential density.

LA can avoid an extreme and inequitable CHIP by incentivizing multifamily housing on R1 lots along opportunity corridors while supporting a public tree canopy standard for all.

Sincerely,

-- Connor Hurley  
[rconnorhurley@gmail.com](mailto:rconnorhurley@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Fery Hejri <feryhejri@gmail.com>

Fri, Sep 13, 2024 at 8:36 PM

Reply-To: Fery Hejri <feryhejri@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, helen.campbell@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning and Councilwoman Eunisses Hernandez,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities.

This approach must also bind the CHIP to a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council, to include in the CHIP, R1 lots on high opportunity corridors classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller streets to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

LA cannot become affordable by providing a complete and total exemption to its largest residential zoning category. I urge you to prevent an extremely inequitable CHIP. Incentivize multifamily homes on R1 lots on opportunity corridors with a public tree canopy standard for all.

Sincerely,

-- Fery Hejri

[feryhejri@gmail.com](mailto:feryhejri@gmail.com)





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## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

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Leland Meade-Miller <leland@metaphorce.com>

Fri, Sep 13, 2024 at 6:10 PM

Reply-To: Leland Meade-Miller <leland@metaphorce.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, elizabeth.ene@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear L.A. City Planning, Commissioners, and Councilman Bob Blumenfield,

I am a renter and stand in solidarity with the residents of Barrington Plaza. Less than 20% of 577 households survived the illegal eviction attempt, despite a battle won in court. Their experience of harassment and intimidation highlights the precarious situation of renters across Los Angeles, where affordable housing is increasingly scarce, and tenant protections are constantly under threat. This petition is on behalf of all renters who face similar uncertainties in an ever-tightening housing market. <a href="https://controller.lacity.gov/landings/evictions">Between February and December of 2023, the Los Angeles Housing Department received a total of **77,049** eviction notices.

The Citywide Housing Incentives Program (CHIP) was introduced to address the dire need for more affordable homes. However, the current exemption of single unit neighborhoods (zoned R1) from this program means that 40-80% of land on the Westside is off-limits for any affordable housing incentives. This exclusion disproportionately impacts minority communities, concentrating affordable housing in specific areas while leaving large swathes of land in high-opportunity neighborhoods untouched.

We believe this approach is both unfair and shortsighted. R1 lots situated on main thoroughfares are ideal for lower-income, multi-family homes and should not be exempt from the CHIP. Including these areas in the program would distribute affordable housing more equitably across the city, ensuring that all Angelenos, regardless of their neighborhood, have access to affordable homes. In addition, family-sized multifamily homes are being replaced by smaller units, which although below market rate for their number of bedrooms, result in a severe increase on a per square foot rent basis. The result is that our families are being displaced. This uproots our long term residents and destabilizes our community. In addition, family sized homes are being rented out in co-living schemes that inflate prices several times over what is the current norm. We cannot ignore the reality that lower income households cannot relocate into homes hundreds of dollars beyond their original rent. In this context, relocation buyouts are one-way-tickets *out* of our community.

Thus, we specifically urge that you (i) motion for R1 lots on high-opportunity corridors, classified as Avenue-1 or larger, be included in CHIP, while R2 lots on Avenue-2 or smaller streets be exempt. These adjustment would help to spread the benefits of affordable housing throughout our city, rather than concentrating them in a few areas, and prevent displacement in pre-existing affordable homes. (ii) Evaluate affordable rent in the Renters Protection Ordinance on a per square foot basis. (iii) Incentivize extended tenant habitability programs that can maintain our families in their communities while new affordable homes, to which they would have a right to return, are built.

We ask LA City Planning and Councilman Bob Blumenfield to consider the needs of all renters and tenants in Los Angeles, in calling for a more just, realistic, and inclusive housing policy.

Thank you for your attention to this critical issue.

-- Leland Meade-Miller  
[leland@metaphorce.com](mailto:leland@metaphorce.com)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf)







Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

---

Chris Kruszynski <pc37@mac.com>

Sat, Sep 14, 2024 at 3:07 PM

Reply-To: Chris Kruszynski <pc37@mac.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Chris Kruszynski  
[pc37@mac.com](mailto:pc37@mac.com)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Molly Fenton** <mollyfenton14@gmail.com>

Sat, Sep 14, 2024 at 3:29 PM

Reply-To: Molly Fenton <mollyfenton14@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

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Sincerely,

-- Molly Fenton  
[mollyfenton14@gmail.com](mailto:mollyfenton14@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Shane Mahdavi <shane.mahdavi@gmail.com>

Sat, Sep 14, 2024 at 6:11 AM

Reply-To: Shane Mahdavi <shane.mahdavi@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—  
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Sincerely,

-- Shane Mahdavi  
[shane.mahdavi@gmail.com](mailto:shane.mahdavi@gmail.com)





Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA

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**Al Limon** <al@3rdiqc.com>

Mon, Sep 16, 2024 at 2:18 PM

To: "housingelement@lacity.org" <housingelement@lacity.org>

: I support the CHIP Ordinance June 2024 draft that rezones our commercial corridors while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezone

Best,

Al Limón

Westcher resident







## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

chez stock <chezstock@gmail.com>

Mon, Sep 16, 2024 at 3:42 PM

Reply-To: chez stock <chezstock@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, Councilmember.Soto-Martinez@lacity.org, karen.mack@lacity.org,

maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear L.A. City Planning, Commissioners, and Councilman Hugo Soto-Martinez,

I am a renter and stand in solidarity with the residents of Barrington Plaza. Less than 20% of 577 households survived the illegal eviction attempt, despite a battle won in court. Their experience of harassment and intimidation highlights the precarious situation of renters across Los Angeles, where affordable housing is increasingly scarce, and tenant protections are constantly under threat. This petition is on behalf of all renters who face similar uncertainties in an ever-tightening housing market. Between February and December of 2023, the Los Angeles Housing Department received a total of **77,049** eviction notices.\*\*

The Citywide Housing Incentives Program (CHIP) was introduced to address the dire need for more affordable homes. However, the current exemption of single unit neighborhoods (zoned R1) from this program means that 40-80% of land on the Westside is off-limits for any affordable housing incentives. This exclusion disproportionately impacts minority communities, concentrating affordable housing in specific areas while leaving large swathes of land in high-opportunity neighborhoods untouched.

We believe this approach is both unfair and shortsighted. R1 lots situated on main thoroughfares are ideal for lower-income, multi-family homes and should not be exempt from the CHIP. Including these areas in the program would distribute affordable housing more equitably across the city, ensuring that all Angelenos, regardless of their neighborhood, have access to affordable homes. In addition, family-sized multifamily homes are being replaced by smaller units, which although below market rate for their number of bedrooms, result in a severe increase on a per square foot rent basis. The result is that our families are being displaced. This uproots our long term residents and destabilizes our community. In addition, family sized homes are being rented out in co-living schemes that inflate prices several times over what is the current norm. We cannot ignore the reality that lower income households cannot relocate into homes hundreds of dollars beyond their original rent. In this context, relocation buyouts are one-way-tickets *out* of our community.

Thus, we specifically urge that you (i) motion for R1 lots on high-opportunity corridors, classified as Avenue-1 or larger, be included in CHIP, while R2 lots on Avenue-2 or smaller streets be exempt. These adjustment would help to spread the benefits of affordable housing throughout our city, rather than concentrating them in a few areas, and prevent displacement in pre-existing affordable homes. (ii) Evaluate affordable rent in the Renters Protection Ordinance on a per square foot basis. (iii) Incentivize extended tenant habitability programs that can maintain our families in their communities while new affordable homes, to which they would have a right to return, are built. (iv) Incentivize a community land trust shared-equity program that would lead to ownership opportunities.

We ask LA City Planning and Councilman Hugo Soto-Martinez to consider the needs of all renters and tenants in Los Angeles, in calling for a more just, realistic, and inclusive housing policy.

Thank you for your attention to this critical issue.

-- chez stock

[chezstock@gmail.com](mailto:chezstock@gmail.com)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf) \*\*<https://controller.lacity.gov/landings/evictions>





## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

Michael Shuck <shuck.mike@gmail.com>

Mon, Sep 16, 2024 at 9:01 PM

Reply-To: Michael Shuck <shuck.mike@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, hakeem.parke-davis@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear L.A. City Planning, Commissioners, and Councilwoman Heather Hutt,

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We ask LA City Planning and Councilwoman Heather Hutt to consider the needs of all renters and tenants in Los Angeles, in calling for a more just, realistic, and inclusive housing policy.

Thank you for your attention to this critical issue.

-- Michael Shuck  
[shuck.mike@gmail.com](mailto:shuck.mike@gmail.com)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf) \*\*<https://controller.lacity.gov/landings/evictions>





## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

Emma Engler <emma.n.engler@gmail.com>

Tue, Sep 17, 2024 at 12:20 PM

Reply-To: Emma Engler <emma.n.engler@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, jeff.khau@lacity.org

Dear L.A. City Planning and Councilwoman Traci Park,

I am a renter and stand in solidarity with the residents of Barrington Plaza. Less than 20% of 577 households survived the illegal eviction attempt, despite a battle won in court. Their experience of harassment and intimidation highlights the precarious situation of renters across Los Angeles, where affordable housing is increasingly scarce, and tenant protections are constantly under threat. This petition is on behalf of all renters who face similar uncertainties in an ever-tightening housing market. Between February and December of 2023, the Los Angeles Housing Department received a total of **77,049** eviction notices.

The Citywide Housing Incentives Program (CHIP) was introduced to address the dire need for more affordable homes. However, the current exemption of single unit neighborhoods (zoned R1) from this program means that 40-80% of land on the Westside is off-limits for any affordable housing incentives. This exclusion disproportionately impacts minority communities, concentrating affordable housing in specific areas while leaving large swathes of land in high-opportunity neighborhoods untouched.

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We ask LA City Planning and Councilwoman Traci Park to consider the needs of all renters and tenants in Los Angeles, in calling for a more just, realistic, and inclusive housing policy.

Thank you for your attention to this critical issue.

-- Emma Engler

[emma.n.engler@gmail.com](mailto:emma.n.engler@gmail.com)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf) \*\*<https://controller.lacity.gov/landings/evictions>





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## Rezoning Comment [CPC-2023-7068-CA and CPC-2024-388-CA]

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**Jess Zellinger** <jessicapzellinger@gmail.com>

Tue, Sep 17, 2024 at 7:15 PM

To: housingelement@lacity.org

I ask that the City Planning Department, City Planning Commission, and City Councilmembers, through the Citywide Housing Incentive Program (CHIP), fulfill our obligation to equitable development and creation of much needed affordable housing. In the Citywide Housing Incentive Program (CHIP) this can be accomplished by increasing the provision of deeply affordable units, (ALI, ELI, and VLI) in the incentive programs. These housing incentive programs, specifically the Mixed Income and Affordable Housing Incentive Programs, must apply across the City, including single family zoned areas.

Additionally, the City should utilize the Resident Protections Ordinance to strengthen provisions to protect tenants, and ensure that RSO units are not needlessly demolished. This includes stronger provisions in the RPO including local preference, enforcement of right to return, and a higher replacement ratio of RSO units with covenanted affordable units. These ordinances are a critical opportunity to fill gaps that exist in our affordable housing provision and tenant protections, and I ask that City Planning take every opportunity to expand equitable access to housing across the city for Angelenos.

These changes are essential to ensure that affordable housing production happens equitably and that it "Affirmatively Furthers Fair Housing:"

1. Expand the MIIP and AHIP to apply to single family zoned parcels.
2. Increase Affordability in Areas Experiencing Gentrification and Displacement Pressure.
3. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns.
4. Strengthen the relocation requirements of the Resident Protections Ordinance to ensure displaced households receive affordable replacement housing and a true opportunity to return. In addition, strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants.
5. Protect RSO by ending double counting of replacement units, and requiring a 2:1 replacement ratio with covenanted units, when demolished.







## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

Nicholas Kelly <nicholas.o.kelly@gmail.com>

Tue, Sep 17, 2024 at 12:37 PM

Reply-To: Nicholas Kelly <nicholas.o.kelly@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, Councilmember.Soto-Martinez@lacity.org, karen.mack@lacity.org,

maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

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We ask LA City Planning and Councilman Hugo Soto-Martinez to consider the needs of all renters and tenants in Los Angeles, in calling for a more just, realistic, and inclusive housing policy.

Thank you for your attention to this critical issue.

-- Nicholas Kelly  
[nicholas.o.kelly@gmail.com](mailto:nicholas.o.kelly@gmail.com)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf) \*\*<https://controller.lacity.gov/landings/evictions>





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## Rezoning Comment [CPC-2023-7068-CA and CPC-2024-388-CA]

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**Michelle Rivera** <mrcrivera@formerstudents.ucdavis.edu>

Thu, Sep 19, 2024 at 3:27 PM

To: housingelement@lacity.org

I ask that the City Planning Department, City Planning Commission, and City Councilmembers, through the Citywide Housing Incentive Program (CHIP), fulfill our obligation to equitable development and creation of much needed affordable housing. In the Citywide Housing Incentive Program (CHIP) this can be accomplished by increasing the provision of deeply affordable units, (ALI, ELI, and VLI) in the incentive programs. These housing incentive programs, specifically the Mixed Income and Affordable Housing Incentive Programs, must apply across the City, including single family zoned areas.

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4. Strengthen the relocation requirements of the Resident Protections Ordinance to ensure displaced households receive affordable replacement housing and a true opportunity to return. In addition, strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants.
5. Protect RSO by ending double counting of replacement units, and requiring a 2:1 replacement ratio with covenanted units, when demolished.

Best,

Michelle Rivera





Housing Element <housingelement@lacity.org>

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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Adrienne Kuhre** <adrienne.motlagh@gmail.com>

Fri, Sep 20, 2024 at 9:49 AM

Reply-To: Adrienne Kuhre <adrienne.motlagh@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—  
Dear LA City Planning, Commissioners, and Councilman Marqueece Harris-Dawson,

I write to express deep frustration with the Citywide Housing Incentives Program (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing multifamily parcels will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. The interior residential areas of minority neighborhoods have been inequitably rezoned in prior housing cycles. Instead, we need to densify based on street width because our streets cross all neighborhoods and connect people to academic and employment opportunities. This approach must also bind the CHIP to a tree canopy standard for an environmentally just and climate resilient L.A.

I urge you to motion City Council, to include in the CHIP, R1 lots on streets classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller to reduce densification pressures in historic minority communities of color that lack the necessary regulatory protections. Moreover, zoning along larger streets, including R1s, provides the space we need to adhere to a 50% sidewalk canopy standard. Affordable housing need not compromise climate resiliency. Tree shade reduces surface temperatures between 22-54°F. They save lives.

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. While R1s on smaller streets provide private canopy, public canopy aligns with environmental justice because lots on broader streets, including R1s, are best equipped to handle both canopy and residential density.

LA can avoid an extreme and inequitable CHIP by incentivizing multifamily housing on R1 lots along opportunity corridors while supporting a public tree canopy standard for all.

Sincerely,

-- Adrienne Kuhre  
[adrienne.motlagh@gmail.com](mailto:adrienne.motlagh@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Alison Klurfeld** <afklurfeld@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:44 AM

Reply-To: afklurfeld@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

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Sincerely,

Sincerely,

Alison Klurfeld

Los Angeles, CA 90048-2207

[afklurfeld@gmail.com](mailto:afklurfeld@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Allison Lee <allee@everyactioncustom.com>

Fri, Sep 20, 2024 at 10:17 PM

Reply-To: [allee@stanfordalumni.org](mailto:allee@stanfordalumni.org)

To: [housingelement@lacity.org](mailto:housingelement@lacity.org)

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Allison Lee  
Los Angeles, CA 90034-3571  
[allee@stanfordalumni.org](mailto:allee@stanfordalumni.org)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Allison Mannos** <neoconliberalz@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:27 AM

Reply-To: neoconliberalz@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Allison Mannos  
Los Angeles, CA 90027-6925  
[neoconliberalz@gmail.com](mailto:neoconliberalz@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Amber Wheat** <arwheat@everyactioncustom.com>

Fri, Sep 20, 2024 at 10:50 PM

Reply-To: arwheat@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Amber Wheat  
Torrance, CA 90504-4902  
[arwheat@gmail.com](mailto:arwheat@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Andrew Crane** <andrew.acrane@everyactioncustom.com>

Fri, Sep 20, 2024 at 2:02 PM

Reply-To: andrew.acrane@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Andrew Crane  
Los Angeles, CA 90016-5106  
[andrew.acrane@gmail.com](mailto:andrew.acrane@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Andrew Menotti** <menotticesarini@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:58 AM

Reply-To: menotticesarini@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

Simply put, LA has a housing crisis. It is one of the worst in the United States. We have the most homeless people per capita of any city in America. And the reason people are homeless is because rent is so expensive, because there is not enough housing. Yes, some of the homeless are addicted to drugs and alcohol, and some are mentally ill. Homelessness is a multi-faceted problem. But one component of the solution is to build more housing. People are also addicted to drugs in Charleston, West Virginia. They actually have a higher incidence of opioid dependency than Los Angeles. But the rent there is cheap enough that those addicted to heroin and fentanyl can still afford to pay their rent. As such, they have a smaller homeless population per capita despite a larger problem with drug addiction per capita.

We need housing, and we need it everywhere. Every community is always going to fight more housing, so the only fair solution is for everyone to share in the increased density and the increase in housing. The same with homeless shelters and low income housing, they need to be in every single neighborhood so that everyone helps out our less fortunate Angelenos. That's why the single-family exemption is glaring loophole that must be ended.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

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Sincerely,

Andrew Menotti

Sincerely,  
Andrew Menotti  
Los Angeles, CA 90045-1405  
[menotticesarini@gmail.com](mailto:menotticesarini@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Andrew Wong** <andrew.wong45@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:10 AM

Reply-To: andrew.wong45@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Andrew Wong  
Pasadena, CA 91106-4915  
[andrew.wong45@gmail.com](mailto:andrew.wong45@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Andy Freeland** <andy@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:08 PM

Reply-To: andy@andyfreeland.net

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Andy Freeland

Los Angeles, CA 90015-2296

[andy@andyfreeland.net](mailto:andy@andyfreeland.net)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Anisa Khanmohamed <anisask@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:19 AM

Reply-To: anisask@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Anisa Khanmohamed  
Los Angeles, CA 90008-1635  
[anisask@gmail.com](mailto:anisask@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Ava Marinelli <admarinelli@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:20 PM

Reply-To: admarinelli@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Ava Marinelli  
Los Angeles, CA 90036-4583  
[admarinelli@gmail.com](mailto:admarinelli@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Billy Taylor** <billyocracy@everyactioncustom.com>

Fri, Sep 20, 2024 at 6:04 PM

Reply-To: billyocracy@gmail.com

To: housingelement@lacity.org

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Sincerely,

Sincerely,  
Billy Taylor  
Los Angeles, CA 90027-1315  
[billyocracy@gmail.com](mailto:billyocracy@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Brent Gaisford** <brentgaisford@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:12 AM

Reply-To: brentgaisford@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Brent Gaisford  
Los Angeles, CA 90029-2706  
[brentgaisford@gmail.com](mailto:brentgaisford@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Bret Contreras** <bretmattc@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:54 PM

Reply-To: bretmattc@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Bret Contreras

Long Beach, CA 90803-2202

[bretmattc@gmail.com](mailto:bretmattc@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Brett Hollenbeck** <brett.hollenbeck@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:07 AM

Reply-To: brett.hollenbeck@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Brett Hollenbeck  
Los Angeles, CA 90230-5155  
[brett.hollenbeck@gmail.com](mailto:brett.hollenbeck@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Caleb Schimke** <cschimke@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:44 AM

Reply-To: cschimke@live.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Caleb Schimke

Monterey Park, CA 91754-3222

[cschimke@live.com](mailto:cschimke@live.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Carey Bennett <careyjeanbennett@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:33 PM

Reply-To: careyjeanbennett@duck.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Carey Bennett  
Los Angeles, CA 90027-3025  
[careyjeanbennett@duck.com](mailto:careyjeanbennett@duck.com)





Housing Element <housingelement@lacity.org>

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## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Cecelia Wright** <cece18@netzero.net>

Fri, Sep 20, 2024 at 5:15 AM

Reply-To: Cecelia Wright <cece18@netzero.net>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, xavier.clark@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, councilmember.price@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning and Councilmember Price,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities.

This approach must also bind the CHIP to a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council, to include in the CHIP, R1 lots on high opportunity corridors classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller streets to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

LA cannot become affordable by providing a complete and total exemption to its largest residential zoning category. I urge you to prevent an extremely inequitable CHIP. Incentivize multifamily homes on R1 lots on opportunity corridors with a public tree canopy standard for all.

Sincerely,

-- Cecelia Wright  
[cece18@netzero.net](mailto:cece18@netzero.net)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Chase Andre** <chase.andre@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:40 AM

Reply-To: chase.andre@yahoo.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,  
Chase Andre  
Alhambra, CA 91801-5465  
[chase.andre@yahoo.com](mailto:chase.andre@yahoo.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Chris Tokita <christopher.tokita@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:00 PM

Reply-To: christopher.tokita@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I'm writing today in support of over 60 civic organizations, including Abundant Housing LA, to call for the inclusion of single-family zoned parcels in the various incentives outlined in the draft CHIP ordinance (CPC-2023-7068-CA). Allowing these parcels to qualify for the CHIP is a crucial step toward meeting LA's goal of producing nearly 500,000 new housing units, promoting equitable housing opportunities, and reducing displacement.

LA is in the midst of a significant housing shortage and crisis, with nearly half of all households struggling with rent or mortgage costs and more than one-third of renters spending half of their income on rent. While unsheltered homelessness has slightly decreased this year, we will continue to see persistently high rates of homelessness as long as housing remains unaffordable to a large portion of the city. Currently, LA's multifamily zoning and new development are disproportionately concentrated in lower-income and renter-heavy neighborhoods. The CHIP offers a chance to correct this imbalance and ensure all neighborhoods contribute their fair share. Unfortunately, as currently written, the ordinance does not expand multifamily housing to new areas, perpetuating inequitable land use patterns. That's why I stand alongside Abundant Housing LA in advocating for the inclusion of single-family zoned parcels in the CHIP programs.

The CHIP's approach to focusing housing near transit and high-opportunity corridors is commendable, and its aim to expedite projects is much needed. I also want to recognize the positive improvements made in the second and third revisions to the CHIP ordinance, including expanding the geography for the Opportunity Corridor Transition Area program and increasing FAR incentives to align with density and height incentives. However, the continued exemption of single-family areas is a significant shortcoming, limiting available sites for new housing, reinforcing segregation, and directing development towards multifamily parcels, increasing the risk of displacement. A blanket exemption for single-family zones is unsustainable and contradicts the city's obligation to Affirmatively Further Fair Housing.

Thankfully, City Planning has presented an opportunity to guide LA towards a future of housing abundance and equity. I urge you to amend the ordinance by adopting Exhibit D Option 1, which would extend eligibility to single-family zoned parcels in the CHIP's designated areas. According to City Planning, this change would unlock over 40,000 parcels for mixed-income development and over 60,000 parcels for 100% affordable development. This adjustment would boost the share of housing opportunities in affluent, historically exclusionary neighborhoods from 54% to 67%. Most importantly, these parcels carry a low displacement risk since they are predominantly homeowner-occupied. Additionally, I ask you to remove the complete exemption of the Coastal Zone from the CHIP, which lacks scientific justification and would continue to restrict access to climate-resilient coastal neighborhoods.

I appreciate City Planning's efforts in creating a solid framework for focusing new homes near transit and services, establishing streamlined processes, and legalizing apartments in single-family areas. Now, you have the opportunity to reverse historic segregation and expand access to opportunity by adopting Exhibit D Option 1 and opening up coastal areas. I strongly urge you to take this step, in line with Abundant Housing LA and its coalition partners.

Sincerely,

Sincerely,  
Chris Tokita  
Los Angeles, CA 90049-5743  
[christopher.tokita@gmail.com](mailto:christopher.tokita@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Christopher Nelson** <itoen90@everyactioncustom.com>

Fri, Sep 20, 2024 at 8:21 PM

Reply-To: itoen90@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

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I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,  
Christopher Nelson  
Los Angeles, CA 90012-3566  
[itoen90@gmail.com](mailto:itoen90@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Cipra Nemeth <cipran@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:28 AM

Reply-To: cipran@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,

Cipra Nemeth

Los Angeles, CA 90048-4612

[cipran@gmail.com](mailto:cipran@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Clayton Becker** <cnbecker14@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:08 AM

Reply-To: cnbecker14@live.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Clayton Becker  
Los Angeles, CA 90035-3659  
[cnbecker14@live.com](mailto:cnbecker14@live.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Daniel Bezinovich** <dbezinovich@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:15 PM

Reply-To: dbezinovich@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,  
Daniel Bezinovich

Sincerely,  
Daniel Bezinovich  
Los Angeles, CA 90020-2713  
[dbezinovich@gmail.com](mailto:dbezinovich@gmail.com)





Housing Element <housingelement@lacity.org>

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## Rezoning Los Angeles - File # CPC-2023-7068-CA.

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**Darren Hallihan** <dhallihan@gmail.com>  
To: housingelement@lacity.org

Fri, Sep 20, 2024 at 8:09 AM

Good morning!

I am writing to express my support for draft #2 of the CHIP program and to advocate for the exemption of single-family, historic districts, and rent-stabilized housing from any proposed added density.

I fully endorse the rezoning of our commercial corridors while ensuring the protection of existing housing, including rent-stabilized units, historic districts, and both low-density multi-family and single-family zones.

Los Angeles stands at an exciting crossroads of progress, with the opportunity to create vibrant new communities without dismantling our cherished existing neighborhoods.

It is perplexing to consider why the city would choose to undermine established communities when it is entirely unnecessary. Such actions would waste valuable resources and funds, and jeopardize the neighborhoods where residents have invested their time and lives.

We know there are alternative options available to add density in suitable areas with the necessary infrastructure in place. The city must pursue this approach; otherwise, risk disregarding the will of the majority of constituents.

Thank you for your attention to this important matter.

Sincerely,  
Darren Hallihan  
Encino, CA





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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David Helps <davidrhhelps@everyactioncustom.com>

Fri, Sep 20, 2024 at 6:45 PM

Reply-To: davidrhhelps@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in support of legalizing new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
David Helps  
Los Angeles, CA 90019-6031  
[davidrhhelps@gmail.com](mailto:davidrhhelps@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**David Tran** <davidt964@everyactioncustom.com>

Fri, Sep 20, 2024 at 4:10 PM

Reply-To: davidt964@g.ucla.edu

To: housingelement@lacity.org

Dear Housing Element,

My name is David L. Tran, and I am a resident of Canoga Park in the San Fernando Valley.

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

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Sincerely,  
David L. Tran  
8500 Browns Creek Lane  
Canoga Park, CA 91304

Sincerely,  
David Tran  
Canoga Park, CA 91304-2119  
[davidt964@g.ucla.edu](mailto:davidt964@g.ucla.edu)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Dominick Falzone** <dominickfalzone1212@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:26 PM

Reply-To: dominickfalzone1212@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Dominick Falzone  
Los Angeles, CA 90005-2060  
[dominickfalzone1212@gmail.com](mailto:dominickfalzone1212@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Emmett Florence** <emmettflorence@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:46 PM

Reply-To: emmettflorence@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

Increasing the housing supply via higher density, ESPECIALLY near public transit is an absolute must. Affordable housing and lower car dependency is the future LA needs and deserves!

Sincerely,  
Emmett Florence  
Los Angeles, CA 90012-5005  
[emmettflorence@gmail.com](mailto:emmettflorence@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Geoff Regalado** <gregalado74@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:43 PM

Reply-To: gregalado74@hotmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Geoff Regalado  
Burbank, CA 91503-4183  
[gregalado74@hotmail.com](mailto:gregalado74@hotmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**helen eigenberg** <hm.eigenberg@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:09 AM

Reply-To: hm.eigenberg@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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I live in Hancock Park, a single family zoned area. All neighborhoods need to join and build housing.

Sincerely,

Helen Eigenberg  
611 Lillian Way  
LA 90004

Sincerely,  
helen eigenberg

Los Angeles, CA 90004-1107  
[hm.eigenberg@gmail.com](mailto:hm.eigenberg@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**J. Ross** <ross\_jay@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:43 AM

Reply-To: ross\_jay@hotmail.com

To: housingelement@lacity.org

Dear Housing Element,

I oppose upzoning or overlays for R1 and R2 areas that are proposed.

L.A. is already zoned for 11,000,000 persons. The Planning Dept won't tell you that. Ask them for that info before making any decisions.

Morrow's thesis is wrong, so don't use that as a guide. It does NOT count apartments that can be built in C zones by right, and he doesn't include density bonuses.

None of the pro-development groups will tell you this either -- they don't know what LA's current zoning capacity either.

There is no crisis for housing. There is a crisis for AFFORDABLE housing, and that can be solved only through more government rent subsidy or higher wages. Increasing supply will not create "trickle down" housing.

The CHIP has plenty of other overlays to increase 200,000 more housing units. No upzoning or R1 or R2 overlays are needed.

Use the options to build on public parking lots, churches, and commercial corridors. They provide all the zoning that you need.

Plenty of minorities in South LA, East LA and the northwest Valley cherish their quiet , pretty R1 neighborhoods (not only "wealthier" areas) and want to keep them.

50% of new house purchasers in LA are minorities, so there is no racist meme to preserving R1 and R2 neighborhoods.

Also, the Planning Dept has not confirmed that there is enough water, sewer, electric and other infrastructure available to build up R1 neighborhoods, which were planned for low density.

J. Ross

L.A. 90064

Sincerely,

J. Ross

Los Angeles, CA 90064-1103

[ross\\_jay@hotmail.com](mailto:ross_jay@hotmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Jacqueline Cochrane** <jackieco310@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:56 PM

Reply-To: jackieco310@aol.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,

Jacqueline Cochrane

Redondo Beach, CA 90278-2045

[jackieco310@aol.com](mailto:jackieco310@aol.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Jamie Chen** <cathayshu@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:22 PM

Reply-To: cathayshu@hotmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Jamie Chen  
Los Angeles, CA 90063-2017  
[cathayshu@hotmail.com](mailto:cathayshu@hotmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Jason Neidleman** <neidleman@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:58 PM

Reply-To: neidleman@hotmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,  
Jason Neidleman

Sincerely,  
Jason Neidleman  
Beverly Hills, CA 90212-4115  
[neidleman@hotmail.com](mailto:neidleman@hotmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Ji Son <kitanji09@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:09 AM

Reply-To: kitanji09@gmail.com

To: housingelement@lacity.org

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Sincerely,

Sincerely,

Ji Son

Los Angeles, CA 90033-3116

[kitanji09@gmail.com](mailto:kitanji09@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Joe Goldman <jgoldmanca@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:06 AM

Reply-To: jgoldmanca@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Joe Goldman  
Los Angeles, CA 90049-4793  
[jgoldmanca@gmail.com](mailto:jgoldmanca@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Jordan Shalom** <jordanjshalom@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:16 PM

Reply-To: jordanjshalom@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Jordan Shalom  
Los Angeles, CA 90025-2767  
[jordanjshalom@gmail.com](mailto:jordanjshalom@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Joseph Botti <josephbotti01@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:13 AM

Reply-To: josephbotti01@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Joseph Botti  
Van Nuys, CA 91411-3235  
[josephbotti01@gmail.com](mailto:josephbotti01@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Joseph Gosling <maxwellgosling@gmail.com>

Fri, Sep 20, 2024 at 10:37 AM

Reply-To: Joseph Gosling <maxwellgosling@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—  
Dear LA City Planning, Commissioners, and Councilman Marqueece Harris-Dawson,

I write to express deep frustration with the Citywide Housing Incentives Program (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing multifamily parcels will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. The interior residential areas of minority neighborhoods have been inequitably rezoned in prior housing cycles. Instead, we need to densify based on street width because our streets cross all neighborhoods and connect people to academic and employment opportunities. This approach must also bind the CHIP to a tree canopy standard for an environmentally just and climate resilient L.A.

I urge you to motion City Council, to include in the CHIP, R1 lots on streets classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller to reduce densification pressures in historic minority communities of color that lack the necessary regulatory protections. Moreover, zoning along larger streets, including R1s, provides the space we need to adhere to a 50% sidewalk canopy standard. Affordable housing need not compromise climate resiliency. Tree shade reduces surface temperatures between 22-54°F. They save lives.

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. While R1s on smaller streets provide private canopy, public canopy aligns with environmental justice because lots on broader streets, including R1s, are best equipped to handle both canopy and residential density.

LA can avoid an extreme and inequitable CHIP by incentivizing multifamily housing on R1 lots along opportunity corridors while supporting a public tree canopy standard for all.

Sincerely,

-- Joseph Gosling  
[maxwellgosling@gmail.com](mailto:maxwellgosling@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Joshua Gonzales** <joshua@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:51 PM

Reply-To: joshua@abundanthousingla.org

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Joshua Gonzales  
Los Angeles, CA 90006-5510  
[joshua@abundanthousingla.org](mailto:joshua@abundanthousingla.org)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Justin Ciccone** <justincheese@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:28 AM

Reply-To: justincheese@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Justin Ciccone  
Venice, CA 90291-4561  
[justincheese@gmail.com](mailto:justincheese@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Karen McCaw** <allenkaren4526@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:21 PM

Reply-To: allenkaren4526@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Karen McCaw

View Park, CA 90043-2012

[allenkaren4526@gmail.com](mailto:allenkaren4526@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Kevin Scott** <kevin.robert.scott@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:43 AM

Reply-To: kevin.robert.scott@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Kevin Scott  
Los Angeles, CA 90042-4610  
[kevin.robert.scott@gmail.com](mailto:kevin.robert.scott@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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KEVIN ZELAYA <kevv21189@everyactioncustom.com>

Fri, Sep 20, 2024 at 4:25 PM

Reply-To: kevv21189@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
KEVIN ZELAYA  
Los Angeles, CA 90019-1812  
[kevv21189@gmail.com](mailto:kevv21189@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Lauren Borchard** <laurenborchard@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:11 AM

Reply-To: laurenborchard@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Lauren Borchard  
Los Angeles, CA 90036-2066  
[laurenborchard@gmail.com](mailto:laurenborchard@gmail.com)





Housing Element <housingelement@lacity.org>

---

## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Leah Herzberg** <lkhfire@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:10 AM

Reply-To: lkhfire@aol.com

To: housingelement@lacity.org

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Sincerely,

Sincerely,

Leah Herzberg

Encino, CA 91436-3222

[lkhfire@aol.com](mailto:lkhfire@aol.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Lisa Schneider** <lisaansell@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:52 AM

Reply-To: lisaansell@yahoo.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Lisa Schneider  
Beverly Hills, CA 90212-4235  
[lisaansell@yahoo.com](mailto:lisaansell@yahoo.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Liz Barillas** <trunkschan90@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:08 AM

Reply-To: trunkschan90@yahoo.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Liz Barillas

Glendale, CA 91201-1637

[trunkschan90@yahoo.com](mailto:trunkschan90@yahoo.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Madeline Prokop** <madeline.prokop@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:22 PM

Reply-To: madeline.prokop@lils.edu

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Madeline Prokop  
Los Angeles, CA 90015-4491  
[madeline.prokop@lils.edu](mailto:madeline.prokop@lils.edu)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Marc Silverman** <dhalgrn@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:37 PM

Reply-To: dhalgrn@pacbell.net

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Marc Silverman

Los Angeles, CA 90068-3071

[dhalgrn@pacbell.net](mailto:dhalgrn@pacbell.net)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Marek Slipski** <marek.slipski@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:55 AM

Reply-To: marek.slipski@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Marek Slipski  
Altadena, CA 91001-2953  
[marek.slipski@gmail.com](mailto:marek.slipski@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Mariana Mellor** <mcns.777@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:05 PM

Reply-To: mcns.777@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Mariana Mellor

Thousand Oaks, CA 91360-4250

[mcns.777@gmail.com](mailto:mcns.777@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Matthew Finlayson** <mattbnfin@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:33 PM

Reply-To: mattbnfin@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Matthew Finlayson  
Santa Monica, CA 90404-4233  
[mattbnfin@gmail.com](mailto:mattbnfin@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Melanie myers** <melaniedavispghs60@everyactioncustom.com>

Fri, Sep 20, 2024 at 5:03 PM

Reply-To: melaniedavispghs60@hotmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Melanie myers  
Indio, CA 92201-0312  
[melaniedavispghs60@hotmail.com](mailto:melaniedavispghs60@hotmail.com)





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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Nannette Gueye** <Dancewithhim@att.net>

Fri, Sep 20, 2024 at 9:07 AM

Reply-To: Nannette Gueye <Dancewithhim@att.net>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—  
Dear LA City Planning, Commissioners, and Councilman Marqueece Harris-Dawson,

I write to express deep frustration with the Citywide Housing Incentives Program (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing multifamily parcels will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. The interior residential areas of minority neighborhoods have been inequitably rezoned in prior housing cycles. Instead, we need to densify based on street width because our streets cross all neighborhoods and connect people to academic and employment opportunities. This approach must also bind the CHIP to a tree canopy standard for an environmentally just and climate resilient L.A.

I urge you to motion City Council, to include in the CHIP, R1 lots on streets classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller to reduce densification pressures in historic minority communities of color that lack the necessary regulatory protections. Moreover, zoning along larger streets, including R1s, provides the space we need to adhere to a 50% sidewalk canopy standard. Affordable housing need not compromise climate resiliency. Tree shade reduces surface temperatures between 22-54°F. They save lives.

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. While R1s on smaller streets provide private canopy, public canopy aligns with environmental justice because lots on broader streets, including R1s, are best equipped to handle both canopy and residential density.

LA can avoid an extreme and inequitable CHIP by incentivizing multifamily housing on R1 lots along opportunity corridors while supporting a public tree canopy standard for all.

Sincerely,

-- Nannette Gueye  
[Dancewithhim@att.net](mailto:Dancewithhim@att.net)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Nick Cron-DeVico** <nickcrobdevico@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:17 AM

Reply-To: nickcrobdevico@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,  
Nick Cron-DeVico  
Los Angeles, CA 90039-2533  
[nickcrobdevico@gmail.com](mailto:nickcrobdevico@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Owen Reese <owenreese100@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:55 AM

Reply-To: owenreese100@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Owen Reese  
Los Angeles, CA 90026-2561  
[owenreese100@gmail.com](mailto:owenreese100@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Paul Moorman <pmoorman@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:16 AM

Reply-To: pmoorman@law.usc.edu

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,

Paul Moorman

West Hollywood, CA 90069-2913

[pmoorman@law.usc.edu](mailto:pmoorman@law.usc.edu)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Riley McNair** <rileymcnair@everyactioncustom.com>

Fri, Sep 20, 2024 at 2:22 PM

Reply-To: rileymcnair@ucla.edu

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,  
Riley McNair  
90024

Sincerely,  
Riley McNair  
Los Angeles, CA 90024-2373  
[rileymcnair@ucla.edu](mailto:rileymcnair@ucla.edu)





Housing Element <housingelement@lacity.org>

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## Request to CPC re: Citywide Housing Incentive Program (CHIP) Ordinance: CPC-2023-7068-CA

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Ron Prasanna <rangapras@gmail.com>

Fri, Sep 20, 2024 at 6:31 PM

To: Housing Element <housingelement@lacity.org>, cpc@lacity.org

Cc: Erika Cui <erika.cui@lacity.org>, Arthi Varma <arthi.varma@lacity.org>, Blair Smith <blair.smith@lacity.org>, mira prasanna <mira.prasannas@gmail.com>, matthew.glesne@lacity.org

Thanks Christine Bustillos !

### Dear CPC members and Planning Team:

First, thanks to everyone for their tireless efforts to provide much needed housing to Los Angeles.

Reading through EXHIBIT A.1: Citywide Housing Incentive Program Ordinance, making the requested modifications will help reduce Disparities in Density, FAR and Height between close neighbors living near Major Transit and help maximize the production of housing units, reduce animosity of living in a 2 story building surrounded by 7 or 8 story buildings of living in a low density building across a hyper dense building for example, and bring equity and harmony to those communities in Transit Oriented Areas. Find attached slides highlighting the issues faced and Requested Changes (copied below):

### Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

- 1) Award similar 'proximity' rights to Transit Oriented Incentive Area (TOIA) as awarded to Opportunity Corridors Incentive areas (OC)
- 2) Remove underlying exception of minimum of 5 for Transit Oriented Incentive Area (TOIA) as this exception is not required for Opportunity Corridors Incentive Area (OC)

I am available to present this to anyone in the team or at the Sept 26 CPC presentation. Please let me know.

Thank you very much.

regards,  
Ron Prasanna  
West LA

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On Wed, Sep 18, 2024 at 10:04 AM Housing Element <housingelement@lacity.org> wrote:

Hi Ron,

Thank you for your email. Please note that the public comment period for the Housing Element Rezoning Program Ordinances, including the Citywide Housing Incentive Program (CHIP) Ordinance, Housing Element Sites and Minimum Density Ordinance, and Resident Protections Ordinance, closed on Monday, August 26, 2024 at 5:00p.m. Apologies for any misinformation or confusion about this date. At this time, any written comments with the applicable case number in the subject line may be submitted to [cpc@lacity.org](mailto:cpc@lacity.org) for consideration by the City Planning Commission. Please see below for case numbers associated with each draft ordinance.

Citywide Housing Incentive Program (CHIP) Ordinance: CPC-2023-7068-CA

Housing Element Sites and Minimum Density Ordinance: CPC-2024-387-CA

Resident Protections Ordinance: CPC-2024-388-CA

As a reminder, the above ordinances will be considered by the CPC on Thursday, September 26, 2024. To review the agenda for the upcoming CPC meeting, please click [here](#). To review City Planning's staff recommendation report and supporting materials, click [here](#).



Thank you,



**Housing Element Staff**  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



On Tue, Sep 17, 2024 at 11:39 AM Ron Prasanna <[rangapras@gmail.com](mailto:rangapras@gmail.com)> wrote:

Hi Erica: see email below from Rose Kato who is working closely with Cesar and helped run several petition campaigns in West LA.

Has the deadline for feedback been extended till Sept 20 as stated below ?

Also, the petitions need to have just the First Name, Last Name and Email address, with no physical address ? The reason I ask is the following petition drive to all the Council Members can be coming from people who are not living in that Council District. It could even come from out of state or out of the country (think BOTs).

Is there an address attached to a petition? If I click any of the links below, it only asks for Name and Email? Is there a way to ascertain that the Petitions are reasonably equally distributed across all council districts, to ensure proper representation across LA county?

Are these petitions public data? if so, I have SQL query skills to quickly analyze any repetition and zip code locations to assess the petitions are roughly equally distributed across all Council Districts, and prevent any smaller group from determining the positions of everyone in LA county.

In addition, Matthew Glesne was in a meeting where the preservation of Sawtelle JapanTown was pitched at a downtown meeting.. He may also know the background of this request and how it became LA County wide petition.

much regards and glad to help analyzing petitions for equitable distribution across Council Districts.

- Ron Prasanna

----- Forwarded message -----

From: R K <[rmkato1516@hotmail.com](mailto:rmkato1516@hotmail.com)>

Date: Fri, Sep 13, 2024 at 8:34 PM

Subject: NEW DEADLINE to LEVEL THE PLAYING FIELD - FRIDAY, SEPT 20

To: R K <[rmkato1516@hotmail.com](mailto:rmkato1516@hotmail.com)>

## **NEW DEADLINE to LEVEL THE PLAYING FIELD: FRIDAY, SEPT 20**

**WE ASK FOR YOUR SUPPORT of this petition that would equitably distribute density based on street width across LA...** that would relieve pressure for all of Sawtelle (and other historic ethnic minority neighborhoods) and would protect the R2s because those streets are Collector streets (even Sawtelle Blvd.).

This petition would help lighten the unfair burden placed on ethnic minority communities through the Citywide Housing Incentive Program (CHIP). It would make the Interim Control Ordinance (ICO) easier because the load would be reduced.

[https://planning.lacity.gov/odocument/a38fe378-2c4b-4260-807e-af66a053a95b/FD\\_CHIP\\_Fact\\_Sheet.pdf](https://planning.lacity.gov/odocument/a38fe378-2c4b-4260-807e-af66a053a95b/FD_CHIP_Fact_Sheet.pdf)

Citywide Housing Incentive Program's (CHIP) exempts R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 further drives displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to 'meet' the City's housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive

deed restrictions. Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities.

**This also proposes a 50% sidewalk tree canopy standard for a climate resilient L.A.**

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously shouldered environmental injustices. Tree shade reduces surface temperatures between 22-54°F. It save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. Preserve the existing canopy and expand tree coverage and affordable homes along our corridors.

- **CHIP pre-empts the Community Plan Updates and will densify non-R1 zones beyond what the Community Plan Updates envision by Feb. 2025\***. CHIP crushes historic ethnic minority communities **WELL BEFORE** Community Plan Updates ever happen.
- **R1s got a TOTAL exemption from ED 1 and ALL of the CHIP—all other zoning categories are forced to shoulder the housing burden.**
- This petition removes the exemption from R1s on streets as big as Pico or larger in exchange for exemptions of R2s on streets as big as Barrington or smaller.
- **This petition would protect both R1s and R2s on smaller streets--but upzone them on the really large streets.**
- This petition would determine density by **STREET SIZE--NOT BY ZONING CATEGORY** alone.
- **It would mean historic ethnic neighborhoods get protected by Feb. 2025.**
- **It also asks for a 50% sidewalk tree canopy standard because setbacks are easier to do on wider streets.**

PLEASE urge City Council to motion to include in the CHIP, R1 lots on high opportunity corridors classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller streets to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

L.A. cannot become affordable by providing a complete and total exemption to its largest residential zoning category. Help prevent an extremely inequitable CHIP. **Incentivize multifamily homes on R1 lots on opportunity corridors with a public tree canopy standard for all.**

**This is a realistic compromise that would be better than dumping everything on the R2s and R3s on Collector streets. It asks L.A. City to zone based on the size of the street--not entirely on pre-existing zoning.**

**The goal is to exempt R2s on SMALL COLLECTOR streets by including every lot on LARGE corridors even R1s...**

**The CHIP deadline for comments has been extended to FRI, SEPT 20.**

**\* Each signed petition sends a powerful message to Mayor Karen Bass, each petitioner's Council District member and City Planning/Director Vince Bertoni.**

NOTE: For family, friends, etc. who reside in the other 14 Council Districts, petition links are listed below:

**Council District 1 - Councilmember Eunisses Hernandez**

<https://sawtellera.org/save-our-cd-1-l-a-environmentally-just-affordable-housing/>

**Council District 2 - Councilmember Paul Krekorian**

<https://sawtellera.org/save-our-cd-2-l-a-environmentally-just-affordable-housing/>

**Council District 3 - Councilmember Bob Blumenfield**

<https://sawtellera.org/save-our-cd-3-l-a-environmentally-just-affordable-housing/>

**Council District 4 - Councilmember Nithya Raman**

<https://sawtellera.org/save-our-cd-4-l-a-environmentally-just-affordable-housing/>

**Council District 5 - Councilmember Katy Yaroslavsky**

<https://sawtellera.org/save-our-cd-5-l-a-environmentally-just-affordable-housing/>

**Council District 6 - Councilmember Imelda Padilla**

<https://sawtellera.org/save-our-cd-6-l-a-environmentally-just-affordable-housing/>

**Council District 7 - Councilmember Monica Rodriguez**

<https://sawtellera.org/save-our-cd-7-l-a-environmentally-just-affordable-housing/>

**Council District 8 - Councilmember Marqueece Harris-Dawson**

<https://sawtellera.org/save-our-cd-8-l-a-environmentally-just-affordable-housing/>

**Council District 9 - Councilmember Curren D. Price, Jr.**

<https://sawtellera.org/save-our-cd-9-l-a-environmentally-just-affordable-housing/>

**Council District 10 - Councilmember Heather Hutt**

<https://sawtellera.org/save-our-cd-10-l-a-environmentally-just-affordable-housing/>

**Council District 11 - Councilmember Traci Park**

<https://sawtellera.org/save-our-cd-11-l-a-environmentally-just-affordable-housing/>

**Council District 12 - Councilmember John Lee**

<https://sawtellera.org/save-our-cd-12-l-a-environmentally-just-affordable-housing/>

**Council District 13 - Councilmember Hugo Soto-Martinez**

<https://sawtellera.org/save-our-cd-13-l-a-environmentally-just-affordable-housing/>

**Council District 14 - Councilmember Kevin de Leon**

<https://sawtellera.org/save-our-cd-14-l-a-environmentally-just-affordable-housing/>

**Council District 15 - Councilmember Tim McOsker**

<https://sawtellera.org/save-our-cd-15-l-a-environmentally-just-affordable-housing/>

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## 2 attachments



**Request CPC to Administer Similar Rights to Transit Oriented Area (T-1,2,3) as Opportunity Corridor I Areas (OC-1, 2, 3).pdf**

1424K



**EXHIBIT A.1 - Citywide Housing Incentive Program Ordinance.pdf**

3370K

## Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

- 1) Award **similar** 'proximity' rights to Transit Oriented Incentive Area (TOIA) as awarded to Opportunity Corridors Incentive areas (OC)
- 2) Remove underlying minimum of 5 for Transit Oriented Incentive Area (TOIA) as this requirement is not required for Opportunity Corridors Incentive Area (OC)

# TOPIC #1

Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

- 1) Award **similar** 'proximity' rights to Transit Oriented Incentive Area (TOIA) as awarded to Opportunity Corridors Incentive areas (OC)

# Sites Abutting, Across OC also get OC incentives, but this is not allowed for TOIA

- Exhibit A-1, Page 55, Item (c) (2), states in part “properties abutting, across the street or alley, or having a common corner with a site eligible for Opportunity Corridor Incentives shall also be eligible for the Opportunity Corridor incentives....”
  - The above creates equal or similar distribution of density in OC – similar rights based on ‘proximity’. OC also does not differentiate based on underlying zoning as long as it is not R1 or more restrictive. Therefore R2, RD3, RD2, RD1.5 all receive same incentives as R3 and above.
  - Item (c) (2) does **not** include Transit Oriented Areas (T-1, 2, 3). Therefore they do not get ‘proximity’ incentives and In addition Transit Oriented incentives are based on underlying zoning thus R2, RD3, RD2, RD1.5 do NOT receive same incentives as R3 and above. This creates ‘islands’, unequal distribution of density, spot zoning, in Transit Oriented Areas as described in the next slides.

