



## DEPARTMENT OF CITY PLANNING

### RECOMMENDATION REPORT

#### City Planning Commission

**Date:** December 7, 2023

**Time:** After 8:30 a.m.

**Place:** John Ferraro Council Chambers  
Room 340, City Hall  
200 N. Spring Street  
Los Angeles, CA 90012

**Public Hearing:** Public Hearing Required  
Initial Public Hearing held on  
September 27, 2023

**Appeal Status:** Not Applicable

**Case No.:** CPC-2021-2642-SP

**CEQA No.:** ENV-2021-2643-EIR

**Incidental Cases:** None

**Related Cases:** None

**Council No.:** 1- Hernandez

**Plan Area:** Downtown, Northeast Los Angeles, Silver Lake-Echo Park-Elysian Valley

**Specific Plan:** Cornfield Arroyo Seco Specific Plan

**Certified NC:** Historic Cultural North, Lincoln Heights, Greater Cypress Park

**GPLU:** Various

**Zone:** Various

**Applicant:** City of Los Angeles

**Representative:** City of Los Angeles

#### PROJECT LOCATION:

The Project Area comprises the entire area within the boundaries of the existing Cornfield Arroyo Seco Specific Plan (CASP), which includes approximately 1,600 assessor's parcels and approximately 600 acres (1.0 square mile) of land. The Project Area is located to the northeast of Downtown Los Angeles and is generally bordered by the communities of Chinatown to the west, Lincoln Heights to the east, and Cypress Park to the north. Thoroughfares include North Figueroa Street at the north, North Spring Street and North Main Street at the south, and North Avenue 19 and North San Fernando Road near the center portion of the Project Area. The Los Angeles River, Arroyo Seco, Interstate 5, State Route 110, and Metro A Line (formally L Line and Gold Line) pass through the Project Area, which also includes the Los Angeles State Historic Park.

#### PROPOSED PROJECT:

The Proposed Project is an update of the Cornfield Arroyo Seco Specific Plan (CASP). The Proposed Project replaces the existing CASP (Existing CASP) with a new Specific Plan (Proposed CASP) that includes revised zoning regulations, incentives, and boundaries, for the purpose of encouraging affordable, mixed-income, and permanent supportive housing production. The Proposed Project strengthens the CASP's affordable housing requirements, including the recalibration of the CASP's current incentive zoning system; establishes a new Community Benefits Program that incentivizes new publicly-accessible open space and community facilities; includes provisions that facilitate the production of new 100 percent affordable housing and permanent supportive housing on public land; increases the zoning capacity for housing in targeted areas; and adopts a modernized zoning system based on the City's New Zoning Code. Adoption of the Proposed Project will involve amendments to the General Plan (Downtown Community Plan Map, Northeast Los Angeles Community Plan Map, and Framework Element) and a number of implementing ordinances, including ordinances to amend the Zoning Map, repeal the Existing CASP and establish the Proposed CASP, add new zoning provisions to Chapter 1A of the New Zoning Code, amend the Cypress Park and Glassell Park Community Design Overlay (CDO) boundaries, and rescind the CASP Transfer of Floor Area (TFAR) Floor Area Payment Trust Fund.

**RECOMMENDED ACTIONS<sup>1</sup>:**

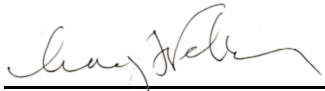
1. **Conduct** a public hearing on the Proposed Project as described in this Staff Recommendation Report.
2. **Approve** the Staff Recommendation report as the Commission Report.
3. **Approve** and **Recommend** that the City Council adopt the Findings in the Staff Recommendation Report.
4. **Recommend** that the City Council instruct the Director of City Planning to amend the Environmental Protection Measures (EPMs) pursuant to Division 4C.12 (Environmental Protection) of the New Zoning Code as appropriate to implement the MMP.
5. **Find** the City Planning Commission has reviewed and considered the Draft Environmental Impact Report (EIR) (City EIR No. ENV-2021-2643-EIR and State Clearinghouse No. 2021040206), as shown in Exhibit A.5, and direct staff to prepare a Final EIR, EIR findings, a Statement of Overriding Considerations, and a Mitigation Monitoring Program (MMP) for City Council consideration.
6. **Recommend** the City Council **Adopt** the Resolution in Exhibit A to certify a Final EIR, adopt EIR findings and a Statement of Overriding Considerations, and adopt a Mitigation Monitoring Program.
7. **Approve** and **Recommend** that the Mayor **Approve** and the City Council **Adopt**, pursuant to LAMC Section 11.5.6 and City Charter Section 555, the attached Resolution in Exhibit A to amend the General Plan as follows:
  - a. Amend the Downtown and Northeast Los Angeles Community Plan Maps, as shown in Exhibits A.2 and A.3.
  - b. Amend the Citywide General Plan Framework Element, as shown in Exhibit A.4.
8. **Approve** and **Recommend** that the City Council **Adopt**, pursuant to LAMC Sections 12.04 and 12.32 and City Charter Section 558, the proposed ordinance to amend the Zoning Map, as shown in Exhibit B.2.
9. **Approve** and **Recommend** that the City Council **Adopt**, pursuant to LAMC Section 12.32 and City Charter Section 558, the proposed ordinance to repeal the existing Cornfield Arroyo Seco Specific Plan and to establish the proposed Cornfield Arroyo Seco Specific Plan, as shown in Exhibit B.1.
10. **Approve** and **Recommend** that the City Council **Adopt** the New Zoning Code Ordinance to amend Chapter 1A ("New Zoning Code") of the Los Angeles Municipal Code to add new regulations to Division 8.3 (Special Districts) of Article 8, as shown in Exhibit C.1, and Amend the accompanying Zoning Code Maps established in Division 1.5 (Zoning Code Maps) of Article 1 of the New Zoning Code, as shown in Exhibit C.2.

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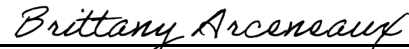
<sup>1</sup> Note that references to processes in Chapter 1 of the LAMC will be updated once the Processes and Procedures Ordinance (Council File 12-0460-S4) goes into effect.

11. **Approve** and **Recommend** that the City Council **Adopt**, pursuant to LAMC Section 12.32.S and City Charter Section 558, the proposed ordinance to amend the Cypress Park and Glassell Park Community Design Overlay (CDO) boundaries, as shown in Exhibit B.3.
12. **Approve** and **Recommend** that the City Council **Adopt**, pursuant to LAMC Section 12.32 and City Charter Section 558, the proposed ordinance to rescind the CASP Floor Area Payment Trust Fund, as shown in Exhibit B.4.
13. **Authorize** the Director of Planning to present the resolutions and proposed General Plan amendments (Exhibits A, A.1, A.2, A.3, A.4, and A.5) to the Mayor and City Council, in accordance with City Charter Section 555 and LAMC Section 11.5.6, and the proposed zoning ordinances (Exhibit B.1, B.2, B.3, B.4, C.1, and C.2) to the City Council, in accordance with City Charter Section 558 and LAMC Section 12.32.


VINCENT P. BERTONI, AICP  
Director of Planning



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## PROJECT ANALYSIS

### Project Summary

The Proposed Project is an update to the Cornfield Arroyo Seco Specific Plan (“CASP”), which was originally adopted on June 28, 2013. The Proposed Project replaces the existing CASP (“Existing CASP”) with a proposed Specific Plan (“Proposed CASP”) that includes revised zoning regulations, affordable housing incentives, and boundaries, for the purpose of supporting affordable, mixed-income, and permanent supportive housing production, along with several other overarching objectives, in this approximately 600-acre (1 square mile) area (“Project Area”) northeast of Downtown Los Angeles.

The Proposed Project strengthens the CASP’s affordable housing standards, including the recalibration of the CASP’s current incentive zoning system; establishes a new Community Benefits Program that incentivizes new publicly-accessible open space and community facilities; includes provisions that facilitate the production of new 100 percent affordable housing and permanent supportive housing projects on public land; increases the zoning capacity for housing in targeted areas; and adopts a modernized zoning system based on the City’s New Zoning Code.

Adoption of the Proposed Project will involve amendments to the General Plan (Downtown Community Plan Map, Northeast Los Angeles Community Plan Map, and Framework Element) and a number of implementing ordinances, including ordinances to amend the Zoning Map, repeal the Existing CASP and establish the Proposed CASP, add new zoning provisions to Chapter 1A of the New Zoning Code, amend the Cypress Park and Glassell Park Community Design Overlay (CDO) to no longer apply in the Proposed CASP Area, and rescind the CASP Transfer of Floor Area Ratio (TFAR) Floor Area Payment Trust Fund.

### Objectives and Guiding Principles

The underlying purpose of the Proposed Project is to support the production of more housing, especially affordable, mixed-income, and permanent supportive housing, in the Proposed CASP Area. The Proposed Project was initiated in response to a Council Motion (Council File No. 13-0078 S2), which called for an evaluation of the CASP’s incentives and regulations relative to the production of mixed-income housing. While the Proposed Project remains focused on carrying out the necessary amendments and revisions to support housing production, the Proposed Project has evolved in response to a wide range of stakeholder feedback to prioritize the production of affordable housing units for low-income households, as well as to address challenges such as housing displacement, environmental justice, and climate change.

The following objectives represent the long-term priorities for the Proposed Project:

- Increase the production of affordable, mixed-income, and permanent supportive housing within the Proposed CASP Area.
- Protect residents, especially low-income households, from indirect and direct displacement, and ensure stability of existing vulnerable communities.
- Design and regulate housing to promote health and well-being, increase access to amenities such as parks and public transit, contribute to a sense of place, and plan for a sustainable future.

- Build, operate, and maintain welcoming and accessible housing for Angelenos with unique needs, including those with disabilities, large families, older adults, and other people facing housing barriers and economic insecurity.
- Refine Plan standards, processes, and procedures to be more intuitive and transparent, with the goal of enhancing development certainty for market-rate, mixed-income, and affordable housing developers; and
- While reducing overall employment capacity, preserve employment areas that show a concentration of jobs, while supporting small and/or legacy businesses, local employment, and new productive uses and employment spaces, such as light industrial and general commercial uses.

## **Background**

### **Regional Context**

Adopted in 2013, the Existing CASP amended portions of the Central City North (Downtown), Northeast Los Angeles, and Silver Lake-Echo Park-Elysian Valley Community Plans and established a new Specific Plan to guide the future growth of a primarily industrial, approximately 600-acre (1 square mile) area. Encompassing roughly 1,600 assessor's parcels, the Project Area is generally bordered by the communities of Chinatown to the west, Lincoln Heights to the east, and Cypress Park to the north, and is located entirely within the boundaries of Los Angeles Council District 1.

The CASP is named after the "Cornfield" and the Arroyo Seco, both of which are located in the Project Area. The Cornfield is the historical nickname for a 32-acre site that is now the Los Angeles State Historic Park, while the Arroyo Seco is the seasonal river that has a confluence with the Los Angeles River. The CASP is located within the original floodplains of the Los Angeles River and Arroyo Seco water bodies. Despite its relatively small size relative to the larger community plans in which it is located, the Project Area has notable transportation infrastructure, including three Los Angeles Metro A Line (formally L Line and Gold Line) train stations located within or adjacent to the Project Area: Chinatown, Lincoln/Cypress, and Heritage Square. Interstate 5 and State Route 110 bisect the northern portion of the Project Area.