Exhibit A.1 - CITYWIDE HOUSING INCENTIVE PROGRAM ORDINANCEPage 55

(c) **Eligibility.** To qualify for the provisions of this subdivision, a Project approved under the Mixed Income Incentive Program must satisfy all of the following eligibility requirements:

(1) Meet the definition of one of the following Project Types described in Table 12.22 A.38(c)(1)(i):

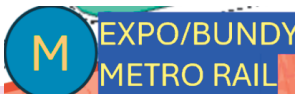
TABLE 12.22 A.38(c)(1)(i) Eligible Project Types and Total Units Required	
Project Type	Total Units Required
Mixed Income Incentive Project	Five or more
Opportunity Corridor Transition Area Incentive Project	Four or more
Type I Unified Adaptive Reuse Project <sup>1</sup>	Five or more

Footnote

<sup>1</sup> See LAMC 12.22 A.26(h)(1) for additional requirements associated with a Type I Unified Adaptive Reuse Project.

(2) Be located in and meet the requirements of a Transit Oriented Incentive Area, Opportunity Corridor Incentive Area, or an Opportunity Corridor Transition Incentive Area as described in Paragraphs (e), (f), and (g) below, except that properties abutting, across the street or alley, or having a common corner with a site eligible for Opportunity Corridor Incentives shall also be eligible for the Opportunity Corridor Incentives as described in paragraph (f) below.

# For Example, Density around Expo/Bundy Transit area (TOI)



2300 Block Wellesley Avenue (West):

- 1) 5 lots of R2 (10-16 density)
  - a) 140 unit density Across the street, Left, Right and Behind.
  - b) Surrounded by 140 units

This is one example. Many such Disparities may be found along the many Transit Stops across LA and can be avoided

Density for Units per 6250 Lot Size, FAR = 4.5, 200 sqft/DU = 140								
	West Centinela (HI)	East Centinela	West Wellesley	East Wellesley	West Amherst	East Amherst	Bundy West	Bundy East
2200 BLOCK	187	187	187	187	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
2300 BLOCK	187	140	10	140	140	140	140	140
	187	140	16	140	140	140	140	140
	187	140	16	140	140	140	140	140
	187	140	16	140	140	140	140	140
	187	140	16	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140

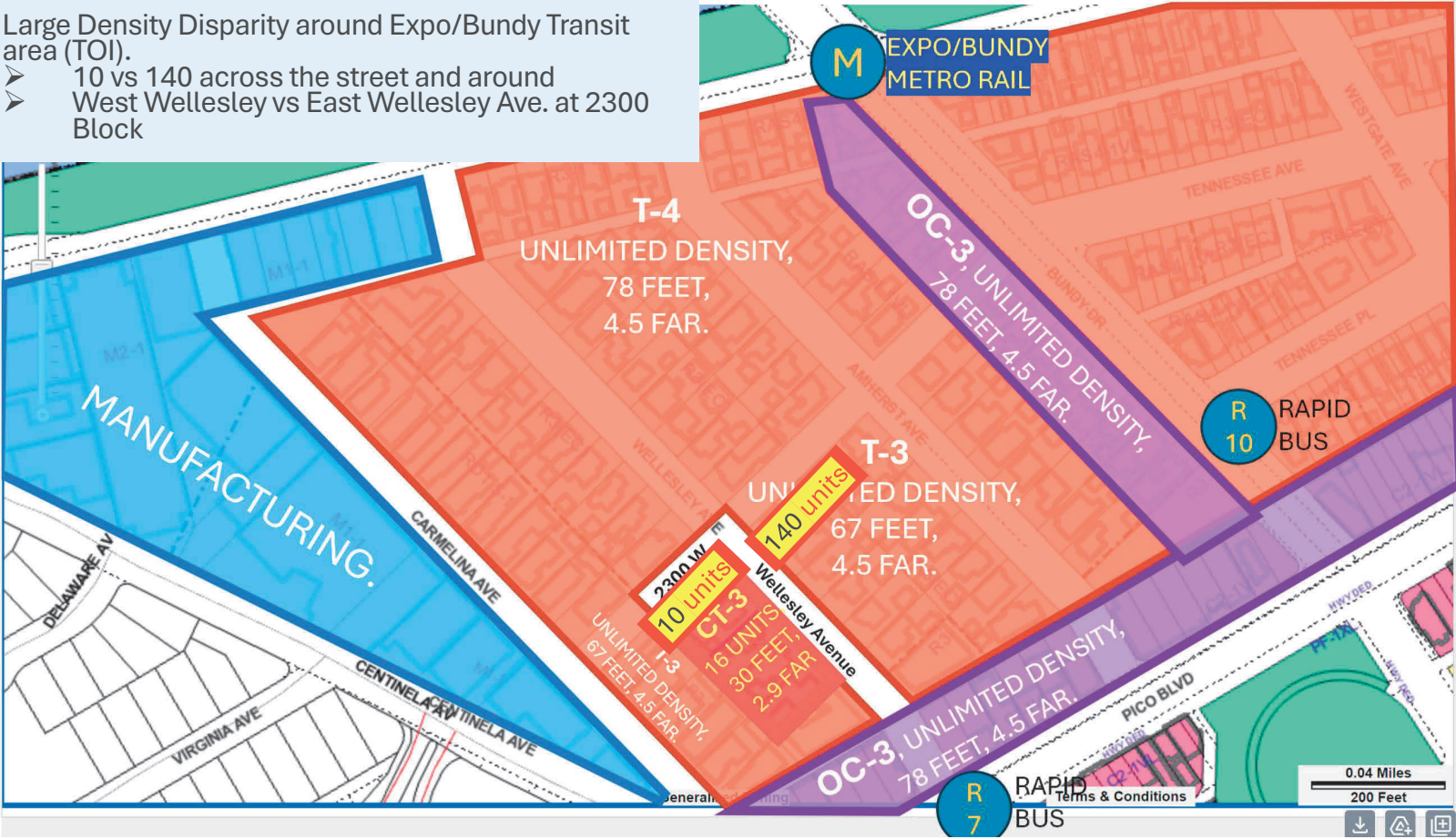
ALL LOTS In **YELLOW** Were R1s for over 80 years.

In 2018, They were upzoned to R3 and RAS4 in 2019 Expo-Line Transit Plan



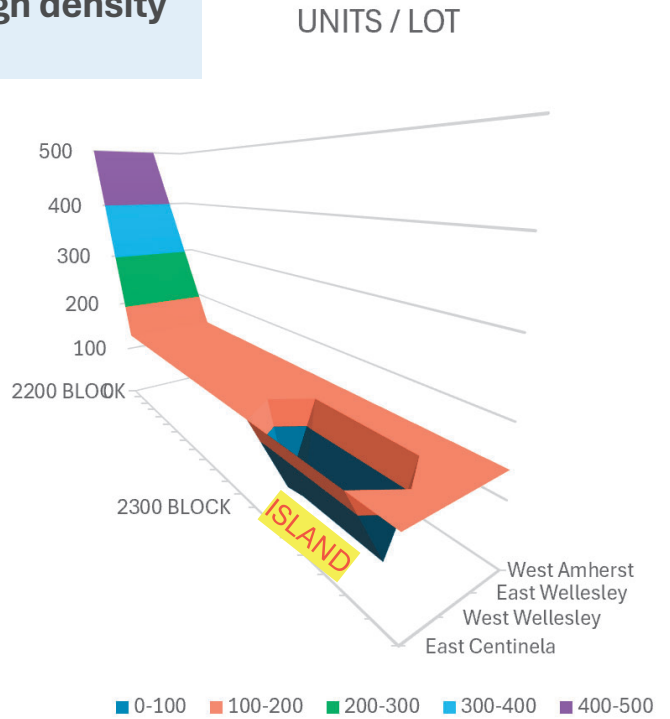
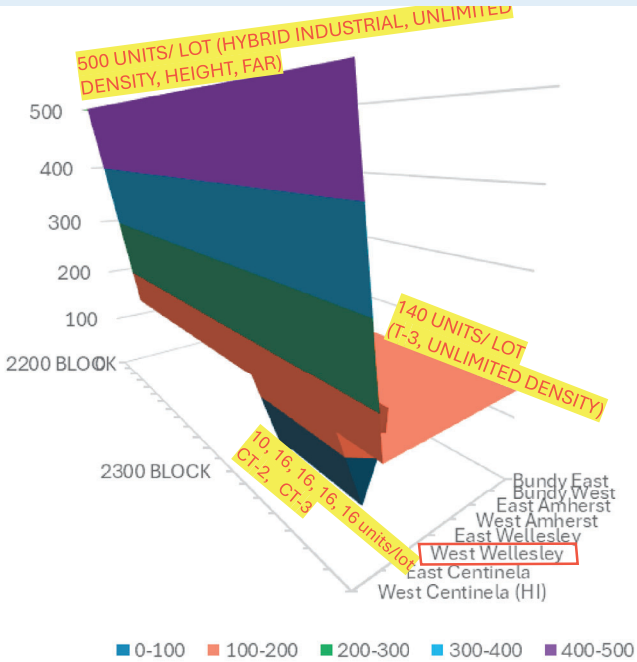
Large Density Disparity around Expo/Bundy Transit area (TOI).

- 10 vs 140 across the street and around
- West Wellesley vs East Wellesley Ave. at 2300 Block



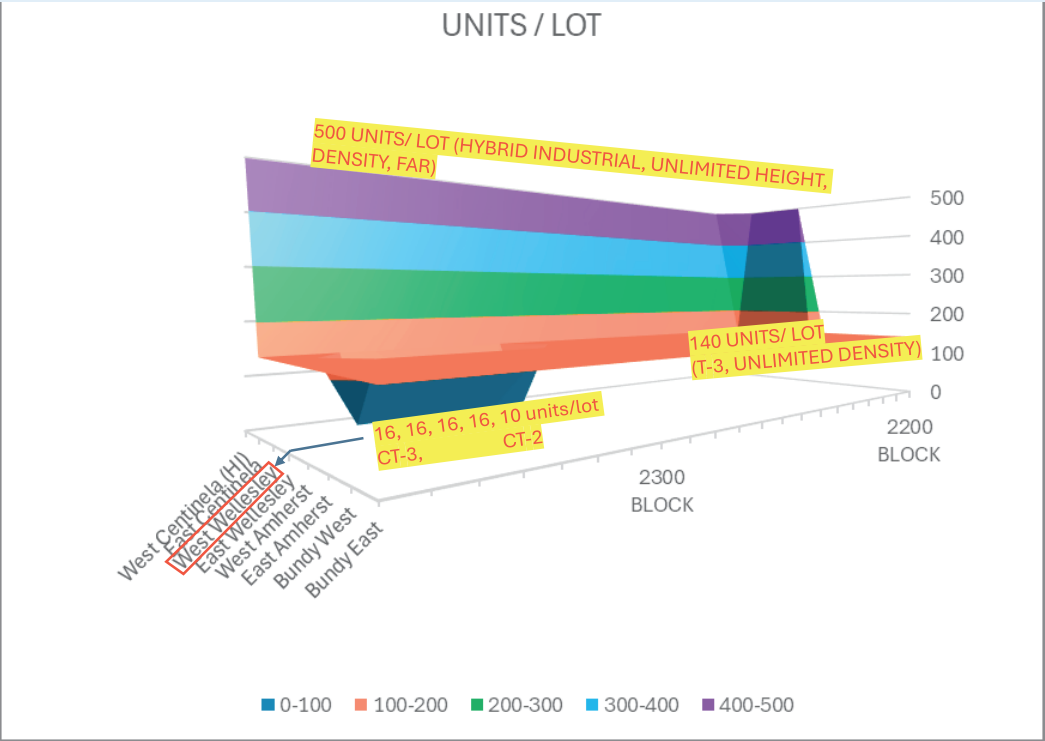


Island of Low density surrounded by Extremely High density (Disparity)



**'ISLAND' of 5 R2/RD3 lots 10 units/lot surrounded by over 140 units per lot with R3, RAS4 and Hybrid Industrial (HI) zoning.**

### Island of Low density surrounded by Extremely High density (Disparity)



## TOPIC #2

Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

2) Remove underlying minimum of 5 for Transit Oriented Incentive Area (TOIA) as this requirement is not required for Opportunity Corridors Incentive Area (OC)

Transit Oriented Areas in  
High opportunity areas,  
Density is Limited only by  
floor area + get 33'  
additional height+ FAR 45%

Table 12.22 A.38(e)(2)(i)					
Eligibility Subarea	Density Bonus	Parking	Floor Area Ratio	Height	
	In each subarea, the maximum increase in the otherwise Maximum Allowable Residential Density shall be as follows:	In each subarea, the required parking ratio shall be as follows: <sup>1,2,6</sup>	In each subarea, the maximum allowable FAR shall be as follows: <sup>3,4</sup>	In each subarea, the maximum allowable height permitted shall be equal to the following: <sup>5</sup>	
T-1	Moderate and Lower Opportunity Areas: 100%	No parking minimum required. If parking is provided, up to 40% of spaces may be provided as compact vehicular spaces. Tandem parking may also be permitted so long as a 24-hour attendant is present on-site.	R - zones: 40% increase. C - zones: 3.25:1, or 40% increase, whichever is greater.	One additional story, up to 11 additional feet.	
	Higher Opportunity Areas: 120%		R - zones: 40% increase. C - zones: 4.2:1, or 45% increase, whichever is greater.		
T-2	Moderate and Lower Opportunity Areas: 110%		R - zones: 40% increase. C - zones: 4.2:1, or 50% increase, whichever is greater.	Two additional stories, up to 22 additional feet.	
	Higher Opportunity Areas: Limited by Floor Area		R - zones: 45% increase. C - zones: 4.5:1, or 50% increase, whichever is greater.		
T-3	Moderate and Lower Opportunity Areas: 120%		R - zones: 45% increase. C - zones: 4.5:1, or 50% increase, whichever is greater.	Three additional stories up to 33 additional feet.	
	Higher Opportunity Areas: Limited by Floor Area		R - zones: 50% increase. C - zones: 4.65:1, or 55% increase, whichever is greater.		

# But Exceptions for limiting density for sites less than base 5 units

## Section (e) (2)(i) Exceptions on Page 64

### Exceptions:

a. Sites with a Maximum Allowable Density of less than 5 units, shall be eligible for Density Bonus of:

- i. T-1: 60%
- ii. T-2: 70%
- iii. T-3: 80%

b. Sites with a Maximum Allowable Density of less than 5 units are not eligible to increase FAR or height.

But these Exceptions DO NOT exist for Opportunity Corridors

Exhibit A.1 - CITYWIDE HOUSING INCENTIVE PROGRAM ORDINANCEPage 64

Footnotes:  
1 Required automobile parking applies for all Residential Units in a Project (not just the restricted affordable units), inclusive of disabled and required guest parking, where applicable. All parking spaces provided shall comply with Subdivision 12.21 A.5 of the Code. Except that any combination of standard, compact or tandem spaces may be provided. Tandem parking spaces that do not comply with Subparagraph 12.21 A.5(h)(2) of the Code may be provided in any configuration as long as a parking attendant or an automated parking system is provided at all times.  
2 Pursuant to California Civil Code Section 1947.1, provided parking shall be sold or rented separately from the units in properties with 16 or more units, as verified by the Los Angeles Housing Department.  
3 The maximum increase in the allowable FAR permitted shall be equal to the table above, provided that any additional floor area provided through this Paragraph is utilized only by residential uses. Any nonresidential uses shall be limited to the FAR associated with a site's underlying zoning prior to the application of any Incentive.  
4 For the purpose of applying this incentive, commercial zones include Hybrid Industrial zones, Commercial Manufacturing zones and any defined area in a Specific Plan or overlay district that allows for both commercial uses and residential uses.  
5 The increase in height shall be applicable to a Project over the entire project site regardless of the number of underlying height limits. The height increase may be applied to the maximum allowable height in feet or stories permitted by the zone, including for mixed-use Projects.  
6 Consistent with California Government Code Section 65915(p)(4), required parking spaces provided allowable may be uncovered.

(i) Exceptions.  
a. Sites with a Maximum Allowable Residential Density of less than 5 units shall be eligible for the following Density Bonuses:  
i. T-1: 60%  
ii. T-2: 70%  
iii. T-3: 80%  
b. Sites with a Maximum Allowable Residential Density of less than 5 units, Designated Historic Resource(s), or Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code shall not be eligible for an incentive to increase allowable FAR or height above one additional story, up to 11 additional feet.

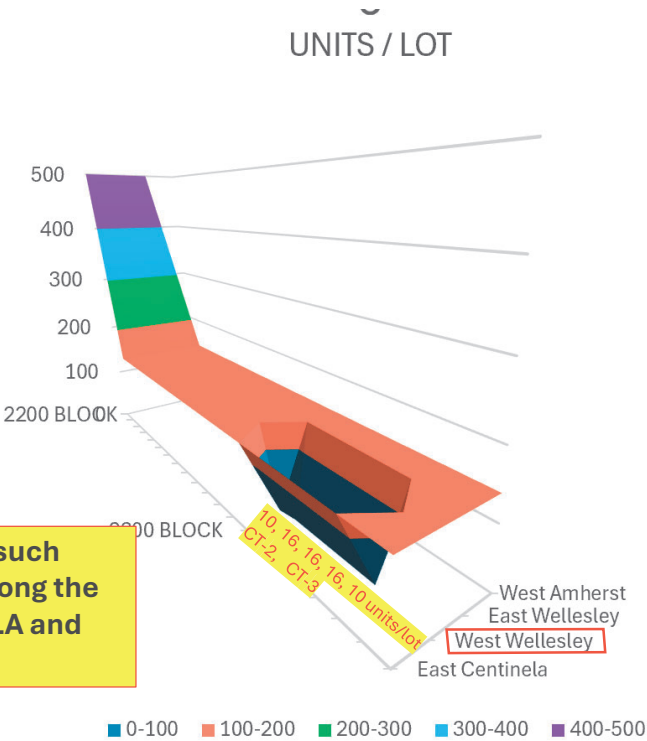
## Because these Exceptions (<5) DO NOT exist for Opportunity Corridors

- Opportunity corridors with R2, RD3, RD1.5, etc are treated equally and uniformly with respect to Density, FAR and Height as R3 and higher zoned areas.
- This Produces uniform density, FAR, Height application across multi-family lots, reducing Disparity.

Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

2) Remove underlying minimum of 5 for Transit Oriented Incentive Area (TOIA) as this requirement is not required for Opportunity Corridors Incentive Area (OC)

# Example of Disparity of density near Expo/Bundy Transit



This is one example. Many such Disparities may be found along the many Transit Stops across LA and can be avoided

## **EXHIBIT A.1:**

### **Citywide Housing Incentive Program Ordinance**

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CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA

For consideration by the City Planning Commission

September 26, 2024



## INTRODUCTION

This document is the third draft of the proposed Citywide Housing Incentive Program Ordinance to amend Chapter 1 and Chapter 1A of the Los Angeles Municipal Code. The proposed Citywide Housing Incentive Program Ordinance aims to Affirmatively Further Fair Housing by promoting housing development citywide and, in particular, increasing affordable housing in Higher Opportunity Areas<sup>1</sup>, where access to affordable housing is limited today. The draft Citywide Housing Incentive Program Ordinance proposes to do this through three distinct programs seen in Contents below. Note that this is a Clean version of the most recently revised draft. To review a strike-out version of this draft or the drafts released in March or June 2024, please visit:

<https://planning.lacity.gov/plans-policies/housing-element-rezoning-program#draft-ordinances>

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<sup>1</sup> More information on Higher Opportunity Areas can be found here:  
<https://planning.lacity.gov/plans-policies/community-plan-update/housing-element-rezoning-program-news/what-are-higher>

## ORDINANCE NO. \_\_\_\_\_

An ordinance amending Sections 12.03, 12.21, 12.22, and 12.24 of Article 2, Sections 13.09 and 13.15 of Article 3, Section 14.00 of Article 4, Section 14.5.4 of Article 4.5, Section 16.05 of Article 6, Section 19.01, 19.14, and 19.18 of Article 9 of Chapter 1; adding Section 11.5.15 to Article 1 of Chapter 1; amending Part 2B and Part 2C of Article 2, 8.1.1., 8.2.2., 8.2.3., 8.2.5., 8.2.6., 8.2.7., and 8.2.8 of Article 8, Sections 9.2.1., 9.3.1., 9.3.2., 9.3.3., and 9.4.1. of Article 9, Sections 13A.2.7., 13B.2.1., 13B.2.2., 13B.2.3., 13B.2.5., and 13B.3. of Article 13 of Chapter 1A; and amending 151.28 of Article 1 of Chapter 15 of the Los Angeles Municipal Code for the purpose of implementing the Citywide Housing Incentive Program.

**THE PEOPLE OF THE CITY OF LOS ANGELES  
DO ORDAIN AS FOLLOWS:**

Section 1. Section 11.5.15 is added to Chapter I of the Los Angeles Municipal Code to read:

- A. **Intent.** This Section is intended to:
1. Ensure that development in the city does not result in detrimental impacts to those residing or working in and around construction activities, and to abutting properties, and the public right-of-way, including the habitat, cultural resources, and historic or fragile buildings.
  2. Provide a mechanism for mitigation measures adopted pursuant to CEQA for city plans, policies, or regulations to be made enforceable on future development projects consistent with *CEQA Guidelines, Section 15162.4*.
  3. Provide a flexible mechanism to adopt and amend uniformly applicable development standards to allow streamlined environmental review, including pursuant to *CEQA Guidelines Section 15183.3*.
- B. **Applicability.** No building permit shall be issued by the Department of Building and Safety without the applicant demonstrating compliance with any regulations adopted by the Director of Planning under this Section to implement environmental protection measures.
- C. **Adoption and Maintenance of the Environmental Protection Measures Handbook.** The Director of Planning, as deemed necessary and appropriate, is authorized to prepare, maintain, amend, and adopt environmental protection measures to meet the intent of this Division, and to prepare, maintain, amend and adopt regulations to implement the environmental protection measures. The Director of Planning may, as deemed appropriate, use technical consultants or a consultant advisory panel to make recommendations on new environmental protection measures or updates to existing environmental protection measures.

- D. **Noncompliance.** Failure to comply with the environmental protection measures, regulations adopted pursuant to this Section, any condition or commitments made in compliance with the environmental protection measures or their implementing regulations, or any provision of this Section, is a violation of the code, subject to all available administrative, criminal and civil remedies for a violation of this Code. Additionally, upon verification of non-compliance, the City of Los Angeles may require as deemed necessary and appropriate the applicant or property owner to retain at its own expense an independent consultant, subject to the City of Los Angeles' approval, to ensure compliance with the environmental protection measures or regulations, and any conditions or commitments made in compliance with the environmental protection measures or regulations.

Section 2. Section 12.03 of Article 2 of Chapter 1 of the Los Angeles Municipal Code is amended to include the following definitions:

**Acutely Low Income.** Income level as defined in Section 50063.5 of the California Health and Safety Code as amended from time to time

**Area Median Income (AMI).** The median income in Los Angeles County as determined annually by the California Department of Housing and Community Development (HCD) or any successor agency, adjusted for household size.

**Coastal Zone.** The Coastal Zone, as defined in California Public Resources Code, Division 20 (commencing with Section 30000).

**Density Bonus.** A density increase over the otherwise Maximum Allowable Residential Density, as of the date of application by the applicant to the City.

**Designated Historic Resource.** A building, structure, object, landscaping element, or natural feature listed or designated as a historical resource, either individually, or as a contributor to a district, at the local, state, or national level. Including but not limited to a listing in the National Register of Historic Places or California Register of Historical Resources, or designation as a Historic-Cultural Monument or Historic Preservation Overlay Zone.

**Development Standard.** A site or construction condition as defined in California Government Code Section 65915(o)(2), or as amended.

**Extremely Low Income.** Income Level as defined in Section 50106 of the California Health and Safety Code.

**Neighborhood Retail and Service Uses.** Uses that involve business activity serving the general public, pursuant to LAMC Section 13.07 C, definitions of Neighborhood Retail and Neighborhood Services, including, but not limited to, retail, professional and personal services, hospitality, restaurants, and entertainment.

**High Quality Transit Service.** A transit route with 15 minutes or less service frequency during peak commute hours in one direction. For the purpose of determining service interval frequency, a bus route may include a combination of overlapping bus lines when part of a “colinear” or “family” line as determined in coordination with SCAG and local transit agencies, may be considered as one service route for service interval frequency.

**Higher Opportunity Areas.** High and Highest Resource Areas as defined and identified by the California Tax Credit Allocation Committee (TCAC).

**Housing Development.** As defined in subdivision (i) of Government Code Section 65915, or as amended, a development project with five or more Residential Units including mixed-use developments; and subdivisions or common interest developments as defined in Section 4100 of the Civil Code or as amended.

**Incentive.** A reduction in site development standards or a modification to zoning code requirements or architectural design requirements that results in identifiable and actual cost reductions to provide for affordable housing costs as defined in subdivision (k) of California Government Code Section 65915, or as amended.

**Lower Income.** Income level as defined in California Health and Safety Code Section 50079.5.

**Moderate and Lower Opportunity Areas.** Moderate Resource, Low Resource, and High-Poverty & Segregation Areas as defined and identified by the California Tax Credit Allocation Committee (TCAC).

**Major Transit Stop.** In addition to California Public Resources Code Section 21064.3, a site containing a rail or bus rapid transit station or the intersection of two or more bus routes with a service interval of 15 minutes or less during the morning and afternoon peak commute periods in either direction. The stations or bus routes may be existing, under construction or included in the most recent Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP). A bus route may include a combination of overlapping buses and may be considered as one service route for service interval frequency, when part of a “colinear”, “family”, or augmented line as determined in coordination with SCAG and transit agencies).

**Maximum Allowable Residential Density.** The greatest number of units allowed on a project site as defined in California Government Code Section 65915(o)(6), or as amended.

**Moderate Income.** Income level as defined in California Health and Safety Code Section 50093.

**One Hundred Percent Affordable Housing Project.** A Housing Development Project, as defined in California Government Code Section 65589.5, that involves the construction of, addition to, or remodeling of any building or buildings which results in the creation of five or more additional residential dwelling units or guest rooms, where all new dwelling units or guest rooms, exclusive of any manager's units, are restricted affordable for a term of at least 55 years for rental projects or at least 45 years for for-sale projects. With the exception of a manager's unit or units, or staff units for Projects utilizing California Government Code Section 65913.16, all units shall be affordable to lower income households earning up to 80 percent of the area median income, and rents or housing costs to the occupying residents do not exceed 30 percent of the maximum gross income, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD), or any successor agency, except that up to 20 percent of the units may be affordable to Moderate Income households earning up to 120 percent of the area median income, with rents or housing costs consistent with the rents and income ranges as defined by California Health and Safety Code Section 50052.5 or California Health and Safety Code Section 50053.

**Privately Owned Public Spaces (POPS).** An open space located on private property accessible to the public, such as a plaza, arcades, paseos, through block pedestrian connections, or open air concourses located in or around buildings. To ensure that such open spaces are available to the public, each space must meet the following criteria:

1. Open to the general public free of charge between sunrise and sunset, or during regular business hours, whichever is longer.
2. The publicly accessible open space shall be at a minimum, equal to, or greater than the common outdoor amenity space required by LAMC Section 12.21 G.2(a) and shall have at least one clear minimum dimension of 15 feet in any direction. Planters used for trees and landscaping may be located within the required 15 foot dimension provided that planters do not exceed a height of 42 inches.
3. Shall provide at least one tree (non-palm species) for every 1,000 square feet of POPS space.
4. At least one Privately Owned Public Space (POPS) sign shall be posted at every public entrance to the amenity space in accordance with the Public Amenity Space Sign Standards as established by the Director of Planning, and in accordance with LAMC Ch1A, Div. 4C.11. (Signs).
5. Provides at least three (3) ground floor pedestrian amenities as listed below:

- a. Movable seating/furniture
- b. At grade planting area
- c. Hydration station inclusive of a water fountain or bottle refill station
- d. Urban garden for community use
- e. Play and/or exercise equipment
- f. Running water elements
- g. Shade structures

**Residential Unit.** A dwelling unit or joint living and work quarters; a mobilehome, as defined in California Health and Safety Code Section 18008, or as amended; a mobile home lot in a mobilehome park, as defined in California Health and Safety Code Section 18214, or as amended; or a Guest Room or Efficiency Dwelling Unit provided that the unit is not located in a Transient Residential Use.

**Restricted Affordable Unit.** A Residential Unit for which rental or mortgage amounts are restricted so as to be affordable to and occupied by Acutely Low Income, Extremely Low, Very Low, Lower or Moderate Income households, as defined by the California Department of Housing and Community Development (HCD) or any successor agency. Affordable means that rents or housing expenses should not exceed requirements set forth in California Health and Safety Code Section 50052.5 for for-sale Residential Units, California Health and Safety Code Section 50053 for for-lease Residential Units, or by the California Tax Credit Allocation Committee.

**Sea Level Rise Area.** An area of the coast that is vulnerable to five feet of sea level rise, as determined by the National Oceanic and Atmospheric Administration, the Ocean Protection Council, the United States Geological Survey, the University of California, or as determined by a local coastal hazards vulnerability assessment.

**Specific Adverse Impact.** Per California Government Code Section 65589.5(d)(2), or as amended, a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.

**Surveyed Historic Resource.** Any building, structure, object, site, landscape, or natural feature identified through an Historic Resources Survey as eligible for listing as either an individual resource or as a contributor to an historic district under a local, state or federal designation program, including but not limited to



listing in the National Register of Historic Places or California Register of Historical Resources, or designation as a Historic-Cultural Monument or as an Historic Preservation Overlay Zone. This term does not include a non-contributor to an eligible historic district.

**Very High Fire Hazard Severity Zones.** Refer to LAMC Section 57.4911.1.1.

**Very Low Income.** Income level as defined in California Health and Safety Code Section 50105.

Section 3. Subdivision 4 of Subsection A of Section 12.21 of the Los Angeles Municipal Code is modified to read as follows:

4. Off-Street Automobile Parking Requirements. (Amended by Ord. No. 185,480, Eff. 5/9/18.) A garage or an off-street automobile parking area shall be provided in connection with and at the time of the erection of each of the buildings or structures hereinafter specified, or at the time such buildings or structures are altered, enlarged, converted or increased in capacity by the addition of dwelling units, guest rooms, beds for institutions, floor area or seating capacity. The parking space capacity required in said garage or parking area shall be determined by the amount of dwelling units, guest rooms, beds for institutions, floor area or seats so provided, and said garage or parking area shall be maintained thereafter in connection with such buildings or structures.

New or existing automobile parking spaces required by the Code for all uses may be replaced by bicycle parking at a ratio of one standard or compact automobile parking space for every four required or non-required bicycle parking spaces provided, so long as the number of compact stalls complies with Section 12.21 A.5.(c) of this Code. In cases where additional bicycle parking spaces are required as a result of an addition to an existing building, the maximum number of bicycle parking spaces eligible to be applied toward the required number of automobile parking spaces shall be calculated based on the total number of bicycle parking spaces provided for the existing building plus the number of bicycle parking spaces provided for the addition. Notwithstanding the foregoing, no more than 20 percent of the required automobile parking spaces for nonresidential uses shall be replaced at a site. Automobile parking spaces for nonresidential projects or buildings located within 1,500 feet of a major transit stop, as defined in Subdivision (b) of Section 21155 of the California Public Resources Code as that section may be amended from time to time, may replace up to 30 percent of the required automobile parking spaces with bicycle parking. For buildings with less than 20 required automobile parking spaces, those spaces may be replaced subject to the limits described in this Subdivision, not exceeding a total of four parking spaces replaced.

Residential buildings, including hotels, motels and apartment hotels, may replace 10 percent of the required automobile parking with bicycle parking. Automobile parking spaces for residential projects or buildings located within 1,500 feet of a major transit stop, as defined in Subdivision (b) of Section 21155 of the California Public Resources

Code, may replace up to 15 percent of the required automobile parking spaces with bicycle parking. If a residential building includes at least the minimum number of restricted affordable units to receive a density bonus ~~under Section 12.22 A.25,~~ pursuant to California Government Code Section 65915 (b) then up to 30 percent of the required automobile parking may be replaced. In such cases, the replacement of automobile parking with bicycle parking shall be implemented in lieu of the parking options in California Government Code Section 65915(p) Section 12.22 A.25(d).

Section 4. Paragraph e Subdivision 31 of Subsection E of Section 12.22 of the Los Angeles Municipal Code is modified to read as follows:

31. Procedures. Application for the TOC Incentives shall be made on a form provided by the Department of City Planning, and shall follow the procedures outlined in Los Angeles Municipal Code Section 13B.2.5 (Director Determination) of Chapter 1A of this Code 12.22 A.25(g).

Section 5. Subdivision 25 of Subsection A of Section 12.22 of Los Angeles Municipal Code is hereby amended to read as follows:-

See LAMC Section 12.22 A.37 (State Density Bonus Program).

**~~25. Affordable Housing Incentives – Density Bonus. (Amended by Ord. No. 179,681, Eff. 4/15/08.)~~**

- (a) **~~Purpose.~~** The purpose of this subdivision is to establish procedures for implementing State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, and to increase the production of affordable housing, consistent with City policies.
- (b) **~~Definitions.~~** Notwithstanding any provision of this Code to the contrary, the following definitions shall apply to this subdivision:

**~~Affordable Housing Incentives Guidelines~~** — the guidelines approved by the City Planning Commission under which Housing Development Projects for which a Density Bonus has been requested are evaluated for compliance with the requirements of this subdivision.

**~~Area Median Income (AMI)~~** — the median income in Los Angeles County as determined annually by the California Department of Housing and Community Development (HCD) or any successor agency, adjusted for household size.

**~~Density Bonus~~** — a density increase over the otherwise maximum allowable residential density under the applicable zoning ordinance and/or specific plan granted pursuant to this subdivision.



~~**Density Bonus Procedures** — procedures to implement the City's Density Bonus program developed by the Departments of Building and Safety, City Planning and Housing.~~

~~**Disabled Person** — a person who has a physical or mental impairment that limits one or more major life activities, anyone who is regarded as having that type of an impairment or, anyone who has a record of having that type of an impairment.~~

~~**Floor Area Ratio** — the multiplier applied to the total buildable area of the lot to determine the total floor area of all buildings on a lot.~~

~~**Housing Development Project** — the construction of five or more new residential dwelling units, the addition of five or more residential dwelling units to an existing building or buildings, the remodeling of a building or buildings containing five or more residential dwelling units, or a mixed use development in which the residential floor area occupies at least fifty percent of the total floor area of the building or buildings. For the purpose of establishing the minimum number of five dwelling units, Restricted Affordable Units shall be included and density bonus units shall be excluded.~~

~~**Incentive** — a modification to a City development standard or requirement of Chapter I of this Code (zoning).~~

~~**Income, Very Low, Low or Moderate** — annual income of a household that does not exceed the amounts designated for each income category as determined by HCD or any successor agency.~~

~~**Residential Hotel** — any building containing six or more Guest Rooms or Efficiency Dwelling Units, which are intended or designed to be used, or are used, rented, or hired out to be occupied, or are occupied for sleeping purposes by guests, so long as the Guest Rooms or Efficiency Dwelling Units are also the primary residence of those guests, but not including any building containing six or more Guest Rooms or Efficiency Dwelling Units, which is primarily used by transient guests who do not occupy that building as their primary residence.~~

~~**Residential Unit** — a dwelling unit or joint living and work quarters; a mobilehome, as defined in California Health and Safety Code Section 18008; a mobile home lot in a mobilehome park, as defined in California Health and Safety Code Section 18214; or a Guest Room or Efficiency Dwelling Unit in a Residential Hotel.~~

~~**Restricted Affordable Unit** — a residential unit for which rental or mortgage amounts are restricted so as to be affordable to and occupied by Very Low, Low or Moderate Income households, as determined by the Los Angeles Housing Department. (Amended by Ord. No. 187,122, Eff. 8/8/21.)~~

~~**Senior Citizens**—individuals who are at least 62 years of age, except that for projects of at least 35 units that are subject to this subdivision, a threshold of 55 years of age may be used, provided all applicable City, state and federal regulations are met.~~

~~**Senior Citizen Housing Development**—a Housing Development Project for senior citizens that has at least 35 units.~~

~~**Specific Adverse Impact**—a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.~~

~~**Transit Stop/Major Employment Center**—any one of the following:~~

- ~~(1) A station stop for a fixed transit guideway or a fixed rail system that is currently in use or whose location is proposed and for which a full funding contract has been signed by all funding partners, or one for which a resolution to fund a preferred alignment has been adopted by the Los Angeles County Metropolitan Transportation Authority or its successor agency; or~~
  - ~~(2) A Metro Rapid Bus stop located along a Metro Rapid Bus route; or, for a Housing Development Project consisting entirely of Restricted Affordable Units, any bus stop located along a Metro Rapid Bus route; or~~
  - ~~(3) The boundaries of the following three major economic activity areas, identified in the General Plan Framework Element: Downtown, LAX and the Port of Los Angeles; or~~
  - ~~(4) The boundaries of a college or university campus with an enrollment exceeding 10,000 students.~~
- ~~(c) **Density Bonus.** Notwithstanding any provision of this Code to the contrary, the following provisions shall apply to the grant of a Density Bonus for a Housing Development Project:~~

- ~~(1) **For Sale or Rental Housing with Low or Very Low Income Restricted Affordable Units.** A Housing Development Project that includes 10% of the total units of the project for Low Income households or 5% of the total units of the project for Very Low Income households, either in rental units or for sale units, shall be granted a minimum Density Bonus of 20%, which may be applied to any part of the Housing Development Project. The bonus may be increased according to the percentage of affordable housing units provided, as follows, but shall not exceed 35%:~~

<del>Percentage Low Income Units</del>	<del>Percentage Density Bonus</del>
<del>40</del>	<del>20</del>

41	21.5
42	23
43	24.5
44	26
45	27.5
46	29
47	30.5
48	32
49	33.5
20	35

Percentage Very Low Income Units	Percentage Density Bonus
5	20
6	22.5
7	25
8	27.5
9	30
10	32.5
11	35

~~(2) For Sale or Rental Senior Citizen Housing (Market Rate). A Senior Citizen Housing Development or a mobile home park that limits residency based on age requirements for housing for older persons pursuant to California Civil Code Sections 798.76 or 799.5 shall be granted a minimum Density Bonus of 20%.~~

~~(3) (Deleted by Ord. No. 181,142, Eff. 6/1/10.)~~

~~(4) A Common Interest Development That Includes Moderate Income Restricted Affordable Units. (Amended by Ord. No. 181,142, Eff. 6/1/10.) A common interest development as defined in Section 1351 of the Civil Code that includes at least 10% of its units for Moderate Income households shall be granted a minimum Density Bonus of 5%. The bonus may be increased according to the percentage of affordable housing units provided, as follows, but shall not exceed 35%:~~

Percentage Moderate Income Units	Percentage Density Bonus
10	5
11	6
12	7
13	8
14	9
15	10
16	11
17	12
18	13
19	14
20	15
21	16
22	17
23	18
24	19
25	20
26	21
27	22
28	23
29	24
30	25
31	26
32	27
33	28
34	29
35	30

36	34
37	32
38	33
39	34
40	35

- ~~(5) **Land Donation.** An applicant for a subdivision, parcel map or other residential development approval that donates land for housing to the City of Los Angeles satisfying the criteria of California Government Code Section 65915(h)(2), as verified by the Department of City Planning, shall be granted a minimum Density Bonus of 15%.~~
- ~~(6) **Child Care.** A Housing Development Project that conforms to the requirements of Subparagraphs (1), (2), (3), (4) or (5) of this paragraph and includes a child care facility located on the premises of, as part of, or adjacent to, the project, shall be granted either of the following:~~
- ~~(i) — an additional Density Bonus that is, for purposes of calculating residential density, an increase in the floor area of the project equal to the floor area of the child care facility included in the project.~~
  - ~~(ii) — An additional Incentive that contributes significantly to the economic feasibility of the construction of the child care facility.~~
- ~~(7) **Fractional Units.** In calculating Density Bonus and Restricted Affordable units, any number resulting in a fraction shall be rounded up to the next whole number.~~
- ~~(8) **Other Discretionary Approval.** Approval of Density Bonus units shall not, in and of itself, trigger other discretionary approvals required by the Code.~~
- ~~(9) **Other Affordable Housing Subsidies.** Approval of Density Bonus units does not, in and of itself, preclude projects from receipt of other government subsidies for affordable housing.~~
- ~~(10) **Additional Option for Restricted Affordable Units located near Transit Stop/Major Employment Center.** In lieu of providing the requisite number of Restricted Affordable Units in a Housing Development Project located in or within 1,500 feet of a Transit Stop/Major Employment Center that would otherwise be required under this subdivision, an applicant may opt to provide a greater number of smaller units, provided that:~~

- ~~(i) the total number of units in the Housing Development Project including Density Bonus units does not exceed the maximum permitted by this subdivision;~~
- ~~(ii) the square footage of the aggregate smaller Restricted Affordable units is equal to or greater than the square footage of the aggregate Restricted Affordable Units that would otherwise be required under this subdivision;~~
- ~~(iii) the smaller Restricted Affordable units are distributed throughout the building and have proportionally the same number of bedrooms as the market rate units; and~~
- ~~(iv) the smaller Restricted Affordable Units meet the minimum unit size requirements established by the Low Income Housing Tax Credit Program as administered by the California Tax Credit Allocation Committee (TCAC).~~
- ~~(11) **Common Interest Development with Low or Very Low Income restricted Affordable Units for Rent.** In a common interest development as defined in California Government Code Section 1351, such as a condominium, Restricted Affordable Units may be for sale or for rent.~~
- ~~(12) **Condominium Conversion.** A Housing Development Project that involves the conversion of apartments into condominiums and that includes 33 percent of its units restricted to households of Low or Moderate income or 15 percent of its units restricted to households of Very Low Income shall be granted a Density Bonus of 25 percent or up to three incentives as provided in Paragraph (c) of this subdivision.~~
- ~~(d) **Parking in a Housing Development Project.** Required parking spaces for a Housing Development Project that is for sale or for rent and qualifies for a Density Bonus and complies with this subdivision may be provided by complying with whichever of the following options requires the least amount of parking: applicable parking provisions of Section 12.21 A.4. of this Code, or Parking Option 1 or Parking Option 2, below. Required parking in a Housing Development Project that qualifies for a Density Bonus may be sold or rented separately from the dwelling units, so that buyers and tenants have the option of purchasing or renting a unit without a parking space. The separate sale or rental of a dwelling unit and a parking space shall not cause the rent or purchase price of a Restricted Affordable Unit (or the parking space) to be greater than it would otherwise have been.~~
- ~~(1) **Parking Option 1.** Required parking for all residential units in the Housing Development Project (not just the restricted units), inclusive of handicapped and guest parking, shall be reduced to the following requirements:~~

- ~~(i) For each Residential Unit of 0-1 bedroom: 1 on-site parking space.~~
- ~~(ii) For each Residential Unit of 2-3 bedrooms: 2 on-site parking spaces.~~
- ~~(iii) For each Residential Unit of 4 or more bedrooms: 2-1/2 on-site parking spaces.~~

~~(2) **Parking Option 2.** Required parking for the Restricted Affordable Units only shall be reduced as set forth in Subparagraphs (i) and (ii) below. Required parking for all other non-restricted units in the Housing Development Project shall comply with applicable provisions of Section 12.21 of this Code.~~

- ~~(i) One parking space per Restricted Affordable Unit, except:
 
  - ~~a. 0.5 parking space for each dwelling unit restricted to Low or Very Low Income Senior Citizens or Disabled Persons; and/or~~
  - ~~b. 0.25 parking space for each Restricted Affordable Unit in a Residential Hotel.~~~~
- ~~(ii) Up to 40% of the required parking for the Restricted Affordable Units may be provided by compact stalls.~~

~~(c) **Incentives.**~~

- ~~(1) In addition to the Density Bonus and parking options identified in Paragraphs (c) and (d) of this subdivision, a Housing Development Project that qualifies for a Density Bonus shall be granted the number of Incentives set forth in the table below.~~

<b>Number of Incentives</b>	<b>Required Percentage* of Units Restricted for Very Low Income Households</b>	<b>Required Percentage* of Units Restricted for Low Income Households</b>	<b>Required Percentage* of Units Restricted for Moderate Income Households (For Sale Only)</b>
One Incentive	5% or	10% or	10%
Two Incentives	10% or	20% or	20%
Three Incentives	15% or	30%	30%

~~\*Excluding Density Bonus Units~~

- ~~(2) To be eligible for any on-menu incentives, a Housing Development Project (other than an Adaptive Reuse project) shall comply with the following:~~

- ~~(i) The facade of any portion of a building that abuts a street shall be articulated with a change of material or with a break in plane, so that the facade is not a flat surface.~~
  - ~~(ii) All buildings must be oriented to the street by providing entrances, windows, architectural features and/or balconies on the front and along any street facing elevations.~~
  - ~~(iii) The Housing Development Project shall not be a contributing structure in a designated Historic Preservation Overlay Zone and shall not be on the City of Los Angeles list of Historical Cultural Monuments.~~
  - ~~(iv) The Housing Development Project shall not be located on a substandard street in a Hillside Area or in a Very High Fire Hazard Severity Zone as established in Section 57.4908 of this Code.~~
- ~~(f) **Menu of Incentives.** Housing Development Projects that meet the qualifications of Paragraph (e) of this subdivision may request one or more of the following Incentives, as applicable:~~
- ~~(1) **Yard/Setback.** Up to 20% decrease in the required width or depth of any individual yard or setback except along any property line that abuts an R1 or more restrictively zoned property provided that the landscaping for the Housing Development Project is sufficient to qualify for the number of landscape points equivalent to 10% more than otherwise required by Section 12.40 of this Code and Landscape Ordinance Guidelines "O."~~
  - ~~(2) **Lot Coverage.** Up to 20% increase in lot coverage limits, provided that the landscaping for the Housing Development Project is sufficient to qualify for the number of landscape points equivalent to 10% more than otherwise required by Section 12.40 of this Code and Landscape Ordinance Guidelines "O".~~
  - ~~(3) **Lot Width.** Up to 20% decrease from a lot width requirement, provided that the landscaping for the Housing Development Project is sufficient to qualify for the number of landscape points equivalent to 10% more than otherwise required by Section 12.40 of this Code and Landscape Ordinance Guidelines "O".~~
  - ~~(4) **Floor Area Ratio.**~~
    - ~~(i) A percentage increase in the allowable Floor Area Ratio equal to the percentage of Density Bonus for which the Housing Development Project is eligible, not to exceed 35%; or~~
    - ~~(ii) In lieu of the otherwise applicable Floor Area Ratio, a Floor Area Ratio not to exceed 3:1, provided the parcel is in a commercial zone in Height~~



~~District 1 (including 1VL, 1L and 1XL), and fronts on a Major Highway as identified in the City's General Plan, and~~

- ~~(iii) the Housing Development Project includes the number of Restricted Affordable Units sufficient to qualify for a 35% Density Bonus, and~~
- ~~(iv) 50% or more of the commercially zoned parcel is located in or within 1,500 feet of a Transit Stop/Major Employment Center.~~

~~A Housing Development Project in which at least 80% of the units in a rental project are Restricted Affordable Units or in which 45% of the units in a for sale project are Restricted Affordable Units shall be exempt from the requirement to front on a Major Highway.~~

~~(g) **Height.** A percentage increase in the height requirement in feet equal to the percentage of Density Bonus for which the Housing Development Project is eligible. This percentage increase in height shall be applicable over the entire parcel regardless of the number of underlying height limits. For purposes of this subparagraph, Section 12.21.1 A.10. of this Code shall not apply.~~

~~(1) In any zone in which the height or number of stories is limited, this height increase shall permit a maximum of eleven additional feet or one additional story, whichever is lower, to provide the Restricted Affordable Units.~~

~~(i) No additional height shall be permitted for that portion of a of a building in a Housing Development Project that is located within fifteen feet of a lot classified in the R2 Zone.~~

~~(ii) For each foot of additional height the building shall be set back one horizontal foot.~~

~~(2) No additional height shall be permitted for that portion of a building in a Housing Development Project that is located within 50 feet of a lot classified in an R1 or more restrictive residential zone.~~

~~(3) No additional height shall be permitted for any portion of a building in a Housing Development Project located on a lot sharing a common lot line with or across an alley from a lot classified in an R1 or more restrictive zone. This prohibition shall not apply if the lot on which the Housing Development Project is located is within 1,500 feet of a Transit Stop but no additional height shall be permitted for that portion of a building in the Housing Development Project that is located within 50 feet of a lot classified in an R1 or more restrictive residential zone.~~

- ~~(4) **Open Space.** Up to 20% decrease from an open space requirement, provided that the landscaping for the Housing Development Project is sufficient to qualify for the number of landscape points equivalent to 10% more than otherwise required by Section 12.40 of this Code and Landscape Ordinance Guidelines “O”.~~
- ~~(5) **Density Calculation.** The area of any land required to be dedicated for street or alley purposes may be included as lot area for purposes of calculating the maximum density permitted by the underlying zone in which the project is located.~~
- ~~(6) **Averaging of Floor Area Ratio, Density, Parking or Open Space, and permitting Vehicular Access.** A Housing Development Project that is located on two or more contiguous parcels may average the floor area, density, open space and parking over the project site, and permit vehicular access from a less restrictive zone to a more restrictive zone, provided that:~~
- ~~(i) the Housing Development Project includes 11% or more of the units as Restricted Affordable Units for Very Low Income households, or 20% of the units for Low Income households, or 30% of the units for Moderate Income households; and~~
  - ~~(ii) the proposed use is permitted by the underlying zone(s) of each parcel; and~~
  - ~~(iii) no further lot line adjustment or any other action that may cause the Housing Development Project site to be subdivided subsequent to this grant shall be permitted.~~