The Project Area is predominantly developed with a mix of industrial, commercial, residential, institutional, educational, and recreational uses, though a variety of sites are undeveloped vacant land. Industrial development is the largest sector within the Project Area, with 62 percent of industrial space used for warehousing, followed by manufacturing at 18 percent. There are numerous vacant properties in the Project Area, totaling approximately 1 million square feet of underutilized or vacant industrial land area. The total residential inventory in the Project Area comprises approximately 2,000 housing units. Approximately 75 percent of the Project Area's existing housing stock is multifamily development, totaling 1.3 million square feet of area, with the remaining units as single-family homes. Approximately 55 percent of multifamily rental inventory in the Project Area is 100 percent affordable, which includes both Low Income Housing Tax Credit (LIHTC) projects such as Tesoro Del Valle, Flores Del Valle, and Camino Al Oro, as well as the 412-unit William Mead Homes public housing development from the Housing Authority of the City of Los Angeles. As of 2021, there are approximately 6,000 residents and 5,400 jobs in the Project Area.

The Existing CASP guides growth in an area well-served by public transit and proximate to Downtown Los Angeles, the employment center of the region and the hub of the region's

expanding transit network. About half of the Project Area, the portion west of the Los Angeles River, is located within the Downtown Community Plan Area. The Project Area is served by three Metro light rail stations that provide connectivity to the greater Los Angeles region as well as Metro and LADOT bus routes that service the local area. Additionally, portions of the Project Area are characterized as being within or adjacent to a Regional Center or a Community Center by the City's General Plan Framework Element. The Proposed Project's effort to support housing production in the Proposed CASP Area is consistent with the City's adopted long-range land use vision to concentrate growth around transit and promote a mix of uses to support walkable communities. The Proposed CASP Area is uniquely situated to accommodate growth near transit, jobs, and public open space on properties that predominantly do not contain any existing residents.

The City of Los Angeles and the region as a whole are in the midst of a severe housing crisis caused by decades of undersupply that has not kept up with population growth. The Proposed Project will increase residential zoning capacity and contribute to the City's efforts to meet its state-mandated Regional Housing Needs Allocation (RHNA) obligations. The Proposed CASP Area includes parcels that have been identified in the adopted Housing Element Rezoning Program. Moreover, the Proposed CASP Area itself is in significant need for more housing, particularly new affordable units, as reflected by a residential vacancy rate of less than 1 percent, a median household income 40 percent lower than the City average, and a high percentage of renter-occupied housing at 76 percent, compared to 63 percent Citywide. Thus, the Proposed Project's goal of supporting housing production, especially affordable housing, and accommodating growth are acutely relevant in the Proposed CASP Area. The need is both a short- and long-term challenge that can be addressed through land use planning, and specifically through planning for additional multi-family housing, taking care to safeguard existing multi-family housing, and incentivizing the production of protected affordable housing.

### **Specific Plan Updates**

The Proposed Project involves updating the Cornfield Arroyo Seco Specific Plan. A Specific Plan is a regulatory land use ordinance that further implements the Community Plan, the Framework Element, and other elements of the General Plan. A Specific Plan provides by ordinance regulatory controls and incentives for the systematic execution of the General Plan and provides for public needs, convenience, and general welfare. Specific Plans allow zoning regulations to be further tailored to local areas and include various types of regulatory limitations, such as land use restrictions and building form and massing requirements. Procedures for the establishment, amendment, or repeal of Specific Plans are set forth in the Municipal Code. The Proposed Project's revisions to the CASP to support more affordable, mixed-income, and permanent supportive housing production, along with the other overarching objectives, will further implement the General Plan, including the Downtown and Northeast Los Angeles Community Plans and the Framework Element.

### **Currently Adopted Specific Plan**

The Existing CASP was adopted in 2013 and was written to guide development through the year 2035. Initially developed with the goal of prioritizing employment-focused uses, the intent of the Existing CASP is to guide the future growth of a vehicular-oriented industrial and public facility area into a cluster of mixed-use, pedestrian-oriented neighborhoods, while retaining land for industrial uses and new clean technology businesses. Broadly, the Existing CASP includes the following:

- The designation of new mixed-use zoning districts that replace former industrial zoning, and the identification of the types and intensities of uses permitted within these districts, as well as building height, massing, and façade standards,

- The establishment of new affordable housing land use incentives,
- The designation of new open spaces and parks and the establishment of open space requirements for new developments,
- Circulation and parking standards,
- Revised street designations and standards,
- Resource conservation standards, and
- Mitigation measures for subsequent development projects.

There are five Generalized Land Use Designations in the Existing CASP: Hybrid Industrial, Public Facilities, Open Space, Residential Multi-Family, and Commercial Manufacturing. Hybrid Industrial is the most common land use designation, comprising 276 acres, followed by Open Space (108 acres), Public Facilities (57 acres), Residential Multi-Family (29 acres), and Commercial Manufacturing (5 acres). The Existing CASP has four zones that are unique to the CASP: the Urban Innovation zone (144 acres), Urban Village zone (90 acres), and Urban Center zone (40 acres), which all correspond with the Hybrid Industrial land use designation, and the Greenway zone (74 acres), which corresponds with the Open Space designation. Other zones in the Existing CASP include the OS zone (34 acres), RD1.5 and RD2 zones (29 acres), PF zone (57 acres), and CM zone (5 acres). The maximum permitted intensity of development under the Existing CASP ranges from a Floor Area Ratio (FAR) of 1.5 to 6.0. The Existing CASP supports a range of housing options, public spaces, opportunities for walking and bicycling, and does not include minimum automobile off-street parking requirements.

One of the primary goals of the Existing CASP is to facilitate the production and continued provision of affordable housing for Extremely Low Income and Very Low Income households. During the adoption phase of the Existing CASP from 2011 to 2013, the City heard strongly from community stakeholders that affordable housing for low-income households was a priority. Local community organizations and their coalitions organized around the issue, engaging their members to advocate for changes that would support affordable housing and help counter displacement. As a result of their efforts, the Existing CASP includes one of the City's first geographically-based incentive zoning programs. The community fought for, and won, provisions that support affordable housing production, with the ensuing CASP being called "A model for L.A. planning" by the Los Angeles Times. The Proposed Project would build upon the incentive program of the Existing CASP by strengthening affordable housing requirements and incentivizing the provision of community benefits, as part of a new Community Benefits Program.

### **Background of the CASP Update**

On June 20, 2018, the Los Angeles City Council passed a motion (Council File No. 13-0078 S2) relative to the CASP that includes three parts. The first is an amendment to the Specific Plan, with a particular outcome envisioned; the second is a request that a particular interpretation of Specific Plan provisions be applied by the Director in reviewing development projects; and the third is an evaluation on the effectiveness of the Specific Plan in producing mixed-income housing, with the motion citing that no housing units have been built in the five years after adoption of the Existing CASP (i.e., the time at which the Council Motion was filed). On March 13, 2020, the Director of Planning commenced a work program responsive to the motion. As part of the work program authorization, Department of City Planning staff is to complete an evaluation on the effectiveness of the Existing CASP's regulations, and second, recommend the necessary amendments and



revisions to the Existing CASP based upon the findings of the evaluation. The request for a specific plan interpretation is not being addressed as part of this work program.

While focused on carrying out the necessary amendments and revisions to support housing production, the Proposed Project also presents an opportunity to more comprehensively update the Existing CASP to better meet the needs of the area. During the outreach process, the Department of City Planning received a wide range of stakeholder feedback, including to prioritize the production of affordable housing units and supportive housing in the Project Area; to protect residents, especially low-income renter households, from indirect and direct displacement; and to advance environmental justice, sustainability, and health and wellbeing. The Proposed Project features revisions and updated strategies that address each of these community concerns, and it builds upon the lessons learned from the recently approved Downtown Community Plan, which the Project Area is partially located in, to charter a course for greater equity through a similar Community Benefits Program and the same tenant protections. Moreover, the Proposed Project addresses the urgent housing crisis facing Los Angeles, which is felt most strongly in low-income, predominantly renter communities including the Project Area, by expanding housing opportunities and incentivizing affordable, mixed-income, and supportive housing.

The update to the CASP has been a multi-year process, starting with a Listen Phase from 2020 to 2021. During this period, the Department of City Planning conducted background research and data collection, identified issues and opportunities, shared information at Neighborhood Council meetings, and held focus group meetings to inform the evaluation of the CASP. A Share/Consult Phase followed, during which draft zoning concepts and proposed revisions were released to the public in November 2021 and presented at a virtual open house for community feedback. A Preliminary Draft Plan was released in November 2022, building upon the stakeholder feedback received during the planning process, and was presented at another virtual open house for further community feedback. The Draft Environmental Impact Report (DEIR) was released on July 20, 2023, for a 60-day public comment period, which was followed by an Information Session and virtual Public Hearing on September 27, 2023. Through this Refine/Finalize Phase of the CASP update, City Planning staff continued to meet with stakeholders and hold in-person Office Hours in the community to receive feedback and answer questions. See Public Communications for more detail on public engagement for the Proposed Project and comments received.

### **Evaluation of the Existing Plan**

In response to the Council Motion request, the Department of City Planning completed an evaluation of the existing Specific Plan relative to affordable and mixed-income housing production. The Department of City Planning sought to identify the barriers to housing production in the Project Area and held focus group meetings to gather perspectives from community organizations in the existing CASP area, affordable housing developers, market-rate developers, and institutional stakeholders. Additionally, permit clearance data were analyzed, and Project Planning staff with CASP implementation experience were interviewed. The findings and recommendations of the evaluation, which inform the Proposed Project's amendments and revisions, are summarized below.

#### **Relatively Few Housing Units Added to the CASP Since Adoption**

Since the Specific Plan's adoption in 2013, new residential development in the Project Area has been limited, with few projects producing housing in compliance with the Existing CASP.

Only two (2) housing projects have been built in the 10 years since the Existing CASP was adopted, adding 418 new dwelling units in total of which only five (5) units are covenanted affordable housing. Neither completed residential project complies with the Existing CASP: one is a 318-unit multifamily building with vested rights from a General Plan Amendment and Zone

Change legislative action approved in 2007 (i.e., project approvals that pre-date the Existing CASP), while the other received a Specific Plan Exception from the Existing CASP's Urban Innovation zoning restrictions, which otherwise limit residential development on a property to no more than 15 percent of a project's total floor area.

Aside from the two completed projects, five (5) multifamily residential projects have been approved in the Project Area totaling 1,929 proposed dwelling units of which 115 units will be covenanted affordable housing. This includes the 725-unit College Station project (129 West College Street) approved by the City Council in 2019 pursuant to a General Plan Amendment and Zone Change, which has not broken ground yet, as well as the 468-unit Avenue 34 project (141 West Avenue 34) currently under construction, which is within the Project Area but does not have CASP zoning under the Existing Plan. Of the residential projects that were approved in the Project Area, only two (2) have been designed to the zoning standards of the Existing Plan. Both of those projects are located in the Urban Village zone, which is the most permissive zone for residential development under the Existing Plan.

The certified Final Environmental Impact Report (FEIR) for the Existing CASP analyzed the addition of 7,141 new housing units between the scoping year 2010 and the horizon year 2035. Now halfway into that period, 418 new dwelling units have been added, or just 6 percent of the Existing CASP's total residential capacity that was analyzed in the FEIR. Compared to the level of residential development that was planned for in the Existing CASP, the amount of new housing production has been low. Equally concerning, only 5 percent of the dwelling units approved or constructed in the Project Area have been restricted affordable units for low-income households since the Existing CASP was adopted. Table 1 below provides a summary of all residential projects approved or constructed in the Project Area since the CASP was adopted.

<b>Table 1: Residential Development Approved or Constructed in the CASP Since 2013</b>							
Year Approved	Year Built	Address	Status	Units	Affordable Units	Affordability Level	Designed to Existing Plan?
2007	2021	1101 North Main Street	Complete	318	0	--	No
2019	--	129 West College Street	Approved	725	0	--	No
2019	2023	181 North Avenue 21	Complete	100	5	Extremely Low Income	No
2020	2024 (est.)	141 West Avenue 34	Under construction	468	66	Very Low Income	No
2020	2024 (est.)	215 North San Fernando Road	Under construction	81	0	--	Yes
2022	--	1457 North Main Street	Approved	376	42	Extremely Low Income	No
2022	2024 (est.)	200 West Mesnager Street	Under construction	279	7	Low Income	Yes
<b>TOTAL</b>				<b>2,347</b>	<b>120</b>		

### Existing CASP Prioritizes Non-Residential Uses

The limited housing production in the Project Area can be in part explained by the Existing CASP's zoning. While the Existing CASP envisions a vibrant hybrid-industrial area where residential, commercial, and light industrial uses can co-locate horizontally and/or vertically, the Existing CASP's limitations on residential development in certain zones likely serve as barriers to new housing construction.