~~(h) **Procedures.**~~

- ~~(1) **Density Bonus and Parking.** Housing Development Projects requesting a Density Bonus without any Incentives (which includes a Density Bonus with only parking requirements in accordance with Paragraphs (c) and (d) of this subdivision) shall be considered ministerial and follow the Affordable Housing Incentives Guidelines and the Density Bonus Procedures. No application for these projects need be filed with the City Planning Department.~~

~~(2) **Requests for Incentives on the Menu.**~~

- ~~(i) The applicant for Housing Development Projects that qualify for a Density Bonus and that request up to three Incentives on the Menu of Incentives in Paragraph (f) of this subdivision, and which require no other discretionary actions, the following procedures shall apply:~~

a. ~~**Application.** The request shall be made on a form provided by the Department of City Planning, as set forth in Section 11.5.7 B.2.(a) of this Code, accompanied by applicable fees.~~

b. ~~**Authority. (Amended by Ord. No. 182,106, Eff. 5/20/12.)** The Director shall be the initial decision maker for applications seeking on Menu incentives.~~

~~**EXCEPTION:** When the application is filed as part of a project requiring multiple approvals, the initial decision maker shall be as set forth in Section 12.36 of this Code; and when the application is filed in conjunction with a subdivision and no other approval, the Advisory Agency shall be the initial decision maker.~~

c. ~~**Action.** The Director shall approve a Density Bonus and requested Incentive(s) unless the Director finds that:~~

i. ~~The Incentive is not required in order to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5, or Section 50053 for rents for the affordable units; or~~

ii. ~~The Incentive will have a Specific Adverse Impact upon public health and safety or the physical environment or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the Specific Adverse Impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.~~

d. ~~**Transmittal of Written Decision.** Within three business days of making a decision, the Director shall transmit a copy by First Class Mail to the applicant and to all owners of properties abutting, across the street or alley from, or having a common corner with the subject property, and to the local Certified Neighborhood Council.~~

e. ~~**Effective Date of Initial Decision.** The Director's decision shall become effective after an elapsed period of 15 calendar days from the date of the mailing of the written decision unless an appeal is filed to the City Planning Commission.~~

~~f. **Appeals. (Amended by Ord. No. 182,106, Eff. 5/20/12.)** An applicant or any owner or tenant of a property abutting, across the street or alley from, or having a common corner with the subject property aggrieved by the Director's decision may appeal the decision to the City Planning Commission pursuant to applicable procedures set forth in Section 11.5.7 C.6. of this Code that are not in conflict with the provisions of this paragraph (g)(2)(i). The appeal shall include a filing fee pursuant to Section 19.01 B. of this Code. Before acting on any appeal, the City Planning Commission shall set the matter for hearing, with written notice of the hearing sent by First Class Mail at least ten days prior to the meeting date to: the applicant; the owner(s) of the property involved; and the interested parties who have requested notice in writing. The appeal shall be placed on the agenda for the first available meeting date of the City Planning Commission and acted upon within 60 days from the last day of the appeal period. The City Planning Commission may reverse or modify, in whole or in part, a decision of the Director. The City Planning Commission shall make the same findings required to be made by the Director, supported by facts in the record, and indicate why the Director erred making the determination.~~

**EXCEPTION:** ~~When the application is filed as part of a project requiring multiple approvals, the appeals procedures set forth in Section 12.36 of this Code shall govern. When the application is filed in conjunction with a Parcel Map and no other approval, the appeals procedures set forth in Section 17.54 of this Code shall govern. When the application is filed in conjunction with a tentative map and no other approval, the appeals procedures set forth in Section 17.06 A.3. of this Code shall govern, provided that such applications shall only be appealable to the Appeal Board, as defined in Section 17.02 of this Code, and shall not be subject to further appeal to the City's legislative body.~~

~~(ii) For Housing Development Projects that qualify for a Density Bonus and for which the applicant requests up to three Incentives listed in Paragraph (f), above, and that require other discretionary actions, the applicable procedures set forth in Section 12.36 of this Code shall apply:~~

~~a. The decision must include a separate section clearly labeled "Density Bonus/ Affordable Housing Incentives Program Determination".~~

- ~~b. The decision maker shall approve a Density Bonus and requested Incentive(s) unless the decision maker, based upon substantial evidence, makes either of the two findings set forth in Subparagraph (2)(i)(c), above.~~

~~(3) Requests for Waiver or Modification of any Development Standard(s) Not on the Menu.~~

- ~~(i) For Housing Development Projects that qualify for a Density Bonus and for which the applicant request a waiver or modification of any development standard(s) that is not included on the Menu of Incentives in Paragraph (f), above, and that are not subject to other discretionary applications, the following shall apply:~~

- ~~a. The request shall be made on a form provided by the Department of City Planning, accompanied by applicable fees, and shall include a pro forma or other documentation to show that the waiver or modification of any development standard(s) are needed in order to make the Restricted Affordable Units economically feasible.~~

- ~~b. **Notice and Hearing.** The application shall follow the procedures for conditional uses set forth in Section 12.24 D. of this Code. A public hearing shall be held by the City Planning Commission or its designee. The decision of the City Planning Commission shall be final.~~

- ~~c. The City Planning Commission shall approve a Density Bonus and requested waiver or modification of any development standard(s) unless the Commission, based upon substantial evidence, makes either of the two findings set forth in Subparagraph (g)(2)(i)c., above.~~

- ~~(ii) For Housing Development Projects requesting waiver or modification of any development standard(s) not included on the Menu of Incentives in Paragraph (f) above, and which include other discretionary applications, the following shall apply:~~

- ~~a. The applicable procedures set forth in Section 12.36 of this Code shall apply.~~

- ~~b. The decision must include a separate section clearly labeled "Density Bonus/ Affordable Housing Incentives Program Determination".~~

~~c. The decision maker shall approve a Density Bonus and requested waiver or modification of any development standard(s) unless the decision maker, based upon substantial evidence, makes either of the two findings set forth in Subparagraph (g)(2)(i)c., above.~~

~~(i) **Covenant.** Prior to issuance of a Building Permit, the following shall apply:~~

~~(1) For any Housing Development Project qualifying for a Density Bonus and that contains housing for Senior Citizens, a covenant acceptable to the Los Angeles Housing Department shall be recorded with the Los Angeles County Recorder, guaranteeing that the occupancy restriction to Senior Citizens shall be observed for at least 30 years from the issuance of the Certificate of Occupancy or a longer period of time if required by the construction or mortgage financing assistance program, mortgage assistance program, or rental subsidy program. **(Amended by Ord. No. 187,122, Eff. 8/8/21.)**~~

~~(2) For any Housing Development Project qualifying for a Density Bonus and that contains housing for Low or Very Low Income households, a covenant acceptable to the Los Angeles Housing Department shall be recorded with the Los Angeles County Recorder, guaranteeing that the affordability criteria will be observed for at least 30 years from the issuance of the Certificate of Occupancy or a longer period of time if required by the construction or mortgage financing assistance program, mortgage assistance program, or rental subsidy program. **(Amended by Ord. No. 187,122, Eff. 8/8/21.)**~~

~~(3) For any Housing Development Project qualifying for a Density Bonus and that contains housing for Moderate Income households for sale, a covenant acceptable to the Los Angeles Housing Department and consistent with the for sale requirements of California Government Code Section 65915(c)(2) shall be recorded with the Los Angeles County Recorder guaranteeing that the affordability criteria will be observed for at least ten years from the issuance of the Certificate of Occupancy. **(Amended by Ord. No. 187,122, Eff. 8/8/21.)**~~

~~(4) If the duration of affordability covenants provided for in this subdivision conflicts with the duration for any other government requirement, the longest duration shall control.~~

~~(5) Any covenant described in this paragraph must provide for a private right of enforcement by the City, any tenant, or owner of any building to which a covenant and agreement applies.~~

~~(j) **Fee Deferral.** At the option of the applicant, payment of fees may be deferred pursuant to Sections 19.01 O. and 19.05 A.1. of this Code.~~

~~(k) **Applicability.** To the extent permitted under applicable State law, if a conflict arises between the terms of this subdivision and the terms of the City's Mello Act Settlement Agreement, Interim Administrative Procedures for Complying with the Mello Act or any subsequent permanent Mello Ordinance, Procedures or Regulations (collectively "Mello Terms"), the Mello Terms preempt this subdivision.~~

Section 6. Subdivision 37 of Subsection A of Section 12.22 of the Los Angeles Municipal Code is added to read as follows:

#### **12.22 A.37 STATE DENSITY BONUS PROGRAM**

(a) **Purpose.** The purpose of this Subdivision is to establish procedures for the implementation of State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, and to increase the production of affordable housing, consistent with City policies.

(b) **Definitions.** The following definitions shall apply to this Subdivision:

**Disabled Veteran.** Disabled Veteran shall be as defined in Section 18541 of the California Government Code.

**Environmental Consideration Area.** Project sites that were previously used as a gas station, gas or oil well, or dry-cleaning facility, or Project sites located on or within 500 feet of a Hazardous Materials site (as listed on any of the following databases: State Water Resources Control Board Geotracker, DTSC EnviroStor or listed pursuant to Government Code Section 65962.5, DTSC Hazardous Waste Tracking System, LAFD Certified Unified Program Agency, Los Angeles County Fire Department Health Hazardous Materials Division, SCAQMD Facility Information Detail), or Project sites located on or within 500 feet of a Hazardous Materials site designated as a Resource Conservation and Recovery Act (RCRA) Small Quantity Generator or Large Quantity Generator (refer to US EPA Envirofacts database), or Project sites located in an Oil Drilling District (O), or Project sites located within the following buffers-of a property identified as having an oil well or an oil field by the California Geologic Energy Management Division: on or within 1,000 feet from an active oil well or field, on or within 200 feet from an idle oil well or field, and on or within 100 feet from a plugged oil well or field.

**Homeless Person.** Homeless Person as defined in the federal McKinney-Vento Homeless Assistance Act (42 U.S.C. Sec. 11301 et seq.).

**Lower Income Student.** A student who has a household income and asset level that does not exceed the level for Cal Grant A or Cal Grant B award recipients as set forth in paragraph (1) of subdivision (k) of Section 69432.7 of the Education Code, or as amended. The eligibility of a student to occupy a unit for lower



income students under this section shall be verified by an affidavit, award letter, or letter of eligibility provided by the institution of higher education in which the student is enrolled or by the California Student Aid Commission that the student receives or is eligible for financial aid, including an institutional grant or fee waiver from the college or university, the California Student Aid Commission, or the federal government.

**Senior Citizens.** Individuals who are at least 62 years of age, except that for projects of at least 35 units that are subject to this subdivision, a threshold of 55 years of age may be used, provided all applicable City, state and federal regulations are met.

**Senior Citizen Housing Development.** A Housing Development that has at least 35 dwelling units or guest rooms, as defined in Sections 51.3 and 51.12 of the Civil Code, or a mobilehome park that limits residency based on age requirements for housing for older persons pursuant to Section 798.76 or 799.5 of the Civil Code.

**Shared Housing Building.** A residential or mixed-use structure, with five or more shared housing units and one or more common kitchens and dining areas designed for permanent residence of more than 30 days by its tenants as defined in California Government Code Section 65915(o)(7)(A), or as amended.

**Shared Housing Unit.** A Residential Unit with one or more habitable rooms, not within another dwelling unit as defined in Government Code Section 65915(o)(7)(B) or as amended. Shared Housing Units shall be considered "Guest Rooms" for purposes of zoning and allowable density.

**Student Housing Development.** Student Housing Development shall be as defined in California Government Code Section 65915(b)(1)(F).

**Transitional Foster Youth.** Transitional Foster Youth shall be as defined in Section 66025.9 of the Education Code.

**Very Low Vehicle Travel Area.** Refer to California Government Code Section 65915 (o)(9).

(c) **Eligibility.** To qualify for the provisions of this Subdivision, a Housing Development must satisfy all of the following:

- (1) Meet the definition of a Housing Development or Shared Housing Building, with five or more Residential Units or Shared Housing Units including mixed-use developments. For the purpose of establishing the minimum number of five Residential Units or Shared Housing Units, Density Bonus units shall be excluded.



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- (2) Reserve a percentage of the Residential Units (excluding Residential Units added by a Density Bonus) provided in a Housing Development for:
  - (i) Restricted Affordable Units for at least one of the following income levels in Table 12.22 A.37(c)(2)(iii) below, or
  - (ii) Restricted Affordable Units for one of the Target Populations listed in Table 12.22 A.37(c)(2)(iii) below.

<b>TABLE 12.22 A.37(c)(2)(iii)</b> <b>Required Percentage of Restricted Affordable Units</b>	
Income Level	Minimum % of Residential Units Provided (Excluding Residential Units Added by a Density Bonus)
Very Low Income (For Rental or For Sale)	5
Low Income (For Rental or For Sale)	10
Moderate Income (For Sale)	10
Target Population	Minimum % of Residential Units Provided (Excluding Residential Units Added by a Density Bonus)
Senior Citizen	100 <sup>1</sup>
Transitional Foster Youth, Disabled Veteran, or Homeless Persons <sup>2</sup>	10
Lower Income Students <sup>3</sup>	20

## Footnotes

1 Senior Citizen Housing Development must comply with Sections 51.2 and 51.3 of the California Civil Code and all units provided in the resulting Senior Citizen Housing Development should be reserved for Senior Citizens regardless of the specifications stated in Table 12.22 A.37(c)(2)(iii).

2 Residential Units provided for Transitional Foster Youth, Disabled Veterans, or Homeless Persons in Table 12.22 A.37(c)(2)(iii) shall be provided as Very Low Income Restricted Affordable Units.

3 Residential Units provided for Lower Income Students shall be provided at an affordability level as specified in California Government Code Section 65915(b)(1)(F).

(3) The Housing Development does not require the demolition of a Designated Historic Resource, as demolition is defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code, and any proposed alteration to a Designated Historic Resource shall not be approved until a review has been completed by the Office of Historic Resources.

(4) Housing Developments located on project sites that meet the definition of an Environmental Consideration Area shall comply with all applicable standards

contained in the Environmental Protection Measures adopted pursuant to LAMC Section 11.5.15.

(d) **Procedures.** A Housing Development that meets the provisions of this Subdivision shall be reviewed pursuant to Procedures described in this Paragraph. Though an approval of a Density Bonus or Incentive pursuant to this Subdivision shall not, in and of itself, trigger a General Plan Amendment, Zone Change, Project Review or other discretionary review actions required by this Zoning Code, the applicable procedures set forth in LAMC Section 13A.2.10 (Multiple Approvals) of Chapter 1A of this Code shall apply for Housing Developments seeking other discretionary approvals in conjunction with an application requested pursuant to the procedures in Paragraph (d).

(1) **Los Angeles Department of Building and Safety Review.** Housing Developments seeking Base Incentives described in Paragraph (e) and/or Incentives listed on the Menu of Incentives described in LAMC Section 12.22 A.37(f)(2) shall be considered ministerial and processed by the Department of Building and Safety.

(i) Exception. Housing Developments requesting Incentives from the Menu of Incentives that cannot comply with the criteria established in LAMC Section 12.22 A.37(f)(1)(iii) shall comply with procedures set forth in LAMC Section 12.22 A.37(d)(2).

(2) **Expanded Administrative Review.** The following Housing Developments shall be ministerially reviewed by the Department of City Planning pursuant to Expanded Administrative Review, as set forth by the provisions of LAMC Section 13B.3.2 (Expanded Administrative Review) of Chapter 1A of this Code. As defined in this section, ministerial approval means an administrative process to approve a “use by right” as this term is defined in California Government Code Section 65583.2 (i). Housing Developments requesting waivers or reductions of Development Standards in addition to Incentives shall be subject to the Procedures described in LAMC Section 12.22 A.37(d)(3).

- (i) Housing Developments that request the Public Benefit Options described in Paragraph (g). Housing Developments that request only Public Benefit Options in addition to Incentives listed on the Menu of Incentives shall not be subject to any hearing procedures regardless of the provisions contained in LAMC Section 13B.3.2.D.
- (ii) Housing Developments that request Incentives not listed on the Menu of Incentives described in LAMC Section 12.22 A.37(f)(2). Housing Developments that request Incentives not listed on the Menu of Incentives may be subject to a public hearing as described in LAMC Section 13B.3.2.D.

(3) **City Planning Commission Review.** The following Housing Developments must file an application pursuant to the procedures set forth in LAMC Section 13B.2.3 (Class 3 Conditional Use Permit) of Chapter 1A of this Code. Notwithstanding the provisions set forth in Sec. 13B.2.3. of Chapter 1A, the decision of the City Planning Commission shall be final.

- (i) Housing Developments that request waivers or reductions of any Development Standards not listed on the Menu of Incentives described in LAMC Section 12.22 A.37(f)(2). Waivers or reductions of Development Standards shall be approved by the applicable decision-making authority unless that decision making authority finds that:
  - a. The Development Standard associated with a request for waiver(s) or reduction(s) in Development Standards will not have the effect of physically precluding the construction of a development meeting the Eligibility criteria described in Paragraph (c) at the densities or with the concessions or incentives permitted under Paragraph (e); or
  - b. The waivers or reductions of Development Standards would have a Specific Adverse Impact as defined in paragraph (2) of subdivision (d) of Section 65589.5, upon public health and safety or on a California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact without rendering the development unaffordable to low-income and moderate-income households; or
  - c. The waivers or reductions of Development Standards are contrary to state or federal law.
- (ii) In addition to the procedures set forth in LAMC Section 13B.2.3 of Chapter 1A of this Code, Housing Developments requesting Density Bonuses that exceed 50% or 88.75% dependent on the percentage of Restricted Affordable Units provided shall be subject to the requirements and findings set forth in LAMC 12.24 U.26.

(4) **One Hundred Percent Affordable Housing Projects.** One Hundred Percent Affordable Housing Projects shall be reviewed pursuant to LAMC Section 12.22 A.39.

- (5) **Other Discretionary Approvals.** Applicable procedures set forth in LAMC Section 13A.2.10 (Multiple Approvals) of Chapter 1A of this Code apply for Housing Developments seeking other discretionary approvals in conjunction with an application requested pursuant to the Procedures in Paragraph (d). Regardless of any other findings that may be applicable, the decision maker must approve the requested Base Incentives and Additional Incentives, either on or off the Menu of Incentives described in LAMC Section 12.22 A.37(f)(2), requested under this Subdivision unless the decision maker, based upon substantial evidence, determines that the Housing Development meets one or more of the criteria described in LAMC Section 12.22 A.37(f)(1)(ii).

- (e) **Base Incentives.** A Housing Development shall be granted any of the Base Incentives established in this Paragraph in exchange for the required minimum percentage of Restricted Affordable Units established in Paragraph (c) of this Subdivision. Projects that qualify for Base Incentives established in this Paragraph shall also be eligible for Additional Incentives pursuant to Paragraph (f) and Public Benefit Options pursuant to Paragraph (g) of this Subdivision unless otherwise stated.

(1) **Density.**

(i) **For Sale or Rental Housing with Very Low or Low Income Restricted Affordable Units and For Sale Housing with Moderate Income Units.**

For Sale or Rental Housing with Very Low or Low Income Restricted Affordable Units and For Sale Housing with Moderate Income units shall receive a Density Bonus as follows in Table 12.22 A.37(e)(1)(i)a but shall not exceed 50% unless seeking an Additional Density Bonus pursuant to Table 12.22 A.37(e)(1)(ii). Residential Units constructed as a result of a Density Bonus may be permitted in geographic areas of the Housing Development other than the areas where Restricted Affordable Units or units for a Target Population are located.

TABLE 12.22 A.37(e)(1)(i)a Required Percentage of Restricted Affordable Unit Set Asides - Density Bonuses			
Percentage of Density Bonus	Percentage of Very Low Income	Percentage of Low Income	Percentage of Moderate Income (For-Sale)
5	-	-	10
6	-	-	11
7	-	-	12
8	-	-	13
9	-	-	14
10	-	-	15
11	-	-	16
12	-	-	17
13	-	-	18

<b>TABLE 12.22 A.37(e)(1)(i)a</b> <b>Required Percentage of Restricted Affordable Unit Set Asides - Density Bonuses</b>			
<b>Percentage of Density Bonus</b>	<b>Percentage of Very Low Income</b>	<b>Percentage of Low Income</b>	<b>Percentage of Moderate Income (For-Sale)</b>
14	-	-	19
15	-	-	20
16	-	-	21
17	-	-	22
18	-	-	23
19	-	-	24
20	5	10	25
20.5	-	-	-
21	-	-	26
21.5	-	11	-
22	-	-	27
22.5	6	-	-
23	-	12	28
23.5	-	-	-
24	-	-	29
24.5	-	13	-
25	7	-	30
25.5	-	-	-
26	-	14	31
26.5	-	-	-
27	-	-	32
27.5	8	15	-
28	-	-	33



<b>TABLE 12.22 A.37(e)(1)(i)a</b> <b>Required Percentage of Restricted Affordable Unit Set Asides - Density Bonuses</b>			
<b>Percentage of Density Bonus</b>	<b>Percentage of Very Low Income</b>	<b>Percentage of Low Income</b>	<b>Percentage of Moderate Income (For-Sale)</b>
28.5	-	-	-
29	-	16	34
29.5	-	-	-
30	9	-	35
30.5	-	17	
31	-	-	36
31.5	-	-	-
32	-	18	37
32.5	10	-	-
33	-	-	38
33.5	-	19	-
34	-	-	39
34.5	-	-	-
35	11	20	40
38.75	12	21	41
42.5	13	22	42
46.25	14	23	43
50	15	24	44

(ii) **Additional Density Bonus.** A Housing Development that provides Restricted Affordable Units sufficient to qualify for a 50% Density Bonus may seek an additional Density Bonus pursuant to Table 12.22

A.37(e)(1)(ii)a provided that the resulting Housing Development does not restrict more than 50% of a Housing Development's overall Residential Units to Restricted Affordable Units. The Additional Density Bonus shall be calculated excluding any Density Bonus allowed by Table 12.22 A.37(e)(1)(i). The Additional Density Bonus shall also be calculated separately from the Density Bonus allowed by Table 12.22 A.37(e)(1)(i)a to account for the rounding of fractional numbers for both the Density Bonus and Additional Density Bonus pursuant to LAMC Section 12.22 A.37(h)(5).

<b>TABLE 12.22 A.37(e)(1)(ii)a Required Percentage of Restricted Affordable Unit Set Asides - Additional Density Bonuses</b>		
<b>Percentage of Density Bonus</b>	<b>Percentage of Very Low Income</b>	<b>Percentage of Moderate-Income</b>
20	5	5
22.5	-	6
23.75	6	-
25	-	7
27.5	7	8
30	-	9
31.25	8	-
32.5	-	10
35	9	11
38.75	10	12
42.5	-	13
46.25	-	14
50	-	15

- (iii) **Housing for Target Populations.** Housing Developments that provide Residential Units for a target population listed in Table 12.22 A.37(c)(2)(iii) shall receive a Density Bonus as follows in Table 12.22 A.37(e)(1)(iii)a. These Density Bonuses may be combined with a Density Bonus for Residential Units set aside as Restricted Affordable Units based on Table 12.22 A.37(e)(1)(i)a so long as the Restricted Affordable Units are set aside for the applicable Target Population.

<b>TABLE 12.22 A.37(e)(1)(iii)a Housing for Target Populations - Density Bonuses</b>	
<b>Target Population</b>	<b>Percentage of Density Bonus</b>
Senior Citizen	20%
Transitional Foster Youth/Disabled Veterans/Homeless Persons	20%
Lower Income Student Development	35%

Footnotes

1 Senior Citizen Housing Development must comply with Sections 51.2 and 51.3 of the California Civil Code.

- (iv) **Land Donation.** An applicant for a subdivision, parcel map or other residential development approval that donates land for housing to the City of Los Angeles satisfying the criteria of California Government Code Section 65915(g)(2), as verified by the Department of City Planning, shall be granted a minimum Density Bonus of 15% in addition to the Density Bonus sought pursuant to LAMC Section 12.22 A.37(e)(1), up to a combined maximum density increase of 35%. The Department of City Planning may create an Implementation Memorandum for the purpose of clarifying procedures associated with the implementation of Land Donations pursuant to California Government Code Section 65915(g).

(2) **Parking.** Housing Developments may reduce the number of required parking spaces set forth in Section 12.21 A.4 of this code as follows, pursuant to California Government Code Section 65915 (p):

(i) Parking shall not be required for Housing Developments located within one-half mile of a Major Transit Stop pursuant to California Government Code Section 65863.2.

(ii) Unless eligible for parking reductions pursuant to California Government Code Section 65863.2, a Housing Development may utilize the vehicular parking ratio described in Table 12.22 A.37(e)(2)(ii)a.

<b>TABLE 12.22 A.37(e)(2)(ii)a</b> <b>Vehicular Parking Ratio for Eligible Housing Developments</b>	
<b>Number of Bedrooms</b>	<b>Parking Spaces per Residential Unit Type</b>
Zero to one bedroom	1
Two to three bedrooms	1.5
Four and more bedrooms	2.5

(iii) Pursuant to California Civil Code Section 1947.1, provided parking shall be sold or rented separately from the Residential Units in Housing Developments with 16 or more units, as verified by the Los Angeles Housing Department.

(iv) Required automobile parking applies for all Residential Units in a Housing Development (not just the Restricted Affordable Units), inclusive of disabled and required guest parking, where applicable. All parking spaces provided shall comply with Subdivision 12.21 A.5 of the LAMC. Except that, consistent with California Government Code Section 65915(p)(4), any combination of standard, compact or tandem spaces may be provided. Tandem parking spaces that do not comply with Subparagraph 12.21 A.5(h)(2) of the LAMC may be provided in any configuration as long as a parking attendant or an automated parking system is provided at all times.

(v) Consistent with California Government Code Section 65915(p)(4), required parking spaces provided may be uncovered.

(f) **Additional Incentives.** A Housing Development shall be granted a number of Additional Incentives pursuant to the provisions of this Paragraph in addition to the Base Incentives established in LAMC Section 12.22 A.37(e).

(1) A Housing Development shall be eligible for Additional Incentives based on Table 12.22 A.37(f)(1)(i) below. A Housing Development may request Incentives listed in Paragraph (f)(2) or use an Incentive to seek a deviation from a Development Standard elsewhere in the LAMC or a Housing Development site's applicable zoning ordinance, specific plan, or overlay. Refer to Paragraph (d) for the approval Procedure that is consistent with the Housing Development's Incentive request.

<b>TABLE 12.22 A.37(f)(1)(i)</b> <b>Allowed Number of Additional Incentives</b>				
Level of Affordability	Required Percentage of Residential Units Provided (Excluding Units Added by a Density Bonus)			
	1 Incentive	2 Incentives	3 Incentives	4 Incentives <sup>1</sup>
Very Low Income (for rental or for sale)	5%	10%	15%	16%
Low Income (for rental or for sale)	10%	17%	24%	N/A*
Moderate Income (for sale)	10%	20%	30%	45%
Lower Income Student Housing	20%	20%	N/A	N/A

Footnotes

<sup>1</sup> One Hundred Affordable Housing Projects shall be processed pursuant to LAMC Section 12.22 A.39.

(ii) Incentives allowed per Table 12.22 A.37(f)(1)(i) and requested pursuant to the applicable procedure in Paragraph (d) of this Subdivision shall be granted unless it is found, based upon substantial evidence, that:

- a. The Incentive does not result in identifiable and actual cost reductions, consistent with California Government Code Section 65915(k), to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5, or for rents for the targeted units to be set as specified in California Government Code Section 65915(c); or
- b. The Incentive will have a Specific Adverse Impact upon public health and safety or the physical environment or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the Specific Adverse Impact without rendering the development unaffordable to low-income and moderate-income households. Inconsistency with the zoning ordinance or general plan land use designation shall not constitute a Specific Adverse Impact upon the public health or safety; or
- c. The Incentive would be contrary to state or federal law.

(iii) To be eligible for the Menu of Incentives described in LAMC Section 12.22 A.37(f)(2) a Housing Development shall comply with the following:

- a. The Housing Development shall not be located in a Very High Fire Hazard Severity Zone, a Sea Level Rise Area, or the Coastal Zone.

(iv) Commercial Off-Site. Pursuant to California Government Code Section 65915.7, a commercial development may request one Incentive set forth in California Government Code Section 65915.7 (b) if the commercial developer directly contributes affordable housing, or enters into a contract for partnered housing described in 65915.7(c) with a housing developer to construct affordable housing. If a commercial developer partners with a housing developer, an agreement, subject to approval by the Department of City Planning, shall identify exactly how the commercial developer will contribute affordable housing. Housing constructed pursuant to this Subparagraph shall be constructed on the site of the commercial development or on a site that meets all of the following requirements:

- a. Located within the boundaries of the City of Los Angeles; and
- b. In close proximity to public amenities including schools and employment centers; and
- c. Located within one-half mile of a Major Transit Stop.

(2) **Menu of Incentives.** A Housing Development may elect to request one of the following incentives not to exceed the allowed number of incentives pursuant to Table 12.22 A.37(f)(1)(i). Each request from the Menu of Incentives shall constitute one Incentive request unless otherwise stated.

(i) **Yards.** Housing Developments may request a reduction of otherwise required yards as follows:

Yards/Setbacks	C Zones	<b>R Zones</b> (yard reductions for requests from the Menu of Incentives in R zones may be combined and require the use of only one incentive)
	In any Commercial zone, Housing Developments may utilize any or all of the yard requirements for the RAS3 zone per LAMC Section 12.10.5. Housing Developments on commercially zoned sites adjacent to properties zoned RD or more restrictive may provide a rear yard of not less than five feet.	<b>Front Yards.</b> Front yard reductions are limited to no more than the average of the front yards, regardless of a required Building Line, of adjoining buildings along the same street frontage. Or, if located on a corner lot or adjacent to a vacant lot, the front yard setback may align with the façade of the adjoining building along the same front lot line. If there are no adjoining buildings, no reduction is permitted.
		<b>Side and Rear Yards.</b> Up to 30% decrease in the required width or depth of any individual yard or setback.



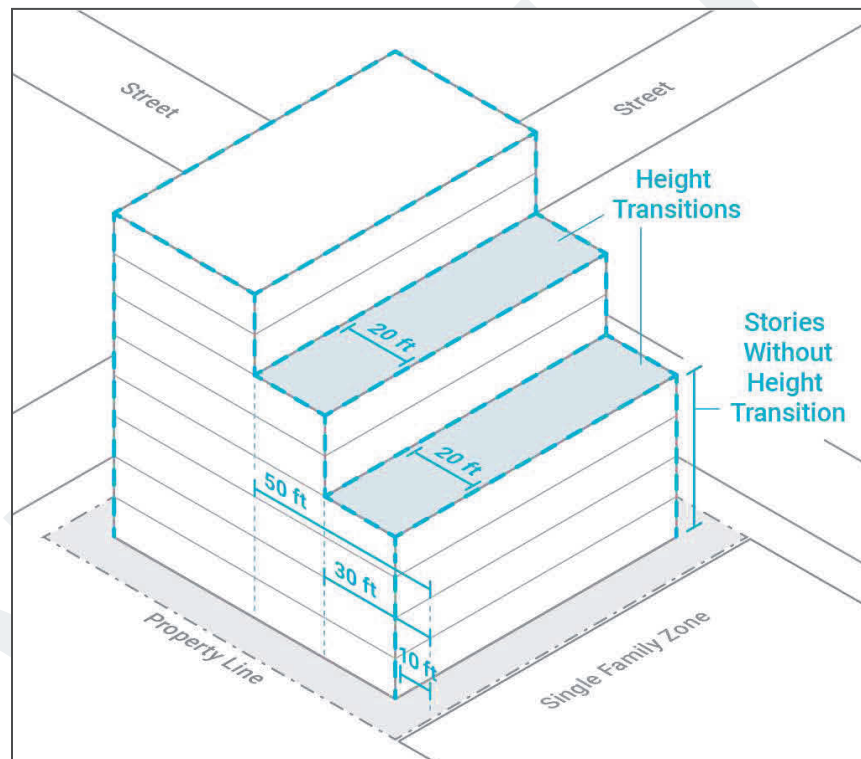
(ii) **Floor Area Ratio.** Housing Developments may request an increase in the otherwise allowed Floor Area Ratio (FAR) equal to the percentage of Density Bonus for which the Housing Development is eligible, not to exceed 35% or a maximum FAR of 3.0:1, whichever is greater, if located within a one-half mile radius (2,640 feet) of a Major Transit Stop. In a mixed-use development, the FAR bonus will apply only to the residential portion of the development and the nonresidential portion shall be limited to the FAR associated with a site's underlying zoning prior to the application of any Incentive.

a. **Exception.** Projects on lots zoned "RD" Restricted Density or more restrictive; or on lots with Designated Historic Resources, or Non-Contributing Elements as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code, shall not be eligible for an on-menu FAR incentive.

(iii) **Height.** A Housing Development may request a height increase to permit a maximum of eleven additional feet or one additional story, whichever is lower. This increase in height shall be applicable over the entire lot regardless of the number of underlying height limits, including Transitional Height or stepback requirements, except when the Transitional Height Incentive below is also requested. The height increase may be applied to the maximum allowable height in feet or stories permitted by the zone, including for mixed-use Housing Developments.

a. Notwithstanding Section 12.21.1, for Housing Developments where a rooftop deck is provided, roof structures for the housing of elevators and stairways may exceed the building height limit by up to seventeen feet in height on sites where the applicable Height District limits height to thirty feet or forty-five feet provided the proposed roof structure(s) is set back from the roof perimeter by five feet.

- (iv) **Transitional Height.** Housing Developments may select the following transitional height requirements in lieu of those found in Section 12.21.1.A.10 of this Code or any applicable transitional height limits in a Housing Development site's applicable zoning, Specific Plan, or overlay including any requirements for reduced building heights or setbacks when a building is adjoining a RW1 or more restrictive zone. Furthermore, Housing Developments adjoining an OS zone may utilize this incentive to be exempt from the transitional height requirements found in Section 12.21.1.A.10 of this Code or any applicable Specific Plan or Overlay for the portion of the Housing Development abutting the OS zone.



	Setback/Step Back Distance*
Side or Rear Setback	10-feet
4 Story Step-Back	30-feet
6 Story Step-Back	50-feet

\*Setback and Step-back is measured from the property line.

- (v) **Space Between Buildings and Passageways.** Housing Developments subject to the provisions set forth in LAMC Section 12.21 C.2 may request a reduction in space between buildings and passageways requirements as follows:
- a. Up to a 30% reduction in the space between buildings required pursuant to LAMC Section 12.21 C.2(a); and
  - b. Up to 50% reduction in the width of the passageway required pursuant to LAMC Section 12.21 C.2(b) or the space provided to meet a subject site's required side yard requirement, whichever provides a greater reduction. Passageways provided may extend from any public street adjacent to the Housing Developments site.
- (vi) **Lot Coverage.** Housing Developments may request up to a 20% increase in lot coverage limits, provided that the landscaping for the Housing Development meets a minimum of 30 points under the Landscape and Site Design Ordinance Section 12.40 of this Code, and the Landscape and Site Design Point System.
- (vii) **Lot Width.** Housing Developments may request up to a 25% decrease from a lot width requirement, provided that the landscaping for the Housing Development meets a minimum of 30 points under the Landscape and Site Design Ordinance Section 12.40 of this Code, and the Landscape and Site Design Point System.
- (viii) **Open Space.** In lieu of the open space calculations set forth in LAMC Section 12.21 G.2, Housing Developments requesting this incentive may calculate their usable open space requirement as 15% of the total lot area or 10% of the total floor area confined within the perimeter walls of the provided Residential Units, whichever is greater, provided that the overall design of the Housing Development meets a minimum of 30 points under the Landscape and Site Design Ordinance Section 12.40 of this Code, and the Landscape and Site Design Point System. Common Open Space shall constitute at least 50% of the usable open space calculated under this incentive and shall be provided as outdoor space and comply with applicable provisions of Section 12.21 G.2(a)(1-4). Usable open space provided as Private Open Space shall comply with Section 12.21 G.2(b).
- (ix) **Density Calculation.** The area of any land required to be dedicated for street or alley purposes may be included as lot area for purposes of calculating the maximum density permitted by the underlying zone in which the Housing Development is located.

(x) **Averaging of Floor Area Ratio, Density, Parking, or Open Space, and permitting Vehicular Access.** A Housing Development that is located on one or more contiguous lots, not separated by a street or alley, may average and permit the floor area, density, open space, and residential and commercial parking over the Housing Development site, and permit vehicular use and access between a less restrictive zone and a more restrictive zone, provided that:

- a. The proposed Housing Development includes the number of Restricted Affordable Units sufficient to qualify for a 35% Density Bonus; and
- b. No further lot line adjustment or any other action that may cause the Housing Development site to be subdivided subsequent to this grant shall be permitted; and
- c. The proposed use is permitted by the underlying zone(s) of each lot.

(xi) **Supplementary Parking Reductions.** An applicant may request the following reductions as a single incentive:

- a. **Commercial Parking.** Housing Developments may request to waive any requirement to provide new or maintain existing automobile parking spaces required by Chapter 1 of this Code associated with a commercial use that is proposed in conjunction with the Housing Developments.
- b. **General Parking Reduction.** Housing Developments located within one-half mile radius of a High Quality Transit Service may receive up to 50% reduction in required parking spaces pursuant to California Government Code Section 65915 (p)(5).

(xii) **P Zone.** In lieu of the limitations described in LAMC Section 12.12.1 and LAMC Section 12.12.1.5, in a P or PB zone a Project may include the uses and area standards permitted in the least restrictive adjoining zone. The phrase “adjoining zone” refers to the zones of properties abutting, across the street or alley from, or having a common corner with, the subject property.

(xiii) **Relief from a Development Standard.** A Housing Development may request up to 20% relief from a Development Standard contained in Chapter 1 of this Code, an Overlay, a Specific Plan, a Q Condition, or a D Condition. Housing Developments requesting this incentive must provide landscaping for the Housing Development that meets a minimum of 30 points under the Landscape and Site Design Ordinance Section 12.40 of this Code, and the Landscape and Site Design Point System. This incentive may be requested more than once, but shall require the use of an Incentive for each request.

a. **Exception.** This incentive shall not apply to standards that regulate FAR, Height, yards/setbacks, ground story requirements, signs, parking in front of buildings, or usable open space. This incentive shall not apply to a Designated Historic Resource(s), or a Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code.

(xiv) **Senior Independent Housing.** In lieu of otherwise applicable limitations, a Housing Development or Senior Citizen Housing Development that also meets the definition of Senior Independent Housing may be permitted in any zone that would otherwise allow a Housing Development. In addition, a Senior Independent Housing development that qualifies as a Shared Housing Building shall be treated the same as a Shared Housing Building.

(g) **Public Benefit Options.** A Housing Development shall be granted any number of Public Benefit Options pursuant to the provisions described below in addition to the Base Incentives established in LAMC Section 12.22 A.37(e) and the Additional Incentives described in LAMC Section 12.22 A.37(f). Housing Developments located in Sea Level Rise Areas, Very High Fire Hazard Severity Zones, or the Coastal Zone shall not be eligible for the Public Benefit Option described in LAMC Section 12.22 A.37(g)(3) or LAMC Section 12.22 A.37(g)(4).

(1) **Child Care Facility.** A Housing Development that includes a Child Care Facility located on the premises of, as part of, or adjacent to, the Housing Development, and that complies with the requirements set forth in Government Code Section 65915(h)(2) shall be granted either of the following:

- (i) An additional Density Bonus that is, for purposes of calculating residential density, an increase in the floor area of the Housing Development equal to the floor area of the Child Care Facility included in the Housing Development; or
- (ii) An additional Incentive from the Menu of Incentives or not listed on the Menu of Incentives that contributes significantly to the economic feasibility of the construction of the Child Care Facility; or
- (iii) Notwithstanding the Public Benefit available under this Subparagraph, pursuant to California Government Code Section 65915(h)(3), a Density Bonus or Incentive for a Child Care Facility shall not be provided if it is found, based on substantial evidence, that the community has adequate Child Care Facilities.

(2) **Multi-Bedroom Units.** A Housing Development providing multi-bedroom units shall be granted one of the following so long as an affidavit declaring the qualifying multi-bedroom units will maintain the same bedroom count and will not be converted to additional Residential Units in the future is executed and recorded with the Department of City Planning:

- (i) A Housing Development that includes a minimum of 10% of Residential Units, including Residential Units added by a Density Bonus, as Residential Units with three bedrooms or more shall be granted additional Floor Area and Height in addition to what is available on the Menu of Incentives in LAMC Section 12.22 A.37(f)(2) as follows in Table 12.22 A.37(g)(3)(i)a; or

<b>TABLE 12.22 A.37(g)(3)(i)a Additional FAR and Height for Multi-Bedroom Units</b>		
Overall Residential Units (including Density Bonus Units)	Additional FAR	Additional Height (Stories)
0-30	0.5:1	1
31-50	1.0:1	1
51-75	1.5:1	2
75+	2.0:1	2

- (ii) A Housing Development shall be granted the following Floor Area and Height Incentives, as described in (a) and (b) below:
  - a. An exemption of the square footage of all Residential Units with three or more bedrooms from the floor area calculations of multi-bedroom units, and/or
  - b. An additional story of height beyond what is available in the applicable height incentive as listed for Additional Incentives in Paragraph (f), provided, the square footage of this additional story is limited to the square footage exempted as a result of applying 12.22 A.37(g)(4)(ii)(a) above.



- (3) **Surveyed Historic Resource Facade Rehabilitation.** Projects incorporating a Surveyed Historic Resource(s) into the Project design shall be granted additional Floor Area up to 1.0 FAR and 22 feet in height beyond what is available on the Menu of Incentives in LAMC Section 12.22 A.37(f)(2), provided all of the following standards are met:
- (i) The Project retains all street Fronting facades to a depth of 10-feet,
  - (ii) New Floor Area shall be setback behind the 10-foot retention area, except that open space, balconies, and non-habitable architectural projections may encroach on the 10-foot retention area. In instances where a lot contains dual-frontages, the setback shall be applied from both frontages, and
  - (iii) Rehabilitation of the facades is completed pursuant to the Secretary of the Interior's Standards for Rehabilitation to the satisfaction of the Office of Historic Resources.
- (h) **Program Standards.** The following program standards shall be applicable to any Housing Development that meets the eligibility criteria established in Paragraph (c) of this Subdivision.
- (1) **Other Density Bonus Programs.** Housing Developments seeking a Density Bonus pursuant to this Subdivision may not pursue a Density Bonus pursuant to the procedures of any other housing incentive program contained in this Code or in an Overlay or Specific Plan.
  - (2) **Calculating Maximum Allowable Residential Density.** Per Government Code Section 65915 (o)(6), a Housing Development shall calculate its Maximum Allowable Residential Density, before the application of a Density Bonus, using the maximum number of units allowed under a Housing Development site's applicable zoning ordinance, specific plan, overlay, or general plan land use designation, whichever is greater. If a range is permitted, the maximum number of units allowed by the specific zoning range, Specific Plan, or General Plan Land Use designation shall be applicable when determining a Housing Development's density prior to the application of a Density Bonus. Residential Units added using an incentive program contained in a specific plan or overlay shall not count toward a Housing Development's Maximum Allowable Residential Density.
  - (3) **Calculating Restricted Affordable Units.** The required number of Restricted Affordable Units shall be calculated based on the Residential Units (excluding Residential Units added by a Density Bonus) provided in a Housing Development.
  - (4) **Calculating a Density Bonus.** In addition to the provisions set forth in Section 12.22 A.37(h)(2), for the purposes of calculating a Density Bonus, the following shall apply:



- (i) Residential Units that comprise a Housing Development shall be on contiguous lots, not separated by a street or alley, that are the subject of a single development application, but do not need to be based on individual subdivision maps or lots.
- (ii) A Shared Housing Unit and its proportional share of associated common area facilities shall be considered a Guest Room pursuant to California Government Code Section 65915(o)(8)(B).
- (iii) An applicant for a Housing Development may have the ability to apply a lesser percentage of Density Bonus, including but not limited to, no Density Bonus.

**(5) Fractional Numbers.**

- (i) **Units.** For the purposes of this Subdivision, calculations for the following resulting in fractional numbers shall be rounded up to the next whole number:
  - a. Maximum Allowable Residential Density
  - b. Density Bonus units
  - c. Number of Restricted Affordable Units
  - d. Number of Replacement Housing Units
  - e. Vehicular Parking
  - f. Number of Multi-Bedroom Units provided pursuant to LAMC Section 12.22 A.37(g)(3)

- (6) Replacement Housing Units and Demolition Protections.** A Housing Development must meet any applicable housing replacement requirements and demolition protections of California Government Code Section 65915(c)(3) and LAMC Section 16.60, as verified by the Los Angeles Housing Department (LAHD) prior to the issuance of a building permit. Replacement Housing Units required pursuant to this Subdivision may count towards any Restricted Affordable Unit requirements.

- (7) **Standards for Restricted Affordable Units.** A Housing Development must meet the applicable requirements regarding the size, location, amenities and allocation of Restricted Affordable Units in LAMC Sections 16.61 B and 16.61 C and in any Implementation Memorandum, Technical Bulletin or User Guide prepared and adopted by the Los Angeles Housing Department or Department of City Planning.
- (8) **Rent Schedules.** Restricted Affordable Units required as part of a Housing Development shall be rented at rates not to exceed those specified in California Health and Safety Code 50052.5 for for-sale units or California Health and Safety Code Section 50053 for for-lease units.
- (9) **Implementation Memorandums, FAQs, Forms/Applications and User Guides.** The Director may prepare Implementation Memorandums, Technical Bulletins and/or User Guides for State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, for the purpose of providing additional information pertaining to this Subdivision and maintaining consistency with State Density Bonus Law.
- (10) **Covenants.** Prior to the issuance of a building permit for any Housing Development qualifying for a Density Bonus pursuant to the provisions of this Subdivision, covenants acceptable to the Los Angeles Housing Department and consistent with the requirements in this Subdivision and set forth in LAMC Section 16.61 shall be recorded with the Los Angeles County Recorder.
- (14) **Story.** A story shall be defined as 11-feet in height.

(i) **Relationship to Other Sections of the Los Angeles Municipal Code.** The following provisions shall govern the relationship to other sections of the Los Angeles Municipal Code for any Housing Development that meets the eligibility criteria established in Paragraph (c) of this Subdivision.

- (1) A Housing Development that meets the eligibility criteria established in Paragraph (c) and complies with the Procedures established in Paragraph (d) may exceed the use limitations that may apply to a Housing Development site.
- (2) If any of the Procedures described in Paragraph (d), Base Incentives described in Paragraph (e), Additional Incentives described in Paragraph (f), Public Benefit Options described in Paragraph (g), or waivers requested pursuant to LAMC Section 12.22 A.37(d)(3)(i) conflict with those of any otherwise applicable specific plan, overlay, supplemental use district, “Q” condition, “D” limitation, or citywide regulation established in Chapter 1 of this Code, including but not limited to the Ordinance Nos. listed below, this Subdivision shall prevail.

- (i) Alameda District Specific Plan (171,139)
- (ii) Avenue 57 Transit Oriented District (174,663)
- (iii) Bunker Hill Specific Plan (182,576)
- (iv) Century City North Specific Plan (156,122)
- (v) Century City West Specific Plan (186,370)
- (vi) Century City South Specific Plan (168,862)
- (vii) Coastal Bluffs Specific Plan (170,046)
- (viii) Coliseum District Specific Plan (185,042)
- (ix) Colorado Boulevard Specific Plan (178,098)
- (x) Cornfield Arroyo Seco Specific Plan (182,617)
- (xi) Crenshaw Corridor Specific Plan (184,795)
- (xii) Devonshire/Topanga Corridor Specific Plan (168,937)
- (xiii) Exposition Corridor Transit Neighborhood Plan (186,402)
- (xiv) Foothill Boulevard Corridor Specific Plan (170,694)
- (xv) Girard Tract Specific Plan (170,774)
- (xvi) Glencoe/Maxella Specific Plan (171,946)
- (xvii) Granada Hills Specific Plan (184,296)
- (xviii) Hollywoodland Specific Plan (168,121)
- (xix) Jordan Downs Urban Village Specific Plan (184,346)
- (xx) Los Angeles Airport/El Segundo Dunes Specific Plan (167,940)
- (xxi) Los Angeles International (LAX) Specific Plan (185,164)
- (xxii) Los Angeles Sports and Entertainment District Specific Plan (181,334)
- (xxiii) Loyola Marymount University Specific Plan (181,605)
- (xxiv) Mt. Washington/Glassell Park Specific Plan (168,707)
- (xxv) Mulholland Scenic Parkway Specific Plan (167,943)
- (xxvi) North Westwood Village Specific Plan (163,202)

- (xxvii) Oxford Triangle Specific Plan (170,155)
- (xxviii) Pacific Palisades Commercial Village and Neighborhood Specific Plan (184,371)
- (xxix) Paramount Pictures Specific Plan (184,539)
- (xxx) Park Mile Specific Plan (162,530)
- (xxxi) Playa Vista Area D Specific Plan (176,235)
- (xxxii) Ponte Vista at San Pedro Specific Plan (182,937 and 182,939)
- (xxxiii) Porter Ranch Land Use/Transportation Specific Plan (180,083)
- (xxxiv) Redevelopment Plans (186,325)
- (xxxv) San Vicente Scenic Corridor Specific Plan (173,381)
- (xxxvi) University of Southern California University Park Campus Specific Plan (182,343)
- (xxxvii) Valley Village Specific Plan (168,613)
- (xxxviii) Venice Coastal Zone Specific Plan (175,693)
- (xxxix) Ventura-Cahuenga Boulevard Corridor Specific Plan (174,052)
- (xl) Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan) (173,749)
- (xli) Warner Center 2035 Plan (182,766)
- (xlii) Westwood Community Multi-Family Specific Plan (163,203 and 163,186)
- (xlili) Westwood Village Specific Plan, Westwood Community Design Review Board Specific Plan (187,644)
- (xliv) Wilshire - Westwood Scenic Corridor Specific Plan (155,044)

- (j) **Interpretation Consistent with State Density Bonus Law.** This Subdivision is intended to be interpreted as consistent with State Density Bonus Law contained in California Government Code Sections 65915-65918. If at any time, this Subdivision becomes inconsistent with California Government Code Sections 65915-65918, the provisions of State Density Bonus Law shall apply.