The Existing CASP's three main zoning districts are Urban Village, a mixed-use residential zone; Urban Center, a mixed-use commercial zone; and Urban Innovation, a mixed-use industrial zone. While all three zones allow for multi-family residential uses, the Existing CASP further regulates the mix and allocation of uses within a project. For example, in the Urban Center and Urban Innovation zones, residential uses may not comprise more than 15 percent of a project's total floor area. The remaining 85 percent of a project must compose of non-residential uses, such as light manufacturing, research and development, corporate headquarters, office, and retail. These use limitations reduce the feasibility of housing production in the Urban Center and Urban Innovation zones, as the required proportion of non-residential uses is drastically higher than that of the typical mixed-use development in Los Angeles, and most predominantly industrial or commercial projects do not include a small residential component. The high non-residential use requirement in the Urban Center and Urban Innovation zones pose a financing challenge for developers, as non-residential rentable floor area carries additional risk for lenders and reduces residual land value compared to a purely residential project in the current market. Despite providing allowances for housing and including an affordable housing incentive program, the Urban Center and Urban Innovation zones in the Existing CASP are unlikely to result in any housing production, including any affordable housing units.

Under the Existing CASP, Urban Innovation is the most common CASP zone by area (144 acres), followed by Urban Village (90 acres), and Urban Center (40 acres). While preserving land for uses that generate industrial-oriented employment opportunities is an important policy consideration for the Project Area, the existing zoning limitations explain in part the limited housing production in the CASP, and why multifamily residential projects that have been built or approved received a General Plan Amendment and Zone Change or a Specific Plan Exception.

To support more housing production, the zoning in the CASP is being revised to include more parcels to Urban Village. The City is also recalibrating the use limits of the Urban Innovation and Urban Center zones to allow a higher percentage of residential uses within a project. While such changes would ultimately reduce the capacity for industrial and commercial uses in the Proposed CASP Area, a thoughtful and targeted approach to updating the CASP's zoning could balance the preservation of key employment areas that show a concentration of jobs with the production of much-needed affordable, mixed-income, and supportive housing. The Proposed Project incorporates these recommendations, taking into consideration industrial development trends and projected industrial demand in the Proposed CASP Area.

### Incentive System Can Be Calibrated to Produce More Public Benefits

The Existing CASP features an incentive-based zoning system that grants developers additional floor area rights in exchange for reserving a portion of units for low-income households. The system seeks to capture the land value increases that result from rezoning and public investment to create public benefits such as affordable housing. Multifamily residential projects under the Existing CASP may select between two Affordable Housing Bonus Options, Strategy A or Strategy B. According to Department of City Planning staff who have implemented the CASP, project applicants have been more interested in Strategy B as it offers a greater FAR bonus per amount of affordable housing required.

Under Strategy B, if an applicant agrees to set aside a portion of the residential units in a project for affordable housing, then for each square foot of affordable housing constructed, the applicant shall be granted the right to construct additional floor area above the Base FAR for the project, as set forth in a Bonus Square Footage Table. For example, one square foot of floor area of affordable housing allocated to Very Low Income households grants an additional 13 square feet of market rate floor area above the Base FAR. On a property that allows a Base FAR of 1.5, a project with an FAR of 3.0 would be required to set aside 2.3 percent of total floor area for Very Low Income housing, while a project with an FAR of 4.5 would be required to set aside 4.8 percent of total floor area for Very Low Income housing, under Strategy B.

During the initial background research for the Proposed Project, City Planning heard from stakeholders that a higher percentage of affordable units could likely be supported than required under Strategy B and that further economic analysis was recommended. The City could recalibrate the incentive zoning of the CASP, accounting for real estate market conditions, the regulatory environment, and economic feasibility analysis. Moreover, the City could altogether replace the Existing CASP's Strategy B incentive system, which was widely viewed as complex and difficult to implement, with the standardized public benefits incentive system established by the New Zoning Code. Based on these findings, the Proposed Project includes a recalibrated incentive zoning system informed by a market study that will deliver significantly more affordable housing units than under the Existing CASP, while being more intuitive to implement.

#### Existing CASP Regulations are Complex and Difficult to Implement

The Department of City Planning received feedback from stakeholders that the Existing CASP's regulations are overly complex and difficult to understand, pointing to the Strategy B affordable housing incentive as an example. Others commented that some Existing CASP's regulations lack the necessary specificity for streamlined ministerial review. For example, the Existing CASP mandates a parking lot design speed of 5 miles per hour without providing guidance on how to evaluate design speed. This standard led to a considerable interdepartmental effort to research options and come up with objective criteria indicating compliance. Similarly, the Existing CASP includes a requirement that all projects provide on-site energy generation to support 20 percent of a project's electricity needs, without specifying by which method electricity demand shall be calculated or providing consideration as to whether there is adequate rooftop solar area to meet a multi-story building's energy demand. The Existing CASP also uses its own terminology and definitions for permitted uses that are different from those in the zoning code or those used on a Certificate of Occupancy. For example, the Existing CASP limits Commercial Office uses in the Urban Innovation zone but allows for Corporate Headquarters uses in the same zone, a distinction based more on the organizational structure of a business entity rather than the form or function of a building. The lack of clarity in the standards has led to conflicting interpretations of the Existing CASP's regulations, creating uncertainty and adding delay to project timelines. The Proposed Project presents opportunities to address the implementation challenges of the Existing CASP, by refining standards and processes to be more intuitive, transparent, and consistent with commonly applied Citywide standards and procedures.

#### Non-Plan Factors

While this report identified aspects of the Existing CASP that create barriers to housing production, the limited extent of new housing development within the Project Area cannot be fully attributed to one land use regulatory document. It should be noted there could be numerous factors other than the Existing CASP, from macroeconomic conditions to the individual choices made by longtime landholders and institutional stakeholders in the Project Area, that have resulted in the present built environment. The Department of City Planning has only evaluated

Plan-related factors that are within the Department's purview to address through community-oriented land use planning.

## **Key Issues**

### **Housing Production**

As noted earlier, the underlying purpose of the Proposed Project is to support the production of more housing, especially affordable, mixed-income, and permanent supportive housing. The City of Los Angeles and the region as a whole are in the midst of a severe housing crisis caused by decades of undersupply that has not kept up with population growth. Without the increase in housing supply, the increased demand on the existing housing stock has detrimental effects including over-crowding, upward pressure on rent levels, displacement of low-income residents, and increased prices of for-sale housing. The provision of affordable housing and housing in general is a pressing concern Citywide and especially for the Project Area, which has one of the lowest residential vacancy rates within the City at under one percent. Throughout the Proposed Project's public outreach process, residents and community members have commented on the need for more housing options that reflect the diverse living arrangements and income levels of the community, which is near transit, while discouraging the displacement of existing residents. In response to this, the Proposed Project introduces several strategies that support housing production detailed below.

#### Increase Housing Capacity in Targeted Areas

To better support the production of much-needed housing, the Proposed Project would increase the zoned capacity for housing in the Proposed CASP Area, principally by expanding the residential-emphasis Urban Village Use District to select areas within the Proposed CASP Area. As a mixed-use zoning designation, Urban Village allows for multi-family residential buildings, as well as some public, institutional, open space, recreation, light industrial, and general commercial uses. In total, the amount of Urban Village area would increase from 90 acres (19 percent of total land area) under the Existing CASP to 135 acres (29 percent of total land area) under the Proposed Project, an increase of approximately 50 percent. The new Urban Village areas present new opportunities for housing in areas that do not have existing residential tenants and are uniquely situated near public transit, open space, and employment sites. This increase in Urban Village area would implement one of the key recommendations in the evaluation of the Existing CASP, which is to expand where new multi-family housing could be located within the Proposed CASP Area.

The new Urban Village areas are zoned Urban Innovation under the Existing CASP and are generally located in two sub-areas: 1) near the Los Angeles State Historic Park, closer to Chinatown and west of the Los Angeles River, and 2) in the area east of the Los Angeles River, west of Interstate 5. The expansion of Urban Village along Main Street on the western portion of the Project Area in particular will serve to better connect the William Mead Homes public housing development with the Los Angeles State Historic Park and future residential-serving amenities in the area.

The Proposed Project also introduces revisions to the allowable uses in Urban Village that are intended to support housing production. Whereas the Existing CASP caps residential development to 90 percent of a project's total floor area in the Urban Village zone, the Proposed Project would allow for a purely residential development in Urban Village, increasing the feasibility of affordable housing units within a mixed-income project as well as for 100 percent affordable housing developments. The Proposed Project would also introduce changes to the Urban Innovation and Urban Center Use Districts, which continue to prioritize light industrial and

commercial uses through a baseline non-residential floor area requirement, to allow for a higher proportion of residential uses within a mixed-use building. Altogether, these proposed changes would expand zoned housing capacity within the Project Area from a reasonably anticipated development of approximately 13,000 dwelling units under the Existing CASP to 20,000 dwelling units under the Proposed Project, by the horizon year of 2040. The proposed changes would contribute to the City's efforts to meet its Regional Housing Needs Allocation (RHNA) obligations and would serve to implement the adopted Housing Element Rezoning Program, which identifies parcels within the Proposed CASP Area as subject to rezoning.

### Affordable Housing

A key component of the Proposed Project is a new Community Benefits Program that establishes incentives for the construction of affordable housing. Under this program, housing projects can achieve higher development rights by setting aside a certain percentage of their dwelling units as affordable. The Proposed Project's Community Benefits Program has been calibrated to maximize the provision of affordable units within a mixed-income project as informed by an economic feasibility study that reflects current market conditions, development costs, and taxes and fees such as Measure ULA and the Affordable Housing Linkage Fee. As described in the evaluation of the Existing CASP, relatively few affordable housing units have been delivered under the Existing CASP's incentive system and higher affordability requirements can likely be supported. The Proposed Project's new Community Benefits Program will require significantly more affordable units than under the current incentive system, in some instances requiring three times the amount of affordable housing than required today. For example, whereas the Existing CASP's Strategy B incentive requires that 4.8 percent of residential floor area be set aside for Very Low Income households for a development seeking a Bonus FAR of 4.5, the same project under the proposed Community Benefits Program would be required to set aside 15 percent of units for Very Low Income households. The proposed Community Benefits Program (Level 1) utilizes Affordable Housing Program Set "A" in the New Zoning Code, and it reflects some of the highest affordability percentages of any area in the City. The Proposed Project also introduces a new Acutely Low Income category to meet the needs of residents in greatest need, for example, a household of four earning less than \$17,750 annually. The affordability requirements under the proposed Community Benefits Program (Level 1) are as follows:

- 10% Acutely-Low (households with incomes at 0-15% of Area Median Income);
- 11% Extremely-Low (households with incomes at 0%-30% of Area Median Income);
- 15% Very Low (households with incomes at 30%-50% of Area Median Income);
- 25% Low (households with incomes at 50%-80% of Area Median Income); or
- 40% Moderate-for-sale (households with incomes at 80%-120% of Area Median Income).