Section 7. Subdivision 38 of Subsection A of Section 12.22 of the Los Angeles Municipal Code is added to read as follows:

#### **12.22 A.38 MIXED INCOME INCENTIVE PROGRAM**

(a) **Purpose.** The purpose of this subdivision is to establish specific incentives and procedures for the implementation of State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, and to increase the production of affordable housing near transit, in Higher Opportunity Areas, and on major corridors. In conjunction with the incentives granted by state law, this subdivision shall offer incentives and waivers or reductions of Development Standards for the purposes of increasing the feasibility of housing construction.

(b) **Definitions.** The following definitions shall apply to this Subdivision:

**Consolidated Development.** A residential or mixed use development that consists of multiple lots with the same owner or developer.

**Corridor.** A major street with Street Designations as designated in the Mobility Element of the General Plan, including Avenue I, Avenue II, Avenue III, Boulevard I, and Boulevard II.

**Direct Pedestrian Access.** A means of approaching or entering a lot from the public right-of-way as a pedestrian.

**Environmental Consideration Area.** As defined in LAMC Section 12.22 A.37 (b).

**Finished Floor Elevation.** The finished floor height associated with the ground story.

**Frequent Bus Service.** A bus route with 30 minute or less service frequency during Peak Commute Hours in at least one direction.

**Ground Floor Frontage.** The lowest story within a building which is accessible to the street, the floor level of which is within three feet above or below curb level, is parallel to or primarily facing any public street, and which is at least 15 feet in depth of the total depth of the structure.

**Market Tier.** Categories of residential market areas adopted by City Council resolution, as described in the Affordable Housing Linkage Fee Ordinance in LAMC Section 19.18 C.1, for the purposes of informing the amount of the Linkage Fee to be assessed for a given Project.

**Mixed Income Incentive Project.** A Project that involves the construction of, addition to, or remodeling of any building or buildings which results in the creation of five or more total residential units, including a mixed use development containing two-thirds of the square footage designated for Residential Units, and meets the eligibility criteria described in Paragraph (c) of LAMC Section 12.22 A.38.

**Opportunity Corridor Transition Area Incentive Project.** A Project, located within 750 feet of an Opportunity Corridor Incentive Area, that involves the construction of, addition to, or remodeling of any building or buildings which result in the creation of four or more total residential dwelling units.

**Peak Commute Hour.** Peak periods are considered to be between 6:00 to 9:00 AM and 3:00 to 7:00 PM.

**Rapid Bus.** A higher quality bus service that may include several key attributes, including full-time dedicated bus lanes, branded vehicles and defined stations, high frequency, limited stops at major intersections, intelligent transportation systems, and possible off-board fare collection and/or all door boarding. It includes, but is not limited to, Metro Bus Rapid Transit lines, Metro Rapid 700 lines, Metro NextGen Tier 1 lines that replaced Metro Rapid 700 lines, Metro G (Orange) and J (Silver Lines), Big Blue Rapid lines and the Rapid 6 Culver City bus. Rapid Bus lines do not need to meet the 15 minute average Peak Commute Hour headways if intersecting at a qualified Major Transit Stop.

**Total Units.** The total units in a project after a Density Bonus is awarded pursuant to this Subdivision.

(c) **Eligibility.** To qualify for the provisions of this subdivision, a Project approved under the Mixed Income Incentive Program must satisfy all of the following eligibility requirements:

- (1) Meet the definition of one of the following Project Types described in Table 12.22 A.38(c)(1)(i):

TABLE 12.22 A.38(c)(1)(i) Eligible Project Types and Total Units Required	
Project Type	Total Units Required
Mixed Income Incentive Project	Five or more
Opportunity Corridor Transition Area Incentive Project	Four or more
Type I Unified Adaptive Reuse Project <sup>1</sup>	Five or more

Footnote

<sup>1</sup> See LAMC 12.22 A.26(h)(1) for additional requirements associated with a Type I Unified Adaptive Reuse Project.

- (2) Be located in and meet the requirements of a Transit Oriented Incentive Area, Opportunity Corridor Incentive Area, or an Opportunity Corridor Transition Incentive Area as described in Paragraphs (e), (f), and (g) below, except that properties abutting, across the street or alley, or having a common corner with a site eligible for Opportunity Corridor Incentives shall also be eligible for the Opportunity Corridor Incentives as described in paragraph (f) below,
- (3) Reserve a percentage of the Project's Total Units for:
- (i) On Site Restricted Affordable Units in a Project for at least one of the following income levels, as defined on Table 12.22 A.38(c)(3)(iii) or by providing the combination of income levels as defined on 12.22 A.38(c)(3)(iv) Table, or
  - (ii) Restricted Affordable Units in a Opportunity Corridor Transition Area Incentive Project for at least one of the following income levels, as defined on Table 12.22 A.38(c)(3)(v) below.

<b>TABLE 12.22 A.38(c)(3)(iii)<sup>1</sup></b> <b>Single Affordability Options for Meeting Restricted Affordable Units</b>					
Market Tier	Incentive Program		Minimum Percent of Total Units Provided as Restricted Affordable Units		
	Transit Oriented Incentive Area	Opportunity Corridors Incentive Area	Income Level		
			Extremely Low Income (For Rental or For Sale)	Very Low Income (For Rental or For Sale)	Low Income (For Rental or For Sale)
Low and Medium Market Tiers	T1	OC-1	9%	12%	21%
	T2	OC-2	10%	14%	23%
	T3	OC-3	11%	15%	25%
High Medium and High Market Tiers	T1	OC-1	11%	14%	23%
	T2	OC-2	12%	16%	25%
	T3	OC-3	13%	17%	27%

## Footnote

1 A Type I Unified Adaptive Reuse Project shall provide Restricted Affordable Units in accordance with the project site's Market Tier location and Base Incentives used. Type I Unified Adaptive Reuse Projects that utilize Base Incentives contingent on a site's location in a Transit Oriented Incentive Area shall provide Restricted Affordable Units in conjunction with a site's applicable Transit Oriented Incentive Area Tier. Type I Unified Adaptive Reuse Projects that utilize Base Incentives contingent on a site's location in an Opportunity Corridor Incentive Area shall provide Restricted Affordable Units in conjunction with a site's applicable Opportunity Corridor. Restricted Affordable Units shall be provided and distributed throughout the entire Type I Unified Adaptive Reuse Project in compliance with LAMC 16.61 B.



<b>TABLE 12.22 A.38(c)(3)(iv)</b> <b>Mixed Affordability Options for Meeting Restricted Affordable Units</b>				
Opportunity Area	Minimum Percent of Total Units Provided as Restricted Affordable Units <sup>1</sup>			
	Income Level			
	Acutely Low Income (For Rental or For Sale)	Extremely Low Income (For Rental or For Sale)	Very Low Income (For Rental or For Sale)	Moderate Income (For Rental or For Sale)
<b>Moderate and Lower Opportunity Areas</b>	-	4% <sup>2</sup>	8%	-
<b>Higher Opportunity Areas</b>	4% <sup>2</sup>	4%	-	12%

Footnote:

<sup>1</sup> Provided at least one affordability income category is consistent with the minimum affordability requirements pursuant to California Government Code Sections 65915.

<sup>2</sup> Projects utilizing the combinations of mixed affordability described in Table 12.22 A.38(c)(3)(iv) to meet the required restricted affordable units must provide one 3-bedroom covenanted unit per Project.

<b>TABLE 12.22 A.38(c)(3)(v)</b>			
Incentive Program	Minimum Percent of Total Units Provided as Restricted Affordable Units <sup>1,2</sup>		
Corridor Transition Incentive Area	Income Level		
	Very Low Income (For Rental or For Sale)	Low Income (For Rental or For Sale)	Moderate Income (For Rental or For Sale)
CT-1A	—	—	1 unit
CT-1B, and CT-2	1 unit	1 unit	2 unit
CT-3	2 units	2 units	3 units

Footnote:

<sup>1</sup> For consolidated lots, the Project shall provide the same affordability as required per individual lot. For example, if a project consolidated two lots into one project using CT-2 incentives, the project would be required to provide either 2 Very Low Income or Low Income units, or 4 Moderate Income units.

<sup>2</sup> Provided at least one affordability income category is consistent with the minimum affordability requirements pursuant to California Government Code Sections 65915.

- (4) The Project site does not include any lots located in a single family or more restrictive zone (RW and more restrictive zone), or any lots located in a manufacturing zone that does not allow multi-family residential uses (M1, M2, and M3), including sites zoned CM, MR1, and MR2 with no residential uses permitted from an applicable planning overlay.
- (5) Projects located on sites that meet the definition of an Environmental Consideration Area shall comply with all applicable standards contained in the Environmental Protection Measures adopted pursuant to LAMC Section 11.5.15.
- (5) The Project site does not include any lots located within a Very High Fire Hazard Severity Zone (VHFHSZ), within the Coastal Zone, or within a Sea Level Rise Area. Except that a project site that is located within a VHFHSZ or Coastal Zone shall be eligible for Opportunity Corridor Incentives as defined in Paragraph (f), if properties are abutting, across the street or alley, or having a common corner with the subject property are not in a VHFHSZ or Coastal Zone, and is eligible for the Opportunity Corridor Incentives as described in paragraph (f) below.
- (6) The Project would not require the demolition of any of the following, as demolition is defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code.
  - (i) A Designated Historic Resource, or
  - (ii) Any Surveyed Historic Resource, eligible or architectural historic resource identified for any historic protection or special consideration or review by an applicable Overlay or Specific Plan including sites located in the South Los Angeles Community Plan Implementation Overlay (CPIO) Section 1-6.C.5.b, the Southeast Los Angeles CPIO Section 1-6.C.5.b, the West Adams CPIO Section 6.C.5.b, or the San Pedro CPIO Section 7.C.5.b, Westwood Village Specific Plan, Echo Park CDO District, or the North University Park Specific Plan.
- (7) A Project involving Designated Historic Resources shall be consistent with the Secretary of the Interior's Standards for Rehabilitation.
- (8) A Project shall not be located in the Boyle Heights Community Plan, the Harbor Gateway Community Plan, the Wilmington-Harbor City Community Plan, the Central City North Community Plan, the Central City Community Plan Areas, and the Cornfield Arroyo Seco Specific Plan.

(d) **Procedures.** A Project that meets the provisions of this Subdivision shall be reviewed pursuant to the Procedures, as set forth below. Though an approval of a Density Bonus or Incentive pursuant to this Subdivision shall not, in and of itself, trigger a General Plan Amendment, Zone Change, Project Review, the applicable procedures set forth in LAMC Section 13A.2.10 (Multiple Approvals) of Chapter 1A of this Code shall apply for Projects seeking other discretionary approvals in conjunction with an application requested pursuant to the Procedures in Paragraph (d).

(1) **Los Angeles Department of Building and Safety Review.** Projects seeking Base Incentives described in Paragraphs (e)(2), (f)(2) or (g)(2), and/or Incentives listed on the Menu of Incentives in Paragraph (h) shall be considered ministerial and processed by the Department of Building and Safety.

(2) **Expanded Administrative Review.** The following Projects shall be ministerially approved pursuant to Expanded Administrative Review, as set forth by the provisions of LAMC Section 13B.3.2 (Expanded Administrative Review) of Chapter 1A of this Code. As defined in this Subdivision, ministerial approval means an administrative process to approve a “use by right” as this term is defined in California Government Code Section 65583.2 (i):

(i) Projects that request the Public Benefit Options described in Paragraph (i). Housing Developments that request only Public Benefit Options in addition to Incentives listed on the Menu of Incentives shall not be subject to any hearing procedures regardless of the provisions contained in LAMC Section 13B.3.2.D.

(ii) Projects that request Incentives not listed on the Menu of Incentives described in LAMC Section 12.22 A.38(h)(2). Housing Developments that request Incentives not listed on the Menu of Incentives may be subject to a public hearing as described in LAMC Section 13B.3.2.D

a. Projects requesting Incentives not listed in Paragraph (h) shall be required to meet a minimum of 35 points under the Landscape and Site Design Ordinance.

b. **Exception.** Projects that request an Incentive not on or in excess of the Menu of Incentives for relief from Floor Area Ratio (FAR), Height, Open Space requirements, tree planting requirements, ground story requirements, and/or yards/setback requirements shall seek approval pursuant to the Procedures described in LAMC 12.22 A.37.

(3) **Director's Determination.** The Director of Planning shall review the following Projects pursuant to LAMC Section 13B.2.5 of Chapter 1A of this Code.

- (i) Projects requesting up to one waiver or reduction of any Development Standard not on the Menu of Incentives described in Paragraph (h). Waivers or reductions of any Development Standards shall be reviewed pursuant to the Findings described in LAMC Section 12.22 A.38(d)(3).

(4) **City Planning Commission Review.** The following Projects must file an application pursuant to LAMC Section 13B.2.3 (Class 3 Conditional Use Permit) of Chapter 1A of this Code. Notwithstanding the provisions set forth in Sec. 13B.2.3. of Chapter 1A, the decision of the City Planning Commission shall be final.

- (i) Projects that request more than one waiver or reduction of any Development Standards not on the Menu of Incentives described in Paragraph (h). Waivers or reduction of any Development Standards shall be reviewed pursuant to the Findings described in LAMC Section 12.22 A.38(d)(5).

(5) **Findings for Waivers or Reductions of Development Standards.** Waivers requested pursuant to the procedures described in this Paragraph shall be approved by the applicable decision-making authority unless that decision-making authority finds that:

- (i) The Development Standard associated with a request for waiver(s) or reduction(s) in Development Standards will not have the effect of physically precluding the construction of a development meeting the Eligibility criteria described in Paragraph (c) at the densities or with the concessions or incentives permitted under Paragraphs (e), (f), or (g); or
- (ii) The waivers or reductions of Development Standards would have a Specific Adverse Impact, as defined in paragraph (2) of subdivision (d) of Section 65589.5, upon public health and safety or on a California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact without rendering the development unaffordable to low-income and moderate-income households; or
- (iii) The waivers or reductions of Development Standards are contrary to state or federal law.

- (6) **Other Discretionary Approvals.** Applicable procedures set forth in LAMC Section 13A.2.10 (Multiple Approvals) of Chapter 1A of this Code apply for Projects seeking other discretionary approvals in conjunction with an application requested pursuant to the Procedures in Paragraph (d). Regardless of any other findings that may be applicable, the decision maker must approve the requested Base Incentives and Additional Incentives, either on or off the Menu of Incentives described in Paragraph (h), requested under this Subdivision unless the decision maker, based upon substantial evidence determines that the Project meets one or more of the criteria described in LAMC Section 12.22 A.38(h)(1).

**(e) Transit Oriented Incentive Area.**

- (1) **Eligibility.** Projects may seek Base Incentives according to the eligibility criteria for Transit Oriented Incentive Areas described below.
- (i) Each one-half mile radius (2,640 feet) around a Major Transit Stop, shall constitute a unique Transit Oriented Incentive Area.
  - (ii) Each lot within a Transit Oriented Incentive Area shall be determined to be in a specific subarea based on the shortest distance between any point on the lot and a qualified Major Transit Stop as delineated in Table 12.22 A.38(e)(1)(iv) below.
  - (iii) Each lot in a Transit Oriented Incentive Area shall be determined to be in a specific Transit Oriented Incentive Area (T-1 to T-3) based on the shortest distance between any point on the lot and a qualified Major Transit Stop.

Table 12.22 A.38(e)(1)(iv)			
Distance to Major Transit Stop	Eligibility Subarea		
Description	T-1	T-2	T-3
Two Regular Buses (intersection of two non Rapid Bus Lines each with at least 15 minute average peak headways)	<2640 feet	-	-
Regular plus Rapid Bus (intersection of a regular bus and a Rapid Bus line)	750 - < 2640 feet	<750 feet	-
Two Rapid Buses (intersection of two Rapid Bus lines)	1500-2640 feet	<1500 feet	-
Metrolink Rail Stations	750 - <2640 feet	<750 feet	-
Metro Rail Stations and Rapid Bus Transit Stations	-	≤ 2640 feet	<750 feet from intersection with another rail line or a Rapid Bus

(2) **Base Incentives.** Projects shall be granted Base Incentives established in Table 12.22 A.38(e)(2)(i), in exchange for the required minimum percentage of Restricted Affordable Units established in Paragraph (c) of this Subdivision. Projects that qualify for Base Incentives established in the table below shall also be eligible for Public Benefit Options listed in Paragraph (i) of this subdivision. For Type I Unified Adaptive Reuse Projects that meet the eligibility criteria established in LAMC 12.22 A.38(c), notwithstanding the Density Bonuses described in Table 12.22 A.38(e)(2)(i), the density shall be limited by floor area and Base Incentives for Parking, FAR, and Height shall only apply to the project's new construction.

Table 12.22 A.38(e)(2)(i)

Eligibility Subarea	Density Bonus	Parking	Floor Area Ratio (FAR)	Height
	In each subarea, the maximum increase in the otherwise Maximum Allowable Residential Density shall be as follows:	In each subarea, the required parking ratio shall be as follows: <sup>1 2 6</sup>	In each subarea, the maximum allowable FAR shall be as follows: <sup>3 4</sup>	In each subarea, the maximum allowable height permitted shall be equal to the following: <sup>5</sup>
T-1	Moderate and Lower Opportunity Areas: 100%	No parking minimum required. If parking is provided, up to 40% of spaces may be provided as compact vehicular spaces. Tandem parking may also be permitted so long as a 24-hour attendant is present on-site.	R - zones: 40% increase.	One additional story, up to 11 additional feet.
			C - zones: 3.25:1, or 40% increase, whichever is greater.	
	Higher Opportunity Areas: 120%		R - zones: 40% increase.	
			C - zones: 4.2:1, or 45% increase, whichever is greater.	
T-2	Moderate and Lower Opportunity Areas: 110%		R - zones: 40% increase.	Two additional stories, up to 22 additional feet.
			C - zones: 4.2:1, or 50% increase, whichever is greater.	
	Higher Opportunity Areas: Limited by Floor Area		R - zones: 45% increase.	
			C - zones: 4.5:1, or 50% increase, whichever is greater.	
T-3	Moderate and Lower Opportunity Areas: 120%		R - zones: 45% increase.	Three additional stories up to 33 additional feet.
			C - zones: 4.5:1, or 50% increase, whichever is greater.	
	Higher Opportunity Areas: Limited by Floor Area		R - zones: 50% increase.	
			C - zones: 4.65:1, or 55% increase, whichever is greater.	

**Footnotes:**

1 Required automobile parking applies for all Residential Units in a Project (not just the restricted affordable units), inclusive of disabled and required guest parking, where applicable. All parking spaces provided shall comply with Subdivision 12.21 A.5 of the Code. Except that any combination of standard, compact or tandem spaces may be provided. Tandem parking spaces that do not comply with Subparagraph 12.21 A.5(h)(2) of the Code may be provided in any configuration as long as a parking attendant or an automated parking system is provided at all times.

2 Pursuant to California Civil Code Section 1947.1, provided parking shall be sold or rented separately from the units in properties with 16 or more units, as verified by the Los Angeles Housing Department.

3 The maximum increase in the allowable FAR permitted shall be equal to the table above, provided that any additional floor area provided through this Paragraph is utilized only by residential uses. Any nonresidential uses shall be limited to the FAR associated with a site's underlying zoning prior to the application of any Incentive.

4 For the purpose of applying this incentive, commercial zones include Hybrid Industrial zones, Commercial Manufacturing zones and any defined area in a Specific Plan or overlay district that allows for both commercial uses and residential uses.

5 The increase in height shall be applicable to a Project over the entire project site regardless of the number of underlying height limits. The height increase may be applied to the maximum allowable height in feet or stories permitted by the zone, including for mixed-use Projects.

6 Consistent with California Government Code Section 65915(p)(4), required parking spaces provided allowable may be uncovered.

**(i) Exceptions.**

a. Sites with a Maximum Allowable Residential Density of less than 5 units shall be eligible for the following Density Bonuses:

i. T-1: 60%

ii. T-2: 70%

lii. T-3: 80%

b. Sites with a Maximum Allowable Residential Density of less than 5 units, Designated Historic Resource(s), or Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code shall not be eligible for an incentive to increase allowable FAR or height above one additional story, up to 11 additional feet.

c. In a Specific Plan or overlay district that has a FAR available through a development bonus or incentive program to provide affordable housing, a Project may utilize the Bonus FAR of the Specific Plan or overlay district in lieu of the FAR maximum described above in Table 12.22 A.38(e)(2)(i).



**(f) Opportunity Corridor Incentive Area.**

- (1) **Eligibility.** Projects may seek Base Incentives according to the eligibility criteria for Mixed Income Incentive Projects as described in Paragraph (c) and Opportunity Corridor Incentive Areas, described in Table 12.22 A.38(f)(1)(i), below.

Table 12.22 A.38(f)(1)(i)		
Eligibility Subarea	Corridor Requirements	Geographic Criteria
OC-1	Corridors with Frequent Bus Service	Higher Opportunity Areas
OC-2	Corridors with High Quality Transit Service	
OC-3	Corridors within one - half mile from Metro Rail Station or Portal and Rapid Bus Stop	

- (ii) **Corridor Access.** A Project must provide Direct Pedestrian Access to the eligible Opportunity Corridor.
- (iii) **Frontage.** Each eligible lot must provide a minimum 25-foot frontage along the eligible corridor, or be part of a Consolidated Development with a 25-foot frontage along the eligible corridor.
- (2) **Base Incentives.** A Project shall be granted Base Incentives established in this Paragraph as defined in Table 12.22 A.38(f)(2)(i) below, in exchange for the required minimum percentage of Restricted Affordable Units established in Paragraph 12.22 A.38(c)(3) of this Subdivision. Projects that qualify for Base Incentives established in the table below shall also be eligible for Public Benefit Options listed in Paragraph (i) of this subdivision. For Type I Unified Adaptive Reuse Projects that meet the eligibility criteria established in LAMC 12.22 A.38(c), the Base Incentives shall only apply to the project's new construction.

<b>Table 12.22 A.38(f)(2)(i)</b> <b>Opportunity Corridor Incentive Area Base Incentives</b>				
<b>Eligibility Subarea</b>	<b>Density Bonus</b>	<b>Parking</b>	<b>Floor Area Ratio</b>	<b>Height</b>
Description	In each subarea, the maximum increase in the otherwise Maximum Allowable Residential Density shall be as follows:	In each subarea, the required parking ratio shall be as follows: <sup>1 2 5</sup>	In each subarea, the maximum allowable FAR permitted shall be as follows <sup>3</sup> :	In each subarea, the maximum allowable height permitted shall be equal to the following: <sup>4</sup>
OC-1	Limited by Floor Area	No Parking required.	R - zones: 45% increase.	One additional story, up to 11 additional feet; or up to a maximum of 5 total stories, whichever is greater.
			C - zones: 4.5:1, or 50% increase, whichever is greater.	
OC-2			R - zones: 50% increase.	Two additional stories, up to 22 additional feet; or up to a maximum of 6 total stories, whichever is greater.
			C - zones: 4.65:1, or 55% increase, whichever is greater.	
OC-3			4.8:1, or 60% increase, whichever is greater.	Three additional stories, up to 33 additional feet; or up to a maximum of 7 total stories, whichever is greater.

## Footnotes:

1 Required automobile parking applies for all Residential Units in an Eligible Project (not just the restricted affordable units), inclusive of disabled and required guest parking, where applicable. All parking spaces provided shall comply with Subdivision 12.21 A.5 of the Code. Except that any combination of standard, compact or tandem spaces may be provided. Tandem parking spaces that do not comply with Subparagraph 12.21 A.5(h)(2) of the Code may be provided in any configuration as long as a parking attendant or an automated parking system is provided at all times.

2 Pursuant to California Civil Code Section 1947.1, provided parking shall be sold or rented separately from the units in properties with 16 or more units, as verified by the Los Angeles Housing Department.

3 The maximum increase in the allowable FAR permitted shall be equal to the table above, provided that any additional floor area provided through this Subdivision is utilized only by residential uses. Any nonresidential

uses shall be limited to the FAR associated with a site's underlying zoning prior to the application of any Incentive.

4 The increase in height shall be applicable to a Project over the entire project site regardless of the number of underlying height limits. The height increase may be applied to the maximum allowable height in feet or stories permitted by the zone, including for mixed-use Projects.

5 Consistent with California Government Code Section 65915(p)(4), required parking spaces provided may be uncovered.

**(ii) Exceptions.**

- a. Sites with Designated Historic Resource(s) or Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code shall not be eligible for an incentive to increase allowable FAR or height above one additional story, up to 11 additional feet.
- b. In a Specific Plan or overlay district that has a FAR available through a development bonus or incentive program to provide affordable housing, a Project may choose to utilize the Bonus FAR and affordability requirement of the Specific Plan or overlay district in lieu of the FAR maximum described above in Table 12.22 A.38(e)(2)(i).

**(g) Opportunity Corridor Transition Incentive Area.**

- (1) **Eligibility.** Projects may seek Base Incentives according to the eligibility criteria for Opportunity Corridor Transition Incentive Areas, described in Table 12.22 A.38(g)(1)(i), below.

Table 12.22 A.38(g)(1)(i)			
Eligibility Subarea	Site Requirements	Eligible Underlying Zones	Geographic Criteria
CT-1	Sites within 750 feet of the furthest property line of a lot from the corridor located within an Opportunity Corridor Incentive Area.	RD zones and R2 zones	Higher Opportunity Areas
CT-2	Sites within 500 feet of the furthest property line of a lot from the corridor located within an Opportunity Corridor Incentive Area.		
CT-3	Sites within 250 feet of the furthest property line of a lot from the corridor located within an Opportunity Corridor Incentive Area.		

- (i) **Property Line Measurement.** Distance measured from the Opportunity Corridor Incentive Area shall be measured from the rear property line of the eligible lot located within the Opportunity Corridor Incentive Area. Where a lot is a Reverse Corner Lot in an Opportunity Corridor Incentive Area, distance shall be measured from the property line parallel to the Opportunity Corridor. In the case that Opportunity Corridor sites are abutting or are consolidated, the buffer measurement will not be adjusted to accommodate the new rear property line of the consolidated site.

(ii) **Exceptions.**

- a. Sites with Designated Historic Resource(s), or Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code shall not be eligible for CT-3 incentives.

- (2) Projects utilizing the Opportunity Corridor Transition Incentive Area Base Incentives as defined in Paragraph (g)(3)(i) are not eligible to request waivers or reductions of any Development Standard. Opportunity Corridor Transition

Incentive Area Projects are not eligible to request Incentives on or off the Menu of Incentives.

- (3) **Base Incentives.** A Project shall be granted Base Incentives established in this Paragraph as defined in Table 12.22 A.38(g)(3)(i) below, in exchange for the required minimum percentage of Restricted Affordable Units established in Paragraph 12.22 A.38(c)(3) of this Subdivision.

<b>Eligibility Subarea</b>	<b>Density Bonus</b>	<b>Floor Ratio</b> (maximum permitted)	<b>Area</b>	<b>Parking</b>	<b>Height</b> (maximum permitted)
Description	In each subarea, the maximum Density shall be as follows:	For each subarea, the maximum FAR shall be equal to the following:		Required automobile parking for all Residential Units in a Project (not just the restricted affordable units), inclusive of disabled and required guest parking, where applicable, shall be as follows: <sup>1 3</sup>	In each subarea, the maximum allowable height permitted shall be as follows:
CT-1A <sup>2</sup>	4 units	1.15:1		No parking required.	2 stories
CT-1B <sup>2</sup>	5 units	1.30:1			
	6 units	1.45:1			
CT-2	7 units	1.60:1			3 stories
	8 units	1.75:1			
	9 units	1.90:1			
	10 units	2.0:1			
CT-3	11 units	2.15:1			
	12 units	2.30:1			
	13 units	2.45:1			
	14 units	2.60:1			
	15 units	2.75:1			
	16 units	2.90:1			

## Footnotes:

1 Pursuant to California Civil Code Section 1947.1, provided parking shall be sold or rented separately from the units in properties with 16 or more units, as verified by the Los Angeles Housing Department.

2 Sites are eligible for CT-1 site requirements from Table 12.22 A.38(g)(1)(i).

3 Consistent with California Government Code Section 65915(p)(4), required parking spaces provided may be uncovered.

(i) **Lot Requirements.** Projects are eligible for a reduction of otherwise required Lot standards, as part of a subdivision as follows:

- a. Minimum Lot Area: 600 square feet
- b. Minimum Lot Width: 15 feet
- c. Minimum Lot Access: A 3-foot pedestrian access easement may be provided in lieu of vehicular access requirements.

(ii) **Yards.** Projects are eligible for the reduction of otherwise required Yard standards, up to the following minimums:

- a. Front yard setback of 10 feet.
- b. Side yard setback of 4 feet, or 3 feet for a two-story structure.
- c. No interior side yard setback shall be required for buildings that are part of the same development.
- d. Rear yard setbacks of 4 feet, provided structures maintain a height of less than 26 feet within 15 feet of the rear property line.
- e. Alley setbacks of zero feet for structures that maintain a height of less than 26 feet in height for at least the first 15 feet from the alley.

(iii) **Multi-Bedroom Units.** A Project that includes a minimum of 40% of total Residential Units as 3-bedrooms or larger, shall be granted either additional Floor Area up to 0.5 FAR and an additional 11 feet in height.

(iv) **Spaces Between Buildings and Passageways.** Projects do not need to meet zoning requirements related to spaces between buildings or passageways pursuant to section 12.21 C.2.

(v) **Consolidated Development.** In the case that a Opportunity Corridor Transition Project consolidates multiple lots, the Density Bonuses established in Table 12.22 A.38(g)(3)(i) shall be available to each lot, however, FAR and height bonuses shall not exceed the maximum permitted Incentive Area in Table 12.22 A.38(g)(3)(i).

- a. For example, if two CT-1 lots are consolidated in one project, the project is eligible for up to 12 units, with 1.45:1 FAR maximum and a height maximum of 2 stories; or if two CT-2 lots are consolidated in one project, the project is eligible for up to 20 units, with a 2.0:1 FAR maximum and a height maximum of 3 stories.
- b. If a project consolidates two lots of differing incentive areas, for example CT-2 and CT-3, the incentives of the more intense incentive area shall be permitted.

(4) **Performance Standards.** Projects approved pursuant to this Subdivision shall meet the following performance standards, and no deviations from these standards shall be granted, except that any project resulting from the conversion of or an addition up to a maximum of 1,200 square feet to an existing structure need not comply with these standards.

(i) **Common Outdoor Open Space Standards.** Projects shall provide at-grade Common Outdoor Open Space that is accessible to all the residential tenants of a project. The Common Outdoor Open Space shall be open to the sky and have no structures that project into the area, except for Outdoor Amenity Space areas as provided in Sec. 12.21 B and except for Projections into Yards, as provided in Section 12.22 C.20(b). This common open space requirement shall supersede the per Residential Unit calculation of common open space in LAMC Section 12.21 G.2. In lieu of the provisions of LAMC Section 12.21 G.2, a project must meet at least one Common Outdoor Open Space typology from the menu listed in Table 12.22 A.38(g)(4)(ii), below.

- a. **Minimum Planting Area.** The Common Outdoor Open Space provided shall comply with the provisions of LAMC 12.21 G.2.(a).(3) regarding minimum planting area.

<b>Table 12.22 A.38(g)(4)(ii)</b> <b>Common Outdoor Open Space Types Menu</b>		
<b>Common Outdoor Open Space Typologies:</b>	<b>Dimension Requirements (minimum)</b>	<b>Standards</b>
Courtyard	<p>Courtyard width (minimum): 30% of lot width or 15 feet, whichever is greater</p> <p>Courtyard depth (minimum): 40% of lot depth (minimum)</p>	<p>Placement of courtyard shall comply with at least one of the following standards:</p> <ol style="list-style-type: none"> <li>1. The courtyard shall be oriented so that it and an existing open space courtyard on an adjacent lot work together to create the effect of one large open space.</li> <li>2. The courtyard shall be contiguous with the minimum front yard setback creating a deep combined courtyard or wide connection between two spaces.</li> <li>3. The courtyard shall be an internal courtyard, entirely contained onsite.</li> </ol>
Paseo	<p>Paseo width (minimum): 10% of lot width or 10 feet wide, whichever is greater</p> <p>Paseo depth (minimum): 60% of the lot depth</p>	<p>A Paseo shall be located between residential structures, perpendicular to the primary lot line. A Paseo shall have a minimum 4 foot wide pedestrian pathway accessible from the Ground Floor Frontage. A Paseo may be covered by architectural projections, but no structures or habitable space shall encroach on the Paseo.</p>
Rear Yard	<p>Rear Yard width (minimum): 50% of lot width</p> <p>Rear Yard depth (minimum): 10% of lot depth, or 15 feet, whichever is greater</p>	<p>Located adjacent to the rear property line</p>



(iii) **Entrances.**

a. **Street-Facing Entrance.** Each unit fronting a public street (provided there is no structure located between the lot line and unit) shall have an entrance facing the public street and one of the following entry features:

1. **Porch.** A wide, raised platform, projecting in front of a street-facing entrance, that is entirely covered but not enclosed. A porch shall have a minimum depth of four and one half feet, a minimum of 30% of the building width, and a finished floor elevation between two to five feet.
2. **Forecourt.** A yard screened with a short wall, fence or hedge that provides significant privacy for tenants located on the ground story, near sidewalk grade. A forecourt shall have a minimum depth of eight feet, a minimum width of 10 feet, required covered entrance, and a fence or wall height between two and one half to three feet and 6 inches.
3. **Recessed entry.** A space set behind the building face plane providing sheltered access to a street-facing entrance. A recessed entry shall have a depth between three to 15 feet minimum, and a maximum width of five feet, and a required covered entrance.



(iv) **Ground Floor External Entrances.** Ground floor external entrances to units not located on a street-fronting lot line, shall have an entrance oriented towards the open space when adjacent to the open space.

**(v) Parking Areas, Garages, and Carports****a. Location.**

1. No above-ground parking areas including parking structures and parking stalls, shall be allowed between a Ground Floor Frontage and public right-of-way.
2. New detached garages and carports shall be located behind the main building(s) facade, furthest from the Ground Floor Frontage Line.
3. Attached parking areas shall be located either underground (subterranean or semi-subterranean) or behind any main building(s).
4. Access driveways shall be provided from alleys when present and determined feasible by LADOT.

**(h) Additional Incentives.** In addition to the Base Incentives established in Paragraphs (e) and (f), Projects that satisfy eligibility criteria set forth in Paragraph (c) shall have the ability to select up to four Incentives from the Menu of Incentives provided in LAMC Section 12.22 A.38(h)(2) below or use an Incentive to seek a deviation from a Development Standard elsewhere in the LAMC. Refer to Paragraph (d) for the approval Procedure that is consistent with the Project's Incentive request. Projects utilizing the Opportunity Corridor Transition Incentive Area are not eligible for Incentives on or off the Menu of Incentives. For Type I Unified Adaptive Reuse Projects, Additional Incentives shall only apply to the project's new construction.

(1) A Project shall be eligible for up to four Additional Incentives. A Project may request Incentives listed in Paragraph (f)(2) or use an Incentive to seek a deviation from a Development Standard elsewhere in the LAMC or a Project site's applicable zoning ordinance, Specific Plan, or overlay. Refer to Paragraph (d) for the approval Procedure that is consistent with the Project's Incentive request.

(i) Incentives requested pursuant to the applicable procedure in Paragraph (d) of this Subdivision shall be granted unless it is found, based upon substantial evidence, that:

- a. The Incentive does not result in identifiable and actual cost reductions, consistent with California Government Code Section 65915(k), to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5, or for rents for the targeted units to be set as specified in California Government Code Section 65915(c); or

b. The Incentive will have a Specific Adverse Impact upon public health and safety or the physical environment or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the Specific Adverse Impact without rendering the development unaffordable to low-income and moderate-income households. Inconsistency with the zoning ordinance or general plan land use designation shall not constitute a Specific Adverse Impact upon the public health or safety; or

c. The Incentive would be contrary to state or federal law.

(2) Menu of Incentives. A Project may elect to request one of the following incentives not to exceed the allowed number of incentives pursuant to Paragraph (h)(1) above. Each request from the Menu of Incentives shall constitute one Incentive request unless otherwise stated.

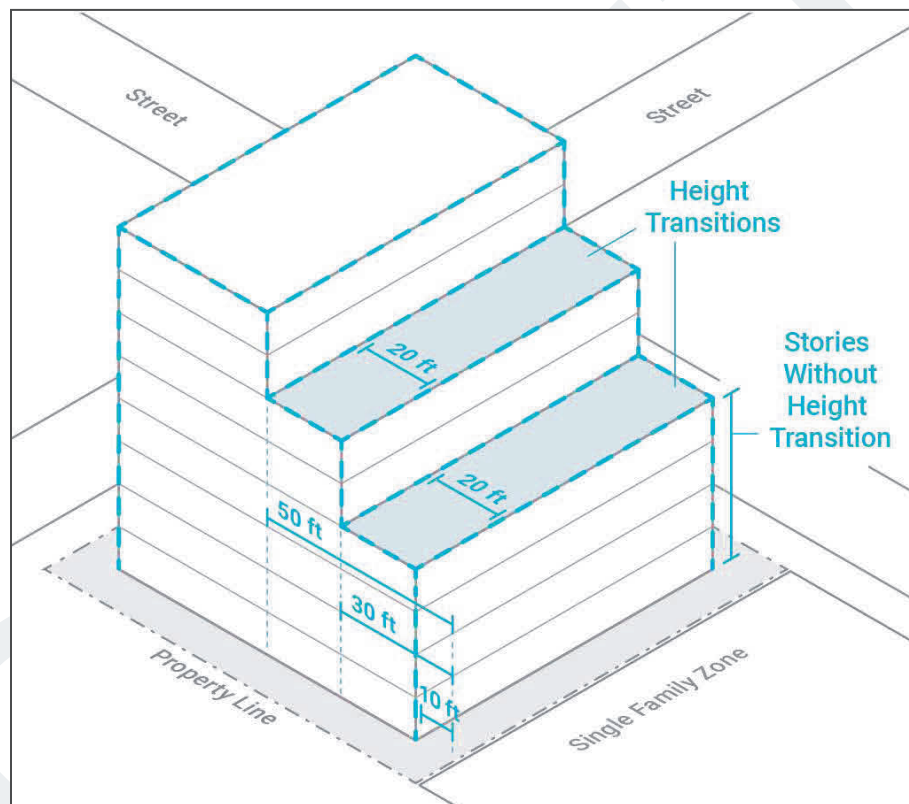
(i) **Yards.** Projects may request a reduction of otherwise required yards as follows:

Yards/Setbacks	C Zones	<b>R Zones</b> (yard reductions for requests from the Menu of Incentives in R zones may be combined and require the use of only one incentive)
	In any Commercial zone, Eligible Projects may utilize any or all of the yard requirements for the RAS3 zone per LAMC Section 12.10.5. Projects on commercially zoned sites adjacent to properties zoned RD or more restrictive may provide a rear yard of not less than five feet.	<b>Front Yards.</b> Front yard reductions are limited to no more than the average of the front yards, regardless of a required Building Line, of adjoining buildings along the same street frontage. If located on a corner lot or adjacent to a vacant lot, the front yard setback may align with the façade of the adjoining building along the same front lot line. If there are no adjoining buildings, no reduction is permitted. If a Project occupies all the lots on an entire street frontage, a reduction to the front yard is permitted so long as it is to the same dimension as a corresponding increase to the rear yard.
		<b>Side and Rear Yards.</b> Up to 30% decrease in the required width or depth of any individual yard or setback.

- (ii) **Ground Floor Height.** Projects involving the construction of a new building or additions may receive up to a 20% reduction in any Ground Floor Height restrictions contained in an Overlay, Specific Plan, Q condition or D condition.

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- (iii) **Transitional Height.** Projects may select the following transitional height requirements in lieu of those found in Section 12.21.1.A.10 of this Code or any applicable transitional height limits in a Project site's applicable zoning, Specific Plan, or overlay including any requirements for reduced building heights or stepbacks when a building is adjoining a RW1 or more restrictive zone. Furthermore, Projects adjoining an OS zone may utilize this incentive to be exempt from the transitional height requirements found in Section 12.21.1.A.10 of this Code or any applicable Specific Plan or Overlay for the portion of the Project abutting the OS zone.



	Setback/Step Back Distance*
Side or Rear Setback	10-feet
4 Story Step-Back	30-feet
6 Story Step-Back	50-feet

\*Setback and Step-back is measured from the property line.

- (iv) **Space Between Buildings and Passageways.** Projects subject to the provisions set forth in LAMC Section 12.21 C.2 may request a reduction in space between buildings and passageways requirements as follows:

- a. Up to a 30% reduction in the space between buildings required pursuant to LAMC Section 12.21 C.2(a); and
  - b. Up to 50% reduction in the width of the passageway required pursuant to LAMC Section 12.21 C.2(b) or the space provided to meet a subject site's required side yard requirement, whichever provides a greater reduction. Passageways provided may extend from any public street adjacent to the project site.
- (v) **Lot Coverage.** Projects may request up to a 20% increase in lot coverage limits, provided that the landscaping for the Project meets a minimum of 30 points under the Landscape and Site Design Ordinance of Section 12.40 of this Code, and the Landscape and Site Design Point System.
- (vi) **Lot Width.** Projects may request up to a 25% decrease from a lot width requirement, provided that the landscaping for the Project meets a minimum of 30 points under the Landscape and Site Design Ordinance of Section 12.40 of this Code, and the Landscape and Site Design Point System.
- (vii) **Open Space.** In lieu of the open space calculations set forth in LAMC Section 12.21 G.2, Projects may calculate their usable open space requirement as 15% of the total lot area or 10% of the total floor area confined within the perimeter walls of the provided Residential Units, whichever is greater, provided that the overall design of the Project meets a minimum of 30 points under the Landscape and Site Design Ordinance pursuant to Section 12.40 of this Code, and the Landscape and Site Design Point System. Common Open Space shall constitute at least 50% of the usable open space calculated under this incentive and shall be provided as outdoor space and comply with applicable provisions of Section 12.21 G.2(a)(1-4). Usable open space provided as Private Open Space shall comply with Section 12.21 G.2(b).
- (viii) **Density Calculation.** The area of any land required to be dedicated for street or alley purposes may be included as lot area for purposes of calculating the maximum density permitted by the underlying zone in which the Project is located.

- (ix) **Averaging of Floor Area Ratio, Density, Parking or Open Space, and permitting Vehicular Access.** A Project that is located on one or more contiguous lots, not separated by a street or alley, may average and permit the floor area, density, open space and residential and commercial parking over the project site, and permit vehicular use and access between a less restrictive zone and a more restrictive zone, provided that:
- a. No further lot line adjustment or any other action that may cause the Project site to be subdivided subsequent to this grant shall be permitted; and
  - b. The proposed use is permitted by the underlying zone(s) of each lot.
- (x) **P Zone.** In lieu of the limitations described in LAMC Section 12.12.1 and LAMC Section 12.12.1.5, in a P or PB zone, a Project may include the uses and area standards permitted in the least restrictive adjoining zone. The phrase “adjoining zone” refers to the zones of properties abutting, across the street or alley from, or having a common corner with, the subject property.
- (xi) **Relief from a Development Standard.** A Project may request up to 20% relief from a Development Standard contained in Chapter 1 of this Code, an Overlay, a Specific Plan, a Q Condition, or a D Condition. Projects requesting this incentive must provide landscaping for the Project that meets a minimum of 30 points under the Landscape and Site Design Ordinance of Section 12.40 of this Code, and the Landscape and Site Design Point System. This incentive may be requested more than once but shall require the use of an Incentive for each request.
- a. **Exception.** This incentive shall not apply to standards that regulate FAR, Height, yards/setbacks, ground story requirements, signs, parking in front of buildings, or usable open space. This incentive shall not apply to a Designated Historic Resource(s), or Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code.

(i) **Public Benefit Options.** Per Paragraphs (e)(2) or (f)(2), all Projects that qualify for the Base Incentives contained in this subdivision shall be eligible for one or more of the following Public Benefit Options. Projects utilizing the Opportunity Corridor Transition Incentive Area are not eligible for Public Benefit Options. Projects may utilize more than one Public Benefit Option if eligible, and development incentives granted in exchange for Public Benefits may be stacked. These Public Benefit Options may be combined with the Additional Incentives pursuant to Paragraph (h). If a Project includes five of the following Public Benefit Options, they shall receive an additional 11 feet in height.

(1) **Child Care Facility.** A Project that includes a Child Care Facility located on the premises of, as part of, or adjacent to, the project, shall be granted either of the following:

- (i) An additional Density Bonus that is, for purposes of calculating residential density, an increase in the floor area of the project equal to the floor area of the Child Care Facility included in the project; or
- (ii) An additional Incentive from the Menu of Incentives or not listed on the Menu of Incentives that contributes significantly to the economic feasibility of the construction of the Child Care Facility. Projects that utilize this incentive may request an additional 11 feet in height.



- (2) **Multi-Bedroom Units.** A Project providing multi-bedroom units shall be granted one of the following so long as an affidavit declaring the qualifying multi-bedroom units will maintain the same bedroom count and will not be converted to additional Residential Units in the future is executed and recorded with the Department of City Planning:

- (i) A Project that includes a minimum of 10% of Total Units as Residential Units with three bedrooms or more shall be granted additional Floor Area and Height as follows in Table 12.22 A.38(i)(2)(i)a in addition to what is available in the applicable FAR and Height incentive as listed for Base Incentives in Table 12.22 A.38(e)(2)(i) or Table 12.22 A.38(f)(2)(i); or

<b>TABLE 12.22 A.38(i)(2)(i)a</b> <b>Additional FAR and Height for Multi-Bedroom Units</b>		
Overall Residential Units (including Density Bonus Units)	Additional FAR	Additional Height (Stories)
0-30	0.5:1	1
31-50	1.0:1	1
51-75	1.5:1	2
75+	2.0:1	2

- (ii) A Project shall be granted the following:
- An exemption of the square footage of all Residential Units with three or more bedrooms from the floor area calculations of family size units.
  - An additional story of height beyond what is available in the applicable height incentive as listed for Base Incentives in Table 12.22 A.38(e)(2)(i) or Table 12.22 A.38(f)(2)(i). The square footage of this additional story shall be limited to the square footage exempted as a result of applying 12.22 A.38(g)(2)(ii)(a).

- (3) **Preservation of Trees.** An additional 11 feet of height may be awarded for projects that maintain existing mature, Significant Trees (any tree that measures 12 inches or more in diameter at four and one-half feet above the average natural grade at the base of the tree and/or is more than 35 feet in height), as verified by a focused Tree Report prepared by a certified arborist. A covenant shall be filed with Los Angeles Department of Building and Safety that requires the tree to be

maintained for at least 15 years unless a certified arborist certifies that the tree is dead, dying, or dangerous to public health.

(4) **Land Donation.** An applicant for a subdivision, parcel map or other residential development approval that donates land for housing to the City of Los Angeles satisfying the criteria of California Government Code Section 65915(g), as verified by the Department of City Planning, shall be granted a Density Bonus of 15%. Provided developments are otherwise consistent with (insert small lot design standards). The Department of City Planning may adopt administrative guidelines for the purpose of clarifying procedures associated with the implementation of Land Donations pursuant to California Government Code Section 65915(g).

(5) **Active Ground Floor Exemption from Calculation of Floor Area.** Active uses, up to 1,500 square feet, located on the ground story shall be exempt from the calculation of floor area.

(i) For the purposes of exempting active uses on the ground story from calculating floor area, active space shall be designed and intended for Neighborhood Retail and Service Uses. Areas for circulation, storage, mechanical equipment, parking, lobbies, mailrooms, laundry rooms, utilities, and waste collection shall not account for more than 15% of an area designated as an active use.

(ii) Projects utilizing this option shall provide a ground story transparency of a minimum of 60% along the building Frontage.

(iii) Projects utilizing this option shall provide a ground floor entrance at minimum every 50 feet along the front property line that provides both ingress and egress pedestrian access to the ground story of the building.

(6) **Privately Owned Public Space.** Projects that provide 4% of buildable lot area that is dedicated as Privately Owned Public Space above the Project site's required Common Outdoor Open Space shall be eligible for zero rear yard setback and shall be eligible to utilize the Modification of Development Standard for site landscaping as described in LAMC Section 12.22 A.38 (h)(2)(xi).

(7) **Surveyed Historic Resource Facade Rehabilitation.** Projects incorporating a Surveyed Historic Resource(s) into the Project design shall be granted additional Floor Area up to 1.0 FAR and 22 feet in height beyond what is available in the applicable height incentive as listed for Base Incentives in Table 12.22 A.38(e)(2)(i) or Table 12.22 A.38(f)(2)(i), provided all of the following standards are met:

(i) The Project retains all street Fronting facades to a depth of 10-feet,

(ii) New Floor Area shall be setback behind the 10-foot retention area, except that open space, balconies, and non-habitable architectural projections may encroach on the 10-foot retention area. In instances where a lot contains dual-frontages, the setback shall be applied from both frontages, and

(iii) Rehabilitation of the facades is completed pursuant to the Secretary of the Interior's Standards for Rehabilitation to the satisfaction of the Office of Historic Resources.

(j) **Program Standards.** The following program standards shall be applicable to any Project that meets the eligibility criteria established in Paragraphs (e), (f), and (g) of this subdivision.

(1) **Other Density Bonus Programs.** Projects seeking a Density Bonus pursuant to this Subdivision may not pursue a Density Bonus pursuant to the procedures of any other housing incentive program contained in the LAMC or in an Overlay or Specific Plan.