The incentives in the Community Benefits Program would apply throughout the Proposed CASP Area and are focused around areas that are served by public transit. Working in concert with proposed zoning tools, the Community Benefits Program focuses on providing affordable housing where it is most needed, while also reflecting the existing physical and economic characteristics of the Proposed CASP Area. The system is designed to encourage the development of mixed-income and 100 percent affordable housing projects, as well as the provision of larger units with multiple bedrooms to accommodate households of various sizes. Projects that provide affordable housing units under the program are required to sign a legally binding covenant to keep these rents affordable to households at that income level for 99 years. This system also serves to streamline the production of affordable housing units, offering ministerial approvals for most housing development projects that participate in the process. The Community Benefits Program replaces the Citywide TOC Guidelines that went into effect in 2017 and functions in tandem with California's State Density Bonus Law. Moreover, the program would supersede the Existing CASP's Transfer of Floor Area (TFAR) program to incentivize the development of affordable

housing units directly on-site, as part of new housing projects, rather than off-site. The proposed Community Benefits Program, coupled with the increase in zoning capacity for housing, will help create affordable housing units in a streamlined, consistent, and predictable manner rather than being decided on a project-by-project basis as part of a legislative action or other discretionary action.

Aside from the Community Benefits Program, the Proposed Project includes provisions that facilitate the production of new 100 percent affordable housing and permanent supportive housing on public land. The Proposed Project applies a new Public 2 (P2) Use District from the New Zoning Code to publicly-owned parcels in the Proposed CASP Area that currently do not contain housing, which is approximately 15 percent of the Project Area by land area. In addition to government buildings, structures, offices, and service facilities, the new P2 Use District allows for 100 percent affordable housing projects and transitional shelters by-right, greatly expanding where such housing types could be built. While any such project initiated by the City would likely involve public review and participation outside of the context of zoning and land use entitlements, this change resolves a major regulatory hurdle in affordable housing development. Additionally, the Proposed Project would exempt 100 percent affordable housing and permanent supportive housing projects from requirements to provide non-residential floor area in the Urban Innovation and Urban Center Use Districts, helping to increase the feasibility of such projects. The result of these combined changes is that the Proposed Project would allow for 100 percent affordable housing development across the entirety of the Proposed CASP Area, aside from open space and freeways, for the first time.

## **Displacement**

During public outreach for the CASP update, the City heard from community stakeholders in the Chinatown and Lincoln Heights neighborhoods who were concerned about neighborhood change in the Downtown and Northeast Los Angeles area and the potential displacement of existing low-income residents and legacy businesses that could occur as a result of neighborhood change. The constrained housing supply in Los Angeles has led to rising housing costs for residents in and around the Project Area, some of whom are especially susceptible to rent increases as low-income households. In addition, the greater CASP area has seen new businesses open, leading to concerns about existing small and/or legacy businesses being pushed out by landlords seeking higher rents from better capitalized commercial or industrial tenants. The Proposed Project introduces numerous zoning strategies that address these ongoing displacement concerns faced by low-income residents and small businesses.

### Safeguarding Households Against Displacement

The Proposed Project addresses both the direct physical displacement that could occur when new development replaces existing housing, as well as the indirect economic displacement of low-income residents that could occur with rising rents. The proposed zoning concentrates housing growth in proximity to transit stations and areas with underutilized or vacant land that have no existing residents, promoting sustainable infill growth while also relieving development pressures on existing residential neighborhoods. Low-density residential neighborhoods located at the edge of the Project Area would be removed from the boundaries of the Proposed CASP and will retain their RD1.5 and RD2 zoning designations to promote neighborhood stability. By focusing growth on areas where there are little to no residents, the Proposed Project is unlikely to result in direct displacement within the Project Area, and the Proposed Project's overall land use strategy is consistent with the City's goals of concentrating new development near civic resources and on underutilized land.

In the instance where there is proposed development on property with existing housing, such as in the surrounding Chinatown or Lincoln Heights areas not governed by the CASP, existing

Citywide and State regulations that mitigate residential displacement will continue to be in effect under the Proposed Project. These regulations include the Housing Crisis Act of 2019 (collectively SB 330 and SB 8), which requires certain residential development projects to achieve no net loss of residential units through replacement provisions. Pursuant to Government Code 66300, proposed developments must replace any demolished protected units at a 1:1 ratio of equivalent size and income level as the protected unit. Protected units, as defined by state law, include any units under an affordability covenant, units occupied by lower-income households, units subject to the Rent Stabilization Ordinance, or units withdrawn from the rental market pursuant to the Ellis Act within the past ten-years. The majority of multi-family units in the Project Area and surrounding area are protected units, which if demolished, must be replaced with Lower Income units under the proposed zoning. In addition to replacement requirements, residents of protected units are eligible for relocation assistance from developers, right to return (right of first refusal) for a comparable unit, and the right to remain in the protected unit until six months before the start of construction of the new development. While direct physical displacement is unlikely to occur within the Proposed CASP Area during implementation of the Proposed Project, these regulations nonetheless provide additional safeguards and apply to any by-right housing development that utilizes the Proposed Project's Community Benefits Program, as well as any discretionary housing development projects and those utilizing a housing incentive program such as Density Bonus.

With respect to the indirect displacement that could be attributable to economic factors, such as rising rents, the Proposed Project would first and foremost help to relieve housing pressures caused by the limited supply of housing surrounding the Project Area. The production of more housing, especially deed-restricted affordable housing, will serve to stabilize rent levels in the surrounding neighborhoods. The Proposed Project features a new Community Benefits Program calibrated to maximize the provision of affordable units within a mixed-income project, and it introduces a requirement that mixed-income projects include 20 percent of units in a new development as two-bedroom units or greater to accommodate multi-generational households. The Community Benefits Program also introduces a new income category for Acutely Low Restricted Affordable Units, for households making 0-15 percent of the Area Median Income (AMI). With nearly 40 percent of persons in the Project Area estimated to have Very Low Income (i.e., at or below 50 percent of area median income), compared to 30 percent Citywide, this introduces affordable housing that is more affordable and accessible to households in the surrounding community. New deed-restricted affordable housing units in projects utilizing the Community Benefits Program are subject to an extended 99-year affordability covenant with the Los Angeles Housing Department (LAHD). Aside from incentivizing mixed-income housing, the Proposed Project also includes numerous other strategies designed specifically to support 100 percent affordable housing and supportive housing projects. Moreover, the vast majority of existing multi-family rental units within the Project Area are covenanted affordable housing or public housing units for low-income households, which are protected from significant rent increases. An even higher proportion of dwelling units within the Project Area and the surrounding area are subject to renter protections under the City's Rent Stabilization Ordinance, which has expanded applicability under the new permanent renter protections passed by the Los Angeles City Council in 2023. The Downtown portion of the Proposed CASP Area is also within the disbursement area of the Downtown Community Benefits Fund, which promotes programs to support affordable housing such as funding for Community Land Trusts or funds to extend expiring affordable housing covenants, as well as facilities and services for people who are experiencing homelessness. By introducing new affordable housing to the Proposed CASP Area, expanding housing supply in areas without existing residents, and ensuring that community benefits are provided when new development occurs, the Proposed Project introduces new strategies that address the concerns of direct and indirect displacement, in tandem with the growing list of State and local tenant protections.



### Maintain and Create Spaces for Small Businesses

The local economy is in large part driven by small businesses in the form of retail and services for residents. The Proposed Project identifies the need to protect existing locally owned businesses from displacement and to better facilitate new locally owned businesses. To achieve this, the Proposed Project features a new Community Benefits Program incentive that requires a property owner to devote floor area with below-market rent for a small and/or legacy business in exchange for additional development rights. Such businesses include those on the Citywide Legacy Business Registry or those meeting criteria based on maximum employee/shareholder count, the acceptance of government issued assistance such as EBT, and/or the hiring of employees who can speak a language other than English to serve linguistically isolated members of the community. The Proposed Project also places restrictions on large format retailers, requiring big-box stores over 100,000 square feet to receive Conditional Use Permit approval from the City Planning Commission to ensure adequate review of such establishments, including required findings on the economic impact a large format retailer would have on the local community. To promote a balance of employment uses relative to housing, the Urban Innovation and Urban Center Use Districts in the Proposed Project require a baseline amount of light industrial and commercial floor area within a mixed-use project, which could be occupied by new, relocating, or expanding small business in the Proposed CASP Area. Additionally, the Mayor's Office has recently issued Executive Directive 4 to support small business creation, development, and growth. The Proposed Project's zoning strategy of allowing a mix of uses, along with its increased ease of implementation through consistency with the New Zoning Code and reduction in project review time, will serve to support this small business growth directive.

### **Environmental Justice and Health**

While the Proposed Project would continue to designate the majority of the Proposed CASP Area as Hybrid Industrial Land Use, which is intended for former or transitioning industrial areas with a mix of residential and low-impact productive uses, the Project Area currently contains a significant number of other industrial uses such as warehousing. While this arrangement has generated employment opportunities, it has also created complex land use patterns where industrial land uses and sensitive uses, such as residences and schools, are in close proximity to each other. The Project Area contains over 3.7 million square feet of industrial space, 62 percent of which is used for warehousing and 18 percent for manufacturing, along with numerous vacant or underutilized properties totaling approximately 1 million square feet of land area. These historical light and heavy industrial uses have resulted in several hazardous material sites within the Project Area as identified by the State Department of Toxic Substances Control (DTSC) where hazardous substances have been released or have potential to be released. In addition, Interstate 5 and State Route 110 bisect the northern portion of the Proposed Project, resulting in the compounding effects of pollution from transportation and industrial uses on local residents within the Project Area and in the surrounding Lincoln Heights, Chinatown, and Cypress Park neighborhoods. The Proposed Project introduces numerous strategies that address the incompatible land use patterns and historical environmental contamination in the Proposed CASP Area, which have historically had disproportionate impacts on low-income communities of color and contributed to inequitable health outcomes.

### Land Use Compatibility

To better address land use compatibility, the Proposed Project further regulates the types of light industrial and commercial uses allowed in its various Use Districts as informed by stakeholder feedback. In response to concerns raised about truck trips and the other deleterious impacts of warehousing uses on surrounding residential neighborhoods and schools, the Proposed Project adds a new limitation on new wholesale trade or warehousing uses to 25,000 square feet in size and applies additional standards including use enclosures. Any new proposed wholesale trade or

warehousing use in excess of that size would be required to obtain a Conditional Use Permit from the Zoning Administrator, subject to required findings about compatibility, to regulate the scale and intensity of such uses and ensure public participation in the review process. These limitations on new warehouses serve to address the impact of large warehousing uses on diesel emissions by further minimizing potential truck trips. The Proposed Project also places limits on auto repair, auto body shops, and gas stations and does not allow for new outdoor storage of cargo containers, commercial vehicles, motor vehicle impound, and auto scrap yards, which is a use presently found in the Project Area adjacent to existing dwelling units. Under the Proposed Project, all permitted light-industrial uses are subject to use standards that require screening when adjacent to sensitive and residential uses, as well as requirements to be fully indoors to minimize impact from operational activities. Moreover, while garment cut and sew activities will still be permitted, textile uses that involve processing and manufacturing of fabrics will not be permitted, due to the high potential of pollution from dyes and chemicals and intensive processing methods.

These changes altogether help to better align the zoning of the CASP with its original vision for industrial uses, which includes clean technology as well as other employment uses that are generally less environmentally impactful. The Proposed Project would also embed “Clean Up Green Up” (CUGU) standards and regulations (Ordinance No. 184246), which were originally devised for environmental justice communities affected by industrial uses, into the Proposed Project’s zoning. The CUGU regulations include buffering and landscape standards to better separate noxious uses from sensitive uses, locational standards such as requiring mechanical equipment or loading areas to be oriented away from sensitive uses, and use limitations for certain noxious uses if other similar uses exist within a defined radius. These standards are broadly applied to all Industrial-Mixed Use Districts as part of the New Zoning Code and in the Proposed Project. In addition, the CUGU program resulted in changes to the Building Code that required specified air filtration methods for residential projects adjacent to freeways. This standard remains in effect citywide.