(2) **Calculating Maximum Allowable Residential Density.** The Maximum Allowable Residential Density of a Project site shall be calculated pursuant to Government Code Section 65915(o)(6), before the application of a Density Bonus, using the maximum number of units allowed under a Project site's applicable zoning ordinance, specific plan, overlay, or general plan land use designation, whichever is greater. If a range is permitted, the maximum number of units allowed by the specific zoning range, specific plan, or general plan land use designation shall be applicable when determining a Project site's density prior to the application of a Density Bonus.

(3) **Calculating Restricted Affordable Units.** The required number of Restricted Affordable Units shall be calculated based on a Project's Total Units and shall include any unit added by a Density Bonus awarded pursuant to this subdivision.

(4) **Calculating a Density Bonus.** For the purposes of calculating a Density Bonus, the following shall apply:

(i) Residential Units that comprise a Project shall be on contiguous lots, not separated by a street or alley, that are the subject of a single development application, but do not need to be based on individual subdivision maps or lots.

(ii) An applicant for a Project may have the ability to apply a lesser percentage of Density Bonus, including but not limited to, no Density Bonus.

(5) **Fractional Numbers.**

(i) **Units.** For the purposes of this Subdivision, calculations for the following resulting in fractional numbers shall be rounded up to the next whole number:

- a. Maximum Allowable Residential Density
- b. Density Bonus units
- c. Number of Restricted Affordable Units
- d. Number of Replacement Housing Units
- e. Vehicular Parking
- f. Number of Multi-Bedroom Units provided pursuant to LAMC Section 12.22 A.38(i)(2)

(6) **Multiple Lots.** A building that crosses one or more lots is eligible for the Transit Oriented Incentive Area or Opportunity Corridor Incentive Area that corresponds to the lot with the highest incentive area permitted in Table 12.22 A.38(e)(1)(iv) or Table 12.22 A.38(f)(1)(i).

(7) **Update Frequency.** The Director shall have the authority to issue updated eligibility maps on an annual basis in order to align with updated zoning and geographic data updates, including updates to Resource Areas as defined and identified by the California Tax Credit Allocation Committee (TCAC) and updates to the locations of major transit stops.

(8) **Updates to Community Plans, Specific Plans, Transit Neighborhood Plans and Overlays.** Community Plans, Specific Plans, Transit Neighborhood Plans and Overlays with sites eligible for this Subdivision shall meet at minimum the Base Incentives and percentage of set-aside affordable units for every lot eligible in the Mixed Income Incentive Programs. In the case that a Community Plan Update, Specific Plan, Transit Neighborhood Plan, or Overlay proposes to exceed the development incentives or set-aside percentages as set forth in the Mixed Income Incentive Program, the Community Plan, Specific Plan, Transit Neighborhood Plan, or Overlay may supercede the Transit-Oriented Incentive Area program. If these provisions are met, Community Plans and Overlay Plans shall not be subject to the Update Frequency provisions of Subparagraph 7 of Paragraph (j) above.

(i) **Exception.** In the case that a Community Plan, Specific Plan, Transit Neighborhood Plan, or Overlay assigns a site a zone that does not match the minimum Base Incentives for every lot eligible for the Transit-Oriented Incentive Area program, the Plan shall be required to demonstrate that the zoning action does not result in the net loss of residential capacity.

- (9) **Request for a Lower Eligibility Subarea.** Even though a project site may be eligible for a certain Transit Oriented Incentive Area or Opportunity Corridor Incentive Area, an applicant may choose to select a lower Transit Oriented Incentive Area or Opportunity Corridor Incentive Area within the applicable market tier by providing the percentage of Restricted Affordable Housing Units required for any lower Transit Oriented Incentive Area or Opportunity Corridor Incentive Area and be limited to the incentives available for the lower Transit Oriented Incentive Area or Opportunity Corridor Incentive Area.
- (10) **Replacement Housing Units.** A Project approved under this subdivision must meet any applicable housing replacement requirements and demolition protections of California Government Code Section 65915(c)(3) and LAMC Section 16.60, as verified by the Los Angeles Housing Department (LAHD) prior to the issuance of a building permit. Replacement Housing Units required pursuant to this Subparagraph may count towards any Restricted Affordable Unit requirements.
- (11) **Standards for Restricted Affordable Units.** Projects must meet the applicable requirements regarding the size, location, amenities and allocation of Restricted Affordable Units in LAMC Section 16.61 B and C and in any Implementation Memorandum, Technical Bulletin or User Guide prepared and adopted by the Los Angeles Housing Department or Department of City Planning.
- (12) **Rent Schedules.** Restricted Affordable Units required as part of a Project shall be rented at rates not to exceed those specified in California Health and Safety Code 50052.5 for for-sale units or California Health and Safety Code Section 50053 for for-lease units. Restricted Affordable Units associated with One Hundred Percent Affordable Housing Projects shall comply with the definition set forth in LAMC Section 12.03.
- (13) **Implementation Memorandums, FAQs, Forms/Applications and User Guides.** The Director may prepare Implementation Memorandums, FAQs, Forms/Applications and/or User Guides for State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, for the purpose of providing additional information pertaining to this Subdivision and maintaining consistency with State Density Bonus Law.

- (14) **Covenants.** Prior to the issuance of a building permit for any Project qualifying for a Density Bonus pursuant to the provisions of this Subdivision, covenants acceptable to the Los Angeles Housing Department and consistent with the requirements in this Subdivision and set forth in LAMC Section 16.61 shall be recorded with the Los Angeles County Recorder.
- (15) **Story.** A story shall be defined as 11-feet in height.
- (k) **Relationship to Other Sections of the Los Angeles Municipal Code.** The following provisions shall govern the relationship to other sections of the Los Angeles Municipal Code for any Project that meets the eligibility criteria established in Paragraph (c) of this Subdivision.
- (1) A Project that meets the eligibility criteria established in Paragraph (c) and complies with the Procedures established in Paragraph (d) may exceed the use limitations that may apply to a Project site.
- (2) If any of the Procedures described in Paragraph (d), Base Incentives described in Paragraphs (e), (f), and (g), Additional Incentives described in Paragraph (h), Public Benefit options described in Paragraph (i), or waivers requested pursuant to LAMC Section 12.22 A.38(d)(4) conflict with those of any otherwise applicable specific plan, overlay, supplemental use district, “Q” condition, “D” limitation, or citywide regulation established in Chapter 1 of this Code, including but not limited to the Ordinance Nos. listed below, this Subdivision shall prevail.
- (i) Alameda District Specific Plan (171,139)
  - (ii) Avenue 57 Transit Oriented District (174,663)
  - (iii) Bunker Hill Specific Plan (182,576)
  - (iv) Century City North Specific Plan (156,122)
  - (v) Century City West Specific Plan (186,370)
  - (vi) Century City South Specific Plan (168,862)
  - (vii) Coastal Bluffs Specific Plan (170,046)
  - (viii) Coliseum District Specific Plan (185,042)
  - (ix) Colorado Boulevard Specific Plan (178,098)
  - (x) Cornfield Arroyo Seco Specific Plan (182,617)
  - (xi) Crenshaw Corridor Specific Plan (184,795)
  - (xii) Devonshire/Topanga Corridor Specific Plan (168,937)
  - (xiii) Exposition Corridor Transit Neighborhood Plan (186,402)
  - (xiv) Foothill Boulevard Corridor Specific Plan (170,694)
  - (xv) Girard Tract Specific Plan (170,774)
  - (xvi) Glencoe/Maxella Specific Plan (171,946)
  - (xvii) Granada Hills Specific Plan (184,296)
  - (xviii) Hollywoodland Specific Plan (168,121)
  - (xix) Jordan Downs Urban Village Specific Plan (184,346)



- (xx) Los Angeles Airport/El Segundo Dunes Specific Plan (167,940)
- (xxi) Los Angeles International (LAX) Specific Plan (185,164)
- (xxii) Los Angeles Sports and Entertainment District Specific Plan (181,334)
- (xxiii) Loyola Marymount University Specific Plan (181,605)
- (xxiv) Mt. Washington/Glassell Park Specific Plan (168,707)
- (xxv) Mulholland Scenic Parkway Specific Plan (167,943)
- (xxvi) North Westwood Village Specific Plan (163,202)
- (xxvii) Oxford Triangle Specific Plan (170,155)
- (xxviii) Pacific Palisades Commercial Village and Neighborhood Specific Plan (184,371)
- (xxix) Paramount Pictures Specific Plan (184,539)
- (xxx) Park Mile Specific Plan (162,530)
- (xxxi) Playa Vista Area D Specific Plan (176,235)
- (xxxii) Ponte Vista at San Pedro Specific Plan (182,937 and 182,939)
- (xxxiii) Porter Ranch Land Use/Transportation Specific Plan (180,083)
- (xxxiv) Redevelopment Plans (186,325)
- (xxxv) San Vicente Scenic Corridor Specific Plan (173,381)
- (xxxvi) University of Southern California University Park Campus Specific Plan (182,343)
- (xxxvii) Valley Village Specific Plan (168,613)
- (xxxviii) Venice Coastal Zone Specific Plan (175,693)
- (xxxix) Ventura-Cahuenga Boulevard Corridor Specific Plan (174,052)
- (xl) Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan) (173,749)
- (xli) Warner Center 2035 Plan (182,766)
- (xlii) Westwood Community Multi-Family Specific Plan (163,203 and 163,186)
- (xlili) Westwood Village Specific Plan, Westwood Community Design Review Board Specific Plan (187,644)
- (xliv) Wilshire - Westwood Scenic Corridor Specific Plan (155,044)

(l) **Interpretations Consistent with State Density Bonus Law.** This Subdivision is intended to be interpreted as consistent with State Density Bonus Law contained in California Government Code Sections 65915-65918. If at any time, this Subdivision becomes inconsistent with California Government Code Sections 65915-65918, the provisions of State Density Bonus Law shall apply.

Section 8. Subdivision 39 of Subsection A of Section 12.22 of the Los Angeles Municipal Code is added to read as follows:

### **12.22 A.39 AFFORDABLE HOUSING INCENTIVE PROGRAM**

(a) **Purpose.** The purpose of this Subdivision is to establish procedures for implementing State Density Bonus requirements as set forth in California Government Code Sections 65915-65918 for affordable housing projects, including Priority Housing Projects, and to increase the production of affordable housing citywide with tailored application for sites on parking (P) zones, public facility (PF) zones, and sites owned by Public Agencies, Faith-Based Organizations and nonprofit Community Land Trusts and Cooperatives. In conjunction with the incentives granted by state law, this subdivision shall offer incentives and waivers or reductions of Development Standards for the purposes of increasing the feasibility of affordable housing construction.

(b) **Definitions.** The following definitions shall apply to this Subdivision:

**Environmental Consideration Area.** As defined in LAMC Section 12.22 A.37.

**Faith-Based Organization Project.** A housing project located on land owned entirely, whether directly or through a wholly owned company or corporation, by a Religious Institution at the time of project filing, developed by or in partnership with a Qualified Developer. This includes ownership through an affiliated or associated nonprofit public benefit corporation organized pursuant to the Nonprofit Corporation Law (Part 2 [commencing with Section 5110] of Division 2 of Title 1 of the Corporations Code).

**General Commercial Uses.** Uses that involve business activity serving the general public, including retail, professional and personal services, hospitality, and entertainment.

**Moderate Opportunity Areas.** Moderate Resource Areas and areas experiencing moderate rates of rapid change as defined and identified by the California Tax Credit Allocation Committee (TCAC).

**Public Agency.** Refer to California Government Code Section 20056.

**Public Land Project.** A housing project located in a Public Facility (PF) Zone and/or located on lots owned by a Public Agency.

**Qualified Developer.** The same meaning as California Government Code Section 65913.16.(b)(9) exclusive of (D). For purposes of this Subdivision, a Qualified Developer shall also include a Community Development Financial Institution (CDFI) identified on the United States Department of the Treasury's list of Certified CDFIs at the time of project filing, provided the CDFI maintains a



non-profit status pursuant to Section 501(c)(3) of the United States Internal Revenue Code.

**Religious Institution.** Refer to California Government Code Section 65913.16.(b)(10).

**Sea Level Rise Area** As defined in LAMC Section 12.22 A.38 (b).

**Shared Equity Project.** A housing project located on land owned by a Community Land Trust as defined in the California Revenue and Taxation Code Section 402.1(a)(11)(C)(ii), or a Limited-equity Housing Cooperative or Workforce Housing Cooperative Trust as defined in Section 817 of The California Civil Code, except that Residential Units, in addition to being sold or rented to income qualified persons, may also be held by the non-profit corporation for the purpose of making Lower Income units financially stable. The land must be owned by the Community Land Trust, Limited-equity Housing Cooperative or Workforce Housing Cooperative Trust at the time of project filing through the issuance of a Certificate of Occupancy.

**Total Units.** The total units in a project after a Density Bonus is awarded pursuant to this subdivision.

**Very Low Vehicle Travel Area.** Refer to California Government Code Section 65915 (o)(9).

(c) **Eligibility Criteria.** To qualify for the provisions of this Subdivision, an Affordable Housing Incentive Project (Project) must satisfy the following eligibility requirements:

- (1) A Project meeting the definition of a One Hundred Percent Affordable Housing Project, Public Land Project, Shared Equity Project, or a Faith Based Organization Project with five or more Total Units.
- (2) Reserve a percentage of the Project's Total Units for at least one of the following income levels or target populations, as defined on Table 12.22 A.39(c)(2).

TABLE 12.22 A.39(c)(2)(i) Required Percentage of Restricted Affordable Units	
Project Type	Minimum % of Total Units that are Restricted Affordable Units <sup>1</sup>
One Hundred Percent Affordable Housing Project	100% <sup>1</sup>
Public Land Project	100% <sup>2</sup>
Faith-Based Organization Project	80% <sup>3</sup>
Shared Equity Project	80% <sup>4</sup>

## Footnotes:

1 Per GCS 65915(b)(1)(G), a One Hundred Percent Affordable Housing Project must reserve all units (including units provided as a result of a Density Bonus), excluding a manager's unit or units, for lower income households earning up to 80 percent of the area median income, and rents or housing costs to the occupying residents do not exceed 30 percent of the maximum gross income, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD), or any successor agency except that 20 percent of the units may be affordable to Moderate Income households, as defined in California Health and Safety Code Section 50053, or as amended.

2 Provided at least one affordability income category is consistent with the minimum affordability requirements pursuant to California Government Code Section 65915.

3 A Faith Based Organization Project must reserve ~~up to~~ 20 percent of Total Units (including units provided as a result of a Density Bonus), excluding a manager's unit or units, for households earning up to 120 percent of the area median income, as defined in California Health and Safety Code Section, or as amended. Remaining Restricted Affordable Units may use rents or housing costs so the occupying residents do not exceed 30 percent of the maximum gross income, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD). 20 percent of Total Units may be unrestricted.

4 A Shared Equity Project must reserve 20 percent of Total Units (including units provided as a result of a Density Bonus), excluding a manager's unit or units, for households earning up to 120 percent of the area median income, as defined in California Health and Safety Code Section 50053, or as amended. Remaining Restricted Affordable Units may use rents or housing costs so the occupying residents do not exceed 30 percent of the maximum gross income, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD). 20 percent of Total Units may be unrestricted.

- (3) The One Hundred Percent Affordable Housing Project site shall not include any lots located in a single family or more restrictive residential zone (RW and more restrictive zone), if a Project's Maximum Allowable Residential Density is less than 5 units. A Shared Equity Project site shall not include lots located in a single family or more restrictive residential zone (RW and more restrictive).
- (4) Faith-Based Organization Projects utilizing land purchased by a Religious Institution after January 1st, 2024, shall not include any lots located in a single family or more restrictive residential zone (RW and more restrictive) unless the filing Religious Institution owns a lot with an existing Church or House of Worship located within 528 feet of the Project site.
- (5) The Faith-Based Organization Project, Shared Equity Project, or a One Hundred Percent Affordable Project with Maximum Allowable Residential Density of less than 5 units, site shall not include any lots located in a manufacturing zone that does not allow multi-family residential uses (M1, M2, M3), including sites zoned CM, MR1, and MR2 with no residential uses permitted from an applicable planning overlay.

- (6) The Faith-Based Organization Project, Shared Equity Project, or a One Hundred Percent Affordable Project with a Maximum Allowable Residential Density of less than 5 units, shall not include any lots located in a Very High Fire Hazard Severity Zone (VHFHSZ), the Coastal Zone, or a Sea Level Rise Area.
- (7) A Faith-Based Organization Project or Shared Equity Project may be located on a lot with a Surveyed Historic Resource, that is classified as a historical resource, as defined by Public Resources Code Section 21084.1 as determined by the Office of Historic Resources. Provided that:
  - (i) If proposed alterations to a Surveyed Historic Resource do not meet the Secretary of the Interior's Standards for Rehabilitation to the satisfaction of the Office of Historic Resources, the Discretionary Procedure pursuant to Section 12.22.A.39(d)(3) shall be followed; and
  - (ii) The Faith-Based Organization Project or Shared Equity Project does not require Demolition as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code a Surveyed Historic Resource.
- (8) The Project does not require the demolition of a Designated Historic Resource, as demolition is defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code , and any proposed alteration to a Designated Historic Resource shall not be approved until a review has been completed by the Office of Historic Resources.
- (9) The following shall apply to a Type I Unified Adaptive Reuse Project, as defined in LAMC 12.22 A.26(h)(1), that meets the definition of a One Hundred Percent Affordable Housing Project, Public Land Project, Faith-Based Organization Project, or a Shared Equity Project, and that complies with the criteria for Eligibility associated with the corresponding project type:
  - (i) The portion of the Type I Unified Adaptive Reuse Project consisting of new construction may be eligible for Base Incentives, Additional Incentives, and Public Benefits Options in LAMC 12.22 A.39 for the respective project type definition unless otherwise stated; and
  - (ii) The Type I Unified Adaptive Reuse Project shall comply with the Procedures set forth in LAMC 12.22 A.39(d) based on the corresponding project type definition and associated project request.
- (10) Projects located on project sites that meet the definition of an Environmental Consideration Area shall comply with all applicable standards contained in the Environmental Protection Measures adopted pursuant to LAMC Section 11.5.15.

(d) **Procedures.** A Project that meets the provisions of this Subdivision shall be reviewed pursuant to Procedures, as set forth below. Though an approval of a Density Bonus or Incentive pursuant to this Subdivision shall not, in and of itself, trigger a General Plan Amendment, Zone Change, Project Review or other discretionary review actions required by this Zoning Code, the applicable procedures set forth in LAMC Section 13A.2.10 (Multiple Approvals) of Chapter 1A of this Code shall apply for Projects seeking other discretionary approvals in conjunction with an application requested pursuant to the procedures in Paragraph (d).

(1) **Los Angeles Department of Building and Safety Review.** A Project seeking Base Incentives described in Paragraph (e) and/or Incentives listed on the Menu of Incentives in Paragraph (f) shall be considered ministerial and processed by the Department of Building and Safety.

(i) **Exceptions.**

a. Faith-Based Organization Projects and Shared Equity Projects with Surveyed Historic Resources shall seek approval pursuant to Subparagraph (2) of Paragraph (d).

(2) **Expanded Administrative Review.** The following Projects shall be ministerially approved pursuant to Expanded Administrative Review, as set forth by the provisions of LAMC Section 13B.3.2 (Expanded Administrative Review) of Chapter 1A of this Code. As defined in this Subdivision, ministerial approval means an administrative process to approve a “use by right” as this term is defined in California Government Code Section 65583.2 (i).

(i) Projects that request the Public Benefit Options described in Paragraph (g). Projects that request only Public Benefit Options in addition to Incentives listed on the Menu of Incentives shall not be subject to any hearing procedures regardless of the provisions contained in LAMC Section 13B.3.2.D.

(ii) Projects seeking Incentives not listed on the Menu of Incentives described in Paragraph (f) pursuant to California Government Code Section 65915(e).

(iii) Projects that request waivers or reductions of any Development Standards not listed on the Menu of Incentives described in LAMC Section 12.22 A.39(f)(2). Waivers or reductions of any Development Standard shall be reviewed pursuant to the Findings described in LAMC Section 12.22 A.39(d)(5).

(vi) Faith Based Organization Projects and Shared Equity Projects with Surveyed Historic Resources.

(vii) Projects requesting Incentives from the Menu of Incentives that cannot comply with the criteria established in LAMC Section 12.22 A.39(f)(1)(ii) shall be subject to the Public Hearing procedures described in LAMC Section 13B.3.2.D of Chapter 1A of this Code in addition to the general procedures described in LAMC Section 13B.3.2 (Expanded Administrative Review) of Chapter 1A of this Code.

(3) **Director's Determination.** The Director of Planning shall review the following Projects pursuant to LAMC Section 13B.2.5 of Chapter 1A of this Code:

(i) Projects requesting up to three waivers or reduction of any Development Standards, pursuant to California Government Code Section 65915. Waivers or reductions of any Development Standards shall be reviewed pursuant to the Findings described in LAMC Section 12.22 A.39(d)(5).

(4) **City Planning Commission Review.** The following Projects must file an application pursuant to LAMC Section 13B.2.3 of Chapter 1A of this Code. Notwithstanding the provisions set forth in Sec. 13B.2.3 (Class 3 Conditional Use Permit) of Chapter 1A , the decision of the City Planning Commission shall be final.

(i) A Project that requests more than three waivers or reductions of Development Standards pursuant to California Government Code Section 65915. Waivers or reductions of any Development Standards shall be reviewed pursuant to the Findings described in LAMC Section 12.22 A.39(d)(5).

(5) **Findings for Waivers or Reductions of Development Standards.** Waivers requested pursuant to the Procedures described in this Paragraph shall be approved by the applicable decision-making authority unless that decision-making authority finds that:

- (i) The Development Standard associated with a request for waiver(s) or reduction(s) in Development Standards will not have the effect of physically precluding the construction of a development meeting the Eligibility criteria described in Paragraph (c) at the densities or with the concessions or incentives permitted under Paragraph (e) or Paragraph (f); or
- (ii) The waivers or reductions of Development Standards would have a Specific Adverse Impact, as defined in paragraph (2) of subdivision (d) of Section 65589.5, upon public health and safety or on a California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the Specific Adverse Impact without rendering the development unaffordable to low-income and moderate-income households; or
- (iii) The waivers or reductions of Development Standards are contrary to state or federal law.

(6) **Other Discretionary Approvals.** Applicable procedures set forth in LAMC Section 13A.2.10 (Multiple Approvals) of Chapter 1A of this Code apply for a Project seeking other discretionary approvals in conjunction with an application requested pursuant to the Procedures in Paragraph (d). Regardless of any other findings that may be applicable, the decision-maker must approve the requested Base Incentives and Additional Incentives, either on or off the Menu of Incentives described in LAMC Section 12.22 A.39(f)(2), requested under this Subdivision unless the decision-maker, based upon substantial evidence, determines that the Project meets one or more of the criteria described in LAMC Section 12.22 A.37(f)(1)(i).

(e) **Base Incentives.** A Project that meets the eligibility criteria established in Paragraph (c) may utilize Base Incentives described in this Paragraph, in exchange for the required minimum percentage of Restricted Affordable Units established in Paragraph (c) of this Subdivision. A Project that qualifies for Base Incentives established in the table below shall also be eligible for Public Benefit Options listed in subparagraph (g).

<b>TABLE 12.22 A.39(e)(i) Base Incentives</b>				
<b>Eligibility Subarea</b>	<b>Density Bonus</b>	<b>Parking</b>	<b>Floor Area Ratio (FAR)</b>	<b>Height</b>
<b>Description</b>	In each Subarea, the maximum increase in the otherwise Maximum Allowable Residential Density shall be as follows:	In each Subarea, the required shall be as follows: <sup>1,2</sup>	In each Subarea, the maximum increase in the allowable FAR permitted shall be as follows <sup>3</sup> :	In each Subarea, the maximum increase in the allowable height permitted shall be equal to the following: <sup>4</sup>
Citywide	Any Density Bonus provided by California Government Code Section 65915. <sup>5</sup>	0.5 Parking Spaces per Unit. <sup>5</sup>	Sites with a Maximum Allowable Residential Density of less than 5 units: The maximum FAR shall be equal to 1.5:1  Otherwise: 3.0:1, or a 35% increase, whichever is greater.	Sites with a Maximum Allowable Residential Density of less than 5 units: Bonus of up to 11' or 1 story, whichever is greater.  Otherwise: Bonus of 22' or 2 stories, whichever is greater.
Lots located within a half mile of a Major Transit Stop or Very Low Vehicle Travel Area <sup>6</sup>	Limited by Floor Area	No minimum parking required. <sup>7</sup>	Sites with a Maximum Allowable Residential Density of less than 5 units: The maximum FAR shall be equal to 2.0:1  Otherwise: 4.5:1, or a 50% increase, whichever is greater.	Sites with a Maximum Allowable Residential Density of less than 5 units: Bonus of up to 11' or 1 story, whichever is greater.  Otherwise: bonus of 33' or 3 stories, whichever is greater.
Higher Opportunity or Moderate Opportunity Area	Limited by Floor Area	No minimum parking required.  Required parking for current or proposed nonresidential uses may be reduced by 25%	Sites with a Maximum Allowable Residential Density of less than 5 units: The maximum FAR shall be equal to 2.5:1  Otherwise: 4.65:1, or a 55% increase, whichever is greater.	Sites with a Maximum Allowable Residential Density of less than 5 units: Bonus of up to 11' or 1 story, whichever is greater.  Otherwise: bonus of 33' or 3 stories, whichever is greater.



## Footnotes:

1 Required automobile parking applies for all Residential Units in a Project (not just the restricted affordable units), inclusive of disabled and required guest parking, where applicable. All parking spaces provided shall comply with LAMC Section 12.21 A.5. Except that any combination of standard, compact or tandem spaces may be provided. Tandem parking spaces that do not comply with LAMC Section 12.21 A.5(h)(2) may be provided in any configuration as long as a parking attendant or an automated parking system is provided at all times. Consistent with California Government Code Section 65915(p)(4), required parking spaces provided may be uncovered.

2 For consistency with California Government Code Section 65913.6, parking that was previously required under a Conditional Use Permit ~~in~~ pursuant to LAMC Section 12.24 for an existing "church" or "house of worship" use, or that would be required as part of a Conditional Use Permit for a proposed "church" or "house of worship" use, shall be reduced by 50%. California Government Code Section 65913.6 does not apply to Projects within half a mile of a Major Transit Stop or to Projects located on a lot within one block of a car share vehicle.

3 Provided that any additional floor area provided through this Subdivision is utilized only by residential uses. Any nonresidential uses shall be limited to the FAR associated with a site's underlying zoning prior to the application of any Incentive.

4 The increase in height shall be applicable to a Project over the entire project site regardless of the number of underlying height limits. The height increase may be applied to the maximum allowable height in feet or stories permitted by the zone, including for mixed-use Projects.

5 No parking shall be required for a Project meeting the criteria of California Government Code Section 65915(p)(3). No minimum parking is required for Faith-Based Organization Project if there is a car share vehicle within one block of the lot.



(2) **Automobile Parking Zones.** In lieu of the limitations described in LAMC Section 12.12.1 and LAMC Section 12.12.1.5, in a P or PB zone, a Project may establish Maximum Allowable Residential Density, uses and area standards permitted in the least restrictive adjoining zone.

(i) **Lots with Dual Zoning.** In cases where a lot contains split zoning with a P or PB Zone, the entire lot may utilize the least restrictive adjoining zone.

(3) **Public Land Project.** In lieu of the requirements in LAMC Section 12.24 U.21 and 12.04.09 B.9, a Public Land Project may either:

- (i) Establish Maximum Allowable Residential Density, uses, and area standards as permitted in the least restrictive adjoining zone. Regardless of adjacent zoning, all Public Land Projects shall be granted a base Floor Area Ratio of 3.0:1 and a base height of three stories or 33 feet whichever is greater; or
- (ii) Where specifically authorized through a resolution of City Council, a Public Land Project, shall be permitted to have multi-family residential uses and shall not be limited to the use and zoning requirements of the underlying zoning, Specific Plan or General Plan.

(4) **Exceptions.**

- (i) A One Hundred Percent Affordable Housing Project with five or more units prior to the issuance of a Density Bonus pursuant to section (i) of California Government Code Sections 65915-65918 shall not be eligible for the FAR and Parking Incentives indicated in Table 12.22.A.39(e)(1) and shall be limited to the Density Bonus, Parking, and Height Incentives for projects meeting the eligibility criteria of 65915(b)(1)(G) set forth in California Government Code Section 65915 if any of the following is applicable:
  - a. The Project is located in a Very High Fire Hazard Severity Zone, the Coastal Zone, or a Sea Level Rise Area; or
  - b. The Project is located in a manufacturing zone that does not allow multi-family residential uses (M1, M2, M3) or is located in a hybrid industrial zone (CM, MR1, MR2) with residential use restrictions from an applicable planning overlay.
  - c. The Project is located in a single-family or more restrictive residential zone (RW or more restrictive).

- (ii) In a Specific Plan or overlay district that has FAR available through a development bonus or incentive program to provide affordable housing, a Project may utilize the Bonus FAR of the Specific Plan or overlay district in lieu of the FAR maximum described in table 12.22 A.39(e)(1).
- (iii) A Shared Equity Project shall be limited to the low density base incentives indicated in Table 22.A.39(e)(1) for a site with a Maximum Allowable Residential Density less than 5 units, regardless of the underlying Maximum Allowable Residential Density or zoning of the Project site.
- a. **Measure ULA Exception.** A Shared Equity Project receiving funding from a program established under Ordinance 187692 (Measure ULA) shall be eligible for incentives as determined by the Project site's Maximum Allowable Residential Density.

(f) **Additional Incentives.** A Project shall be granted a number of Additional Incentives pursuant to the provisions described below in addition to the Base Incentives established in Paragraph (e).

(1) A Project shall be eligible for up to five Additional Incentives. A Project may request Incentives listed in Paragraph (f)(2) or use an Incentive to seek a deviation from a Development Standard elsewhere in the LAMC or a Project site's applicable zoning ordinance, specific plan, or overlay. Refer to Paragraph (d) for the approval Procedure that is consistent with the Project's Incentive request.

(i) Incentives requested pursuant to the applicable procedure in Paragraph (d) of this Subdivision shall be granted unless it is found, based upon substantial evidence, that:

- a. The Incentive does not result in identifiable and actual cost reductions, consistent with California Government Code Section 65915(k), to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5, or for rents for the targeted units to be set as specified in California Government Code Section 65915(c); or
- b. The Incentive will have a Specific Adverse Impact upon public health and safety or the physical environment or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the Specific Adverse Impact without rendering the development unaffordable to low-income and moderate-income households. Inconsistency with the zoning ordinance or general plan land use designation shall not constitute a Specific Adverse Impact upon the public health or safety; or
- c. The Incentive would be contrary to state or federal law.

(ii) To be eligible for the Menu of Incentives described in LAMC Section 12.22 A.39(f)(2) a Project shall comply with all of the following:

- a. The Project shall not be located in a Very High Fire Hazard Severity Zone, Sea Level Rise Area or the Coastal Zone.
- b. The Project would not require the Demolition, as Demolition is defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code, of a Designated Historic Resource, or any Surveyed Historic Resource, eligible or architectural historic resource identified for any historic protection or special consideration or review by an applicable Overlay or Specific Plan including sites located in the South Los Angeles Community Plan Implementation Overlay

(CPIO) Section 1-6.C.5.b, the Southeast Los Angeles CPIO Section 1-6.C.5.b, the West Adams CPIO Section 6.C.5.b, or the San Pedro CPIO Section 7.C.5.b, Westwood Village Specific Plan, Echo Park CDO District, or the North University Park Specific Plan.

- c. The Project shall not include any lots located in a manufacturing zone that does not allow multi-family residential uses (M1, M2, M3) or lots located in a hybrid industrial zone (CM, MR1, MR2) with residential use restrictions from an applicable planning overlay, except for Public Land Projects.

(2) **Menu of Incentives.** A Project may elect to request any of the following incentives not to exceed the allowed number of incentives pursuant to Subparagraph (f)(1) above. Each request from the Menu of Incentives shall constitute one Incentive request unless otherwise stated.

(i) **Yards.** Projects contained in this subdivision may request a reduction of otherwise required yards as follows:

<b>Yards/ Setbacks</b>	<b>C Zones</b>	<b>R Zones</b> (yard reductions in R zones may be combined and require the use of only one incentive)
	In any Commercial zone, a Project may utilize any or all of the yard requirements for the RAS3 zone per LAMC Section 12.10.5. Projects on commercially zoned sites adjacent to properties zoned RD or more restrictive may provide a rear yard of not less than five feet.	<p><b>Front Yards.</b> Front yard reductions are limited to no more than the average of the front yards, regardless of a required Building Line, of adjoining buildings along the same street frontage. Or, if located on a corner lot or adjacent to a vacant lot, the front yard setback may align with the façade of the adjoining building along the same front lot line. If there are no adjoining buildings, no reduction is permitted. If a Project occupies all the lots on an entire street frontage, a reduction to the front yard is permitted so long as it is to the same dimension as a corresponding increase to the rear yard.</p> <p><b>Side and Rear Yards.</b> Up to 30% decrease in the required width or depth of any individual yard or setback.</p>

- (ii) **Transitional Height.** No otherwise applicable requirement for transitional height including Section 12.21.1 A.10., or any applicable transitional height limits in a Project site's applicable zoning, Specific Plan, or overlay, including any requirements for reduced building heights when a building is adjoining a more restrictive zone, shall need to be met for projects eligible for the Base Incentives contained in this subdivision.
- (iii) **Ground Floor Activation.** Where nonresidential Floor Area is required by a zoning ordinance, Specific Plan, Community Plan Implementation Overlay, Pedestrian Overlay Zone, or other set of Development Standards, including to meet the definition of a Mixed Use Project in LAMC Section 13.09 B.3, that requirement may be reduced by 50 percent and be satisfied by residential lobbies, community rooms, resident amenities spaces, child care centers, supportive services areas, common open space or use whose primary purpose is to provide services and assistance to residents of the building or the general public.
- (iv) **Ground Floor Height.** Projects eligible for the base incentives contained in this subdivision may request a 30% reduction in any ground floor height requirement.
- (v) **Commercial Parking.** Projects may request to waive any requirement to provide new or maintain existing automobile parking spaces associated with a commercial use that is proposed in conjunction with the Project.
- (vi) **Space Between Buildings and Passageways.** Projects subject to the provisions set forth in LAMC Section 12.21 C.2 may request a reduction in space between buildings and passageways requirements as follows:
  - a. Up to a 30% reduction in the space between buildings required pursuant to LAMC Section 12.21 C.2(a).
  - b. Up to 50% reduction in the width of the passageway required pursuant to LAMC Section 12.21 C.2(b) or the space provided to meet a subject site's side yard requirement, whichever provides a greater reduction. Passageways provided may extend from any public street adjacent to the project site.
- (vii) **Lot Coverage.** Up to 20% increase in lot coverage limits, provided that the landscaping for the Project meets a minimum of 30 points under the Landscape and Site Design Ordinance, Section 12.40 of this Code, and the Landscape and Site Design Point System.

- (viii) **Lot Width.** Up to 25% decrease from a lot width requirement, provided that the landscaping for the Project meets a minimum of 30 points under the Landscape and Site Design Ordinance, Section 12.40 of this Code, and the Landscape and Site Design Point System.
- (ix) **Open Space.** In lieu of the open space calculations set forth in LAMC Section 12.21 G.2, A Project requesting this incentive may calculate its usable open space requirement as 15 of the total lot area or 10 of the total floor area confined within the perimeter walls of the provided Residential Units, whichever is greater, provided that the overall design of the Project meets a minimum of 30 points under the Landscape and Site Design Ordinance, Section 12.40 of this Code, and the Landscape and Site Design Point System. Common Open Space shall constitute at least 50% of the usable open space calculated under this incentive and shall be provided as outdoor space and comply with applicable provisions of Section 12.21 G.2(a)(1-4). Usable open space provided as Private Open Space shall comply with Section 12.21 G.2(b).
- (x) **Density Calculation.** The area of any land required to be dedicated for street or alley purposes may be included as lot area for purposes of calculating the maximum density permitted by the underlying zone in which the Project is located.
- (xi) **Averaging of Floor Area Ratio, Density, Parking or Open Space, and permitting Vehicular Access.** A Project that is located on two or more contiguous lots, not separated by a street or alley, may average and permit the floor area, density, open space, and residential and commercial parking over the project site, and permit vehicular use and access between a less restrictive zone and a more restrictive zone, provided that:
- a. No further lot line adjustment or any other action that may cause the Project to be subdivided subsequent to this grant shall be permitted; and
  - b. The proposed use is permitted by the underlying zone(s) of each lot.

(xii) **Relief from a Development Standard.** A Project may request up to 20% relief from a Development Standard contained in Chapter 1 of this Code, an Overlay, a Specific Plan, a Q Condition, or a D Condition. Projects requesting this incentive must provide landscaping for the Projects that meets a minimum of 30 points under the Landscape and Site Design Ordinance, Section 12.40 of this Code, and the Landscape and Site Design Point System. This incentive may be requested more than once, but shall require the use of an Incentive for each request.

a. **Exception.** This incentive shall not apply to standards that regulate FAR, Height, yards/setbacks, signs, parking in front of buildings, or usable open space. This incentive shall not apply to a Designated Historic Resource(s), or a Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code.

(xiii) **Lot Requirements.** Faith Based Organization Projects and Shared Equity Projects on sites with a Maximum Allowable Residential Density of less than 5 units are eligible for a reduction of otherwise required Lot standards, as part of a subdivision as follows:

- a. Minimum Lot Area: 600 square feet
- b. Minimum Lot Width: 15 feet
- c. Minimum Lot Access: A 3-foot pedestrian access easement may be provided in lieu of vehicular access requirements.

(xiv) **Yards.** Faith Based Projects and Shared Equity Projects on sites with a Maximum Allowable Residential Density of less than 5 units are eligible for the reduction of otherwise required Yard standards, up to the following minimums:

- a. Front yard reductions are limited to no more than the average of the front yards, regardless of a required Building Line, of adjoining buildings along the same street frontage. Or, if located on a corner lot or adjacent to a vacant lot, the front yard setback may align with the façade of the adjoining building along the same front lot line. If there are no adjoining buildings, no reduction is permitted. If a Project occupies all the lots on an entire street frontage, a reduction to the front yard is permitted so long as it is to the same dimension as a corresponding increase to the rear yard.
- b. Side yard setback of 4 feet, or 3 feet for a two-story structure.
- c. No interior side yard setback shall be required for buildings that are part of the same development.
- d. Rear yard setbacks of 4 feet, provided structures maintain a height of less than 26 feet within 15 feet of the rear property line.



- e. Alley setbacks of zero feet for structures that maintain a height of less than 26 feet in height for at least the first 15 feet from the alley.

(xv) **Spaces Between Buildings and Passageways.** A Faith Based Organization Project or Shared Equity Project on sites with a Maximum Allowable Residential Density of less than 5 units does not need to meet zoning requirements related to spaces between buildings or passageways pursuant to section 12.21 C.2.

- (g) **Public Benefits Options.** A Project that qualifies for the Base Incentives contained in this Subdivision shall be eligible for one or more of the following Public Benefit Options. Projects may utilize more than one Public Benefit Option if eligible, and bonuses granted in exchange for Public Benefits may be stacked. These Public Benefit Options may be combined with the Additional Incentives granted pursuant to Paragraph (h). If a Project includes 5 of the following Public Benefit Options, they shall receive an additional 11 feet in height. Projects located in Very High Fire Hazard Severity Zones, Coastal Zones or Sea Level Rise Areas shall only be eligible for Public Benefit Options listed in 12.22 A.39(g)(1) or 12.22 A.39(g)(4).

- (1) **Child Care Facility.** A Project that includes a Child Care Facility located on the premises of, as part of, or adjacent to, the Project, shall be granted either of the following:

- (i) An additional Density Bonus that is, for purposes of calculating residential density, an increase in the Floor Area of the project equal to the Floor Area of the Child Care Facility included in the Project.
- (ii) An additional Incentive from the Menu of Incentives or not listed on the Menu of Incentives that contributes significantly to the economic feasibility of the construction of the Child Care Facility. A Project that utilizes this incentive may request an additional 11 feet in height.

(2) **Multi-Bedroom Units.** A Project providing multi-bedroom units shall be granted one of the following so long as an affidavit declaring the qualifying multi-bedroom units will maintain the same bedroom count and will not be converted to additional Residential Units in the future is executed and recorded with the Department of City Planning:

- (i) A Project that includes a minimum of 10% of the Total Units, as Residential Units with three bedrooms or more shall be granted additional Floor Area and Height in addition to what is available on the Base Incentives in LAMC Section 12.22 A.39(e) as follows in Table 12.22 A.39(g)(2)(i)a; or

<b>TABLE 12.22 A.39(g)(2)(i)a Additional FAR and Height for Multi-Bedroom Units</b>		
Overall Residential Units (including Density Bonus Units)	Additional FAR	Additional Height (Stories)
0-30	0.5:1	1
31-50	1.0:1	1
51-75	1.5:1	2
75+	2.0:1	2

- (ii) A Project shall be granted the following:
- An exemption of the square footage of all Residential Units with three or more bedrooms from the floor area calculations of family size units.
  - An additional story of height beyond what is available in the applicable height incentive as listed for Base Incentives in Paragraph (e). The square footage of this additional story shall be limited to the square footage exempted as a result of applying 12.22 A.39(g)(2)(ii)(a).

- (3) **Preservation of Trees.** Additional 11 feet of height may be awarded for Projects that maintain existing mature, Significant Trees (any tree that measures 12 inches or more in diameter at four and one-half feet above the average natural grade at the base of the tree and/or is more than 35 feet in height), as verified by a focused Tree Report prepared by a certified arborist. A covenant shall be filed with Los Angeles Department of Building and Safety that requires the tree to be maintained for at least 15 years unless a certified arborist certifies that the tree is dead, dying or dangerous to public health.
- (4) **Land Donation.** An applicant for a subdivision, parcel map or other residential development approval that donates land for housing to the City of Los Angeles satisfying the criteria of California Government Code Section 65915(g), as verified by the Department of City Planning, shall be granted a minimum Density Bonus of 15%. The Department of City Planning may adopt administrative guidelines for the purpose of clarifying procedures associated with the implementation of Land Donations pursuant to California Government Code Section 65915(g).
- (5) **Active Ground Floor Exemption from Calculation of Floor Area.** Active uses, up to 1,500 square feet, located on the ground story shall be exempt from the calculation of floor area.
- (i) For the purposes of exempting active uses on the ground story from calculating floor area, active space shall be designed and intended for Neighborhood Retail and Service Uses. Areas for circulation, storage, mechanical equipment, parking, lobbies, mailrooms, laundry rooms, utilities, and waste collection shall not account for more than 15% of an area designated as an active use.
  - (ii) Projects utilizing this option shall provide a ground story transparency of a minimum of 60% along the building Frontage.
  - (iii) Projects utilizing this option shall provide a ground floor entrance at minimum every 50 feet along the front property line that provides both ingress and egress pedestrian access to the ground story of the building.
- (6) **Privately Owned Public Space.** Projects that provide 4% of buildable lot area that is dedicated as Privately Owned Public Space above the Project site's required Common Outdoor Open Space, the Project shall be eligible for zero rear yard setback and shall be eligible to utilize the Modification of Development Standard for site landscaping as described in Paragraph (f)(2)(xii).

- (7) **Surveyed Historic Resource Facade Rehabilitation.** Projects incorporating a Surveyed Historic Resource(s) into the Project design shall be granted additional Floor Area up to 1.0 FAR and 22 feet in height beyond what is available in the applicable height incentive as listed for Base Incentives in Table 12.22 A.39(e)(2)(i), provided all of the following standards are met:

- (i) The Project retains all street Fronting facades to a depth of 10-feet,
- (ii) New Floor Area shall be setback behind the 10-foot retention area, except that open space, balconies, and non-habitable architectural projections may encroach on the 10-foot retention area. In instances where a lot contains dual-frontages, the setback shall be applied from both frontages, and
- (iii) Rehabilitation of the facades is completed pursuant to the Secretary of the Interior's Standards for Rehabilitation to the satisfaction of the Office of Historic Resources.

- (h) **Program Standards.** The following program standards shall be applicable to any Project that meets the eligibility criteria established in Paragraph (c) of this subdivision.

- (1) **Other Density Bonus Programs.** Projects seeking a Density Bonus pursuant to this Subdivision may not pursue a Density Bonus pursuant to the procedures of any other housing incentive program contained in the LAMC or in an Overlay or Specific Plan.
- (2) **Calculating Maximum Allowable Residential Density.** The Maximum Allowable Residential Density of a Project site shall be calculated pursuant to Government Code Section 65915(o)(6), before the application of a density bonus, using the maximum number of units allowed under a project site's applicable zoning ordinance, specific plan, or general plan land use designation, whichever is greater. If a range is permitted, the maximum number of units allowed by the specific zoning range, specific plan, or general plan land use designation shall be applicable when determining a Project site's density prior to the application of a density bonus. A Project in a P or PB zone shall calculate Maximum Allowable Residential Density using additional provisions pursuant to Subparagraph (2) of LAMC 12.22.A.39(e), and a Public Land Project shall calculate Maximum Allowable Residential Density using additional provisions pursuant to Subparagraph (3) of LAMC 12.22.A.39(e).
- (3) **Calculating Restricted Affordable Units.** The required number of Restricted Affordable Units shall be calculated based on the Total Units of a Project.
- (4) **Calculating a Density Bonus.** For the purposes of calculating a Density Bonus, the following shall apply:

- (i) Residential Units that comprise a Project shall be on contiguous lots, not separated by a street or alley, that are the subject of a single development application, but do not need to be based on an individual subdivision maps or lots.
- (ii) An applicant for a Project may always have the ability to apply a lesser percentage of Density Bonus, including but not limited to, no Density Bonus.

**(5) Fractional Numbers.**

- (i) Units. For the purposes of this Subdivision, calculations for the following resulting in fractional numbers shall be rounded up to the next whole number:
  - a. Maximum Allowable Residential Density
  - b. Density Bonus Units
  - c. Number of Restricted Affordable Units
  - d. Number of Replacement Housing Units
  - e. Vehicular Parking
  - f. Number of Multi-Bedroom Units provided pursuant to LAMC Section 12.22 A.39(g)(2)

- (6) Replacement Housing Units and Demolition Protections.** A Project approved under this subdivision must meet any applicable housing replacement requirements and demolition protections of California Government Code Section 65915(c)(3) and LAMC Section 16.60, as verified by the Los Angeles Housing Department (LAHD) prior to the issuance of a building permit. Replacement Housing Units required pursuant to this Subdivision may count towards any Restricted Affordable Unit requirements.

- (7) Standards for Restricted Affordable Units.** A Project must meet the applicable requirements regarding the size, location, amenities and allocation of Restricted Affordable Units in LAMC Section 16.61 B and C and in any Implementation Memorandum, Technical Bulletin or User Guide prepared and adopted by the Los Angeles Housing Department or Department of City Planning.

- (8) **Implementation Memorandums, FAQs, Forms/Applications and User Guides.** The Director may prepare Implementation Memorandums, FAQs, Forms/Applications and/or User Guides for State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, for the purpose of providing additional information pertaining to this Subdivision and maintaining consistency with State Density Bonus Law.
- (9) **Covenants.** Prior to the issuance of a building permit for any Project qualifying for a Density Bonus pursuant to the provisions of this Subdivision, covenants acceptable to the Los Angeles Housing Department and consistent with the requirements in this Subdivision and set forth in LAMC Section 16.61 shall be recorded with the Los Angeles County Recorder. For Shared Equity Projects covenants shall restrict the resale of the property to Community Land Trusts, Limited Equity Housing Cooperatives, Workforce Housing Cooperative Trusts, or nonprofit affordable housing corporations pursuant to Section 501(c)(3) of the United States Internal Revenue Code.
- (10) **Interpretation Consistent with State Density Bonus Law.** This Subdivision is intended to be interpreted as consistent with State Density Bonus Law contained in California Government Code Sections 65915-65918. If at any time, this Subdivision becomes inconsistent with California Government Code Sections 65915-65918, the provisions of State Density Bonus Law shall apply.
- (11) **Update Frequency.** The Director shall have the authority to issue updated eligibility maps on an annual basis in order to align with updated zoning and geographic data updates, including updates to Resource Areas as defined and identified by the California Tax Credit Allocation Committee (TCAC) and updates to the locations of Very Low Vehicle Travel Areas and Major Transit Stops.
- (12) **Adjoining Zone.** Refers to the zones of properties abutting, across the street or alley from, or having a common corner with, the subject property.
- (13) **Income Limits, For-sale Costs, and Rent Schedules.** Restricted Affordable Units required as part of a One Hundred Percent Affordable Housing Project, Public Land Project, Faith-Based Organization Project, or Shared Equity Project shall meet the income limit, for-sale cost and rent schedule requirements specified for these Projects in footnotes (1) (2) (3) and (4) of Table A.39(c)(2)(i).
- (14) **Story.** A story shall be defined as 11-feet in height.

(i) **Relationship to Other Sections of the Los Angeles Municipal Code.** The following provisions shall govern the relationship to other sections of the Los Angeles Municipal Code for any Project that meets the eligibility criteria established in Paragraph (c) of this Subdivision.

- (1) A Project that meets the eligibility criteria established in Paragraph (c) and complies with the Procedures established in Paragraph (d) may exceed the use limitations that may apply to a Project site.
- (2) If any of the Procedures described in Paragraph (d), Base Incentives described in Paragraph (e), Additional Incentives described in Paragraph (f), Public Benefit Options described in Paragraph (g), or waivers requested pursuant to LAMC Section 12.22 A.39(d)(2) or LAMC Section 12.22 A.39(d)(4) conflict with those of any otherwise applicable specific plan, overlay, supplemental use district, “Q” condition, “D” limitation, or citywide regulation established in Chapter 1 of this Code, including but not limited to the Ordinance Nos. listed below, this Subdivision shall prevail.

- (i) Alameda District Specific Plan (171,139)
- (ii) Avenue 57 Transit Oriented District (174,663)
- (iii) Bunker Hill Specific Plan (182,576)
- (iv) Century City North Specific Plan (156,122)
- (v) Century City West Specific Plan (186,370)
- (vi) Century City South Specific Plan (168,862)
- (vii) Coastal Bluffs Specific Plan (170,046)
- (viii) Coliseum District Specific Plan (185,042)
- (ix) Colorado Boulevard Specific Plan (178,098)
- (x) Cornfield Arroyo Seco Specific Plan (182,617)
- (xi) Crenshaw Corridor Specific Plan (184,795)
- (xii) Devonshire/Topanga Corridor Specific Plan (168,937)
- (xiii) Exposition Corridor Transit Neighborhood Plan (186,402)
- (xiv) Foothill Boulevard Corridor Specific Plan (170,694)
- (xv) Girard Tract Specific Plan (170,774)
- (xvi) Glencoe/Maxella Specific Plan (171,946)
- (xvii) Granada Hills Specific Plan (184,296)
- (xviii) Hollywoodland Specific Plan (168,121)
- (xix) Jordan Downs Urban Village Specific Plan (184,346)
- (xx) Los Angeles Airport/El Segundo Dunes Specific Plan (167,940)
- (xxi) Los Angeles International (LAX) Specific Plan (185,164)
- (xxii) Los Angeles Sports and Entertainment District Specific Plan (181,334)
- (xxiii) Loyola Marymount University Specific Plan (181,605)
- (xxiv) Mt. Washington/Glassell Park Specific Plan (168,707)
- (xxv) Mulholland Scenic Parkway Specific Plan (167,943)
- (xxvi) North Westwood Village Specific Plan (163,202)



- (xxvii) Oxford Triangle Specific Plan (170,155)
- (xxviii) Pacific Palisades Commercial Village and Neighborhood Specific Plan (184,371)
- (xxix) Paramount Pictures Specific Plan (184,539)
- (xxx) Park Mile Specific Plan (162,530)
- (xxxi) Playa Vista Area D Specific Plan (176,235)
- (xxxii) Ponte Vista at San Pedro Specific Plan (182,937 and 182,939)
- (xxxiii) Porter Ranch Land Use/Transportation Specific Plan (180,083)
- (xxxiv) Redevelopment Plans (186,325)
- (xxxv) San Vicente Scenic Corridor Specific Plan (173,381)
- (xxxvi) University of Southern California University Park Campus Specific Plan (182,343)
- (xxxvii) Valley Village Specific Plan (168,613)
- (xxxviii) Venice Coastal Zone Specific Plan (175,693)
- (xxxix) Ventura-Cahuenga Boulevard Corridor Specific Plan (174,052)
- (xl) Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan) (173,749)
- (xli) Warner Center 2035 Plan (182,766)
- (xlii) Westwood Community Multi-Family Specific Plan (163,203 and 163,186)
- (xlili) Westwood Village Specific Plan, Westwood Community Design Review Board Specific Plan (187,644)
- (xliv) Wilshire - Westwood Scenic Corridor Specific Plan (155,044)

(j) **Interpretations Consistent with State Density Bonus Law.** This Subdivision is intended to be interpreted as consistent with State Density Bonus Law contained in California Government Code Sections 65915-65918. If at any time, this Subdivision becomes inconsistent with California Government Code Sections 65915-65918, the provisions of State Density Bonus Law shall apply.



Section 9. Subdivision 26 of Subsection U of Section 12.24 of the Los Angeles Municipal Code is amended as follows:

**Density Bonus for a Housing Development in Which the Density Increase Is Greater than the Maximum Permitted in Section ~~12.22 A.25~~ 12.22 A.37. (Amended by Ord. No. 185,373, Eff. 2/26/18.)**

- (a) In addition to the findings set forth in LAMC Section 13B.2.3. (Class 3 Conditional Use Permit) of Chapter 1A of this Code, the City Planning Commission shall find that:
- (1) the project is consistent with and implements the affordable housing provisions of the Housing Element of the General Plan;
  - (2) the project contains the requisite number of Restricted Affordable Units ~~sufficient to qualify for a 88.75% or 100% Density Bonus pursuant to 12.22 A.37~~, based on the number of Residential Units ~~units permitted by the maximum allowable density provided, excluding Residential Units added by a Density Bonus~~, on the date of application, as follows:
    - (i) ~~a. 25~~ 44% Very Low Income Units for a 88.75 ~~35~~% density increase; or
    - (ii) ~~b. 24~~ 20% Low Income Units for a 50 ~~35~~% density increase; or
    - (iii) ~~c. 44~~ 40% Moderate Income Units for a 50 ~~35~~% density increase in for-sale projects.

The project may then be granted an additional Density Bonus ~~density increases~~ beyond 50 ~~100~~ ~~35~~% or 88.75% by providing additional affordable housing units in the following manner:

- ~~a.—d.~~ (iv) For every additional 1% set aside of Very Low Income Units, the project is granted an additional 2.5% density increase; or
- ~~b.—e.~~ (v) For every additional 1% set aside of Low Income Units, the project is granted an additional 1.5% density increase; or

- e.— f.— (vi) For every additional 1% set aside of Moderate Income Units in for-sale projects, the project is granted an additional 1% density increase; or
- d.—g.— (vii) In calculating the density increase and Restricted Affordable Units, each component of any density calculation, including the calculation of Maximum Allowable Residential Density, ~~base density~~ and bonus density, resulting in fractional units shall be separately rounded up to the next whole number.
- (3) the project meets any applicable dwelling unit replacement requirements and demolition protections of California Government Code Section 65915(c)(3) and LAMC Section 16.60 as verified by the Los Angeles Housing Department (LAHD). Replacement housing units required pursuant to these sections may count towards any On-Site Restricted Affordable Unit requirement;
- (4) the project meets the requirements for projects including affordable housing in LAMC Section 16.61 B and C.
- (5) ~~(4)~~ the project's Restricted Affordable Units are subject to a recorded affordability restriction of 55 years or 99 years longer pursuant to LAMC Section 16.61 A from the issuance of the Certificate of Occupancy, recorded in a covenant acceptable to the Los Angeles Housing Department, and subject to fees as set forth in Section 19.14 of the Los Angeles Municipal Code; and **(Amended by Ord. No. 187,122, Eff. 8/8/21.)**
- ~~—(5) the project addresses the policies and standards contained in the City Planning Commission's Affordable Housing Incentives Guidelines.~~

Section 10. Paragraph e of Subdivision 3 of Subsection E of Section 13.09 of the Los Angeles Municipal Code is modified to read as follows:

- e. Affordable Housing. The transit facility and Central Parking Structure incentives set forth above shall not be combined with the parking reduction provided for affordable housing as set forth in Section ~~42.22 A.25(d)(2)~~ 12.22 A.37, 12.22 A.38, or 12.22 A.39.

Section 11. Subdivision 1 of Subsection E of Section 13.15 of the Los Angeles Municipal Code is modified to read as follows:

1. An MPR District shall not authorize any of the strategies listed above, except for the strategies described in subsections D.5. and D.6., for any lot that contained a residential use subject to the Rent Stabilization Ordinance, or that contained any Restricted Affordable units, ~~as defined in Section 12.22 A.25.(b) of the Code,~~ within the five years preceding the adoption of the MPR District. Required parking on such properties, however, may be reduced pursuant to Section ~~12.22 A.25.~~ 12.22 A.37, 12.22 A.38, or 12.22 A.39. of the Code, or pursuant to any other applicable affordable housing incentive program.

Section 12. Subdivision 2 of Subsection E of Section 13.15 of the Los Angeles Municipal Code is modified to read as follows:

2. Minimum parking requirements for multi-residential uses in an MPR district shall be less restrictive for projects that qualify for a density bonus under Section ~~12.22 A.25~~ 12.22 A.37, 12.22 A.38, or 12.22 A.39. of the Code.

Section 13. Subdivision 2 of Subsection A of Section 14.00 of the Los Angeles Municipal Code is modified to read as follows:

2. Density increase for a Housing Development to provide for additional density in excess of that permitted in Section ~~12.22 A.25~~ 12.22 A.37, 12.22 A.38, or 12.22 A.39. (Subdivision Title Amended by Ord. No. 179,681, Eff. 4/15/08.)

Section 14. Sub-subparagraph i of Subparagraph 4 of Paragraph d of Subdivision 10 of Subsection A of Section 14.00 of the Los Angeles Municipal Code is modified to read as follows:

i. Parking may be recalculated for all units in the project (not just the restricted units) using ~~Parking Option 1 in LAMC Section 12.22 A.25(d) Table 12.22 A.37(e)(2)(iii) in~~ Section 12.22 A.37.

Section 15. Sub-subparagraph ii of Subparagraph 4 of Paragraph d of Subdivision 10 of Subsection A of Section 14.00 of the Los Angeles Municipal Code is modified to read as follows:

ii. Parking may be calculated by maintaining all existing parking and providing additional parking just for the newly legalized unit(s) in accordance with ~~Parking Option 2 in LAMC Section 12.22 A.25(d)~~ Table 12.22 A.37(e)(2)(iii) in Section 12.22 A.37 as long as one Restricted Affordable Unit or dwelling unit for Low Income individuals who are 62 years of age or more, or who has a physical or mental impairment that limits one or more major life activities is provided for each legalized unit; or

Section 16. Subparagraph 1 of Paragraph b of Subdivision 13 of Subsection A of Section 14.00 of the Los Angeles Municipal Code is modified to read as follows:

1. Other Affordable Housing Incentive Programs. Except as described in Paragraph (f), applicants for other affordable housing incentive programs, including, but not limited to, the Floor Area Bonus for the Greater Downtown Housing Incentive Area in Section 12.22 A.29.; the Density Bonus provisions in Section ~~12.22 A.25~~ 12.22 A.37, 12.22 A.38, 12.22 A.39.; the Transit Oriented Communities Affordable Housing Incentive Program in Section 12.22 A.31.; or affordable housing incentive provisions in Community Plan Implementation Overlays (CPIOs) ~~community plan implementation overlays (CIPOs)~~, shall not also be eligible for a Qualified Permanent Supportive Housing Project approval at the same location.

Section 17. Sub-subparagraph ii of Subparagraph 2 of Paragraph d of Subdivision 13 of Subsection A of Section 14.00 of the Los Angeles Municipal Code is modified to read as follows:

ii. For Qualified Permanent Supportive Housing Projects located within one-half (1/2) mile of ~~a Transit Stop~~ a Rapid Bus, as defined in Section 12.22 A.38(b) ~~Section 12.22 A.25(b)~~, High Quality Transit Service, or of a Major Transit Stop as defined in Section 21155(b) of the Public Resources Code, no more than one-half (1/2) parking space shall be required for each income-restricted Dwelling Unit or Guest Room not occupied by the Target Population. Otherwise, no more than one (1) parking space shall be required for each income-restricted Dwelling Unit or Guest Room not occupied by the Target Population.

Section 18. Paragraph f of Subdivision 13 of Subsection A of Section 14.00 of the Los Angeles Municipal Code modified to read as follows:

f. Request for Additional Waivers. The City may not apply a development standard that will physically preclude the construction of the Qualified Permanent Supportive Housing Project. Applicants may request additional waivers pursuant to the discretionary review procedures described in Section ~~12.22 A.25(g)(3)~~ 12.22 A.37(d)(3) of this Code. The applicant shall not be required to provide a pro forma or other documentation to show

that the waiver or modification of any development standard(s) is needed in order to make the Qualified Permanent Supportive Housing Project economically feasible, but must provide reasonable documentation of its eligibility for the requested waiver. Additional waivers shall not be used to exempt compliance with the performance standards described in Paragraph (g).

Section 19. Subdivision 5 of Subsection A of Section 14.5.4 of the Los Angeles Municipal Code is modified to read as follows:

5. Residential Projects that exceed the number of dwelling units or Floor Area permitted by the zoning or the Community Plan as a result of a density or Floor Area bonus received pursuant to Sections ~~12.22 A.25, 12.22 A.37, 12.22 A.38, 12.22 A.39,~~ 12.22 A.29., 12.24 U.26. or 12.24 U.27. of this Code.

Section 20. Subdivision 4 of Subsection B of Section 14.5.4 of the Los Angeles Municipal Code is modified to read as follows:

4. Residential Projects that exceed the number of dwelling units or Floor Area permitted by the zoning or the Community Plan as a result of a density or Floor Area bonus received pursuant to Sections ~~12.22 A.25, 12.22 A.37, 12.22 A.38, 12.22 A.39,~~ 12.22 A.29., 12.24 U.26. or 12.24 U.27. of this Code.

Section 21. Subdivision 11 of Subsection D of Section 16.05 of the Los Angeles Municipal Code is added to read as follows:

11. A Housing Development that provides Restricted Affordable Units consistent with the affordability requirements set forth in LAMC Section 19.18 B.2(b) in lieu of the Linkage Fee that may otherwise be required pursuant to LAMC Section 19.18.

Section 22. Subsection M of Section 19.01 of the Los Angeles Municipal code is modified to read as follows:

Type of Application	Base Fee*
Application for a Density Bonus <u>in conjunction with:</u> <u>Up to one waiver of a development standard under the Mixed Income Incentive Program; or</u>  <u>Up to three waivers of a development standard under the Affordable Housing Incentive Program including a request for one or more Incentives included in the Menu of Incentives</u> ( <del>Section 12.22 A.25.(g)(2)</del> Section 12.22 A.38(d)(3); Section 12.22 A.39(d)(3); Section 13B.2.5.)	\$9,459
Application for a Density Bonus <u>in conjunction with:</u> <u>Waivers under the State Density Bonus Program;</u>  <u>More than one waiver under the Mixed Income Incentive Program; or</u>  <u>More than three waivers under the Affordable Housing Incentive Program including a request for one or more Incentives not included in the Menu of Incentives</u> ( <del>Section 12.22 A.25.(g)(3)</del> Section 12.22 A.37(d)(3); Section 12.22 A.38(d)(4); Section 12.22 A.39(d)(4); Section 13B.2.3.)	\$24,349
Application for a Density Bonus in excess of that permitted by Section 12.22 A.3725. (Section 12.24 U.26.; Section 13B.2.3)	\$24,359

Section 23. Subsection A of Section 19.14 of the Los Angeles Municipal Code is modified to read as follows:

A. Unless a fee Exemption pursuant to Section 19.14(b) applies, the following fees shall be charged and collected by the Los Angeles Housing Department (Department) for the preparation, enforcement, monitoring, and associated work relating to the affordable housing covenants ~~described in Sections 12.22 A.25(h)(1) through (3), required by~~ Sections 12.22 A.37, 12.22 A.38, 12.22 A.39, 12.22 A.29.(d)(1) through (2), and 14.00 A.10.(c)(2) of this Code. (Amended by Ord. No. 187,122, Eff. 8/8/21.)

Section 24. Paragraph b of Subdivision 2 of Subsection C of Section 19.18 of the Los Angeles Municipal Code is modified to read as follows:

b. Any for-sale or rental housing development containing restricted affordable units where at least 40% of the total units or guest rooms are dedicated for moderate income households, or at least 20% of the total units or guest rooms are dedicated for low income households, or at least 11% of the total units or guest rooms are dedicated for very low income households, or at least 8% of the total units or guest rooms are

dedicated for extremely low income households, for at least 55 years, where a covenant has been made with the Los Angeles Housing Department and required covenant and monitoring fees have been paid, or any Mixed Income Incentive Project consistent with LAMC Section 12.22 A.38. Such a covenant shall also subject projects using this exemption to the replacement policies in Government Code Section 65915(c)(3), as that section may be amended from time to time, and to LAHD fees related to housing replacement determinations pursuant to state law, as set forth in this Code. For the purposes of this section, total units includes any units added by a density bonus or other land use incentive, consistent with the affordability levels defined in Government Code Section 65915, as that section may be amended from time to time.

Section 25. Paragraph b of Subdivision 4 of Subsection C of Section 19.18 of the Los Angeles Municipal Code is modified to read as follows:

b. Affordable Housing Units. Any Restricted Affordable Units ~~as defined in Section 12.22 A.25 of this Code~~ may be subtracted from the total number of dwelling units or guest rooms in a building in determining the required Linkage Fee.

Section 26. Part 2B and Part 2C of Article 2 (Form) of Chapter 1A of the Los Angeles Municipal Code are amended as follows:

*[Language in Development. Intent: Provide revisions to Part 2B and Part 2C of Article 2 (Form)]*

Section 27. Sections 8.1.1, 8.2.2, 8.2.3, 8.2.5, 8.2.6, 8.2.7, and 8.2.8 of Article 8 (Specific Plans, Supplemental and Special Districts) of Chapter 1A of the Los Angeles Municipal Code are amended as follows:

*[Language in Development. Intent: Provide revisions to 8.1.1, 8.2.2, 8.2.3, 8.2.5, 8.2.6, 8.2.7, and 8.2.8 of Article 8 (Specific Plans, Supplemental and Special Districts)]*

Section 28. Sections 9.2.1, 9.3.1, 9.3.2, 9.3.3, and 9.4.1 of Article 9 (Public Benefit Programs) of Chapter 1A of the Los Angeles Municipal Code are amended to read as follows:

*[Language in Development. Intent: Provide revisions to Sections 9.2.1, 9.3.1, 9.3.2, 9.3.3, and 9.4.1 of Article 9 (Public Benefit Programs)]*



Section 29. Section 13B.3.2. Expanded Administrative Review within Division 13B.3. of Part B. of the Table of Contents of Article 13 of Chapter 1A of the Los Angeles Municipal Code is added as follows:

<b>Div. 13A.1. Authorities . . . . .</b>	<b>13-5</b>
Sec. 13A.1.1. Mayor . . . . .	13-5
Sec. 13A.1.2. City Council. . . . .	13-5
Sec. 13A.1.3. City Planning Commission . . . . .	13-6
Sec. 13A.1.4. Area Planning Commission . . . . .	13-8
Sec. 13A.1.5. Cultural Heritage Commission . . . . .	13-12
Sec. 13A.1.6. Director of Planning . . . . .	13-13
Sec. 13A.1.7. Zoning Administrator. . . . .	13-14
Sec. 13A.1.8. Department of Building and Safety . . . . .	13-16
Sec. 13A.1.9. Advisory Agency . . . . .	13-17
Sec. 13A.1.10. Subdivision Committee . . . . .	13-17
Sec. 13A.1.11. Design Review Board. . . . .	13-17
Sec. 13A.1.12. Historic Preservation Overlay Zone (HPOZ) Board . . . . .	13-19
<b>Div. 13A.2. General Procedural Elements . . . . .</b>	<b>13-20</b>
Sec. 13A.2.1. Applicability . . . . .	13-20
Sec. 13A.2.2. Process Elements. . . . .	13-21
Sec. 13A.2.3. Applications. . . . .	13-25
Sec. 13A.2.4. Notice of Public Hearing. . . . .	13-26
Sec. 13A.2.5. Decisions . . . . .	13-29
Sec. 13A.2.6. Transfer of Jurisdiction. . . . .	13-31
Sec. 13A.2.7. Scope of Decision . . . . .	13-31
Sec. 13A.2.8. Appeals . . . . .	13-34
Sec. 13A.2.9. Permits Issued in Error. . . . .	13-37
Sec. 13A.2.10. Multiple Approvals . . . . .	13-38
<b>Div. 13B.1. Legislative Action . . . . .</b>	<b>13-45</b>
Sec. 13B.1.1. General Plan Adoption/Amendment . . . . .	13-45
Sec. 13B.1.2. Specific Plan Adoption/Amendment . . . . .	13-51
Sec. 13B.1.3. Zoning Code Amendment . . . . .	13-56
Sec. 13B.1.4. Zone Change . . . . .	13-59
Sec. 13B.1.5. Guidelines or Standards Adoption/Amendment . . . . .	13-70
Sec. 13B.1.6. Land for Public Use. . . . .	13-72
<b>Div. 13B.2. Quasi-Judicial Review. . . . .</b>	<b>13-75</b>
Sec. 13B.2.1. Class 1 Conditional Use Permit . . . . .	13-75
Sec. 13B.2.2. Class 2 Conditional Use Permit . . . . .	13-81



<b>Div. 13B.3. Ministerial Action . . . . .</b>	<b>13-106</b>
Sec. 13B.3.1. Administrative Review . . . . .	13-106
Sec. 13B.3.2. Expanded Administrative Review . . . . .	13-107
<b>Div. 13B.4. Specific Plan Implementation . . . . .</b>	<b>13-108</b>
Sec. 13B.4.1. General Provisions . . . . .	13-108
Sec. 13B.4.2. Project Compliance . . . . .	13-110
Sec. 13B.4.3. Project Compliance (Design Review Board) . . . . .	13-113
Sec. 13B.4.4. Project Adjustment . . . . .	13-120
Sec. 13B.4.5. Project Exception . . . . .	13-124
Sec. 13B.4.6. Specific Plan Interpretation . . . . .	13-130
<b>Div. 13B.5. Quasi-Judicial Relief . . . . .</b>	<b>13-133</b>
Sec. 13B.5.1. Alternative Compliance . . . . .	13-133
Sec. 13B.5.2. Adjustment . . . . .	13-136
Sec. 13B.5.3. Variance . . . . .	13-140
Sec. 13B.5.4. Modification of Entitlement . . . . .	13-148
Sec. 13B.5.5. Reasonable Accommodation . . . . .	13-151
<b>Div. 13B.6. Non-Compliance . . . . .</b>	<b>13-155</b>
Sec. 13B.6.1. Evaluation of Non-Compliance . . . . .	13-155
Sec. 13B.6.2. Nuisance Abatement/Revocation . . . . .	13-159
<b>Div. 13B.7. Division of Land . . . . .</b>	<b>13-168</b>
Sec. 13B.7.1. General Provisions . . . . .	13-168
Sec. 13B.7.2. Parcel Map Exemption/Lot Line Adjustment . . . . .	13-171
Sec. 13B.7.3. Tentative Tract Map . . . . .	13-173
Sec. 13B.7.4. Final Tract Map . . . . .	13-184
Sec. 13B.7.5. Preliminary Parcel Map . . . . .	13-188
Sec. 13B.7.6. Final Parcel Map . . . . .	13-196
Sec. 13B.7.7. Private Street Map . . . . .	13-200
Sec. 13B.7.8. Subdivision Appeal . . . . .	13-204
<b>Div. 13B.8. Historic Preservation . . . . .</b>	<b>13-206</b>
Sec. 13B.8.1. General Provisions . . . . .	13-206
Sec. 13B.8.2. Historic Preservation Overlay Zone Designation . . . . .	13-217
Sec. 13B.8.3. Preservation Plan Adoption/Amendment . . . . .	13-223
Sec. 13B.8.4. Review of Conforming Work . . . . .	13-227

Sec. 13B.8.5. Certificate of Appropriateness (Construction, Addition, Alteration, or Reconstruction)	13-232
Sec. 13B.8.6. Certificate of Appropriateness (Demolition, Removal, or Relocation)	13-238
Sec. 13B.8.7. Certificate of Compatibility for Non-Contributing Elements	13-244
<b>Div. 13B.9. Coastal Development</b>	<b>13-250</b>
Sec. 13B.9.1. Coastal Development Permit (Pre-Certification)	13-250
Sec. 13B.9.2. Coastal Development Permit (Post-Certification)	13-262
<b>Div. 13B.10. Department of Building and Safety</b>	<b>13-285</b>
Sec. 13B.10.1. General Provisions	13-285
Sec. 13B.10.2. Appeals From LADBS Determinations	13-288
Sec. 13B.10.3. Annual Inspection Monitoring (Auto Dismantling Yards, Junk Yards, Scrap Metal or Recycling Materials Processing Yards, Recycling Collection and/or Buyback Centers, Recycling Materials Sorting Facilities, Cargo Container Storage Yards, And Collection Bins)	13-292
Sec. 13B.10.4. Annual Inspection Monitoring (Automotive Repair Garage and Used Vehicle Sales Areas)	13-297
<b>Div. 13B.11. California Environmental Quality Act (CEQA) Provisions</b>	<b>13-303</b>
Sec. 13B.11.1. Environmental Review Procedures	13-303
<b>Div. 13C.1. Definitions</b>	<b>13-318</b>

Section 30. Table 2 - Process Summary of Subsection A (Overview) of Section 13A.2.2. (Process Elements) of Article 13 (Administration) of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

Entitlement Review	Ministerial	Director	Zoning Administrator	Subdivision Committee	City Engineer	Hearing Officer	Area Planning Commission	City Planning Commission	City Council	Mayor	Design Review Board	HPOZ Board	Cultural Heritage Commission
Legislative Action													
General Plan Adoption / Amendment		R †						[R] †	[D] †	R/ SV †			
Specific Plan Adoption / Amendment		R						[R] †	[D] †	SV †			
Zoning Code Amendment		R						[R] †	D †	SV †			
Zone Change		R					[R]	[R]* †	[D] †	SV †			
Guidelines of Standards Adoption/ Amendment								[D]					
Land for Public Use								R	D				
Quasi-Judicial Review													
Class 1 Conditional Use Permit			<D>				[A]						
Class 2 Conditional Use Permit			D †				[A] †						
Class 3 Conditional Use Permit		[R] †						[D] †	[A]				
Project Review		<D>					[A]						
Director Determination		D					[A]	[A]					
Ministerial Action													
Administrative Review		D											
Expanded Administrative Review		<D>											
Specific Plan Implementation													
Project Compliance		<D>					[A]						
Project Compliance (Design Review Board)		D					[A]				[R]		
Project Adjustment		<D>					[A]						
Project Exception							[D]		[A]				

Specific Plan Interpretation	<D>				[A]	[A]													
Quasi-Judicial Relief																			
Alternative Compliance	D					[A]													
Adjustment	<D>					[A]													
Variance			[D] †			[A] †		[A]											
Modification of Entitlement	↔					↔												↔	
Reasonable Accommodation	D							[A]											
Non-Compliance																			
Evaluation of Non-Compliance			[D]			[A]	[D]	[A]											
Nuisance Abatement/Revocation			[D]					[A] †											
Division of Land																			
Parcel Map Exemption/ Lot Line Adjustment	D					[A]	[A]												
Tentative Tract Map	[D]			R		[A]	[A]												
Final Tract Map					C			D											
Preliminary Parcel Map	[D]			R		[A]	[A]												
Final Parcel Map					C			D											
Private Street Map	<D>			R		[A]	[A]												
Subdivision Appeal						[D]	[D]												
Historic Preservation																			
Historic Preservation Overlay Zone Designation							[R]	[D]										C	
Preservation Plan Adoption / Amendment		R				[R] †		[D]										[R]	
Review of Conforming Work	D																	D	
Certificate of Appropriateness (Construction, Addition, Alteration, or Reconstruction)		D					[A]											[R]	
Certificate of Appropriateness (Demolition, Removal, or Relocation)							D		[A]									[R]	
Certificate of Compatibility for Non-Contributing Elements		D					[A]											[R]	
Coastal Development																			
Coastal Development Permit (Pre-Certification)	↔					↔												↔	

Coastal Development Permit (Post-Certification)	<D>			<D>		[A]						
Department of Building and Safety												
Appeals from LADBS Determination	<D>					[A]	[A]					
California Environmental Quality Act (CEQA) Provisions												
CEQA Appeal								D				

**Key**

C Certification  
R Review & Recommendation  
D Decision or Acceptance  
SV Signature / Veto

A Appeal  
[ ] Public Hearing

< > Public Hearing optional or waivable

‡ Optional or where directed by decision

**Blank Cell** Not required

† Required by City Charter

**Italics** Action only under certain conditions (such as project size, delegation or transfer from another agency, etc.)

↔ Varies with underlying process

\* If filed by application and CPC recommends disapproval, its decision is appealable to CC.

Section 31. Table 4 - Summary of Notice Requirements of Subsection F (Notice Requirements of Each Process) of Section 4 (Notice of Public Hearing) of Division 13A.2. (General Procedural Elements) of Part A (General Administrative Provisions) of Article 13 of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

Action	Reference	Publication	Mail	Posting
<b>Legislative Action</b>	<b>Div. 13B.1.</b>			
General Plan Adoption / Amendment	Sec. 13B.1.1.	■	■	●
Specific Plan Adoption / Amendment	Sec. 13B.1.2.	■	●	●
Zoning Code Amendment	Sec. 13B.1.3.	■		
Zone Change	Sec. 13B.1.4.	■	●	●
Guidelines or Standards Adoption / Amendment	Sec. 13B.1.5.	■		
Land for Public Use	Sec. 13B.1.6.			
<b>Quasi-Judicial Review</b>	<b>Div. 13B.2.</b>			
Class 1 Conditional Use Permit	Sec. 13B.2.1.		■	■
Class 2 Conditional Use Permit	Sec. 13B.2.2.	■	■	■
Class 3 Conditional Use Permit	Sec. 13B.2.3.	■	■	■
Project Review	Sec. 13B.2.4.		■	
Director Determination	Sec. 13B.2.5.		○	○
<b>Ministerial Action</b>	<b>Div. 13B.3.</b>			
Administrative Review	Sec. 13B.3.1.			
Expanded Administrative Review	Sec. 13B.3.2.		■	■
<b>Specific Plan Implementation</b>	<b>Div. 13B.4.</b>			
Project Compliance	Sec. 13B.4.2.		○	
Project Compliance (Design Review Board)	Sec. 13B.4.3.		■	■
Project Adjustment	Sec. 13B.4.4.		○	
Project Exception	Sec. 13B.4.5.	■	■	■
Specific Plan Interpretation	Sec. 13B.4.6.		○	
<b>Quasi-Judicial Relief</b>	<b>Div. 13B.5.</b>			
Alternative Compliance	Sec. 13B.5.1.		○	
Adjustment	Sec. 13B.5.2.		■	■
Variance	Sec. 13B.5.3.		■	■
Modification of Entitlement	Sec. 13B.5.4.		◆	◆
Reasonable Accommodation	Sec. 13B.5.5.	○	○	○
<b>Non-Compliance</b>	<b>Div. 13B.6.</b>			
Evaluation of Non-Compliance	Sec. 13B.6.1.		■	■
Nuisance Abatement/Revocation	Sec. 13B.6.2.		■	■
<b>Division of Land</b>	<b>Div. 13B.7.</b>			
Parcel Map Exemption/Lot Line Adjustment	Sec. 13B.7.2.			
Tentative Tract Map	Sec. 13B.7.3.	■	■	■



Tentative Tract Map	Sec. 13B.7.3.	■	■	■
Final Tract Map	Sec. 13B.7.4.			
Preliminary Parcel Map	Sec. 13B.7.5.	■	■	■
Final Parcel Map	Sec. 13B.7.6.			
Private Street Map	Sec. 13B.7.7.		■	■
Subdivision Appeal	Sec. 13B.7.8.		■	
Historic Preservation	Div. 13B.8.			
Historic Preservation Overlay Zone Designation	Sec. 13B.8.2.	■	■	●
Preservation Plan Adoption or Amendment	Sec. 13B.8.3.		■	
Review of Conforming Work	Sec. 13B.8.4.			
Certificate of Appropriateness (Construction, Addition, Alteration, or Reconstruction)	Sec. 13B.8.5.		■	■
Certificate of Appropriateness (Demolition, Removal, or Relocation)	Sec. 13B.8.6.		■	■
Certificate of Compatibility for Non-Contributing Elements	Sec. 13B.8.7.		■	■
Coastal Development	Div. 13B.9.			
Coastal Development Permit (Pre-Certification)	Sec. 13B.9.1		■	◆
Coastal Development Permit (Post-Certification)	Sec. 13B.9.2		■	◆
Department of Building and Safety	Div. 13B.10			
Appeals from LADBS Determinations	Sec. 13B.10.2		■	
California Environmental Quality Act (CEQA) Provisions	Div. 13B.11			
CEQA Appeal	Sec. 13B.11.1		■	

Key: ■ = initial decision ● site specific only (not City-initiated) ○ = appeal only

◆ = varies with underlying application

Section 32. Table 5 - Classifications of Actions for Multiple Approvals of Paragraph 2 (Terms) of Subsection A (Applicability) of Section 10 (Multiple Approvals) of Division 13A.2. (General Procedural Elements) of Part A (General Administration Provisions) of Section of Article 13 of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

Action	Reference	Legislative	Quasi-judicial	Subdivision	Ministerial
<b>Legislative Action</b>	<b>Div. 13B.1.</b>				
General Plan Adoption / Amendment	Sec. 13B.1.1.	■			
Specific Plan Adoption / Amendment	Sec. 13B.1.2.	■			
Zoning Code Amendment	Sec. 13B.1.3.	■			
Zone Change	Sec. 13B.1.4.	■			
Guidelines or Standards Adoption/Amendment	Sec. 13B.1.5.	■			
Land for Public Use	Sec. 13B.1.6.	■			
<b>Quasi-Judicial Review</b>	<b>Div. 13B.2.</b>				
Class 1 Conditional Use Permit	Sec. 13B.2.1.		■		
Class 2 Conditional Use Permit	Sec. 13B.2.2.		■		
Class 3 Conditional Use Permit	Sec. 13B.2.3.		■		
Project Review	Sec. 13B.2.4.		■		
Director Determination	Sec. 13B.2.5.		■		
<b>Ministerial Action</b>	<b>Div. 13B.3.</b>				
Administrative Review	Sec. 13B.3.1.				—
Expanded Administrative Review	Sec. 13B.2.2				—
<b>Specific Plan Implementation</b>	<b>Div. 13B.4.</b>				
Project Compliance	Sec. 13B.4.2.		■		
Project Compliance (Design Review Board)	Sec. 13B.4.3.		■		
Project Adjustment	Sec. 13B.4.4.		■		
Project Exception	Sec. 13B.4.5.		■		
Specific Plan Interpretation	Sec. 13B.4.6.		—		
<b>Quasi-Judicial Relief</b>	<b>Div. 13B.5.</b>				
Alternative Compliance	Sec. 13B.5.1.		■		
Adjustment	Sec. 13B.5.2.		■		
Variance	Sec. 13B.5.3.		■		
Modification of Entitlement	Sec. 13B.5.4.		■		
Reasonable Accommodation	Sec. 13B.5.5.		—		
<b>Non-Compliance</b>	<b>Div. 13B.6.</b>				
Evaluation of Non-Compliance	Sec. 13B.6.1.		—		
Nuisance Abatement/Revocation	Sec. 13B.6.2.		—		
<b>Division of Land</b>	<b>Div. 13B.7.</b>				
Parcel Map Exemption/Lot Line Adjustment	Sec. 13B.7.2.			—	
Tentative Tract Map	Sec. 13B.7.3.			■	
Final Tract Map	Sec. 13B.7.4.			—	



Final Tract Map	Sec. 13B.7.4.			—	
Preliminary Parcel Map	Sec. 13B.7.5.			■	
Final Parcel Map	Sec. 13B.7.6.			—	
Private Street Map	Sec. 13B.7.7.			■	
Subdivision Appeal	Sec. 13B.7.8.			—	
Historic Preservation	Div. 13B.8.				
Historic Preservation Overlay Zone Designation	Sec. 13B.8.2.	—			
Preservation Plan Adoption / Amendment	Sec. 13B.8.3.	■			
Review of Conforming Work	Sec. 13B.8.4.				—
Certificate of Appropriateness (Construction, Addition, Alteration, or Reconstruction)	Sec. 13B.8.5.		■		
Certificate of Appropriateness (Demolition, Removal, or Relocation)	Sec. 13B.8.6.		■		
Certificate of Compatibility for Non-Contributing Elements	Sec. 13B.8.7.		■		
Coastal Development	Div. 13B.9.				
Coastal Development Permit (Pre-Certification)	Sec. 13B.9.1		■		
Coastal Development Permit (Post-Certification)	Sec. 13B.9.2		■		
Department of Building and Safety	Div. 13B.10				
Appeals from LADBS Determinations	Sec. 13B.10.2		—		
Annual Inspection Monitoring (Recycling)	Sec. 13B.10.3		—		
Annual Inspection Monitoring (Automotive)	Sec. 13B.10.4		—		
California Environmental Quality Act (CEQA) Provisions	Div. 13B.11.				
CEQA Appeal	Sec. 13B.11.1.		—		

Key: ■ = qualifies for multiple approval — = varies with underlying application

Section 33. Paragraph (C) of Section 13A.2.7. (Scope of Decision) of Article 13 (Administration) of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

#### C. Utilizing the Grant

1. A discretionary project approval is considered utilized after it has been effectuated by the Department of City Planning and a building permit has been issued by the Department of Building and Safety. Utilization of a grant must occur no later than 3 years from the last date an action can be effectuated. An approval not requiring building permits from the Department of Building and Safety is considered utilized when compliance with all conditions of approval have been demonstrated, appropriate fees paid, plans stamped and authorization has been obtained from the Department of City Planning.
2. Exceptions
  - a. Religious and Institutional Uses  
Where a lot or lots have been approved for use as a governmental enterprise, religious use, hospital, educational institution or private school,

including elementary and high schools, no time limit to utilize the privileges shall apply provided that all of the following conditions are met:

- i. The property involved is acquired or legal proceedings for its acquisition are commenced within one year of the effective date of the decision approving the conditional use.
  - ii. A sign is immediately placed on the property indicating its ownership and the purpose to which it is to be developed, as soon as legally possible after the effective date of the decision approving the conditional use. This sign shall have a surface area of at least 20 square feet.
  - iii. The sign is maintained on the property and in good condition until the conditional use privileges are utilized.
- b. Affordable Housing Projects  
A six-year time limit to utilize the privileges shall apply where a lot or lots have been approved for housing that includes 100% restricted Affordable Units, exclusive of a manager's unit or units, as defined in ~~Sec. 12.22 A.25(b) (Exceptions: Affordable Housing Incentives – Density Bonus; Definitions)~~ *Sec. 12.03 (Definitions) of Chapter 1 (General Provisions and Zoning)* of this Code.

Section 34. Paragraph (D) of Section 13B.2.1 (Class 1 Conditional Use Permit) of Article 13 (Administration) of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

DG. Decision

1. General Procedures  
See *Sec. 13A.2.5. (Decisions)*.
2. Decision Maker  
The Zoning Administrator is the initial decision maker.
3. Public Hearing
  - a. The Zoning Administrator shall set the matter for public hearing, giving notice in the manner specified in Subsection C. (Notice) of this Section.
  - b. The Zoning Administrator may conduct the hearing or designate a Hearing Officer to conduct the hearing.
4. Decision
  - a. The Zoning Administrator shall render the initial decision within 75 days of the date the application is deemed complete.
  - b. If the Zoning Administrator fails to make a timely decision, the applicant may file a request for transfer of jurisdiction to the Area Planning Commission pursuant to *Sec. 13A.2.6. (Transfer of Jurisdiction)*.

## 5. Conditions of Approval and inspections

- a. In approving a project, the decision maker may impose conditions related to the interests addressed in the findings set forth in Subsection E. (Standards for Review and Required Findings) of this Section.
- b. The decision may state that the height and area regulations required by other provisions of this Chapter and *Chapter 1 (General Provisions and Zoning)* shall not apply to the conditional use approved. ~~If the Density Bonus is increased beyond the maximum allowed as defined in Sec. 12.22 A.37 (State Density Bonus Program), the development project must also contain the requisite number of Restricted Affordable Units as set forth in Sec. 12.24 U.26. (a)(1) – (5) (Density Bonus for a Housing Development in Which the Density increase is Greater than the Maximum Permitted in Sec. 12.22 A.3725) of this Code.~~
- c. The Department shall have the authority to conduct inspections to verify compliance with any and all conditions imposed on any conditional use or other similar Quasi-judicial approval granted pursuant to this Section. Clearance, monitoring and inspection fees shall be paid by the business operator or property owner to the Department in accordance with the fee schedule in *Article 9 (Fees) of Chapter 1 (General Provisions and Zoning)*.
- d. If, upon inspection, the Department finds that the applicant has failed to comply with conditions of any conditional use or other similar Quasi-judicial approval granted pursuant to this Section, the Department shall give notice to the business operator or property owner to correct the specific deficiencies and the time in which to complete the correction. Evidence of compliance shall be submitted to the Department within the specified correction period. If the deficiencies are not corrected within the time prescribed by the Department, revocation proceedings pursuant to *Sec. 13B.6.1. (Evaluation of Non-Compliance)* or *Sec. 13B.6.2. (Nuisance Abatement/Revocation)* may commence.

Section 35. Paragraph (D) of Section 13B.2.2 (Class 2 Conditional Use Permit) of Article 13 (Administration) of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

D. Decision

1. General Procedures

See *Sec. 13A.2.5. (Decisions)*.

2. Decision Maker

The Zoning Administrator is the initial decision maker.

3. Public Hearing

a. Upon receipt of a complete application, the Zoning Administrator shall set the matter for public hearing, giving notice in the manner specified in Subsection C. (Notice) of this Section.

b. The Zoning Administrator may conduct the hearing or designate a Hearing Officer to conduct the hearing.

4. Decision

a. The Zoning Administrator shall render the initial decision within 75 days of the date the application is deemed complete.

b. If the Zoning Administrator fails to make a timely decision, the applicant may file a request for transfer of jurisdiction to the Area Planning Commission pursuant to *Sec. 13A.2.6. (Transfer of Jurisdiction)*.

5. Conditions of Approval and inspections

a. In approving a project, the decision maker may impose conditions related to the interests addressed in the findings set forth in Subsection E. (Standards for Review and Required Findings) of this Section.

b. The decision may state that the height and area regulations required by other provisions of this Chapter and *Chapter 1 (General Provisions and Zoning)* shall not apply to the conditional use approved. ~~If the Density Bonus is increased beyond the maximum allowed as defined in Sec. 12.22 A.37 (Affordable Housing incentives – Density Bonus), the development project must also contain the requisite number of Restricted Affordable Units as set forth in Sec. 12.24 U.26. (a)(1) – (5) (Density Bonus for a Housing Development in Which the Density increase is Greater than the Maximum Permitted in Sec. 12.22 A.3725) of this Code.~~

c. The Department shall have the authority to conduct inspections to verify compliance with any and all conditions imposed on any conditional use or other similar Quasi-judicial approval granted pursuant to this Section.

Clearance, monitoring and inspection fees shall be paid by the business operator or property owner to the Department in accordance with the fee schedule in *Article 9 (Fees) of Chapter 1 (General Provisions and Zoning)*.

- d. If, upon inspection, the Department finds that the applicant has failed to comply with conditions of any conditional use or other similar Quasi-judicial approval granted pursuant to this Section, the Department shall give notice to the business operator or property owner to correct the specific deficiencies and the time in which to complete the correction. Evidence of compliance shall be submitted to the Department within the specified correction period. If the deficiencies are not corrected within the time prescribed by the Department, revocation proceedings pursuant to *Sec. 13B.6.1. (Evaluation of Non-Compliance)* or *Sec. 13B.6.2. (Nuisance Abatement/Revocation)* may commence.

6. Transmittal

The Zoning Administrator shall transmit a copy of the written findings and decision to the applicant, to all owners of properties abutting, across the street or alley from, or having a common corner with, the subject property and all persons who filed a written request for the notice with the Zoning Administrator.

Section 36. Paragraph (D) of Section 13B.2.3 (Class 3 Conditional Use Permit) of Article 13 (Administration) of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

D. Decision

1. General Procedures

See *Sec. 13A.2.5. (Decisions)*.

2. Decision Maker

The City Planning Commission is the initial decision maker.

3. Public Hearing

- a. Upon receipt of a complete application, the City Planning Commission shall set the matter for public hearing, giving notice in the manner specified in Subsection C. (Notice) of this Section.
- b. The City Planning Commission may conduct the hearing itself or designate the Director to conduct the hearing.

4. Decision

- a. If the Director conducts the public hearing, the Director shall transmit its findings and recommendation to the City Planning Commission.

- b. After the Director or City Planning Commission's hearing is closed, the City Planning Commission shall render the initial decision at a public meeting.
  - c. The City Planning Commission shall render the initial decision within 75 days of the date the application is deemed complete.
  - d. If the City Planning Commission fails to make a timely decision, the applicant may file a request for transfer of jurisdiction to the City Council pursuant to *Sec. 13A.2.6. (Multiple Approvals)*.
5. Conditions of Approval and inspections
- a. In approving a project, the decision maker may impose conditions related to the interests addressed in the findings set forth in Subsection E. (Standards for Review and Required Findings) of this Section.
  - b. The decision may state that the height and area regulations required by other provisions of this Chapter and *Chapter 1 (General Provisions and Zoning)* shall not apply to the conditional use approved. If the Density Bonus is increased beyond the maximum allowed as defined in ~~Sec. 12.22 A. 25 (Affordable Housing Incentives – Density Bonus)~~, Sec. 12.22 A.37 (State Density Bonus Program), the development project must also contain the requisite number of Restricted Affordable Units as set forth in *Sec. 12.24 U.26. (a)(1) - (5) (Density Bonus for a Housing Development in Which the Density Increase is Greater than the Maximum Permitted in Sec. 12.22 A.2537)* of this Code.
  - c. The Department shall have the authority to conduct inspections to verify compliance with any and all conditions imposed on any conditional use or other similar Quasi-judicial approval granted pursuant to this Section. Clearance, monitoring, and inspection fees shall be paid by the business operator or property owner to the Department in accordance with the fee schedule in *Article 9 (Fees) of Chapter 1 (General Provisions and Zoning)*.
  - d. If, upon inspection, the Department finds that the applicant has failed to comply with conditions of any conditional use or other similar Quasi-judicial approval granted pursuant to this Section, the Department shall give notice to the business operator or property owner to correct the specific deficiencies and the time in which to complete the correction. Evidence of compliance shall be submitted to the Department within the specified correction period. If the deficiencies are not corrected within the time prescribed by the Department, revocation proceedings pursuant to *Sec. 13B.6.1. (Evaluation of Non-Compliance)* or *Sec. 13B.6.2. (Nuisance Abatement/Revocation)* may commence.

## 6. Transmittal

The City Planning Commission shall transmit a copy of the written findings and decision to the applicant, to all owners of properties abutting, across the street or alley from, or having a common corner with the subject property and all persons who filed a written request for the notice.

Section 37. Paragraph (G) of Section 13B.2.5 of Chapter 1A of the Los Angeles Municipal Code is amended as follows:

## G. Appeals

### 1. General Procedures

See Sec. 13A.2.8. (Appeals).

### 2. Decision Maker

a. The Area Planning Commission is the appellate decision maker.

b. ~~On-Menu Density Bonus~~ Density Bonus

The City Planning Commission is the appellate decision maker for projects seeking approval pursuant to Sec. 12.22 A.37(d)(5)(iii) (State Density Bonus Program), Sec. 12.22 A.38(d)(3) (Mixed Income Incentive Program), or Sec. 12.22 A.39(d)(3) (Affordable Housing Incentive Program) ~~(Sec. 12.22 A.25. (Affordable Housing Incentives — Density Bonus))~~ of Chapter 1 (General Provisions and Zoning).

### 3. Filing

a. An applicant or any other person aggrieved by the Director's decision may file an appeal.

b. ~~On-Menu Density Bonus~~ Density Bonus

An applicant or any owner or tenant of a property abutting, across the street or alley from, or having a common corner with the subject property aggrieved by the Director's decision may file an appeal on projects seeking approval pursuant to Sec. 12.22 A.37(d)(5)(iii) (State Density Bonus Program), Sec. 12.22 A.38(d)(3) (Mixed Income Incentive Program), or Sec. 12.22 A.39(d)(3) (Affordable Housing Incentive Program) ~~Sec. 12.22 A.25. (Affordable Housing Incentives — Density Bonus)~~ of Chapter 1 (General Provisions and Zoning).

### 4. Appellate Decision

a. Before acting on any appeal, the Area Planning Commission shall set the matter for hearing, giving notice in the manner specified in Subsection C. (Notice) of this Section.



- b. The Area Planning Commission shall act within 75 days after the expiration of the appeal period.

5. Exception

- a. When the application is filed as part of a project requiring multiple approvals, the appeals procedures set forth in LAMC Section 13A.2.10. (Multiple Approvals) of this Code shall govern.
- b. When the application is filed in conjunction with a Parcel Map and no other approval, the appeals procedures set forth in LAMC Section 13B.7.8. (Subdivision Appeal) of this Code shall govern.
- c. When the application is filed in conjunction with a Tentative Map and no other approval, the appeals procedures set forth in LAMC Section 13B.7.3.G. (Tentative Tract Map; Appeals) of this Code shall govern, provided that such applications shall only be appealable to the Appeal Board, as defined in Div. 13C.1. (Administration Definitions) of this Code, and shall not be subject to further appeal to the City's legislative body.



Section 38. A new Section 2. is added to Division 13B.3. of Article 13 (Administration) of Chapter 1A of the Los Angeles Municipal Code as follows:



A. Applicability

1. This Section applies where any provision of this Code requires an Expanded Administrative Review.

B. Initiation

1. An application for an Expanded Administrative Review is filed with the Department.
2. An Expanded Administrative Review is initiated as required in order to obtain a building permit.

## C. Notice

## 1. Notice of Public Hearing

The following notice is required for the public informational hearing on the decision, if held.

Type of Notice	When	Where/To Whom/Additional Requirements
Mail	24 days	<ul style="list-style-type: none"> <li>• The applicant;</li> <li>• The owner(s) of the property involved;</li> <li>• The owners and tenants of all property within 300 feet of the boundary of the subject site;</li> <li>• The Certified Neighborhood Council representing the area in which the property is located; and</li> <li>• Interested parties who have requested in writing to be notified</li> </ul>
Posting	10 days	<ul style="list-style-type: none"> <li>• The applicant will post notice in a conspicuous place on the property</li> </ul>

## D. Review

1. The Department shall determine compliance with the applicable regulations and standards for projects requiring an Administrative Review.

## 2. Clearance

Clearance shall be issued as required pursuant to the applicable ordinance or building permit requirement.

## 3. Public Hearing

If the matter has a significant effect on neighboring properties, or if required where any provision of this Code requires an Expanded Administrative Review and a public hearing, the Department may require a public hearing in the manner specified in Subsection C.

## E. Criteria for Compliance Review

The Department shall review the application for compliance with the applicable regulations and standards of this Code or the applicable specific plan or overlay, including the zoning standards, established development standards, and any supplemental use regulations.