#### Emissions Reduction by Directing New Housing and Commercial Development Around Transit and Other Non-Automobile Mobility Options

The Proposed Project promotes a built environment that prioritizes people over cars and reduces the negative health and environmental impacts of driving, while increasing physical activity and equitable access to goods and services. The integration of multimodal mobility options into land use planning helps reduce greenhouse gas (GHG) emissions, reduce vehicle miles traveled (VMT), and improve overall air quality and access to commercial uses, fresh foods, jobs, and schools without a car. The Proposed Project includes zoning that concentrate new higher density mixed use developments near transit and commercial corridors and design standards for commercial developments to encourage multimodal options that deprioritize accommodations for single occupancy vehicles.

#### Soil Remediation for Projects on Hazardous Materials Sites

Throughout the years there have been concerns raised over the issues of soil contamination due to prior industrial uses in the Project Area. The Project Area contains a number of active hazardous materials or cleanup sites according to DTSC and State Water Resources Control Board (SWRCB) records, which include publicly owned sites such as the Los Angeles State Historic Park, William Mead Homes, the former Lincoln Heights Jail, and two LADWP sites, as well as privately owned properties. To better address contaminated soils and minimize public health risks, the Proposed Project includes environmental mitigation measures for projects that involve ground disturbance and require a grading permit. Any project within 500 feet of an identified active hazardous materials site, or any site that previously had industrial zoning or was used as a gasoline station or dry cleaning facility, or sites that meet other criteria, would be required to undergo investigation and remedial action as set forth by an environmental site

assessment. For more information, see Mitigation Measure MM 4.8-4(a) in the Draft Environmental Impact Report for the Proposed Project. The mitigation measures in the Proposed Project build upon the existing local, State, and federal regulatory framework for contaminated sites that future development must comply with and would help to continue the cleanup of soil contamination in the Proposed CASP Area over time.

### Tree Canopy and Open Space

The Proposed Plan includes sustainability measures in its zoning standards, along with additional development standards that apply to all projects under the New Zoning Code, to improve air quality and access to public open space. The Proposed Plan introduces new Lot Amenity Space requirements located in the Form District regulations, which apply to all development and uses, whereas the current Zoning Code's common open space requirements apply only to residential projects. The lot amenity space calculation provides a bonus to amenity spaces that are open to the public, incentivizing property owners to provide green space for the benefit of the surrounding community. Similarly, Development Standards require tree planting for all uses based on FAR, as opposed to the existing dwelling unit-based tree planting requirements of the current zoning code. The Proposed Plan also adds a requirement for certain filtration plants and trees to be planted on properties with industrial uses, as well as properties within 500 feet of a freeway. Moreover, the Proposed Plan promotes public access to the Los Angeles River, including special landscaping and native plant requirements, as well as special Frontage District rules that call for buildings to engage with the River in terms of their urban design and orientation.

### **Changing Nature of Industrial Uses**

As noted above, the Project Area contains a significant amount of industrial space, mainly composed of warehousing uses, along with numerous vacant or underutilized industrial properties. In more recent years traditional manufacturing jobs have declined in the Project Area, while growth in warehousing has primarily occurred outside of the CASP, due to the Project Area's more aged inventory of industrial buildings with smaller floorplates and parcel sizes than the new warehouses being developed today. To promote the development of employment-focused districts, while taking into consideration the evolution of industrial uses in the greater CASP Area, the Proposed Project builds upon the Hybrid Industrial land use designation of the Existing CASP. The proposed zoning would allow for a flexible mix of uses to support a variety of employment opportunities including light industrial and commercial uses in tandem with live/work and residential uses, consistent with policies to provide land for the retention and attraction of new industries but prohibit heavy industrial uses that pose health risks.

For example, both the Urban Innovation and Urban Center Use Districts require that a minimum of 15 percent of floor area or 0.5 FAR, whichever is greater, be allocated to productive uses such as Light Industrial within any mixed-use development that contains dwelling units or live/work units. This requirement is modeled after the Industrial-Mixed IX3 Use District in the new Downtown Community Plan and translates to about a minimum of one floor of productive uses within a seven-story building. The range of light industrial and general commercial uses permitted under this scenario is more job dense than the existing warehousing uses that comprise the majority of industrial buildings in the Project Area today. Through the proposed zoning, which requires for a baseline level of job-producing uses, the Proposed Project affirms an employment focus for the Proposed CASP Area, while also responding to the need for a greater diversity of uses other than warehousing to ensure the viability of future employment.

### **Improving Ease of Implementation**

As discussed in the evaluation of the Existing CASP, the City has received feedback from internal and external stakeholders that the Existing CASP's regulations are overly complex and difficult to

understand, while sometimes lacking the necessary specificity for streamlined ministerial review. The lack of clarity in the standards has led to conflicting interpretations of the Existing CASP's regulations, adding uncertainty and delay to project timelines. The Proposed Project would refine the processes and regulatory standards of the CASP to be more intuitive, transparent, and consistent with Citywide standards and procedures.

To enhance the clarity and consistency of the CASP's regulations, the Proposed Project adopts a new zoning structure based on the City's New Zoning Code. The updated CASP would draw from and reference the definitions, processes, and general standards of the New Zoning Code, while continuing to be a document separate from the Downtown and Northeast Los Angeles Community Plans. The existing zoning standards of the CASP have been transposed to a system of Form Districts, Frontage Districts, Development Standards Districts, Use Districts, and Density Districts similar to the zoning districts established by the New Zoning Code. Wherever today's CASP contains redundant standards, such as those that already exist in other regulations (e.g., the Green Building Code and the New Zoning Code), they have been removed to improve ease of implementation and ensure consistency with Citywide standards. This approach ensures that the regulatory intent of the CASP continues to apply to development projects and means that as Citywide standards are created or updated, to reflect for example advancements in technology or our understanding of the impacts of climate change, they will now also apply to projects in the Proposed CASP Area. The more consistent and objective standards of the Proposed Project will reduce ambiguity and ensure its provisions can be meaningfully applied.

### **Inclusionary Housing and Incentive Zoning Study**

One of the key issues heard throughout the CASP update process is the importance of housing that is affordable and accessible to residents in the greater community. Affordable housing production can be supported through different strategies, including incentive programs like the proposed Community Benefits Program, where non-profit and private housing developers include all or some affordable housing units in exchange for incentives, such as additional buildable area. Another approach is inclusionary housing, which requires developers to include affordable units in market-rate housing projects, regardless of whether development incentives are offered. In addition to these approaches, the City has an Affordable Housing Linkage Fee, which requires projects to pay into an affordable housing fund, with an exception to the fee if affordable housing units are provided on site, which is sometimes viewed as a de facto inclusionary requirement. Los Angeles voters also recently passed Measure ULA which became effective April 2023 and imposes a 4.5 percent additional tax on sales of real estate valued at between \$5 million and \$10 million, or a 5.5 percent additional tax on sales of more than \$10 million (or a 6.06 percent total tax when Measure ULA is combined with the existing base real estate transfer tax). Measure ULA funds are to be used to subsidize affordable housing development, preserve affordable homes, prevent homelessness, and guarantee counsel to tenants in eviction court.

Over the years, there have been broader Citywide conversations about the possibility of mandating development projects to provide affordable housing units directly onsite through an inclusionary zoning approach. To better inform decisionmakers, stakeholders, and the general public about the potential implementation of an inclusionary housing program in the Project Area, the Department of City Planning contracted with an economic consultant, HR&A Advisors, to analyze the financial feasibility implications of an inclusionary housing program as part of the CASP update. The analysis is summarized in a memorandum that reports the financial feasibility results for inclusionary housing programs that would require developers to set aside specified percentages of affordable housing units within multi-family housing developments (Exhibit D). Different percentages of set-aside units were tested at multiple affordable household income levels, for a Base Floor Area Ratio (FAR) level and for FAR bonuses with higher affordability requirements. Two scenarios were tested, one with and one without ground floor retail use. Implications of waiving the City's Affordable Housing Linkage fee are also addressed. The

financial feasibility analysis is based on current real estate market conditions, and it also considers the impact of the Measure ULA real estate transfer tax. Most developers in Los Angeles sell their multi-family projects upon lease-up stabilization or shortly thereafter, as determined by the term of the construction loan, and therefore will consider the added cost of complying with Measure ULA in assessing feasibility.

The analysis found that inclusionary housing is not feasible at the Base FAR level under current real estate market conditions. The Proposed Plan's allowable Base FAR of 1.5, which is carried over from the Existing Plan, is too low to feasibly support any affordable housing units in an unsubsidized housing development. However, an incentive zoning approach can unlock a range of percentages of supportable affordable housing at different household income levels. Based upon the analysis, the Set A affordability requirements of the Proposed Project's Community Benefits Program are feasible at a Bonus FAR of 4.5 at the 10 percent Acutely Low Income and 11 percent Extremely Low Income levels for a residential development in the Proposed CASP Area. Therefore, the Proposed Project would continue to support affordable housing production through an incentive zoning program, albeit at levels calibrated to maximize the provision of deed-restricted units. As previously noted, the Set A affordability requirements of the Community Benefits Program (10 percent Acutely Low Income, 11 percent Extremely Low Income, 15 percent Very Low Income and 25 percent Low Income) reflect some of the highest affordability percentages of any area in the City. Given the increased Residual Land Value (RLV) that the incentive zoning is expected to create above the Base FAR scenario, it is expected that future development projects in the Proposed CASP Area would utilize the Community Benefits Program and provide affordable units for low-income households.

The feasibility study also analyzed a scenario without the Measure ULA transfer tax, such as if the measure were to be repealed by a state ballot measure or overturned in court. While it is not suggested or presumed that the impact of Measure ULA can be disregarded, as it is speculative, this sensitivity test indicates the incremental affordability benefits that are supportable in a scenario without the higher transfer tax. For example, absent Measure ULA, a residential development could feasibly set aside an additional 3 percent of units as Acutely Low Income or Extremely Low Income at a Bonus FAR of 4.5, based on the findings of this sensitivity test. This analysis helps to illustrate the policy trade-offs between generating on-site affordable units through an incentive zoning program and the creation of off-site affordable units that are subsidized through Measure ULA fund disbursement.

## **Components of the Proposed Project**

The Proposed Project is an update to the Cornfield Arroyo Seco Specific Plan, including the adoption of a new Proposed CASP with revised zoning regulations, affordable housing incentives, and boundaries. The Proposed Project includes amendments to the General Plan (Downtown Community Plan Map, Northeast Los Angeles Community Plan Map, and Framework Element) and a number of implementing ordinances, including ordinances to amend the Zoning Map, repeal the Existing CASP and establish the Proposed CASP, add new zoning provisions to Chapter 1A of the New Zoning Code, amend the Cypress Park and Glassell Park Community Design Overlay (CDO) boundaries, and rescind the CASP Transfer of Floor Area Ratio (TFAR) Floor Area Payment Trust Fund.