F. Scope of Action

After the Expanded Administrative Review determines that the application is in compliance with the applicable regulations and standards, the following actions must comply with the approved plans:

1. The erection, enlargement or maintenance of buildings;
2. Any development or construction work; or
3. Issuance of a grading, building, demolition, or change of use permit.

G. Appeals

There is no appeal.

H. Modification Procedures

1. Modifications Equal to or Less than 10%

- a. Projects approved pursuant to this Section may seek a modification to modify conditions of approval for the original action prior to the issuance of the Certificate of Occupancy.
- b. For purposes of this Section, a “modification” means any changes in the proposed physical development or related conditions of approval that were approved in the original action by no more than 10%.
- c. A modification does not include the granting of any new rights or increased or additional incentives, nor does it include the granting of any new deviation from zoning regulations in this Chapter or Chapter 1 (General Provisions and Zoning).
- d. An application for a Modification pursuant to this Section shall be filed with the Department before the original action expires and include development plans showing the requested modifications.
- e. In approving a modification pursuant to this section, the Department shall review the application for compliance with the applicable regulations and standards of this Code or the applicable specific plan or overlay, including the zoning standards, established development standards, and any supplemental use regulations

2. Modifications Greater than 10%

Any request for a modification that exceeds the 10% limitation will not be processed as a modification of the original action under this Subdivision and shall instead require a filing of a new Expanded Administrative Review Application pursuant to this Section.

Section 39. Subsection B of Section 151.28 of Chapter 15 of the Los Angeles Municipal Code is modified to read as follows:

Units that are used to qualify for a density bonus pursuant to the provisions of either California Government Code Section 65915 or Los Angeles Municipal Code Section ~~12.22 A.25~~, 12.22 A.37, 12.22 A.38, or 12.22 A.39, or are used to satisfy any inclusionary zoning or replacement affordable housing requirement, or are used to qualify for any other public benefit or incentive, may be used to qualify as replacement affordable housing units pursuant to the provisions of this subsection.

Section 40. **SEVERABILITY.** If any portion, subsection, sentence, clause or phrase of this ordinance is for any reason held by a court of competent jurisdiction to be invalid such a decision shall not affect the validity of the remaining portions of this ordinance. The City Council hereby declares that it would have passed this ordinance and each portion or subsection, sentence, clause and phrase herein, irrespective of the fact that any one or more portions, subsections, sentences, clauses or phrases be declared invalid.





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Ryan Metheny** <ryan.metheny1@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:57 PM

Reply-To: ryan.metheny1@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,  
Ryan Metheny  
Los Angeles, CA 90042-3935  
[ryan.metheny1@gmail.com](mailto:ryan.metheny1@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Ryan Rubin** <rubinryand@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:06 AM

Reply-To: rubinryand@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,  
Ryan Rubin  
Los Angeles, CA 90042-3135  
[rubinryand@gmail.com](mailto:rubinryand@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Scott Korinke** <shkbarca@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:19 PM

Reply-To: shkbarca@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

Hope your day is going well, and thank you for reading my comment. This has been an impressive and worthwhile process - I'm excited to see the final!!

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,

Scott Korinke

West Hollywood, CA 90046-4561

[shkbarca@gmail.com](mailto:shkbarca@gmail.com)





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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Soyoung Yim** <syim415@gmail.com>

Fri, Sep 20, 2024 at 10:36 AM

Reply-To: Soyoung Yim <syim415@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning, Commissioners, and Councilman Marqueece Harris-Dawson,

I write to express deep frustration with the Citywide Housing Incentives Program (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing multifamily parcels will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. The interior residential areas of minority neighborhoods have been inequitably rezoned in prior housing cycles. Instead, we need to densify based on street width because our streets cross all neighborhoods and connect people to academic and employment opportunities. This approach must also bind the CHIP to a tree canopy standard for an environmentally just and climate resilient L.A.

I urge you to motion City Council, to include in the CHIP, R1 lots on streets classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller to reduce densification pressures in historic minority communities of color that lack the necessary regulatory protections. Moreover, zoning along larger streets, including R1s, provides the space we need to adhere to a 50% sidewalk canopy standard. Affordable housing need not compromise climate resiliency. Tree shade reduces surface temperatures between 22-54°F. They save lives.

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. While R1s on smaller streets provide private canopy, public canopy aligns with environmental justice because lots on broader streets, including R1s, are best equipped to handle both canopy and residential density.

LA can avoid an extreme and inequitable CHIP by incentivizing multifamily housing on R1 lots along opportunity corridors while supporting a public tree canopy standard for all.

Sincerely,

-- Soyoung Yim  
[syim415@gmail.com](mailto:syim415@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Stacey Slevcove** <sslevcove@everyactioncustom.com>

Fri, Sep 20, 2024 at 5:13 PM

Reply-To: sslevcove@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

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Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,  
Stacey Slevcove  
Long Beach, CA 90802-3776  
[sslevcove@gmail.com](mailto:sslevcove@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Tami Kagan-Abrams** <tami@everyactioncustom.com>

Fri, Sep 20, 2024 at 2:27 PM

Reply-To: tami@abramsgroup.org

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,  
Tami Kagan-Abrams  
Los Angeles, CA 90046-1634  
[tami@abramsgroup.org](mailto:tami@abramsgroup.org)







Housing Element <housingelement@lacity.org>

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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Tanisha Thomas** <tanishathomas@hotmail.com>

Fri, Sep 20, 2024 at 8:09 PM

Reply-To: Tanisha Thomas <tanishathomas@hotmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

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Dear LA City Planning, Commissioners, and Councilman Marqueece Harris-Dawson,

I write to express deep frustration with the Citywide Housing Incentives Program (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger. Excluding every R1 will drive further displacement as more existing multifamily parcels will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. The interior residential areas of minority neighborhoods have been inequitably rezoned in prior housing cycles. Instead, we need to densify based on street width because our streets cross all neighborhoods and connect people to academic and employment opportunities. This approach must also bind the CHIP to a tree canopy standard for an environmentally just and climate resilient L.A.

I urge you to motion City Council, to include in the CHIP, R1 lots on streets classified as Avenue-1 or larger, and exempt R2 lots on Avenue-2 or smaller to reduce densification pressures in historic minority communities of color that lack the necessary regulatory protections. Moreover, zoning along larger streets, including R1s, provides the space we need to adhere to a 50% sidewalk canopy standard. Affordable housing need not compromise climate resiliency. Tree shade reduces surface temperatures between 22-54°F. They save lives.

Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. While R1s on smaller streets provide private canopy, public canopy aligns with environmental justice because lots on broader streets, including R1s, are best equipped to handle both canopy and residential density.

LA can avoid an extreme and inequitable CHIP by incentivizing multifamily housing on R1 lots along opportunity corridors while supporting a public tree canopy standard for all.

Sincerely,

-- Tanisha Thomas  
[tanishathomas@hotmail.com](mailto:tanishathomas@hotmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Thomas Valet <tj.valet@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:49 PM

Reply-To: tj.valet@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,

Thomas Valet

Marina Del Rey, CA 90292-5185

[tj.valet@gmail.com](mailto:tj.valet@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Tracey Alexander Ettinger <traceylalexander@everyactioncustom.com>

Fri, Sep 20, 2024 at 12:10 PM

Reply-To: traceylalexander@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Tracey Alexander Ettinger  
Pacific Palisades, CA 90272-3834  
[traceylalexander@gmail.com](mailto:traceylalexander@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Varesh Prasad <varesh.prasad@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:17 AM

Reply-To: varesh.prasad@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,

Varesh Prasad

Los Angeles, CA 90038-4377

[varesh.prasad@gmail.com](mailto:varesh.prasad@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Verity Freebern** <verityfreebern@everyactioncustom.com>

Fri, Sep 20, 2024 at 8:33 PM

Reply-To: verityfreebern@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Verity Freebern

Los Angeles, CA 90065-3146

[verityfreebern@gmail.com](mailto:verityfreebern@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Victor Tran** <victortran3052@everyactioncustom.com>

Fri, Sep 20, 2024 at 1:04 PM

Reply-To: victortran3052@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Victor Tran  
Los Angeles, CA 90025-4011  
[victortran3052@gmail.com](mailto:victortran3052@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Violet Carne** <zayquana@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:11 AM

Reply-To: zayquana@gmail.com

To: housingelement@lacity.org

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Sincerely,

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Violet Carne

Los Angeles, CA 90006-5312

[zayquana@gmail.com](mailto:zayquana@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP for R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Virginia Kuhn <virginiakuhn@gmail.com>

Fri, Sep 20, 2024 at 8:37 AM

Reply-To: Virginia Kuhn <virginiakuhn@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, rachel.brashier@lacity.org, vince.bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, albizael.delvalle@lacity.org, maurice.johnson@lacity.org, roberto.perez@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

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[virginiakuhn@gmail.com](mailto:virginiakuhn@gmail.com)







Housing Element <housingelement@lacity.org>

---

## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

---

**William Scalia** <william@everyactioncustom.com>

Fri, Sep 20, 2024 at 11:08 AM

Reply-To: william@williamscalia.net

To: housingelement@lacity.org

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Sincerely,

Sincerely,  
William Scalia  
Los Angeles, CA 90066-4212  
[william@williamscalia.net](mailto:william@williamscalia.net)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Alex Dobbs <alex.dobbs@everyactioncustom.com>

Sat, Sep 21, 2024 at 8:55 AM

Reply-To: alex.dobbs@scene8.net

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Alex Dobbs  
Los Angeles, CA 90022-2514  
[alex.dobbs@scene8.net](mailto:alex.dobbs@scene8.net)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Carolina Goodman** <dgcg2@everyactioncustom.com>

Sat, Sep 21, 2024 at 4:18 PM

Reply-To: dgcg2@sbcglobal.net

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Carolina Goodman  
Sherman Oaks, CA 91401-5741  
[dgcg2@sbcglobal.net](mailto:dgcg2@sbcglobal.net)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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David Barboza <dejaybe@everyactioncustom.com>

Sat, Sep 21, 2024 at 7:39 AM

Reply-To: dejaybe@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
David Barboza  
Whittier, CA 90602-1353  
[dejaybe@gmail.com](mailto:dejaybe@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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David Welch <dwelch@everyactioncustom.com>

Sat, Sep 21, 2024 at 12:41 PM

Reply-To: dwelch@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

David Welch

North Hollywood, CA 91601-3542

[dwelch@gmail.com](mailto:dwelch@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Graham Messadieh <squigleyg@everyactioncustom.com>

Sat, Sep 21, 2024 at 5:17 PM

Reply-To: squigleyg@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,

Graham Messadieh

North Hollywood, CA 91606-4871

[squigleyg@gmail.com](mailto:squigleyg@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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John McHugh <northpk@everyactioncustom.com>

Sat, Sep 21, 2024 at 7:53 AM

Reply-To: northpk@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
John McHugh  
Los Angeles, CA 90026-6002  
[northpk@gmail.com](mailto:northpk@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Joshua Ray <j1.9ray@everyactioncustom.com>

Sat, Sep 21, 2024 at 10:40 AM

Reply-To: j1.9ray@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Joshua Ray  
Los Angeles, CA 90018-5002  
[j1.9ray@gmail.com](mailto:j1.9ray@gmail.com)







Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Justin Jones** <justinj1@everyactioncustom.com>

Sat, Sep 21, 2024 at 3:28 AM

Reply-To: justinj1@hotmail.com

To: housingelement@lacity.org

Dear Housing Element,

You dont need to go after single family neighborhoods. Not for a while. FIRST YOU NEED A VACANCY/DERELICTION TAX ON THE THOUSANDS OF ACRES OF COMMERCIAL LOTS THAT SIT UNUSED. FORCE THEM TO BUILD HOUSING ON THOSE LOTS. thanks

Sincerely,

Justin Jones

Los Angeles, CA 90031-2965

[justinj1@hotmail.com](mailto:justinj1@hotmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Lama Gyatso** <LamaJigmeG@everyactioncustom.com>

Sat, Sep 21, 2024 at 1:23 PM

Reply-To: LamaJigmeG@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Lama Gyatso  
Burbank, CA 91505-3298  
[LamaJigmeG@gmail.com](mailto:LamaJigmeG@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Leonora Camner <leonorasc@everyactioncustom.com>

Sat, Sep 21, 2024 at 1:27 PM

Reply-To: leonorasc@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,

Leonora Camner

Santa Monica, CA 90403-4331

[leonorasc@gmail.com](mailto:leonorasc@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Leslie Harada <lh1018185@gmail.com>

Sat, Sep 21, 2024 at 4:27 PM

Reply-To: Leslie Harada <lh1018185@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—  
Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Leslie Harada  
[lh1018185@gmail.com](mailto:lh1018185@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Mariana Morales** <Marianam1027@everyactioncustom.com>

Sat, Sep 21, 2024 at 4:21 PM

Reply-To: Marianam1027@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Mariana Morales  
Alhambra, CA 91801-4389  
[Marianam1027@gmail.com](mailto:Marianam1027@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Mary C <emailparty28@gmail.com>

Sat, Sep 21, 2024 at 12:39 AM

Reply-To: Mary C <emailparty28@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

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Sincerely,

-- Mary C  
[emailparty28@gmail.com](mailto:emailparty28@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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**Robert Wong** <Robnako@gmail.com>

Sat, Sep 21, 2024 at 8:14 AM

Reply-To: Robert Wong <Robnako@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

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Sincerely,

-- Robert Wong  
[Robnako@gmail.com](mailto:Robnako@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Samantha Seminario-Burns** <samanthaseminario@everyactioncustom.com>

Sat, Sep 21, 2024 at  
3:23 AM

Reply-To: samanthaseminario@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,

Samantha Seminario-Burns

Los Angeles, CA 90063-4029

[samanthaseminario@gmail.com](mailto:samanthaseminario@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Aida Ashouri** <aashouri@everyactioncustom.com>

Sun, Sep 22, 2024 at 5:24 PM

Reply-To: aashouri@msn.com

To: housingelement@lacity.org

Dear Housing Element,

Stop perpetuating exclusionary zoning! According to the law you shouldn't be allowed any HUD funding if you are blocking housing being built. I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,

Aida Ashouri

Manhattan Beach, CA 90266-3107

[aashouri@msn.com](mailto:aashouri@msn.com)





Housing Element <housingelement@lacity.org>

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## Case file CPC-2023-7068-CA CHIP June 2024 draft

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**Carol Williams** <carolw825@att.net>

Sun, Sep 22, 2024 at 3:35 PM

To: housingelement@lacity.org

Cc: councilmember.park@lacity.org

PLEASE ADD THIS EMAIL TO PUBLIC RECORD:

On July 25, 2024, City Planning held a public hearing to accept comments on proposed revisions to the Proposed Housing Element and Citywide Housing Incentive Program (CHIP).

I cannot support CHIP as proposed because it unfairly burdens Ladera with housing density that is inconsistent with the rest of Westchester/Playa, similar to the Land Use Plan. Moreover, it does not protect single-family homes, historic sites, or Rent Stabilized Units, and it completely overlooks available sites in CD 11 that are ideally situated for high-density housing (the Westchester/Veterans Metro Station is just one example) in favor of shoehorning high-density housing in the midst of a thriving, diverse single-family home community. And let's be very clear: once our vibrant, long-standing, SFR community is gone, we will never be able to get it back.

Ladera is extraordinarily diverse, and many of the residents have chosen to make their homes here precisely because it is zoned R-1. There are numerous strategic and sensible locations for the creation of high-density housing that would not entail the disruption of this established residential community.

Regards,

Sent from my iPhone





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Claire O'Hanlon <charm@everyactioncustom.com>

Sun, Sep 22, 2024 at 5:18 PM

Reply-To: charm@manyquarks.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Claire O'Hanlon  
Venice, CA 90291-6104  
[charm@manyquarks.com](mailto:charm@manyquarks.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Katherine Bachelor** <Katebachelor@everyactioncustom.com>

Sun, Sep 22, 2024 at 5:02 PM

Reply-To: Katebachelor@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Katherine Bachelor  
Sherman Oaks, CA 91403-2500  
[Katebachelor@gmail.com](mailto:Katebachelor@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Lama Gyatso** <LamaJigmeG@everyactioncustom.com>

Sun, Sep 22, 2024 at 1:47 PM

Reply-To: LamaJigmeG@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,  
Lama Gyatso  
Burbank, CA 91505-3298  
[LamaJigmeG@gmail.com](mailto:LamaJigmeG@gmail.com)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Michael Shure <mashure@gmail.com>

Sun, Sep 22, 2024 at 7:33 PM

Reply-To: Michael Shure <mashure@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Michael Shure  
[mashure@gmail.com](mailto:mashure@gmail.com)





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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Samuel Shapiro-Kline** <sshapirokline@everyactioncustom.com>

Sun, Sep 22, 2024 at 1:46 PM

Reply-To: sshapirokline@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

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Sincerely,

Sincerely,  
Samuel Shapiro-Kline  
Santa Monica, CA 90403-3449  
[sshapirokline@gmail.com](mailto:sshapirokline@gmail.com)





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Tanner Vandenbosch** <tannerjv01@everyactioncustom.com>

Sun, Sep 22, 2024 at 10:58 AM

Reply-To: tannerjv01@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Tanner Vandenbosch  
Los Angeles, CA 90034-5160  
[tannerjv01@gmail.com](mailto:tannerjv01@gmail.com)







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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Terry Trieu <ttrieu@everyactioncustom.com>

Sun, Sep 22, 2024 at 7:01 PM

Reply-To: ttrieu@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,  
Terry Trieu  
Los Angeles, CA 90045-2051  
[ttrieu@gmail.com](mailto:ttrieu@gmail.com)





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## CHIP Public Comment

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**DongWan Kim** <kdwnnn@gmail.com>

Mon, Sep 23, 2024 at 11:28 AM

To: housingelement@lacity.org

Cc: mpatino@saje.net

Dear Los Angeles City Planning Department staff,

I am a Resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Citywide Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in building affordable housing in our city and I also believe that we need to ensure that affordable housing production is done equitably and that it "Affirmatively Furthers Fair Housing". I have the following recommendations in order to improve the ordinances proposed.

1. Protect the City's rent-stabilized housing stock by requiring 2:1 replacement of demolished RSO units
2. Replacement Units Should Be Counted in Addition to Affordable Set-Aside Requirement.
3. Encourage deeply affordable units by adding "Acutely Low Income" incentives
4. Expand the MIIP and AHIP to apply to single family zoned parcels
5. Specify and strengthen the relocation requirements of the Resident Protections Ordinance to ensure displaced households receive affordable replacement housing and a true opportunity to return
6. Strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants
7. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns

Sincerely,

Andy Kim





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Anita Lin <anita@everyactioncustom.com>

Mon, Sep 23, 2024 at 10:45 AM

Reply-To: anita@activesgv.org

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

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Sincerely,

Sincerely,

Anita Lin

El Monte, CA 91733-2163

[anita@activesgv.org](mailto:anita@activesgv.org)





Housing Element <housingelement@lacity.org>

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## CHIP: R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA]

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Ann Kaneko <annkaneko@gmail.com>

Mon, Sep 23, 2024 at 1:55 PM

Reply-To: Ann Kaneko <annkaneko@gmail.com>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, Vincent.Bertoni@lacity.org

Cc: petition1@ixz.nfa.temporary.site, jeff.khau@lacity.org, karen@lacommons.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Dear LA City Planning Commissioners and Councilwoman Traci Park,

I write to express deep frustration with the Citywide Housing Incentives Program's (CHIP) exemption of R-1s (single unit lots) on broad corridors classified as Avenue-1 (e.g. Pico Blvd) or larger, while including every R2 lot regardless of their smaller street location. Excluding every R1 will drive further displacement as more existing, lower-density multifamily parcels on smaller streets will need to be redeveloped to meet our housing needs. This is inherently unjust because it is based on pre-existing zoning, which is a direct continuation of racially exclusive deed restrictions. These are low density multifamily lots, such as R2, on small streets that will shoulder the fair share resulting from the complete R1 exemption. These small streets are home to most of our mature tree canopy and many **undesigned** historic communities of color.

Instead, L.A. must densify, consistently and without exception, along broad corridors, which cross all neighborhoods and connect people to academic and employment opportunities. This approach also allows the CHIP to establish a 50% sidewalk tree canopy standard for a climate resilient L.A. Neighborhoods experiencing higher intensity urban heat islands are often the same vulnerable communities that have previously borne environmental injustices. Tree shade reduces surface temperatures between 22-54°F. They save lives. Areas along broader corridors, including R1s, are best equipped to handle both canopy and multifamily homes. We must preserve the canopy we have, while expanding tree coverage and affordable homes along our corridors.

I urge you to motion City Council for a CHIP that includes ALL residential lots on Ave-1 or larger corridors in Mixed Income and Affordable Housing programs in highest and higher opportunity areas, and exempts both R1 and R2 lots on Avenue-2 or smaller streets from Mixed Income programs to reduce displacement pressure and canopy-loss risk in historic communities of color. L.A. must retain its multicultural history.

I urge you to prevent an extremely inequitable CHIP and put forth a plan that complies with sensible urban planning principles: exempt both R1 and R2 lots on smaller streets (Ave-2 or smaller) and incentivize multifamily homes on ALL residential lots (including R1s) on Ave-1 or larger corridors.

Sincerely,

-- Ann Kaneko

[annkaneko@gmail.com](mailto:annkaneko@gmail.com)







Housing Element <housingelement@lacity.org>

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## CHIP Public Comment

---

**Brady Collins** <brady@kiwa.org>

Mon, Sep 23, 2024 at 11:28 AM

To: housingelement@lacity.org

Cc: mpatino@saje.net

Dear Los Angeles City Planning Department staff,

I am a Resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Citywide Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in building affordable housing in our city and I also believe that we need to ensure that affordable housing production is done equitably and that it "Affirmatively Furthers Fair Housing". I have the following recommendations in order to improve the ordinances proposed.

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6. Strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants
7. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns

Sincerely,

Brady

Sent from my iPhone





Housing Element <housingelement@lacity.org>

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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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**Courtney Miles** <CAliciaMiles@everyactioncustom.com>

Mon, Sep 23, 2024 at 11:13 AM

Reply-To: CAliciaMiles@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

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Sincerely,

Sincerely,  
Courtney Miles  
Gardena, CA 90249-2325  
[CAliciaMiles@gmail.com](mailto:CAliciaMiles@gmail.com)





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## CHIP Public Comment

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**Hannah Cornfield** <cornfieldh@gmail.com>  
To: housingelement@lacity.org

Mon, Sep 23, 2024 at 11:30 AM

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## CHIP Public Comment

---

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To: housingelement@lacity.org  
Cc: mpatino@saje.net

Mon, Sep 23, 2024 at 11:28 AM

Dear Los Angeles City Planning Department staff,

I am a Resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Citywide Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in building affordable housing in our city and I also believe that we need to ensure that affordable housing production is done equitably and that it "Affirmatively Furthers Fair Housing". I have the following recommendations in order to improve the ordinances proposed.

1. Protect the City's rent-stabilized housing stock by requiring 2:1 replacement of demolished RSO units
2. Replacement Units Should Be Counted in Addition to Affordable Set-Aside Requirement.
3. Encourage deeply affordable units by adding "Acutely Low Income" incentives
4. Expand the MIIP and AHIP to apply to single family zoned parcels
5. Specify and strengthen the relocation requirements of the Resident Protections Ordinance to ensure displaced households receive affordable replacement housing and a true opportunity to return
6. Strengthen systems of tenant outreach to ensure that newly-developed units reach their intended occupants
7. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns

Sincerely,  
Jason Cohn







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## CHIP Public Comment

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**jin kim** <martinjinkim2@gmail.com>  
To: housingelement@lacity.org  
Cc: mpatino@saje.net

Mon, Sep 23, 2024 at 11:30 AM

Dear Los Angeles City Planning Department staff,

I am a Resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Citywide Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in building affordable housing in our city and I also believe that we need to ensure that affordable housing production is done equitably and that it "Affirmatively Furthers Fair Housing". I have the following recommendations in order to improve the ordinances proposed.

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Sincerely,





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## CHIP Comentario Publico

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**Leticia Choi** <leti@kiwa.org>  
To: housingelement@lacity.org  
Cc: mpatino@saje.net

Mon, Sep 23, 2024 at 1:27 PM

Al personal del Departamento de Planificación de la Ciudad de Los Ángeles,

Soy residente de la ciudad de Los Ángeles y le escribo para brindar mis recomendaciones para el Programa de incentivos de vivienda para la ciudad de Los Angeles (CHIP) y en la Ordenanza de Protección de Habitantes. Creo firmemente en la construcción de viviendas asequibles en nuestra ciudad y también creo que debemos garantizar que la producción de viviendas asequibles se realice de manera equitativa y que promueva afirmativamente la vivienda justa. Tengo las siguientes recomendaciones para mejorar las ordenanzas propuestas.

1. Proteger las unidades de viviendas bajo la ordenanza de estabilización de renta de la ciudad exigiendo el reemplazo 2:1 de las unidades "RSO" demolidas.
2. Las unidades de reemplazo deben ser contadas aparte de las unidades requeridas.
3. Fomentar unidades profundamente asequibles agregando incentivos para "ingresos agudamente bajos"
4. Ampliar el MIIP y el AHIP para aplicar a parcelas zonificadas unifamiliares
5. Especificar y fortalecer los requisitos de reubicación de la Ordenanza de Protección de Residentes para garantizar que los hogares desplazados reciban viviendas de reemplazo asequibles y una verdadera oportunidad de regresar.
6. Fortalecer los sistemas de comunicación con los inquilinos para garantizar que las unidades recientemente desarrolladas lleguen a sus ocupantes previstos.
7. Requerir un estudio ambiental sólido y participación pública.

Estimadamente,



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## CHIP Public Comment

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**Leticia Choi** <leti@kiwa.org>  
To: housingelement@lacity.org  
Cc: mpatino@saje.net

Mon, Sep 23, 2024 at 1:27 PM

To the Staff of the Los Angeles City Planning Department,

I am a resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in the construction of affordable housing in our city and also believe that we must ensure that the production of affordable housing is done in an equitable manner and affirmatively furthers fair housing. I have the following recommendations to improve the proposed ordinances.

1. Protect housing units under the City's rent stabilization ordinance by requiring 2:1 replacement of demolished "RSO" units.
2. Replacement units should be counted separately from the required units.
3. Encourage deeply affordable units by adding incentives for "acutely low income"
4. Expand the MIIP and AHIP to apply to single-family zoned parcels
5. Specify and strengthen the Resident Protection Ordinance's relocation requirements to ensure displaced households receive affordable replacement housing and a real opportunity to return.
6. Strengthen tenant communication systems to ensure newly developed units reach their intended occupants.
7. Require a robust environmental study and public participation.





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## CHIP Public Comment

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**Michelle Matt** <mmatt25@icloud.com>

Mon, Sep 23, 2024 at 11:27 AM

To: housingelement@lacity.org

Cc: mpatino@saje.net

Dear Los Angeles City Planning Department staff,

I am a Resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Citywide Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in building affordable housing in our city and I also believe that we need to ensure that affordable housing production is done equitably and that it "Affirmatively Furthers Fair Housing". I have the following recommendations in order to improve the ordinances proposed.

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Sincerely,







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## CHIP Public Comment

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**Tara Stone** <tarastone144@gmail.com>

Mon, Sep 23, 2024 at 1:28 PM

To: housingelement@lacity.org

Dear Los Angeles City Planning Department staff,

I am a Resident of the City of Los Angeles and I am writing to provide my recommendations for the City of Los Angeles Citywide Housing Incentive Program (CHIP) and the Resident Protection Ordinance. I strongly believe in building affordable housing in our city and I also believe that we need to ensure that affordable housing production is done equitably and that it "Affirmatively Furthers Fair Housing". I have the following recommendations in order to improve the ordinances proposed.

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7. Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns

Sincerely,  
Tara Stone



Housing Element &lt;housingelement@lacity.org&gt;

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## CHIP Comentario Publico

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**Ale Campillo** <ale@kiwa.org>

Wed, Sep 18, 2024 at 4:01 PM

To: housingelement@lacity.org

Al personal del Departamento de Planificación de la Ciudad de Los Ángeles,

Soy residente de la ciudad de Los Ángeles (CD1) y le escribo para brindar mis recomendaciones para el Programa de incentivos de vivienda para la ciudad de Los Angeles (CHIP) y en la Ordenanza de Protección de Habitantes. Creo firmemente en la construcción de viviendas asequibles en nuestra ciudad y también creo que debemos garantizar que la producción de viviendas asequibles se realice de manera equitativa y que promueva afirmativamente la vivienda justa. Tengo las siguientes recomendaciones para mejorar las ordenanzas propuestas.

1. Proteger las unidades de viviendas bajo la ordenanza de estabilización de renta de la ciudad exigiendo el reemplazo 2:1 de las unidades "RSO" demolidas.
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6. Fortalecer los sistemas de comunicación con los inquilinos para garantizar que las unidades recientemente desarrolladas lleguen a sus ocupantes previstos.
7. Requerir un estudio ambiental sólido y participación pública.

Estimadamente,

Ale Andres Campillo



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## Legalize apartments in single family areas! -- (CPC-2023-7068-CA)

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Joey Gawor <jcgawor@everyactioncustom.com>

Mon, Sep 23, 2024 at 5:13 PM

Reply-To: jcgawor@gmail.com

To: housingelement@lacity.org

Dear Housing Element,

I write today in solidarity with the over 60 civic organizations, including Abundant Housing LA, calling on LA's rezoning program to legalize new apartments on single family zoned parcels otherwise eligible for the various incentives included in the draft CHIP ordinance (CPC-2023-7068-CA). Making these parcels eligible for the CHIP is an essential ingredient to LA's goal to produce nearly a half million new housing units, promote equitable housing, and stem the tide of displacement.

We know that LA is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent. And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share. Unfortunately, the ordinance as drafted does not significantly alter where multi-family housing is allowed, and therefore perpetuates inequitable land use patterns. That is why I stand with Abundant Housing LA in advocating for single-family zoned parcels to be eligible for CHIP programs.

The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. I also would like to commend City Planning on a number of positive changes made in the second and third revisions to the CHIP ordinance, including wider geography for the Opportunity Corridor Transition Area program, and increases in FAR incentives to match density and height incentives. However, the single-family exemption is a fatal flaw in the draft ordinance that will reduce potential sites for new housing, reinforce existing patterns of segregation, and steer development toward existing multifamily parcels with higher displacement risk. A wholesale exemption for single family areas is an indefensible policy and flies in the face of the city's obligation to Affirmatively Further Fair Housing.

Happily, City Planning has offered you an excellent opportunity to steer LA in a new direction for housing abundance and equity. Please vote to amend the ordinance by adopting Exhibit D Option 1, which would make single family zoned parcels in the CHIP's existing geographies eligible for the incentives. According to City Planning, this change would open up over 40,000 parcels for mixed income development and over 60,000 parcels to 100% affordable development. The proportion of housing opportunities in affluent, historically exclusionary communities would increase from 54% to 67%. Perhaps best of all, these newly available parcels would have very low displacement risk, as most single family zoned parcels are homeowner-occupied. Furthermore, I request that you remove the wholesale exemption of the Coastal Zone from the CHIP, which is unsupported by science and will further prevent access to climate resilient coastal urban neighborhoods.

I applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles (near transit and services), for creating new streamlined processes to deliver new housing, and for offering a high quality option for legalizing apartments in single-family zoned areas in the heart of our city. Now you have the opportunity to undo historic patterns of segregation and create access to opportunity by adopting Exhibit D Option 1, and opening up coastal areas. I join Abundant Housing LA and its coalition partners in strongly urging you to do so.

Sincerely,

Sincerely,

Joey Gawor

Los Angeles, CA 90027-4417

[jcgawor@gmail.com](mailto:jcgawor@gmail.com)

# **DAY OF HEARING SUBMISSIONS**



## Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

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September 24, 2024

TO: City Planning Commission

FROM: Julia HeideIman, City Planner  
Theadora Trindle, City Planner  
Jeanalee Obergfell, City Planner

### **ADDITIONAL INFORMATION FOR CASE NOS. CPC-2024-388-CA, CPC-2023-7068-CA, AND CPC-2024-387-CA**

Please find additional resources and information on the Housing Element Rezoning program website linked here for ease of reference:

1. [Concept Explorer](#)
2. [Resources Tab](#)
3. [News Tab](#)



## Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

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September 25, 2024

TO: City Planning Commission  
FROM: Julia HeideIman, City Planner

### **TECHNICAL MODIFICATIONS TO THE PROPOSED ORDINANCE (EXHIBIT A.2) FOR CASE NO. CPC-2024-388-CA**

#### TECHNICAL MODIFICATIONS TO EXHIBIT A.2

The following technical corrections and additions are to be incorporated into Exhibit A.2 (Proposed Resident Protections Ordinance) of the staff recommendation report to be considered at the City Planning Commission meeting on September 26, 2024 related to Item No. 6 on the meeting agenda.

**INSTRUCTIONS:** Revise Section 16.60 A.3(b)(5)(iv) on page 13 in Exhibit A.2 as follows:

Within thirty (30) days of receipt of the notice that the Temporary or Final Certificate of Occupancy has been issued and the replacement unit is available, a tenant household must notify the owner if it wishes to reoccupy the replacement unit or room. The owner must hold the unit or room vacant at no cost to the tenant for sixty (60) days from the date the tenant household's written notice of its intent to reoccupy the rental unit is received.

**100+ CONSTITUENTS SUBMITTED THE FOLLOWING  
STATEMENT TO THE [CPC@LACITY.ORG](mailto:CPC@LACITY.ORG) INBOX FOR  
THE CITY PLANNING COMMISSION'S CONSIDERATION:**

**Items 07:**

Case No. CPC-2023-7068-CA

**Subject Lines:**

City Planning Commission Meeting 9/26/24 - Agenda Item 7 - Case Number: CPC-2023-7068-CA

**Message:**

Dear City Planning Commission:

With regards to Agenda Item 7 Exhibit D: Option 5 is only option that considers the needs of our working-class community and mitigates the impacts of development in an equitable fashion.

Thank you.

**200+ CONSTITUENTS SUBMITTED THE FOLLOWING  
STATEMENT TO THE [CPC@LACITY.ORG](mailto:CPC@LACITY.ORG) INBOX FOR  
THE CITY PLANNING COMMISSION'S CONSIDERATION:**

**Items 07:**

Case No. CPC-2023-7068-CA

**Subject Lines:**

CPC-2023-7068-CA: Housing Element Rezoning

**Message:**

Dear Mayor Bass and Members of the Los Angeles City Planning Commission,

I urge you to publicly voice your support for Draft #3 of the CHIP program as recommended by the Los Angeles Planning Department on September 16, 2024. Draft 3 targets underutilized commercial corridors, including in high resource areas, while protecting vulnerable existing residential areas from needless densification.

The City of Los Angeles can both increase affordable housing and protect existing RSO units, single family homes, coastal and high fire hazard severity zones, and HPOZs at the same time.

We need your public support for Draft 3 without the added options that include single family parcels, which were introduced without transparency or input from homeowner stakeholders.

Thank you.



# **300+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT TO THE [CPC@LACITY.ORG](mailto:CPC@LACITY.ORG) INBOX FOR THE CITY PLANNING COMMISSION'S CONSIDERATION:**

## **Items 06-08:**

Case Nos. CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA

## **Subject Lines:**

CPC\_2023\_7068: Housing Element Rezoning

CPC\_2023\_7068: Housing Element Rezoning / Support for Draft #3

## **Message:**

Planning Commission,

I support Draft #3 which places density on our commercial corridors.

There is plenty of capacity in Los Angeles to meet our housing needs while still protecting existing RSO multi-family neighborhoods, single-family, our HPOZs that are the historic heart of our city, and our vulnerable communities in high fire and coastal zones.

I support the density of our commercial corridors where new vibrant neighborhoods can be created in each and every high-resource community.

All of us will be part of the solution to create affordable housing in LA

ATHENA NOVAK  
4924 BALBOA BLVD., #518  
ENCINO, CA 91316  
PHONE: 818-906-7449  
September 24, 2024

To: Los Angeles City Planning Commission

Dear Commissioners:

Please know I support Draft Three (3) that places density on our commercial corridors. For many years areas in the city of Los Angeles have had Height Districts that were designated to the land decades ago. Development and Construction Materials have changed over the decades and increased height (5 to 10 stories) for lot on our commercial corridors is good urban planning. Also increased Floor Area for Commercial Zone sites (that allow residential) can be justified to provide the much-needed housing and encourage mixed use project that are pedestrian friendly. Example the C2 zone and or C4 zone allows 1.5:1 Floor Area. This Floor Area should be 4.0:1 and or 6.0:1 to allow units.

What we must realize at this time is there is a current vacancy factor in the city of Los Angeles Multi Residential communities at an average of 3% up to 5% in some areas. These numbers and the current vacancy factors provide there is no longer a housing crisis and or housing shortage. If there were there would have to be a 100% occupancy rate in Los Angeles and waiting list for rental units to become vacant. This is not the case.

Therefore, to push housing into areas zoned for single family homes in summary has always been awful urban planning policies. In an emergency this may be looked at but often not implemented. Housing supply and demand changes over the years. To damage and or adversely impact single family home communities as a sacrifice for housing is not justified now nor has it been justified in the past by the Los Angeles City Planning Department.

There is plenty of capacity in LA to meet our housing needs while still protecting existing RSO multi-family neighborhoods, single-family, our HPOZs that are the historic heart of our city, and our vulnerable communities in high fire and coastal zones.

I support the density of our commercial corridors where new vibrant neighborhoods can be created in each high resource community.

There are currently ample affordable housing units in Los Angeles. If you drive through Van Nuys and or Reseda etc. You will find apartment units available that meet the same rental rates (private owned landlord set rents) as HUD and even HCID. If there was a Bonafede crisis these units would not exist. They exist therefore providing there is no low-income rental housing crisis.

Best,

*Athena Novak*



September 26, 2024

**Day of Hearing Submission; [Case Numbers CPC-2023-7068-CA and CPC-2024-388-CA]**

To the Members of the City Planning Commission:

The ACT-LA coalition submits this as feedback in response to the Staff Recommendation Report and current versions of the Citywide Housing Incentive Program Ordinance (CHIP) and draft Resident Protections Ordinance (RPO). Our coalition submitted a more detailed letter as a secondary submission, however the following outlines several of our priorities:

**Recommendations for the Citywide Housing Incentive Program**

**Adjust affordability requirements in the MIIP to focus on deep affordability, replacing moderate income incentives.** Rents in moderate income units are not affordable to the nearly two-thirds of renter households in Los Angeles that are low income or below. Housing incentives in the MIIP should focus on producing housing at rents where the need is greatest. Specifically, the requirement for moderate income housing in Higher Opportunity Areas should be replaced with an increased requirement for deeply affordable housing, and the Opportunity Corridor Transition Area Program should provide true incentives for ALI, ELI and VLI.

**Allow MIIP and AHIP incentives to be used on single-family zoned parcels in Higher Opportunity areas (“Option 1”), and require deeper affordability.** Excluding single family zoned parcels maintains exclusionary zoning, and will limit the effectiveness of the MIIP to affirmatively further fair housing by undermining the goal of increasing affordable housing opportunities in high opportunity areas. The City’s wealthiest and most privileged areas, R1 zones in high and highest opportunity areas, should not remain off-limits to mixed-income and affordable development.

**Recommendations for the Resident Protections Ordinance**

**ACT-LA supports the robust implementation of state relocation payment requirements reflected in the draft RPO.** The draft RPO now includes a streamlined implementation of relocation payment requirements that will be easy for tenants and developers to navigate, and enforcement mechanisms against developers that illegally evade relocation requirements. This policy will help low-income tenants secure comparable replacement housing. New housing development should not occur at the expense of existing low-income renters.

**Strengthen replacement requirements by requiring 2:1 replacement of demolished RSO units.** Too often, new housing projects demolish existing rent stabilized housing and create only a few more affordable units than the units demolished. In fact, the AECOM analysis revealed that mixed-income RSO development projects between 2020-2023 resulted in the demolition of 1,091 RSO units and produced only 1,161 affordable units - a net increase of only 70 protected units. We urge the City Planning Commission to recommend a higher replacement rate.



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## Public comment - Case Number CPC-2023-7068-CA for the CHIP and CPC-2024-388-CA for the Renter Protections Ordinance

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Brittany Rivas <bdrv427@gmail.com>

Thu, Sep 26, 2024 at 7:25 AM

To: cpc@lacity.org

Hello,

My name is Brittany Rivas and I work in the Wilmington neighborhood.

This comment is in regard to **Case Number CPC-2023-7068-CA for the CHIP and CPC-2024-388-CA for the Renter Protections Ordinance**

I ask that the City Planning Department fulfill our obligation to equitable development by increasing the provision of deeply affordable units in the housing incentive programs. These housing incentive programs, specifically the Mixed Income and Affordable Housing Incentive Programs, must apply across the City, including single family zoned areas.

Additionally, the City should strengthen provisions to protect tenants, and ensure our stock of affordable housing grows. This includes stronger provisions in the RPO including local preference, enforcement of right to return, and a higher replacement ratio of RSO units with covenanted affordable units.

Lastly, I ask that the ordinance requires public participation before approving projects in areas of heightened environmental justice concerns. Specifically, in areas that appear in the 80th percentile or higher of the CalEnviroScreen map, the City should hear from local community members about potential hazards and health concerns.

These ordinances are a critical opportunity to fill gaps that exist in our affordable housing provision and tenant protections, and I ask that City Planning take every opportunity to expand equitable access to housing across the City for Angelenos.

September 26, 2024

Los Angeles City Planning Commission  
Department of City Planning  
200 North Spring Street  
Los Angeles, California 90012

**Re: COUNCILMEMBER HERNANDEZ RECOMMENDATIONS FOR RESIDENT PROTECTIONS ORDINANCE (RPO) [CPC-2024-388-CA]**

Dear Members of the City Planning Commission,

I write to you to express my broad and strong support for the Resident Protections Ordinance (RPO). While I would like to share some recommendations on how to strengthen and make more effective the goals of the RPO, I will begin by underscoring that this draft ordinance is game-changing work that balances the need for reaching our housing goals with very real concerns of gentrification and displacement. The Housing Element Rezoning Program must provide the city a pathway to build the housing we need across the City, but we cannot afford to do this at the expense of vulnerable, low-income communities of color who already suffer disproportionately from the housing crisis. The RPO presents necessary features to accomplish this.

I would like to highlight the following existing components that represent either significant improvements from previous drafts and/or the types of elements that will protect vulnerable tenants while helping us to increase our housing stock across the City that I am full-heartedly in support of:

- The inclusion of a realistic local formula for relocation assistance that better aligns with state law is critical to ensuring that displaced households can successfully find replacement housing;
- The establishment of a private right of action will help protect distressed tenants and creates a process to track and stop harassment;
- By proposing a formula that allows us to maximize Extremely Low Income (ELI) unit replacement in areas more likely to have existing ELI renters we can continue to build for our deep affordability needs;
- The same goes for adding Acutely Low Income (ALI) as an income category that must be replaced when an existing or prior tenant's income is known to be ALI. This helps ensure that the City will not lose the stock of housing units affordable to this vulnerable population;
- Extending covenant terms for new restricted affordable units from 55 to 99 years speaks to the need for long-term affordability across the City;
- Expanding the definition of a "comparable unit" to require the same number of bathrooms and bedrooms and also applying it to the right to return when demolition does not occur is critical to ensuring families can continue to thrive in our City;
- The changes to tenant notification requirements and procedures now do more to make sure that tenants are adequately notified of their rights throughout the life of the project.

That said, we do have the ability to strengthen what is before us. Results from the AECOM analysis shared with you from the Planning Department reveal that too often existing below-market rent stabilized units are

demolished for new housing projects that create only a few more affordable units than previously existed. Between 2020-2023, mixed-income RSO developments produced 1,161 affordable units while 1,091 RSO units were demolished. This resulted in a net of 70 units. Over the same time period, the CD 1 community of Westlake had the highest number of RSO redevelopment projects of any neighborhood citywide. 135 RSO units were proposed to be demolished, and only 153 affordable units were added, including units required for Density Bonus and TOC incentives - resulting in only a net increase of 18 units.

If we are going to be sacrificing precious RSO units to meet our housing goal, then we must be netting out more units. I am requesting the Commission **add a recommendation that applies a 2:1 unit replacement ratio for developments in low resource areas, in accordance with the TCAC maps. Additionally, a 2:1 replacement ratio should also be implemented for units whose affordability covenants have expired within 10 years of the proposed development.**

Lastly, I am requesting that the City Planning Commission include the below instructions to request additional information that can help inform this body and the City Council of additional opportunities to strengthen the RPO:

1. Instruct the Los Angeles Housing Department in coordination with the Department of City Planning to provide additional reports on the follow:
  1. An implementation and staffing plan for the Anti-Harassment Violators Database as well as a Replacement Unit Database to ensure relocation and right to return is being effectively implemented;
  2. Establishing an ordinance, consistent with the Federal Fair Housing Act to establish a Local Preference Program for residents displaced by incentive programs outlined within the CHIP and State Density Bonus;
  3. Provide the Planning and Land Use Management (PLUM) committee a detailed Affirmatively Affirming Fair Housing (AFFH) analysis of the RHNA rezoning program; and
  4. Opportunities for the in-lieu fee to be prioritized for a revolving loan for small landlords and non-profit developers to do building wide upgrades and preserve affordable units.

These are all components I believe are essential to an effective and impactful Resident Protections Ordinance. Through their inclusion in the RPO I know the City will be in a better position to develop without displacement of existing tenants, which lowers their risk of homelessness.

Thank you for your consideration,



Eunisses Hernandez , Los Angeles City Councilmember, 1st District

September 26, 2024

Los Angeles City Planning Commission  
Department of City Planning  
200 North Spring Street  
Los Angeles, California 90012

**Re: COUNCILMEMBER HERNANDEZ RECOMMENDATIONS FOR CITYWIDE HOUSING INCENTIVE PROGRAM (CHIP) ORDINANCE [CPC-2023-7068-CA]**

Dear Honorable Members of the City Planning Commission,

On behalf of the First District, I would like to thank you for your consideration and thank community members, advocates, and City Planning staff for the thoughtfulness that has gone into carefully crafting and analyzing this ordinance. I would like to express my broad support for the program. It is incumbent upon the City to take meaningful action and to address our housing crisis and affirmatively further fair housing.

I would like to uplift measures in the CHIP to promote affordable housing specifically in High Opportunity Areas, where there is a historic trend of exclusionary housing policies and a lack of affordable housing development. TOIA incentives have been oriented to provide more generous incentives in High Opportunity Areas, and stimulate the development of affordable housing in these communities.. Buffers for developments around active oil well sites have been increased, better protecting residents from the significant health impacts associated with these sites. I would also like to applaud the addition of shared equity projects for incentives, allowing for alternative ownership mechanisms that promote community ownership and development of property.

Although these measures are a step in the right direction, it is critical that further changes are adopted by this commission to meet our housing production needs and affirmatively further fair housing:

**Mixed Income Incentive Program & Opportunity Corridor Transition Changes**

The Opportunity Corridor Transition areas provide a great opportunity for modest, missing-middle housing in Higher Opportunity areas adjacent to major corridors served by transit. I believe that certain changes should be made to expand the reach of these transition areas:

- Currently, these transition areas only expand out 750 feet from the corridors - oftentimes meaning that these incentives don't go beyond the city block directly adjacent to the corridor. I believe that these **transition areas should be extended out to a ½ mile from the corridor**, or within about 10 minutes while walking. This will expand our capacity for new housing in walkable communities close to transit.
- **Allow one additional story, increased FAR, and density for projects in CT-2 and CT-3 areas that covenant additional affordable units.** This will allow for a more gentle scaling from opportunity corridors to lower-density neighborhoods, while promoting the creation of more affordable units. To ensure light infiltration and airflow, transitional height requirements should be applied to these additional stories.

I would also like to see modifications made to MIIP to promote more deeply affordable units.

- **Removal of the requirement for moderate income housing in Higher Opportunity Areas in TOIAs/OCs, and replacement with provisions for ALI/ELI.**
- The current affordability levels for OC Transition Areas do not meaningfully incentivize the creation of deeply affordable (ALI, ELI, or VLI) units. **Adjustments to the affordability levels should be made to meaningfully incentivize these much-needed units.**



## Increased Environmental Health Protections

I would like to reiterate my support for the increased buffers for oil wells that have been incorporated into the most recent draft of CHIP. Protecting the health of our residents and ensuring that we are developing in a responsible way is a primary concern for me.

Advocates including the ACT-LA coalition have continued to raise environmental justice concerns related to the proposed ordinance. I echo their concerns and recommend **greater environmental review and public participation for projects within Environmental Consideration Areas**. This could include requirements for Phase I and/or II Environmental Site Assessments, public hearings, and/or changes to the definition of an Environmental Consideration Area. We must ensure that we stimulate the production of affordable housing without compromising the health and safety of our residents.

## Adoption of Option 1 in Exhibit D for the Inclusion of Single-Family Zoned Areas

The Department's efforts to begin the necessary discussion around the inclusion of single family housing in the proposed ordinance is appreciated, however, DCP's [own document](#) from October 26th of last year states, "*As a result of a significant proportion of zoned land in Higher Resource Areas remaining restricted to single-family uses, development of affordable housing remains concentrated in Lower Resource Areas where multifamily development is permitted by today's existing zoning regulations. This has created clear disparities in housing access throughout the City.*" The City's 2021 Housing Needs Assessment ([p. 106](#)) finds that 95 percent of Racially Concentrated Areas of Influence (RCAs) in the City are zoned for single-family uses and that these areas have "*some of the highest performing schools, greatest access to employment, and greatest access to environmental health,*" and they "*reinforce power imbalances and inhibit the equitable distribution of resources and amenities.*"

The City cannot argue in good faith that we are Affirmatively Furthering Fair Housing while creating a carve out for some of the best-resourced areas of the City. Single-family zoning currently constitutes 72% of the City's residential area and often goes by another name - exclusionary zoning. It has historically been used as a tool for exclusion and segregation, only being affordable to higher-income residents while we have tens of thousands of Angelenos sleeping on the streets every night.

The proposed changes allow for modest multifamily housing that won't tower over existing single-family neighborhoods. This multi-family housing will largely be centered around transit and major corridors in high-resource areas of the City. Exempting single family zones from the majority of AHIP and MIIP proliferates the legacy of redlining and segregation. As a City, we must take reasonable action to increase our housing stock. **I call upon the City Planning Commission to adopt Option 1 in Exhibit D - allowing for the broad inclusion of single-family zoned areas in the AHIP and MIIP programs.** I believe this to be the most necessary change to CHIP and ensure we meet State requirements and our equity goals to Affirmatively Affirm Fair Housing.

We must continue to stimulate the creation of affordable housing across the City. The ability of our existing residents and children to stay in this City is dependent upon having accessible housing in all areas of the City.

Thank you for your consideration,



Eunisses Hernandez , Los Angeles City Councilmember, 1st District



September 26, 2024  
Attention: Los Angeles City Planning Commission

RE: Housing Element Rezoning Program Draft Ordinances

Dear Commissioner Lawshe and Honorable City Planning Commissioners,

My office and I are committed to a proactive and productive housing agenda that reduces development barriers, increases housing capacity along major commercial corridors near transit and jobs, protects and expands the supply of rent-stabilized and covenanted affordable housing, improves infrastructure to support sustainable, connected, and walkable neighborhoods, strengthens tenant protections, supports social housing, de-politicizes development decisions to ensure accountability and trust, and promotes racial integration and economic prosperity. It is in that spirit that I share these comments.

I commend Los Angeles City Planning and the Los Angeles Housing Department on completing the Housing Element Rezoning Program Draft Ordinances as part of the City Council adopted 2021-2029 Housing Element. The Housing Element is a bold opportunity to ensure that the City of Los Angeles is meeting its current and future housing needs under various state mandates while also tackling urgent affordability, homelessness, and equity challenges. The City of Los Angeles' Regional Housing Needs Assessment allocation mandates that Los Angeles plan for more than 450,000 new housing units, of which close to 185,000 must be affordable to lower income households, for this eight-year Housing Element Cycle based on realistic development considerations and anticipated housing buildout. This is demonstrably being done through the Housing Element Rezoning Program Draft Ordinances which must be adopted and effectuated by February 2025.

Antiquated and discriminatory regulations have led to slow growth, underdevelopment, socioeconomic stratification, and a reliance on onerous discretionary processes across the city. On average, Angelenos pay more of their monthly income towards housing, live in overcrowded conditions, and have the highest rates of unsheltered homelessness of any city in the country. While Los Angeles has made progress on building affordable housing in recent years, these units have not been evenly distributed across the city. According to recent data, only 14% of affordable housing units permitted in the last ten years were located in high-resource neighborhoods, while the remaining 86% were located in low-resource and high-poverty neighborhoods. In Council District 4, 489 affordable housing units were permitted from the years 2009 to 2020 – that is only three percent of the total number of affordable housing units citywide. As noted in the City of Los Angeles Historical Housing and Land Use Study commissioned by the Planning Department, “more than 80 percent of the land area determined to offer the best chance for life success (areas of high opportunity) is zoned only for single-family use-the most expensive and least attainable housing type. Single-family homes have historically been, and continue to be, more expensive to own or rent than denser multi-family housing options. Areas found to be both racially concentrated and very affluent were found to be zoned 95 percent for single-family use. Moreover, public investments in single-family neighborhoods were found to be disproportionately higher than denser neighborhoods with higher populations and thus greater needs.”



The Housing Element Rezoning Program introduces concrete and meaningful strategies to rightsize residential capacity near and along transit- and jobs-rich commercial corridors in high-resource areas; presents citywide anti-displacement policies, particularly for sensitive renter households more vulnerable to the risk of gentrification, displacement, and speculative real estate pressures; and reverses historic patterns of racial and class-based exclusion by affirmatively furthering fair housing opportunities so that everyone, especially low-income communities and communities of color, has full access to neighborhood amenities, housing security, and wealth creation both now and for future generations.

I believe approving the Draft Ordinances with some changes gets us closer to accomplishing our collective goals of ensuring equal access to housing stability and improved quality of life for all Angelenos. I would like to respectfully propose the following modifications for your consideration as the City Planning Commission conducts its deliberative process:

### **Citywide Housing Incentive Program (CHIP)**

#### **Major Highlights:**

- Improves process streamlining, including through the creation of a new ministerial process known as Expanded Administrative Review for qualifying projects seeking on-menu incentives.
- Reintroduces higher on-menu height and floor area incentives, expands geographic eligibility, and expands density bonuses under some CHIP programs in residential and commercial zones, especially along corridors in High Opportunity Areas.
- Introduces a new Shared Equity Project category under AHIP, which defines a project as one where 80% of units are covenanted affordable on land owned by a Community Land Trust or Limited-Equity Housing Cooperative.
- Introduces an Acutely Low Income (ALI) level, which is set for 0-15% of Area Median Income (AMI).
- Generally increases the number of set-aside affordability provisions than in previous versions, and introduces two market tiers — low/medium and high-medium/high — instead of four under the Mixed Income Incentive Program.
- Creates a more favorable program for projects on land owned by Faith-Based Organizations by requiring that 80% of units are covenanted affordable (instead of 100% via SB4) under the Affordable Housing Incentive Program.
- Introduces “Environmental Consideration Area” definition to the State Density Bonus Program to more clearly refer to sites within close proximity to oil wells or sites that previously or currently host hazardous uses.

#### **Suggested Modifications:**

- Consider including single-family zones in Higher Opportunity Areas under the Mixed Income Incentive Program and the Affordable Housing Incentive Program so that new development does not only happen where existing multi-family housing is located, much of which is rent-stabilized.



- Consider unlimited incentives (as modeled in the original version of Executive Directive 1) for one hundred percent and mixed-income affordable housing developments on vacant parcels that have not been occupied by a residential use in five years or more to encourage a net gain in housing units.
- Consolidate the Opportunity Corridor Transition Area subareas into a single expanded geography with standards that make “missing middle” housing feasible to build.
- Remove optional staff level informational public hearing provision under Expanded Administrative Review.
- Update Multi-Bedroom Incentive so that projects which include at least 15% of residential units as 2+ bedrooms (instead of 3+ bedrooms) shall be granted additional floor area and height incentives.
- Ensure CHIP is at least in parity and at most more favorable than existing incentive-based density programs in the City.

### **Renter Protection Ordinance (RPO)**

#### **Major Highlights**

- Codifies and expands state laws that ensure occupant protections to further support low-income tenants against displacement. These include policies for protected units and provisions for unit replacement, right to return, right to remain, and an adjusted relocation amount to meet the demands of the current housing market.
- Extends affordable covenants from 55 years to 99 years.
- Includes no net loss standards to ensure that a development cannot demolish more units than it will create and that units must be replaced in the same building at an equivalent size and affordable price inclusive of low-, very low-, and extremely low-income households. The ordinance also requires ALI replacement when any ALI tenants report their income to the city.
- Prioritizes populations that include those displaced through no-fault evictions, lower income residents impacted by rent increases due to the termination of affordability restrictions, and residents displaced due to natural disasters and other code enforcement orders issued for uninhabitable units.
- Introduces new protectionist policies such as private right of action and civil penalties, the ability to withhold or revoke demolition permit approval for illegal tenant harassment or eviction; and the creation of an Anti-Harassment Violators Database.
- Requires that units that have been demolished or vacated on the date of application shall be replaced with units at an Affordable Rent or Affordable Housing Cost based upon the highpoint in occupancy during the previous five years. Additionally, if the demolition does not take place and the property returns to the rental market, former tenants are allowed to return at their prior rental rate and to a comparable unit.

#### **Suggested Modifications:**

- Require true 1:1 or 1.5:1 replacement for demolished rent-stabilized units by adding a clear definition and standards that projects using incentive-based programs cannot



count their required affordable units towards rent-stabilized replacement requirements.

- Strengthen provisions around local preference to target affordable housing for tenants facing displacement risk as well as local area workers within their existing neighborhoods.
- Require that all written notices are provided in a tenant's primary language.
- Equip the Housing Department with the necessary resources required to ensure robust monitoring and enforcement of newly passed policies and newly developed units by increasing staffing and enhancing existing and/or creating new rental, eviction filing, anti-harassment, displacement tracking, and affordable housing registries.

Commendable work has gone into the Housing Element Rezoning Program, and I continue to be encouraged by the high level of engagement by community stakeholders and city departments alike. At a time when Los Angeles continues to experience skyrocketing rents, and most new development is out of reach for many Angelenos, we have a moral obligation to take decisive action.

Sincerely,

Nithya Raman  
LA City Councilmember, 4th District



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## CPC-2024-387-CA

2 messages

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**Fran Chodosh** <fchodosh@gmail.com>  
To: cpc@lacity.org

Tue, Sep 24, 2024 at 2:04 PM

Hello Housing Element Planning Team,

I am writing to you to let you know that I support excluding all R-1 from CHIP

I am writing today to thank you for removing the single family neighborhoods and coastal zone from the builder incentives proposed for the Housing Element, and to strongly urge you to leave them out as you move forward to finalize the ordinances.

The corridors make the most sense in terms of focusing precious city budget dollars on infrastructure improvements, and providing easy resident access to shops, restaurants and transit (hopefully incentivizing them to ditch, or minimize use of, their cars). Building density without walkability makes no sense.

Single-family neighborhoods were built for light density. Why would it make sense to our cash-strapped city to spread out infrastructure improvements across random high-rises in low-rise neighborhoods?

Our precious single-family neighborhoods are already subject to upzoning with ADUs and SB9. Put the high-rises where they belong – along the commercial zones with other tall buildings.

I know there is a lot of pressure to obliterate our single family neighborhoods with high-rises, but we don't need to do that yet. There is ample room along the corridors. Please do not change the current draft of the ordinances to include single family neighborhoods or the coastal zone. Respectfully.

Fran Chodosh  
310.749.2188  
[6350 W 84th Street](#)  
[Los Angeles, CA 90045](#)

Fran Chodosh Coastal Properties, LLC [8726 S Sepulveda Blvd, Ste D](#)- 3032 Los Angeles CA 90045 310.749.2188 Lic # 01280009 **NOTICE:** This e-mail message and any attachments transmitted with it may contain information that is legally privileged, confidential, a trade secret, or otherwise protected from disclosure. If you are not the intended recipient, or it is apparent that the transmission is not intended for you, you are hereby notified that any reading, dissemination, distribution, copying, or other use of this message or its attachments is strictly prohibited. If you have received e-mail message and any attachments transmitted with it, in error, please notify the sender by telephone (310-450-5151) or by electronic mail ([fchodosh@aol.com](mailto:fchodosh@aol.com)) and then delete this message and all copies and backups thereof. **By opening emails from this sender you agree to these terms.** Thank you.

Good afternoon,

Please note your day of submission has been received and it will be distributed to the City Planning Commission for the meeting of September 26, 2024.

It can be found [here](#), as stated on our agenda.

Thank you,



LOS ANGELES  
CITY PLANNING

**Cecilia Lamas, Commission Exec. Asst. II**

**- City Planning Commission (CPC)**

**- Harbor Area Planning Commission**

200 N. Spring St., Room 272

Los Angeles, CA 90012

T: (213) 978-1299 | [Planning4LA.org](http://Planning4LA.org)



*Note: Regular Day Off Alternating Fridays*

[Quoted text hidden]

I am strongly OPPOSED to the CHIP Ordinance for the following reasons:

1. It should NOT apply to single family zoned parcels. It is unnecessary, not required, as confirmed by Planning, as it would exceed the city's state housing capacity obligations which is already cushioned with a RHNA overage of 10% more sites for low income and 15% more sites for moderate income. Let's put this kind of density in proper locations, within multi-family and commercial zoned corridors. Let's first exhaust all of our efforts before literally destroying our single family neighborhoods with dense and out of scale multi-family development. This should only be used as a last resort.
2. Reducing yard setbacks by 30 percent increases hardscape and reduces the amount of yard space for significant trees to grow in the ground, for water to be absorbed, and for residents to enjoy. Reducing yard space to this extent is excessive and it will adversely impact the health and wellbeing of Angelinos who are already affected by air pollution and intense heat, especially in heat prone areas like the San Fernando Valley. We need MORE natural green space and trees with every development project, not less!
3. The Environmental Protection Measures are woefully incomplete and essentially aims to handover the most critical natural features of our city, such as trees and wildlife, to building and safety. Building and safety (DBS) staff are NOT stewards of the environment. My experience to this day is they don't want to be and don't care to be, and will tell you so "*We don't have anything to do with trees*" even though DBS is supposed to enforce conditions of approval and approved plans on discretionary cases. They treat the public with disdain and refuse to share any information, especially something like Tree Disclosure Statements. Even worse, they don't even bother to verify if the Tree Disclosure Statement is accurate or not. Planning staff needs to improve their stewardship of the environment and not hand this over to DBS. The CHIP ordinance needs an environmental document with TEETH that actually mitigates and protects against unnecessary tree and habitat removal. Deferring EPM's for trees and biological resources to a later date is unacceptable.
4. Site Plan Review (SPR) was *recently amended* to not include any affordable set aside units however have it still apply to projects with 50 or more market rate units. This is an important cross check threshold to ensure there are no potential environmental impacts with larger residential projects. The CHIP ordinance seeks to be exempt from SPR for any project that provides restricted affordable units. This exemption is unjustified and quite frankly leads to a chaotic building frenzy with no real planning involved.
5. The EIR Addendum 2 is unacceptable and reckless!! Here you are giving up entire ecosystems for out of control development. The EIR Addendum 2 finds there will be "Significant and Unavoidable" impacts to Biological Resources.

Shockingly stated in the EIR Addendum, "As Mitigation would not apply to ministerial projects, the mitigation measures would not eliminate all potential impacts to special status species from implementation of the Housing Element Update. **Applying the measure to ministerial projects is infeasible based on the necessary resources to implement and administer the measure and**



**the burden to needed housing.** Additionally, without knowing all site-specific conditions and depending on circumstances, even applying mitigation measures, impacts may still occur. Therefore, impacts related to the Housing Element Update are significant and unavoidable.

This is NOT unavoidable!! This is merely a choice to choose building over the environment at any cost. How about working on getting the resources necessary to have a balanced approach to protecting the environment and supporting development. It should not be never a false choice, or all or nothing scenario. We are the second largest city in the country and we can't even be bothered to address this?

6. EIR Addendum 2- pg 61 - Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? The EIR reads "Less than significant impact" and states the following: Housing development occurring within the City would be required to comply with the City's Tree Preservation Ordinance, which makes it illegal to relocate, remove, or fatally harm the trees without the issuance of a permit.

This statement is false on many levels. First, we do NOT have a "Tree *Preservation* Ordinance" and that is exactly what is needed before considering the wide destruction that CHIP will have on our significant mature trees. Significant trees are being removed, clear cut from site, without consideration for preservation. On discretionary projects, the Project Planners have the authority and responsibility to preserve trees where feasible, this can mean making adjustments to the project and incorporating that into the project plans before a decision is made.

Unfortunately most planners are not doing this. For by-right, ministerial projects, no one is tasked to look at preserving significant trees. As a result, we are losing our tree canopy at an accelerated rate. Not only are significant trees (i.e. 8 inch or 12 inch dbh) not being preserved, they are not being replaced. The city is only looking at "protected trees" such as oaks and sycamores, a very small amount of the trees we have, and even that is done quite poorly.

Please, please, please, let's have a more balanced approach to home building and tree and wildlife habitat preservation. It's is a not difficult task, it's just a matter of making a real effort.

Sincerely,

Marianne King (speaking on behalf of herself)

CD12 Community Forest Advisory Commissioner, Chatsworth NC Land Use Stakeholder member,  
Former City Planner



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September 06, 2024

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Vincent P. Bertoni, AICP,  
Director of Planning  
City of Los Angeles Department of City Planning  
CC: Mayor Bass, Los Angeles City Council

**RE: Citywide Housing Incentive Program**

The Mid City West Neighborhood Council is writing in response to the revised Citywide Housing Incentive Program (CHIP) ordinance. The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. We applaud the City for improvements that have been made to the proposed ordinance from the original draft, including wider geographic eligibility for the Opportunity Corridor Transition Areas and smartly calibrated incentives for family-sized units. Unfortunately, the most substantial changes in the latest draft reduce incentives, and therefore allowable density, across the multiple programs and geographies in the ordinance. Overall, we believe the revised CHIP ordinance would make it even more difficult to accommodate an additional 200,000 new homes and Affirmatively Further Fair Housing (AFFH) by equitably distributing new housing across the city. We are further concerned that by disallowing affordable and mixed-income homes on 72% of land in the City zoned for single-family homes, the CHIP ordinance further incentivizes demolishing rent-stabilized homes in existing multifamily areas.

We know that Los Angeles is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending half their income on rent.<sup>1</sup> And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unattainable and unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP and housing element process creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share to house Angelenos at all income levels. Unfortunately, the CHIP does not



significantly alter where multi-family housing is allowed, perpetuating inequitable land use patterns that have led the City into our current housing affordability crisis. That is why we are advocating for key changes to the CHIP to more effectively deploy the innovative incentive programs in the ordinance.

Namely, we continue to urge the City to allow all CHIP incentive programs in single-family zones in order to meet its housing targets and more equitably distribute new housing supply. Making single-family zoned parcels in highest and high opportunity areas eligible for incentive programs is of particular importance, as these areas are rich in jobs, public investments, and services, and have historically excluded Angelenos of color and lower income Angelenos. We appreciate that City Planning has created a more generous set of standards for the proposed new CT-3 subareas, but we continue to recommend consolidating the Opportunity Corridor Transition Area subareas into a single expanded geography with standards that make missing middle housing feasible to build.

Specifically, we recommend eliminating the CT-1 and CT-2 subareas and expanding CT-3 to at least a half-mile from the rear property lines of parcels abutting the corridors including all overlay zones, especially in high resource communities like our own. Put simply, the CHIP ordinance must fundamentally expand where multi-family housing is allowed if it is to:

1. address the City's urgent need for more housing;
2. equitably distribute new development to higher resource areas;
3. and minimize the risk of displacement.

Overall, we must express our disappointment that the revised ordinance fails to make meaningful improvements towards opening up single-family zoned parcels to the incentive programs, despite the role exclusionary zoning has played in perpetuating segregation. Rather, the bulk of the changes seem to be focused on further limiting the potential for the CHIP to build the homes our city desperately needs. In particular, we oppose the removal of the coastal zone from the Mixed Income Incentive Program; the removal of unlimited density incentives in the upper tiers of the Transit Oriented Incentive Area program; the removal/reduction of FAR and height incentives for the State Density Bonus Program; and the removal of FAR incentives in historic areas in the Opportunity Corridor program. These changes will drive further displacement as a greater



number of existing multifamily parcels will need to be redeveloped to meet the need for more housing.

We want to reiterate that without allowing mixed-income multifamily housing throughout the City, especially in single-family zoned parcels in highest and high opportunity areas, we will never be able to truly address the critical shortage of affordable housing and reverse historic patterns of segregation. If we do not take bold action to make these needed changes, homelessness will not only remain unsolved, but will increase. The City must address zoning in single-family zones in order to meet its housing targets, more equitably distribute new housing supply, and more effectively deploy the innovative incentive programs in the CHIP. We are confident that Los Angeles, with the political courage and leadership of this Council, can tackle this crisis head-on, and CHIP is the key opportunity to do so. We must end exclusionary Single Family Zoning City wide and allow 4 plexes by right on every residential lot in the City and restore unlimited density incentives near high frequency transit.

The rezoning program offers a once in a generation opportunity for the city to address the harms of the past, and build a future where all Angelenos enjoy access to opportunity and are able to live in the neighborhoods of their choice. We applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles - near transit and in high opportunity communities - and for creating new streamlined processes to deliver new housing. But walling off single family neighborhoods from these programs reinforces exclusionary zoning and hobbles their effectiveness. We believe the City of Los Angeles can and must do better to undo these historic wrongs.

Sincerely,  
Chris Dower  
Co-Chair Planning & Land Use Committee  
Mid City West Neighborhood Council

<sup>1</sup> 2021-2029 Housing Element, pg 9.



## CHIP R1(Ave-1) & R2(Ave-2) [CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA]

Naomi Rhoads <Nrhoads@edn.la>

Wed, Sep 25, 2024 at 2:36 PM

Reply-To: Naomi Rhoads <Nrhoads@edn.la>

To: housingelement@lacity.org, matthew.glesne@lacity.org, blair.smith@lacity.org, kevin.keller@lacity.org, cpc@lacity.org

Cc: bptchip@ixz.nfa.temporary.site, Mashael.Majid@lacity.org, karen.mack@lacity.org, maria.cabildo@lacity.org, elizabeth.zamora@lacity.org, monique.lawshe@lacity.org

—

Estimados Comisionados, Concejala y Planificación de la Ciudad de Los Ángeles Nithya Raman:

Soy inquilino y me solidarizo con los residentes de Barrington Plaza. Menos del 20 % de los 577 hogares sobrevivieron al intento de desalojo ilegal, a pesar de una batalla ganada en los tribunales. Su experiencia de acoso e intimidación resalta la precaria situación de los inquilinos en Los Ángeles, donde la vivienda asequible es cada vez más escasa y las protecciones para los inquilinos están constantemente bajo amenaza. Esta petición es en nombre de todos los inquilinos que enfrentan incertidumbres similares en un mercado inmobiliario cada vez más ajustado. Entre febrero y diciembre de 2023, el Departamento de Vivienda de Los Ángeles recibió un total de 77 049 avisos de desalojo.\*\*

El Programa de Incentivos para la Vivienda en toda la Ciudad (CHIP) se introdujo para abordar la gran necesidad de viviendas más asequibles. Sin embargo, la exención actual de los vecindarios de unidades únicas (zonificados R1) de este programa significa que entre el 40% y el 80% de los terrenos en el lado oeste están fuera del alcance de cualquier incentivo de vivienda asequible. Esta exclusión afecta desproporcionadamente a las comunidades minoritarias, concentrando viviendas asequibles en áreas específicas mientras deja grandes franjas de tierra en vecindarios de altas oportunidades intactas.

Creemos que este enfoque es injusto y miope. Los lotes R1 ubicados en las vías principales son ideales para viviendas multifamiliares de bajos ingresos y no deberían estar exentos del CHIP. Incluir estas áreas en el programa distribuiría viviendas asequibles de manera más equitativa en toda la ciudad, asegurando que todos los angelinos, independientemente de su vecindario, tengan acceso a viviendas asequibles. Además, las viviendas multifamiliares de tamaño familiar están siendo reemplazadas por unidades más pequeñas, que aunque están por debajo del precio del mercado por su número de habitaciones, resultan en un aumento severo en la renta por pie cuadrado. El resultado es que nuestras familias están siendo desplazadas. Esto desarraiga a nuestros residentes de largo plazo y desestabiliza nuestra comunidad. Además, las viviendas de tamaño familiar se están alquilando en esquemas de convivencia que inflan los precios varias veces por encima de lo que es la norma actual. No podemos ignorar la realidad de que los hogares de bajos ingresos no pueden mudarse a casas que cuestan cientos de dólares más que el alquiler original. En este contexto, las reubicaciones son boletos de ida para salir de nuestra comunidad.

Por lo tanto, instamos específicamente a que (i) se incluyan en el CHIP los lotes R1 en corredores de alta oportunidad, clasificados como Avenue-1 o más grandes, mientras que los lotes R2 en Avenue-2 o calles más pequeñas estén exentos. Estos ajustes ayudarían a distribuir los beneficios de la vivienda asequible en toda nuestra ciudad, en lugar de concentrarlos en unas pocas áreas, y evitarían el desplazamiento en viviendas asequibles preexistentes. (ii) Evaluar el alquiler asequible en la Ordenanza de Protección de Inquilinos sobre una base por pie cuadrado. (iii) Incentivar programas de habitabilidad para inquilinos extendidos que puedan mantener a nuestras familias en sus comunidades mientras se construyen nuevas viviendas asequibles, a las que tendrían derecho a regresar. (iv) Incentivar un programa de participación accionaria compartida en fideicomisos de tierras comunitarias que genere oportunidades de propiedad.

Pedimos a la concejala Nithya Raman, de Planificación de la Ciudad de Los Ángeles, que tenga en cuenta las necesidades de todos los inquilinos y arrendatarios de Los Ángeles y exija una política de vivienda más justa, realista e inclusiva.

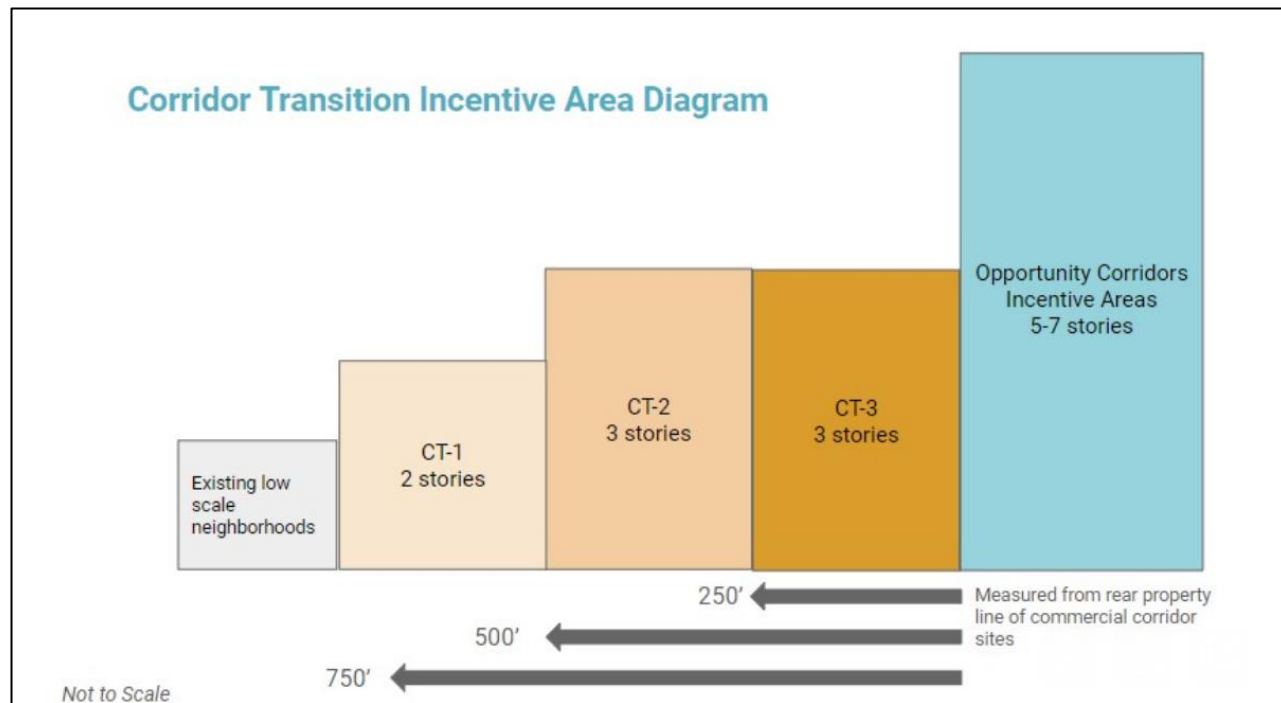
Gracias por su atención a este tema crítico.

-- Naomi Rhoads  
[Nrhoads@edn.la](mailto:Nrhoads@edn.la)

\* See Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416), [https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair\\_Share\\_Report.pdf](https://planning.lacity.gov/odocument/0062db2b-073b-4e96-8217-8b103ccde78b/Fair_Share_Report.pdf) \*\*<https://controller.lacity.gov/landings/evictions>

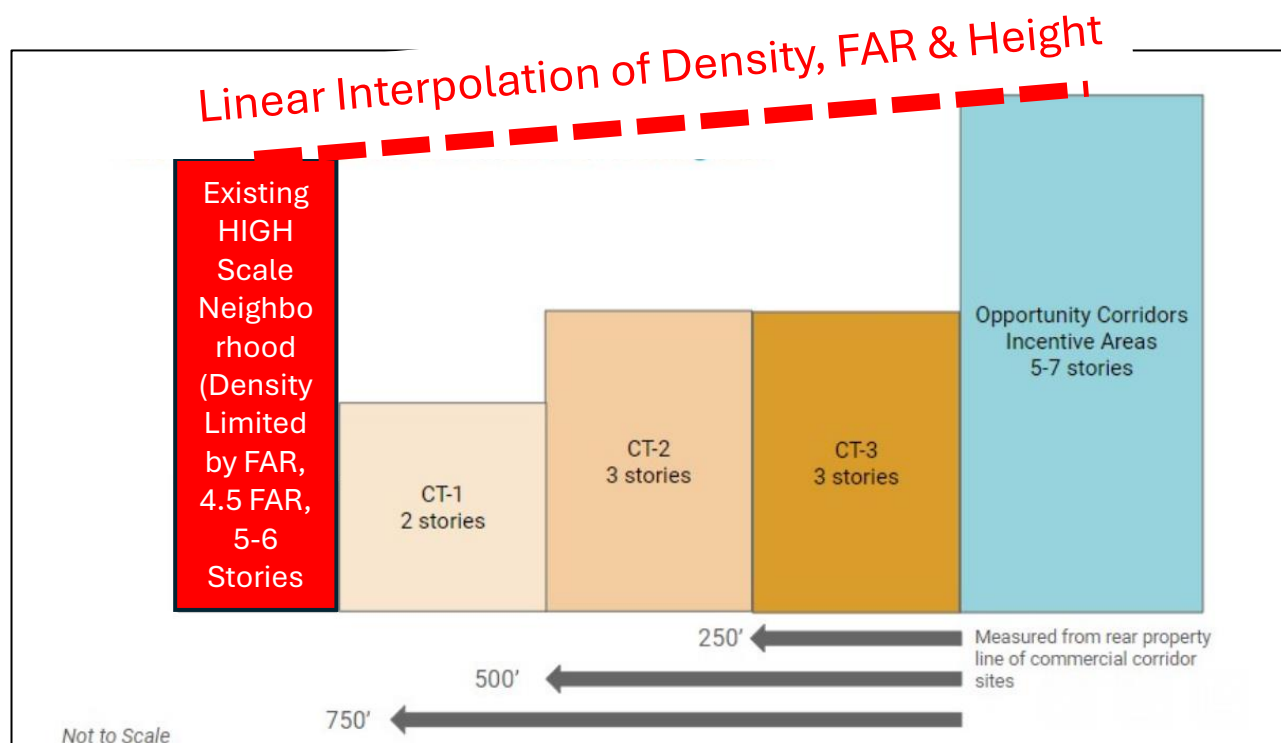
# OCT Transition Methodology for Linear Interpolation for Transition to **HIGHER** Scale neighborhood.

Current Methodology



**When NO low scale neighborhood exist!**

**Proposal To gradually Meet the existing neighborhood LINEARLY in Density, FAR and Height**



for OCT, if there are no Low Scale Density to approach,  
Request Linear Interpolation Methodology



# 2300 W Block Wellesley -> Neighbors want **upzone** to Match surrounding Density (**not removed** from upzoning)

## WLASNC Board FY 2017-2018

Jamie Keeton - Chair/ At Large Rep.  
Eric Nakamura - Vice Chair/ Business Rep.  
Jay Handal - Treasurer/ Organizational Rep.  
Naomi Kageyama - Secretary/ Business Rep.

Steven Kwok - North West Rep.  
Vacant - North East Rep.  
Arman Ghorbani - South East Rep.  
Jean Shigematsu - South West Rep.  
Dylan Wright - At Large Rep.  
Galen Pindell - At Large Rep.  
Ron Migdal - At Large Rep.  
Desa Philadelphia - At Large Rep.  
Jay Ross - At Large Rep.  
Danilo Torro - Business Rep.  
Vacant - Organizational Rep.



1645 Corinth Ave.  
Los Angeles Calif. 90025  
(310) 235-2070

E Mail: [info@WLANC.COM](mailto:info@WLANC.COM)  
[www.WLASawtelle.org](http://www.WLASawtelle.org)



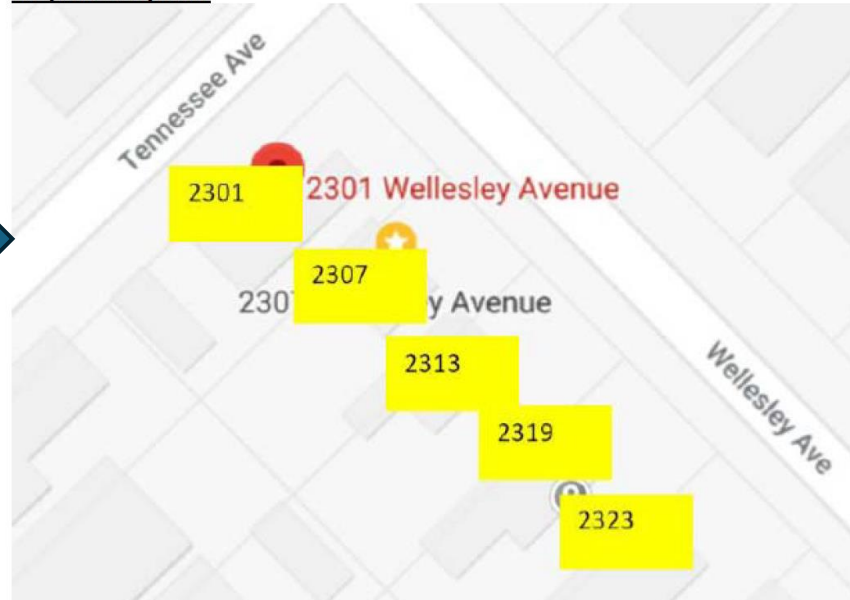
## Planning and Land Use Management Cmte.

**To: Jamie Keeton, Chair, Board of Directors**  
**Fr: J. Ross, Chair**  
**Date: Mar. 13, 2019**  
**Re: Resolution: 2300 block of Wellesley Ave. – neighbor request for re-zone**

*This resolution is only a recommendation from the PLUM Committee, and it will be considered by the Board of Directors for a final decision on Mar. 27.*

Resolution: The PLUM voted, 4-2-0, to recommend that the Board support re-zoning the five properties on west side of the 2300 Wellesley Ave. block, in order to make the zoning the same as the future zoning of the rest of the area in the Exposition Station Transit Neighborhood Plan, pending the support of the 5 property owners on the block.

## Request to upzone



## To UPZONE

2301 Wellesley  
2307 Wellesley  
2313 Wellesley  
2319 Wellesley  
2323 Wellesley



## 2300 W Block Neighbors' letters



Date: 15 March 2019

From  
Steven O'Neill  
2301 Wellesley Avenue  
Los Angeles, CA 90064

To  
Jay Ross/Jamie Keeton  
Chair  
PLUM/west LA neighborhood Council

Dear Jay Ross/Jamie Keeton:

My name is Steven O'Neill, owner of 2301 Wellesley Ave. it has come to my attention that my lot was not included in the recent Upzoning effort through the ordinance number 185671 – exposition Corridor transit neighborhood plan (specific plan), adopted by LA Council 11/9/17. (City clerk file: 18– 0437).

I request that my property be Upzoned to R3-EC 1200, equivalent to the Upzoning of My neighbors across the street, and in the Wellesley Avenue North of Tennessee Avenue. I fully support the LA city plan to increase density near transit and want the opportunity to support it, just like many or most everyone else in the BundyTriangle Neighborhood. I also request uniform application of Upzoning on My street Wellesley Avenue, and not be left out of the opportunity.

Please consider this my formal request to Upzone my property 2301 Wellesley Ave.

Thank you very much for your consideration.

Sincerely,

Steven O'Neill  
2301 Wellesley Ave.

310-826-4481

Date: 18 March 2019

From  
Ken Pham  
2319 Wellesley Avenue  
Los Angeles, CA 90064

To  
Jay Ross/Jamie Keeton  
Chair  
PLUM/west LA neighborhood Council

Dear Jay Ross/Jamie Keeton:

My name is Ken Pham, owner of 2319 Wellesley Ave. it has come to my attention that my lot was not included in the recent Upzoning effort through the ordinance number 185671 – exposition Corridor transit neighborhood plan (specific plan), adopted by LA Council 11/9/17. (City clerk file: 18– 0437).

I request that my property be Upzoned to R3-EC 1200, equivalent to the Upzoning of My neighbors across the street, and in the Wellesley Avenue North of Tennessee Avenue. I fully support the LA city plan to increase density near transit and want the opportunity to support it, just like many or most everyone else in the BundyTriangle Neighborhood. I also request uniform application of Upzoning on My street Wellesley Avenue, and not be left out of the opportunity.

Please consider this my formal request to Upzone my property 2319 Wellesley Ave.

Thank you very much for your consideration.

Sincerely,

Ken Pham  
2319 Wellesley Ave.  
(714) 651-4551  
[Kkenpham@gmail.com](mailto:Kkenpham@gmail.com)

Date: 16 March 2019

From  
Fumiko S Koyama  
2323 Wellesley Avenue  
Los Angeles, CA 90064

To  
Jay Ross/Jamie Keeton  
Chair  
PLUM/west LA neighborhood Council

Dear Jay Ross/Jamie Keeton:

My name is Fumiko S Koyama,, owner of 2323 Wellesley Ave. it has come to my attention that my lot was not included in the recent Upzoning effort through the ordinance number 185671 – exposition Corridor transit neighborhood plan (specific plan), adopted by LA Council 11/9/17. (City clerk file: 18– 0437).

I request that my property be Upzoned to R3-EC 1200, equivalent to the Upzoning of My neighbors across the street, and in the Wellesley Avenue North of Tennessee Avenue. I fully support the LA city plan to increase density near transit and want the opportunity to support it, just like many or most everyone else in the BundyTriangle Neighborhood. I also request uniform application of Upzoning on My street Wellesley Avenue, and not be left out of the opportunity.

Please consider this my formal request to Upzone my property 2323 Wellesley Ave.

Thank you very much for your consideration.

Sincerely,

  
Fumiko S. Koyama  
2323 Wellesley Ave.



Planning CPC <cpc@lacity.org>

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## STOP HIGH DENSITY APARTMENTS IN SINGLE-FAMILY NEIGHBORHOODS!

---

**Sonia Feldman** <soniafeldman@gmail.com>

Wed, Sep 25, 2024 at 1:33 PM

To: "cpc@lacity.org" <cpc@lacity.org>

No high density housing in single family residential neighborhoods. Place them in commercial corridors.

--

~~~~~  
Sonia Feldman  
[soniafeldman@gmail.com](mailto:soniafeldman@gmail.com)  
~~~~~



September 26th, 2024

Los Angeles City Planning Commission  
200 Spring St  
Los Angeles, CA 90012

Re: Items #6, 7, 8: Housing Element Rezone Programs:  
CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA

Dear Commission President Lawshe and Honorable City Planning Commission Members,

On behalf of UNITE HERE Local 11, we support ACT LA's recommendations to improve the proposed ordinances and to ask for one more important change. We request that projects with hotels not be allowed to use the Mixed Income or Affordable Housing Incentive Programs or ask for any density bonus exceeding what is allowed under state law. We are concerned that benefits like increased FAR in mixed hotel/housing projects will be used to maximize hotel uses, rather than the housing that the program intended for and believe this problem can be simply resolved by simply excluding projects with hotel uses. Thank you.

Regards,

Charlie Carnow. UNITE HERE Local 11

Tony Braswell, President  
Jake Yocham, Vice President  
Dorothy Apple, Treasurer  
Marc Woerschling, Secretary  
Carol Kiernan Convey  
Alice Hart  
Ginny Hatfield  
Sandy Hubbard  
Suzanne Lewis  
Ernie Merlan  
John Moser  
Jenna Powers  
Christyn Saracino  
Paulette Stokes  
Maribel Ulloa-Garcia

## CITY OF LOS ANGELES

CALIFORNIA



## NEIGHBORHOOD COUNCIL VALLEY VILLAGE

P.O. Box 4703  
Valley Village, CA 91617  
[www.myvalleyvillage.com](http://www.myvalleyvillage.com)

## CELEBRATING 20 YEARS OF SERVICE

September 25, 2024

RE: CPC-2023-7068-CA, CPC-2024-387-CA, and CPC-2024-388-CA

[cpc@lacity.org](mailto:cpc@lacity.org)  
[paul.krekorian@lacity.org](mailto:paul.krekorian@lacity.org)  
[housingelement@lacity.org](mailto:housingelement@lacity.org)  
[tiffany.zeytounian@lacity.org](mailto:tiffany.zeytounian@lacity.org)  
[zeke.wapner@lacity.org](mailto:zeke.wapner@lacity.org)  
[sarah.hounsell@lacity.org](mailto:sarah.hounsell@lacity.org)  
[brian.chun@lacity.org](mailto:brian.chun@lacity.org)  
[amanda.kainer@lacity.org](mailto:amanda.kainer@lacity.org)

Dear CPC staff, Councilperson Krekorian, CHIP Ordinance staff & Housing Element team at LA Planning:

The Neighborhood Council Valley Village (NCVV) supports if amended the CHIP draft ordinance version 3 that rezones our commercial corridors to allow mixed-use development while protecting single-family neighborhoods, Historic Districts/HPOZs and Rent Stabilized Units from being rezoned, and that keeps single-family neighborhoods from being considered in the expansion of the Transit Oriented Communities Affordable Housing Incentive Program.

NCVV encourages the City to create transitional housing from the commercial corridors into the single-family neighborhoods. For instance, a proposed housing development on a commercial corridor adjacent to single-family neighborhoods should encourage 2-3 story single-family attached housing (facing single-family) as the transition to higher multi-family buildings. This will offer much needed missing middle housing opportunities.

NCVV opposes creating additional multi-family housing units within the single-family home blocks, beyond the ADUs and duplexes that state law currently allows, thereby asking the CPC to exclude Exhibit D from consideration.

NCVV strongly recommends that a solution is developed for parcels that contain mixed-zoning designations, and that they should not default to the highest-use possible, but rather, the density should be allocated on the parcel reflecting sensitivity to the density of the parcels adjacent to them. This is an issue that affects much of the San Fernando Valley due to older zoning policies.

The Purposes stated in the Valley Village Specific Plan—part of the Community Plan for more than 30 years and developed by the Valley Village community at large in conjunction with City Planning—should continue to be the Guiding Principles of managing growth in what has been identified as a neighborhood with distinctive character.

*Whereas some of the following comments are specifically related to the Housing Element Inventory Listing of sites, NCVV would appreciate it if you would forward this communication to the appropriate planners and staff.*

- 1) There are a number of locations on Magnolia Blvd, between Irvine and the 170 highway that are owned by Oakwood, a private school. These properties are currently marked as Faith-based, but they are not. They are owned by a private entity, and this information should be updated on the Inventory List.
- 2) There are addresses for small-lot projects located on Emery Lane and Milan Drive that are designated as vacant or otherwise available to be upzoned. These are relatively recent developments, and we query why they are on a list as available to upzone?
- 3) There are other addresses that we question which will need a boots-on-the-ground investigation. We respectfully request the right to add to this list.

*Whereas some of the following recommendations may apply more to the NoHo/Valley Village Community Plan Update process, NCVV would appreciate it if you would forward this communication to the appropriate planners and staff.*

- 1) We recommend that future growth be concentrated along the Orange Line path (on Chandler, in Valley Village), to encourage walkability to the Orange Line, especially if parking reduction continues to be implemented.
- 2) We'd recommend a parking permit or "renters without cars" certification program be instituted for every building where development is permitted with reduced or no parking allocations. Increased density justified by transit proximity cannot simply encourage transit ridership, it must mandate it to bring the plan to fruition, and to avoid exacerbating street parking scarcity and competition.
- 3) Magnolia Blvd., between the 170 freeway and Laurel Canyon should not be designated Medium Neighborhood Residential because the street is narrowly constrained to two lanes of traffic, and will be constrained for many years in the future by the designation of the Historic Monument status granted to the trees at NHHS, as well as the tremendous amount of school traffic (both vehicular and pedestrians) carried on this stretch that is only one lane in each direction.
- 4) We recommend instead that the Medium Neighborhood Residential designation be allocated to the area of Riverside and Whitsett, as both of those streets are 2 lanes in each direction and have the infrastructure to sustain more growth.
- 5) We recommend that the density for the area between Chandler and Magnolia, along Agnes and Ben Street, should be increased to be consistent with the area extending east to North Hollywood High School.
- 6) We recommend that the density for the triangular area between Chandler, Colfax and the 170 freeway should be increased.
- 7) The maximum seven-story height proposed for the Community Commercial designation is too high. It should be reduced to five stories maximum.
- 8) The Community Commercial area designation at Laurel and Chandler should be designated for more residential than Commercial use to assist taking the burden off of Magnolia, and because the job centers planned for at NoHo West, NoHo Metro, the eventual Valley Plaza developments, ReImagine NoHo, and Studio City will need to be sustained by local housing.
- 9) We recommend that the City consider a Conservation District designation for the corners of Magnolia and Whitsett, to preserve the existing distinctive and historical architectural motifs, and to encourage future development that is complimentary and harmonious with it, supporting pedestrian orientation and inclusion of open space, as the natural community use of this area has evolved.

10) We recommend that the RiteAid property at Magnolia and Whitsett be designated for mixed use, with commercial on the lower level, housing above. Open space should be included at this site to serve as a community gathering area, as this area of the North Hollywood-Valley Village community is lacking open space.

11) We recommend that the Gelsons property at Laurel Canyon and Riverside be designated for mixed use, with commercial on the lower level (appropriate for retaining large market), housing above. Open space should be included at this area to serve as a community gathering area, and to mitigate the density and ingress/egress in close proximity to the 101 freeway. Parking reduction should not be allowed for mixed-use projects containing grocery stores.

12) We recommend that the Jons Market corners at Laurel Canyon and Magnolia be designated for mixed use, with commercial on the lower level (appropriate for retaining large market), housing above. Open space should be included at this area to serve as a plaza-like community gathering area at the core of Valley Village, consistent with use on the adjacent corners. Parking reduction should not be allowed for mixed-use projects containing grocery stores.

13) We recommend that developments along the Tujunga Wash should have access to the Wash.

14) We encourage the revitalization of the Tujunga Wash area for community use of open space, with appropriate landscaping, walking/biking paths, and amenities such as playground and fitness equipment.

15) In alignment with the goals of the Landscape Ordinance and the 2023 Memo on Tree and Biodiversity Planning, we recommend that any concentration of mature trees warrant inclusion in a Conservation zoning designation, whether commercial or residential. The City needs to make a greater effort at retaining these trees that in many cases date back to the WWII era housing found here.

16) We recommend a review of the Infrastructure in Valley Village—there are many areas that have underperforming (or no) storm drains or an absence of sidewalks, due to the aging infill areas built in the WWII/mid-century era. Building to maximum density allowances may exceed the deliverable services, ultimately degrading what is now considered to be a “high opportunity” area.

17) Valley Village has a Specific Plan in place that designates a height-limitation for this community. We recommend that zoning throughout the area acknowledge the height that bonuses and incentives could reach, and that the underlying zoning be applied so the height-limitation cannot be exceeded by the bonuses and incentives.

18) We also request a review of the Specific Plan to see what should be updated/changed/removed. The action of the Community Plan Update should not be taken with the intent of removing the goals of the Specific Plan without being specifically addressed with the community.

Respectfully,



Tony Braswell  
President  
Neighborhood Council Valley Village



Sandy Hubbard  
Chair  
Planning and Land Use Committee





# WESTERN STATES REGIONAL COUNCIL OF CARPENTERS

Sean Hartranft  
President

Frank Hawk  
Executive Secretary-Treasurer

Frank Zambrano  
Vice President



September 25, 2024

59 Spokane, WA  
82 Great Falls, MT  
96 NW Millwrights  
196 Pile Drivers, WA  
206 Seattle, WA  
213 Los Angeles, CA  
323 So. Los Angeles, CA  
360 So. Puget Sound, WA  
425 No. Puget Sound, WA  
503 Portland, OR  
541 Eugene, OR  
555 Colorado  
562 Long Beach, CA  
619 San Diego, CA  
635 Boise, ID  
661 Sylmar, CA  
714 Buena Park, CA  
721 Whittier, CA  
743 Bakersfield, CA  
801 Utah  
805 Camarillo, CA  
808 Idaho Falls, ID  
909 Ontario, CA  
951 Riverside, CA  
971 Reno, NV  
1136 Kettle Falls, WA  
1243 Fairbanks, AK  
1281 Anchorage, AK  
1319 New Mexico  
1607 Millwrights  
1912 Arizona  
1977 Las Vegas, NV  
2520 Pile Drivers & Divers, AK  
2761 McCleary, WA  
2851 La Grande, OR  
2949 Roseburg, OR

Los Angeles City Planning Commission  
201 N. Figueroa Street  
Los Angeles, CA 90012

## Re: Citywide Housing Incentive Program, Case No. CPC-2023-7068-CA

Dear President Lawshe and Members of the City Planning Commission:

On behalf of the Western States Regional Council of Carpenters (WSRCC), comprising nearly 100,000 hardworking men and women in construction across twelve states, we write to bring three points to your attention:

1. As proposed, the Citywide Housing Incentive Program (CHIP) is economically infeasible for over 90% of all Opportunity Corridor parcels according to the City's own analysis. Los Angeles can do better.
2. The CHIP also removes state-supported labor standards in SB 4 (Yes in God's Backyard) and AB 2011 (Affordable Housing and High Road Jobs Act), exacerbating the already rampant exploitation of residential construction workers through criminal pay practices. The housing crisis will remain if workers building our housing are driven into poverty.
3. **Carpenters want to build!** We advocate for more housing through increasingly sophisticated policy proposals that include a combination of developer incentives and labor standards such as the highly innovative AB 2011 Costco/housing (800 units of housing including 180 affordable units over a Costco) project now underway in Baldwin Village. We have proposed an economically feasible and voluntary Opportunity Corridor labor-housing incentive that we urge you to consider because it will build much more housing and assure that those who build the housing can afford to live in it.

Our members want to see housing built, not just housing planned.

LA stands for Labor Standards – a fair day's work deserves a fair day's pay! We appreciate your consideration of our concerns and proposed solutions.

Sincerely,

Frank Hawk  
Executive Secretary-Treasurer  
Western States Regional Council of Carpenters