### **Proposed CASP**

The Proposed Project would establish a Special District in the New Zoning Code that utilizes the provisions of the Proposed CASP as the vehicle for regulatory measures for the Proposed CASP Area. The Proposed CASP would continue to be a standalone regulatory document adopted by

ordinance that is tailored to the specific needs of this unique hybrid industrial area. However, unlike the Existing CASP, the Proposed CASP utilizes the overall structure and regulatory system of the New Zoning Code, and references the same definitions and procedures as the New Zoning Code for greater consistency and ease of implementation. The Proposed CASP is organized as follows:

- *Chapter 1 (Introduction)* establishes the administration, applicability, and review procedures for projects within the Proposed CASP Area.
- *Chapter 2 (Form)* establishes Form Districts for the Proposed CASP Area, which generally govern the scale and intensity of development, as well as the placement of a building on a lot. The maximum floor area ratio (FAR) allowed on a lot is prescribed here, among other regulations.
- *Chapter 3 (Frontage)* establishes Frontage Districts for the Proposed CASP Area, which governs how a site or building addresses abutting streets, parks, pedestrian amenity spaces, waterways, or other public spaces.
- *Chapter 4 (Development Standards)* establishes the Development Standards District for the Proposed CASP Area, which regulates site design, including the location and characteristics of access, parking, landscaping, and other features of a site.
- *Chapter 5 (Use)* establishes standards for Use Districts for the Proposed CASP Area, which determine the activities allowed on a property, as well as the level of permission required for each.
- *Chapter 6 (Density)* contains provisions pertaining to Density and sets forth the maximum number of dwelling units per given area.
- *Chapter 7 (Community Benefits Program)* establishes the Community Benefits Program for the Proposed CASP Area, an incentive program that offers concessions on floor area and other regulations in exchange for the provision of affordable housing and other desired public benefits.
- *Chapter 8 (Streets)* identifies streetscape improvements for subsequent development projects in the Proposed CASP Area.
- *Chapter 9 (Environmental Standards)* sets forth the procedures for implementing the Mitigation and Monitoring Program as part of the Proposed Project and to be described in the Final Environmental Impact Report.

### Chapter 1 (Introduction)

Chapter 1 serves as the Introduction to the CASP, specifying its authority, boundaries, and purposes. The chapter defines terms that are unique to the Proposed CASP and explains the relationship of the Proposed CASP with other regulations including the New Zoning Code. The chapter also sets forth the applicability of the Proposed CASP's regulations and the review procedures for a project.

### *Revised Boundaries*

The boundaries in the Existing CASP include parcels that do not have CASP zoning and therefore are not subject to the zoning regulations of the CASP. The Proposed Project features revised boundaries that would exclude parcels without CASP zoning to further clarify the non-applicability of the Proposed CASP on those parcels. The revised boundaries also exclude the only few parcels in the Silver Lake-Echo Park-Elysian Valley Community Plan that are within the Existing Plan. These vestigial parcels are part of the larger Elysian Park, and are currently zoned Greenway (i.e., Open Space). In sum, the Proposed Project would exclude the following types of parcels from the Proposed CASP's boundaries:

- Existing RD1.5 and RD2 zoned properties within the Project Area;
- Existing C2 zoned properties within the Project Area;
- Existing CM zoned parcels within the Project Area; and
- Existing Greenway zoned parcels within the Project Area located within the Silver Lake-Echo Park-Elysian Valley Community Plan.

The total land area of the CASP would decrease from approximately 600 acres to approximately 550 acres (8 percent reduction) including area devoted to public rights-of-way. Properties no longer within the Specific Plan boundaries would retain their existing RD1.5, RD2, C2, or CM zones. The subject Greenway zoned parcels would be rezoned as OS (Open Space) under the Silver Lake-Echo Park-Elysian Valley Community Plan consistent with its existing Open Space General Plan Land Use Designation which would not change.

### Chapter 2 (Form)

Chapter 2 establishes new Form Districts for the Proposed CASP Area that consolidate and update existing building form regulations, including those pertaining to floor area ratio (FAR), height, lot size, building coverage, upper-story bulk, and building mass standards. The Proposed Plan includes four Form Districts, FOR, FO1, FO2, and FO3, all with a maximum Base FAR of 1.5.

FOR is a *Low-Rise Medium* Form District that allows low-rise development (up to 4.0 FAR with a bonus) and medium building width (maximum of 160 feet). The FOR Form District is generally applied adjacent to the Los Angeles River and Arroyo Seco and limits lot coverage to 50 percent in order to maximize the provision of open space and access to the River.

FO1 is a *Low-Rise Broad* Form District that allows low-rise development (up to 3.0 FAR with a bonus) and broad building width (maximum of 280 feet), with a maximum lot coverage of 85 percent. The FO1 Form District is applied in areas closer to lower-scale residential neighborhoods and it limits upper-story bulk, capping structures to two stories high for a depth of 20 feet next to areas with a maximum height of 45 feet or lower.

FO2 and FO3 are *Medium-Rise Broad* Form Districts that allow medium-rise development (up to 4.5 FAR and 5.0 FAR with bonuses, respectively) and broad building width (maximum of 280 feet), with a maximum lot coverage of 85 percent. The FO3 Form District is applied in the same general areas that currently have a Maximum FAR of 5.0 under the Existing Plan, including near the Los Angeles State Historic Park, as well as a five-block area between the Los Angeles River and Interstate 5.

### Chapter 3 (Frontage)

Chapter 3 establishes new Frontage Districts that govern how a site or building addresses abutting streets, parks, pedestrian amenity spaces, waterways, or other public spaces. The Frontage Districts consolidate and update the Existing Plan's regulations relating to setbacks, minimum ground floor and upper floor transparency, entrance location and spacing, minimum ground story height, and ground floor elevation. The Proposed Plan includes three Frontage Districts, FR1, FR2, and FR3, that are tailored to the Proposed CASP Area.

The application of Frontage Districts largely mirror how the Existing Plan's various urban design regulations are applied in the Project Area. FR1 is primarily applied in industrial areas and along the Los Angeles River, and it features specific landscaping, transparency, and entrance spacing standards for the portion of structures having frontage along the River. FR2 is the most commonly applied Frontage District, with moderate build-to widths, ground floor transparency, and entrance spacing standards. FR3 is applied where pedestrian-friendly design is prioritized, such as near the Los Angeles State Historic Park and along the Broadway and Figueroa Street corridors. FR3 requires high levels of ground floor transparency, frequent entrance spacing, and ground floor elevation at or near sidewalk grade to promote a legible street wall and activate the public realm with pedestrian activity and visual interest.

### Chapter 4 (Development Standards)

Chapter 4 establishes the Development Standards District for the Proposed CASP Area. Under the New Zoning Code, there are various Development Standards sets that package together requirements relating to parking and access, buffers and screens, landscaping, and on-site sign requirements. All properties in the Proposed CASP will utilize Development Standards District 4, as set forth in Division 4B.4 of the New Zoning Code.

Development Standards District 4 prioritizes the pedestrian experience, with standards that require direct pedestrian access from the public right-of-way to building entrances, as well as pedestrian passageways no more than 350 feet apart to improve the porosity through large sites. Similar to the Existing CASP, new parking for automobiles would not be mandated, encouraging uses to orient toward pedestrian traffic in a walkable environment. Parking facilities must meet design standards to ensure pedestrian mobility, safety, and comfort are not hindered. Under Development Standards District 4, parking garages must be wrapped with occupiable space at the ground floor and screened at upper stories, while parking integrated into a building must be wrapped with uses at both the ground floor and upper stories when along a primary street, and screened on upper stories when along a side street. In addition, on-site signs must be sized and located to support a pedestrian-oriented public realm.

The Proposed CASP also incorporates the Development Standards Rules set forth in Part 4C of the New Zoning Code, which are intended to apply broadly and are not unique to a specific built environment or context. These standards include regulations for pedestrian access, automobile access, bicycle parking, automobile parking, transportation demand management, plants, fences and walls, screening, grading and retaining walls, outdoor lighting and glare, signs, site elements, and environmental protection. These development standards will apply to the entire Proposed CASP Area as applicable based on the relevant regulations.

### Chapter 5 (Use Districts)

Chapter 5 establishes the Use Districts for the Proposed CASP Area. The Existing Plan's three primary zoning designations are Urban Village, which emphasizes residential uses; Urban Center, which emphasizes commercial uses; and Urban Innovation, which emphasizes industrial uses. Under the Proposed Plan, each of the three zones has been transposed into a new Use District



of the same name. Compared to the previous zones, the new Use Districts include revisions or additions to better align with use definitions found in the New Zoning Code; support housing production, including affordable, mixed-income, and supportive housing; limit deleterious uses; and accomplish the various other policy objectives of the Proposed Plan. The amount of land devoted to each zone or Use District has also changed by area, as shown in Table 2.

<b>Table 2: Existing Zoning and Proposed Zoning by Area</b>				
Zone or Use District	Project Area Under Existing CASP		Project Area Under Proposed CASP	
	Area (acres)	Percentage	Area (acres)	Percentage
Urban Village	90	19%	135	29%
Urban Innovation	144	30%	63	13%
Urban Center	40	8%	30	6%
Greenway	74	15%	0	0%
RD1.5/RD2	29	6%	29	6%
CM	5	1%	5	1%
Open Space (OS)	35	7%	103	22%
PF	57	12%	0	0%
FWY	0	0%	40	8%
Public Use (P2)	0	0%	70	15%
C2	8	2%	8	2%
<b>TOTAL*</b>	483	100%	483	100%
*Total area shown excludes the area within City rights-of-way. The acreage per zone may not add up to the total area due to rounding.				

### *Urban Village*

Similar to the Existing CASP, Urban Village under the Proposed CASP has a residential focus and would continue to allow for multi-family residential buildings, as well as select public, institutional, open space, recreation, light industrial, and general commercial uses. To support housing production in the Proposed CASP Area, the amount of Urban Village area increases from 90 acres (19 percent of total land area) under the Existing CASP to 135 acres (29 percent of total land area) under the Proposed CASP, resulting in an increase in residential zoning capacity. The new Urban Village areas present new opportunities for housing in areas that do not have existing residential tenants and are uniquely situated near public transit, open space, and employment sites.

The Proposed Project also introduces revisions to the allowable uses in Urban Village that are intended to support housing production. Whereas the Existing CASP caps residential development to 90 percent of a project's total floor area in the Urban Village zone, the Proposed CASP would allow for a purely residential development in Urban Village, increasing the feasibility

of including affordable housing units within a mixed-income project as well as for 100 percent affordable housing developments. The Urban Village Use District would also explicitly allow supportive housing uses by-right, including both general permanent supportive housing and transitional shelters, for the first time in the Proposed CASP Area.

To better address land use compatibility concerns, the Proposed CASP further regulates the types of light industrial and commercial uses allowed in Urban Village as informed by stakeholder feedback. For example, any new wholesale trade or warehousing use in the Urban Village Use District in excess of 25,000 square feet would now require a conditional use permit approved by the Zoning Administrator, in response to concerns raised about the deleterious impacts of such uses on surrounding residential neighborhoods, schools, and other sensitive uses. General outdoor storage, as well as the outdoor storage of cargo containers, commercial vehicles, and motor vehicle impound, would not be permitted in Urban Village, nor would new automotive fueling stations. Additionally, in response to concerns that allowing hotels by-right would promote the development of hotel and lodging over much needed housing, the Proposed Project would add a new conditional use permit requirement for hotel uses in the Urban Village Use District to ensure public participation in the review process.

#### *Urban Innovation*

Under the Proposed Plan, Urban Innovation would continue to prioritize light industrial uses and a wide variety of employment opportunities. Similar to the proposed changes made to Urban Village, the Urban Innovation Use District includes new features that improve the compatibility of light industrial uses with residential and other existing sensitive uses to better address environmental justice concerns in the Proposed CASP Area. The changes help to better align the zoning of the CASP with its original vision for industrial uses, which includes clean technology as well as other employment uses that are generally less environmentally impactful. For example, warehouses over 25,000 square feet will now require a conditional use permit to regulate the scale and intensity of such uses and ensure public participation in the review process. Outdoor storage of cargo containers, commercial vehicles, and motor vehicle impound would not be allowed, while self-storage buildings would be subject to supplemental standards that require a minimum 0.1 FAR of other uses to activate the ground floor of the building and support pedestrian friendly design. Light industrial uses in the Urban Innovation Use District must be fully enclosed and screened.

To ensure the continued provision of employment opportunities within this hybrid-industrial area, the proposed Urban Innovation Use District requires that a minimum of 15 percent of floor area or 0.5 FAR, whichever is greater (up to a maximum requirement of 1.0 FAR), be allocated to Light Industrial or Office uses within any mixed-use development that contains dwelling units. This requirement is modeled after the Industrial-Mixed IX3 Use District in the new Downtown Community Plan and translates to about a minimum of one floor of productive uses within a seven-story building. Supportive housing and 100 percent affordable housing projects in the Urban Innovation Use District would be exempt from this minimum productive space requirement in order to support the feasibility of such uses.

#### *Urban Center*

Urban Center is a Use District largely concentrated at the northern end of the Proposed CASP Area along Figueroa Street and accommodates a range of commercial uses, along with light industrial and residential uses. Similar to Urban Innovation, any mixed-use residential project in Urban Center would be required to allocate a minimum of 15 percent of floor area or 0.5 FAR, whichever is greater (up to a maximum requirement of 1.0 FAR), to General Commercial or Light Industrial Uses, with 100 percent affordable and supportive housing projects being exempt from

this requirement. The Proposed Project also introduces new changes to Urban Center that improve the compatibility of light industrial uses with surrounding uses, such as a conditional use permit requirement for any light industrial uses that exceed 25,000 square feet, including wholesale trade and warehousing.

*New Zoning Code: P2, OS1, and FWY*

In addition to the CASP-specific Use Districts described above, the Proposed CASP includes properties that are subject to Use Districts established in the New Zoning Code and generally available Citywide: Public 2 (P2) and Open Space 1 (OS1).

The P2 Use District is generally applied to publicly-owned parcels within the Proposed CASP Area, and it allows for government buildings, structures, offices, and services facilities. Additionally, the Use District allows for 100 percent affordable housing projects and transitional shelters by-right. Numerous other uses are also permitted depending on the most permissive adjoining use district; however, such uses must be joint public and private developments approved subject to discretionary review.

The OS1 Use District is intended to protect and preserve natural resources, provide outdoor recreation opportunities, and facilitate the efficient management of municipal resources. The District is broadly applied to open space areas, including Los Angeles State Historic Park, Albion Park, and alongside the Los Angeles River and Arroyo Seco, and replaces the similar Greenway zone of the Existing Plan.

Additionally, freeway parcels owned by the California Department of Transportation (Caltrans) within the Proposed CASP Area are subject to the Freeway (FWY) Special District established in the New Zoning Code. To the extent that Caltrans is using or building on State-owned property for highway purposes, it will be immune from the City's zoning regulations. A number of institutional uses are also allowed in the FWY Special District but are only allowed with the approval of a conditional use permit.

Chapter 6 (Density Bonus)

Chapter 6 of the Proposed Plan contains provisions pertaining to density. Most of the Proposed CASP Area is subject to Density District FA from the New Zoning Code, which indicates that the number of dwelling units is limited only by the maximum floor area for the lot and other practical requirements, with no density limit specified to allow for a variety of unit types and sizes. The open space portions of the Proposed CASP are subject to Density District N from the New Zoning Code, which indicates that dwellings are not a permitted use. The Proposed Project places most of the Proposed CASP Area in Density District FA, which effectively provides for unlimited density within the maximum allowable floor area and other restrictions, similar to the Existing CASP.

Chapter 7 (Community Benefits Program)

Chapter 7 of the Proposed CASP sets forth the Community Benefits Program, which is an incentive-based zoning system that allows developers to exceed base development rights and build larger buildings in exchange for providing commensurate public benefits such as affordable housing, publicly accessible open space, or community facilities.

The main incentive used to garner public benefits under the Proposed CASP is through floor area rights (depicted as Floor Area Ratio, or FAR). As noted, Form Districts would outline Base and Bonus FAR for each parcel. The Base FAR is available by-right. The Bonus FAR is available for projects that participate in the Community Benefits Program. The Community Benefits Program

for the Project is structured into two different levels. The scale of benefits required to achieve the bonus incentives would increase in proportion to the level of bonus development rights.

*Level 1:* Under Level 1, Housing Development Projects can increase their permitted FAR from 1.5 to 4.5 in exchange for providing Restricted Affordable Units at the Set “A” level, the highest set available in the New Zoning Code:

- 10% Acutely-Low (households with incomes at 0-15% of Area Median Income);
- 11% Extremely-Low (households with incomes at 0%-30% of Area Median Income);
- 15% Very Low (households with incomes at 30%-50% of Area Median Income);
- 25% Low (households with incomes at 50%-80% of Area Median Income); or
- 40% Moderate-for-sale (households with incomes at 80%-120% of Area Median Income).

Level 1 of the Community Benefits Program does not apply to non-housing development projects and non-housing development projects are not subject to the above affordable housing requirements to achieve bonus development potential and can instead access bonus incentives by providing community benefits under Level 2 described below.

*Level 2:* Housing projects that fully exhaust Level 1 can access additional development rights above Level 1 and up to the maximum Bonus FAR prescribed by the Form District, by providing Publicly Accessible Open Space, Community Facilities, or by providing more Restricted Affordable Units, as outlined below:

- **Publicly Accessible Private Open Space:** If a project chooses to provide publicly accessible private open space to access the available bonus development potential, it is required to allocate a percentage (depending on the zoning Form District and the amount of bonus FAR) of its overall lot area as Publicly Accessible Open Space. These spaces are required to comply with location, access, and informational sign requirements; meet design, shade, and landscaping standards; and include amenities such as restrooms and drinking water fountains.
- **Community Facilities:** If a project chooses to provide a Community Facility to access bonus development potential, it is required to set aside a minimum of 5,000 square feet and provide additional Floor Area towards a Community Facility for every additional bonus FAR. Community Facilities may be provided in the form of schools, social services, public facilities, community-serving small business space, or daycare services. Other examples of eligible Community Facilities include public or non-profit health and counseling clinics, small business resource centers, job training centers, commissary kitchens for food vendors, cultural centers, and libraries.
- **Additional Affordable Housing:** A project may choose to provide additional affordable housing above the required amounts in Level 1 to access additional FAR up to the maximum Bonus FAR.

To ensure that public benefits are provided on-site, the Community Benefits Program of the Proposed CASP no longer includes a Transfer of Floor Area Ratio program. Additionally, mixed-income residential projects under the Community Benefits Program are required to have at least 20 percent of the total dwelling units as two bedrooms or greater to ensure households of various sizes, such as intergenerational households, are accommodated.

## Chapter 8 (Streets)

Chapter 8 of the Proposed Plan contains street and streetscape improvement standards for subsequent development projects in the Proposed CASP Area. The Proposed Plan would retain

the street designations and street standards established by the Existing CASP, which included modified street cross-section dimensions to enhance safety and connectivity for all road users. Projects under the Proposed CASP would be required to implement these street standards through the applicable dedication and improvement processes set forth in the New Zoning Code.

Additionally, the Proposed CASP establishes Basic Streetscape Improvements for when a right-of-way improvement is required of any development project. These Basic Streetscape Improvements are defined in a menu of options and include parkways, special sidewalk paving, special lighting, bicycle racks, potted planters, and bus shelters, with the number of improvements required based on the number of dwelling units and/or the floor area of the project. At minimum, all projects under the Proposed CASP are required to provide street trees planted in parkways in coordination with the Bureau of Engineering and as approved by the Bureau of Street Services, Urban Forestry Division.

The Proposed CASP also includes a list of Major Streetscape Improvements which serves to inform future street improvements and investments within the Proposed CASP Area, including public street improvement projects by City agencies. These Major Streetscape Improvements include proposed new crosswalks, and traffic signals that are mapped in the Proposed CASP, as well as bicycle infrastructure that may be implemented by the Department of Transportation over time.

#### Chapter 9 (Environmental Standards)

Chapter 9 details Environmental Standards that implement the Mitigation and Monitoring Program included as part of the Proposed Project and to be described in the Final Environmental Impact Report. For more details, see the Environmental Analysis/CEQA section of this report.

#### **General Plan Amendments**

The Proposed Project involves amending the General Plan Land Use Map to re-designate portions of the Downtown Community Plan Area and Northeast Los Angeles Community Plan Area with new land use designations included in the Proposed Project, as well as amending the Framework Element of the General Plan to reflect the changes made to the CASP.

The Proposed Project has three General Plan Land Use designations: Hybrid Industrial, Public Facilities, and Open Space. The Proposed Project would amend the Downtown Community Plan Map to add the CASP as a corresponding Special District for each of these three General Plan Land Use designations. Additionally, while nearly all CASP parcels within the Downtown Community Plan Area would retain their existing land use designation, a small number of parcels would have revised land use designations for greater consistency or to correct previous errors. These parcels consist of the LADWP site at North Main Street, which would change from Hybrid Industrial to Public Facilities General Plan Land Use Designation, and a sliver of parcels along the Los Angeles River that would change from Hybrid Industrial to Open Space, or from Production to Public Facilities.

The Northeast Los Angeles Community Plan Map would also be amended to include the CASP as a corresponding zoning designation with the Hybrid Industrial, Public Facilities, and Open Space General Plan Land Use Designations. Similar to the Downtown Community Plan Map, a small number of parcels within the Northeast Los Angeles Community Plan Map would receive revised land use designations to be consistent with the zoning designations or to correct any previous errors. Table 3 provides a summary of General Plan Land Use designations by area for the Existing CASP and the Proposed CASP.

<b>Table 3. Existing and Proposed Land Use Designations</b>		
<b>Existing Land Use Designations</b>	<b>Acres</b>	<b>Percentage of Project Area</b>
Hybrid Industrial	277	57%
Open Space	109	23%
Public Facilities	57	12%
Residential Multi-Family	29	6%
Commercial Manufacturing	5	1%
Regional Center	5	1%
<b>Total</b>	<b>483 /a/</b>	

<b>Proposed Land Use Designations</b>	<b>Acres</b>	<b>Percentage of Project Area</b>
Hybrid Industrial	231 /b/	48%
Open Space	103	21%
Public Facilities	70	15%
Public Facilities – Freeways	40 /c/	8%
Residential Multi-Family	29	6%
Commercial Manufacturing	5	1%
Regional Center	5	1%
<b>Total</b>	<b>483 /a/</b>	

/a/ Total acreage for each land use designation and proposed designation reflects rounding to the nearest whole number, which results in a slight difference in existing and proposed land use acreage totals. Total acreage does not include area within City rights-of-way.

/b/ The reduction in “Hybrid Industrial” acreage is due to the redesignation of some publicly-owned parcels to “Public Facilities”.

/c/ The addition of “Public Facilities – Freeways” acreage is not due to new Freeway construction, but instead a result of reclassification of “Public Facilities” properties owned by Caltrans and used as Freeways.

The Proposed Project also includes amendments to the Framework Element to include the CASP as an area that has adopted Chapter 1A of the LAMC (New Zoning Code) and to include the CASP as a corresponding Special District to the Hybrid Industrial, Public Facilities, and Open Space General Plan Land Use Designations.

### Implementing Ordinances

The Proposed Project includes a number of implementing ordinances to update the CASP, which are summarized as follows:

- An ordinance to amend the Zoning Map;
- An ordinance to repeal the Existing CASP and establish the Proposed CASP;
- An ordinance to amend the Cypress Park and Glassell Park Community Design Overlay (CDO) boundaries to no longer apply in the Proposed CASP Area; and
- An ordinance to rescind the CASP Transfer of Floor Area (TFAR) Floor Area Payment Trust Fund.

As the Proposed Project features urban design standards that render portions of the Cypress Park and Glassell Park CDO redundant, the Proposed Project would amend the boundaries of the CDO to no longer apply in the Proposed CASP Area. The Proposed Project would rescind the CASP Floor Area Payment Trust Fund, as the proposed Community Benefits Program will replace the existing TFAR program to ensure greater provision of community benefits such as affordable housing on-site.

## **Amendments to the New Zoning Code**

The Proposed Project includes a New Zoning Code Ordinance to amend Chapter 1A (New Zoning Code) of the Municipal Code to add new regulations to Division 8.3 (Special Districts) of Article 8, and to amend the Zoning Code Maps of Division 1.5 (Zoning Code Maps) of Article 1 of the New Zoning Code.

The Proposed Project would establish a new Special District in the New Zoning Code that utilizes the provisions of the Proposed CASP as the vehicle for regulatory measures for the Proposed CASP Area. Additionally, the Proposed Project includes a revised Targeted Planting Map to include portions of the Proposed CASP Area as a River Planting Area or a Filtration Planting Area to encourage native plants and reduce particulate matter pollution, respectively. The Proposed Project also includes a revised Special Lot Line Map, which would enable the Project to establish tailored Form District and Frontage District standards for the portions of property in the Proposed CASP Area that abut the Los Angeles River.

## **Environmental Analysis/California Environmental Quality Act (CEQA)**

Pursuant to CEQA Guideline Section 15082, on April 8, 2021, the City issued a Notice of Preparation (NOP) for the Draft EIR for a 30-day public review period. A total of 13 comment letters were received regarding the CASP Update. A virtual scoping meeting was held on April 21, 2021, via Zoom. The purpose of the scoping meeting was to provide early consultation for the public to express their concerns about the potential environmental impacts of the proposed project and acquire information and make recommendations on issues to be addressed in the Draft EIR. A Q&A session was held after the presentation to answer questions. The Draft EIR analyzed potential impacts with respect to the following environmental impact areas.

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise and Vibration
- Population and Housing
- Public Services and Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems

The Draft EIR was circulated for a 60-day review period (15 days more than required by law). The review period began on July 20, 2023, with a closing date of September 18, 2023. As the lead agency, the City of Los Angeles received seven (7) written comments on the Draft EIR from public agencies and community groups during the review period. Responses to all comments on the Draft EIR received during the comment period will be included in the Final EIR. The Final EIR will be made available prior to City Council's consideration and adoption of the Proposed Project and certification of the EIR pursuant to CEQA Section 15090.

## Revisions to the City Planning Commission Draft

The Department of City Planning released a Summer 2023 Draft Plan for public review together with the release of the Draft Environmental Impact Report (EIR) on July 20, 2023. A review of written comments and verbal testimony received during the Draft EIR comment period and the Public Hearing identified key priorities and concerns of community stakeholders. Additionally, the results of an inclusionary housing and incentive zoning feasibility study became available in November 2023 (Exhibit D). In response to public testimony, written comments, and additional staff analysis, a number of revisions have been incorporated into the Proposed CASP as presented to the City Planning Commission for consideration and as included in Exhibit B.1.

### Chapter 2 (Form)

The Proposed CASP places each of its Form Districts into Form District Categories based on the New Zoning Code nomenclature. Specifically, Form District CASP-FOR is categorized under the *Low-Rise Medium* category, while Form District CASP-FO1 is categorized under the *Low-Rise Broad* category. Form Districts CASP-FO2 and CASP-FO3 are categorized as *Mid-Rise Broad*.

Additionally, the Proposed CASP would expand the application of Form Districts CASP-FO2 and CASP-FO3 to more properties in the Proposed CASP Area west of the Los Angeles River, allowing for a higher maximum Bonus FAR on those parcels seeking additional floor area under the Community Benefits Program. Form District CASP-FOR, which is sparingly applied to river-adjacent properties and limits Building Coverage to 50 percent of lot area, is revised to allow for a Bonus FAR of 4.0 and a maximum story height of 7 stories, compared to a Bonus FAR of 2.0 and a maximum height of 5 stories, in an effort to provide greater design flexibility given the lot coverage limitations of this Form District and to make the provision of community benefits more feasible.

### Chapter 3 (Frontage)

The Proposed CASP corrects a typographical error in the Summer 2023 Draft Plan, which set a 75-foot minimum planting area for Frontage District CASP-FR1 (River frontage) instead of the 75 percent minimum planting area originally intended.

### Chapter 5 (Use)

The Proposed CASP changes the Use District of a three-acre block bound by Darwin Avenue, Avenue 20, North Main Street, and Avenue 19 from Urban Innovation to Urban Village. This change is in response to concerns raised during the Public Hearing from residents of that block that their neighborhood is residential in character and that the existing Urban Innovation zone did not reflect community needs. Neighboring properties are primarily zoned RD2 and are not subject to the CASP. The change to Urban Village would enhance land use compatibility on this block, which contains single-family dwellings, and it would allow for homeowners to build the Accessory Dwelling Units they have sought to construct but were not able to under Urban Innovation as it would have required adding an industrial or commercial component on their property.

In an effort to facilitate a meaningful net increase in productive space within the Urban Innovation and Urban Center Use Districts, while still facilitating economically feasible housing production, the Proposed CASP includes a revised productive space obligation that scales according to project size. The Proposed CASP requires housing development projects in the Urban Innovation and Urban Center Use Districts to provide 15 percent of their floor area for productive uses, with a minimum obligation of 0.5 FAR, and a maximum obligation of 1 FAR. This change is consistent



with the latest City Planning recommendations for the IX3 Industrial-Mixed Use District under the Downtown Community Plan, in the September 19, 2023, report to the City Council.

The Proposed CASP also includes Use District revisions to better address environmental justice concerns, as discussed in the Issues section of this staff report. Compared to the Summer 2023 Draft Plan, the Proposed CASP introduces additional limits on warehousing uses, outdoor storage, textile manufacturing, and motor vehicle uses. In addition, the sale of alcoholic beverages for on-site consumption or retail would require a Conditional Use Permit under the Proposed CASP, as opposed to being streamlined under the Restaurant Beverage Program. Finally, the Proposed CASP adds language clarifying that the CASP's Urban Village, Urban Center, and Urban Innovation Use Districts are each categorized as an Industrial-Mixed Use District under the New Zoning Code.

### **Chapter 7 (Community Benefits Program)**

The Proposed CASP's Community Benefits Program has been revised to reflect the analysis of the inclusionary housing and incentive zoning study prepared for the Project Area. Specifically, the floor area allowed under the Level 1 incentive of the Community Benefits Program increases from 3.0 FAR to 4.5 FAR. The previous draft's Level 1 FAR of 3.0 is unlikely to be feasible at Set A affordability levels, or at any of the other affordability level sets available in the New Zoning Code, once the costs of the Measure ULA transfer tax are accounted for. Given the overarching purpose of the Proposed Project is to support the production of housing, along with the provision of community benefits like affordable housing that are tied to new development, the incentive zoning system must be carefully calibrated so as to avoid unintended consequences such as deterring housing production.

### **Chapter 8 (Streets)**

The Proposed CASP revises the applicability provisions of Major Streetscape Improvements. Whereas the Summer 2023 Draft Plan requires any discretionary project to implement the applicable portions of the Major Streetscape Improvements list, which include the installation of new traffic signals, the creation of new streets, and the buildout of bicycle lanes, the Proposed Project's Major Streetscape Improvements list is advisory only and serves to inform and support future capital improvements implemented in coordination with City agencies. The applicability of Minor Streetscape Improvements remains unchanged.

## **Measure JJJ Assessment**

**Section 11.5.8** – In November 2016, voters passed Measure JJJ, which was then certified by the County Clerk on December 13, 2016. In accordance with Charter Section 555, Measure JJJ requires that for any amendment to a Community Plan, the Planning Department complete a comprehensive assessment to ensure that proposed changes do not:

1. Reduce the capacity for creation and preservation of affordable housing and access to local jobs; or
2. Undermine California Government Code Section 65915 or any other affordable housing incentive program.

Since the Proposed Project includes amendments to two Community Plan maps, the Downtown Community Plan and Northeast Los Angeles Community Plan, an assessment to ensure compliance with the above-mentioned findings is required.

**The Proposed Project does not reduce the capacity for creation and preservation of affordable housing.**

The Proposed Project includes numerous strategies that support the creation and preservation of affordable housing. A key component of the Proposed Project is a new Community Benefits Program that establishes incentives for the construction of affordable housing. Under this program, housing projects can achieve higher development rights by setting aside a certain percentage of their dwelling units as affordable. The Community Benefits Program in the Proposed Plan has been calibrated to maximize the provision of affordable units within a mixed-income project as informed by an economic feasibility study that reflects current market conditions, development costs, and fees. The new Community Benefits Program under the Proposed Project will require significantly more affordable units than under the existing CASP's current incentive system, in some instances requiring three times the amount of affordable housing than required today. The proposed Community Benefits Program utilizes Affordable Housing Program Set "A" in the New Zoning Code, and it reflects some of the highest affordability percentages of any area in the City. Projects that provide affordable housing units under the Program are required to sign a legally binding covenant to keep these rents affordable to households at that income level for 99 years. This system also serves to streamline the production of affordable housing units, offering ministerial approvals for most housing development projects that participate in the process.

Aside from the Community Benefits Program, the Proposed Plan includes provisions that facilitate the production of new 100 percent affordable housing and permanent supportive housing on public land. The Proposed Project applies a new Public 2 (P2) Use District from the New Zoning Code to publicly-owned parcels in the Proposed CASP Area that currently do not contain housing. In addition to government buildings, structures, offices, and service facilities, the new P2 Use District allows for 100 percent affordable housing projects and transitional shelters by-right, greatly expanding where such housing types could be built. While any such project initiated by the City would likely involve public review and participation, this change resolves a major regulatory hurdle in affordable housing development. Additionally, the Proposed Project would exempt 100 percent affordable housing and permanent supportive housing projects from requirements to provide non-residential floor area in the Urban Innovation and Urban Center Use Districts, helping to increase the feasibility of such projects. The result of these combined changes is that the Proposed Project would allow for 100 percent affordable housing development across the entirety of the Proposed CASP Area, aside from open space and freeways, for the first time.

The majority of existing multi-family units within the Project Area today are covenanted affordable housing or public housing units, with numerous protections to ensure those units remain affordable. The Proposed Project would also support the preservation of naturally occurring affordable housing by safeguarding households against displacement through a land use strategy that concentrates growth in areas that do not contain existing dwelling units. Moreover, numerous local and State tenant protection laws would continue to be in effect under the Proposed Plan, including no net loss of residential units through replacement unit provisions and renter protections under the City's expanded Rent Stabilization Ordinance. By introducing new affordable housing to the Proposed CASP Area, expanding housing supply in areas without existing residents, and ensuring that community benefits are provided when new development occurs, the Proposed Project does not reduce the capacity for the creation or preservation of affordable housing.

**The Proposed Project does not reduce access to local jobs.**

The Proposed Project seeks to retain employment areas with a concentration of jobs, while supporting small and/or legacy businesses, and new types of productive uses and employment spaces that are more job dense and result in fewer adverse impacts. The Proposed Project maintains most of the existing hybrid industrial land as part of the local employment base, recognizing the importance of the industrial sector as a source for employment opportunities with its close proximity to Downtown. Urban Innovation and Urban Center Use Districts would continue to prioritize commercial and light industrial uses that provide a wide range of employment opportunities through a minimum floor area requirement for non-residential uses. The Proposed Project also incentivizes community benefits such as grocery stores, health centers, civic facilities, schools, and small and/or legacy business space through the Community Benefits Program, which provide community-serving local employment opportunities. The Proposed Project increases access and connectivity to jobs through zone changes that facilitate residential, light industrial, and commercial development capacity in areas that are in close proximity to transit stations and transit corridors. The proposed zoning would allow for a flexible mix of uses that can also allow for adaptation to a changing economy over time while allowing for introduction of compatible residential uses and amenities.

**The Proposed Project does not undermine California Government Code Section 65915 or any other affordable housing program.**

The Proposed Project introduces a Community Benefits Program that aligns with other affordable housing programs. The proposed Community Benefits Program prioritizes the provision of affordable housing by requiring that housing development projects participate in the Local Affordable Housing Incentive Program, which requires affordable housing units consistent with California Government Code Section 65915, before offering incentives for other public benefits. Furthermore, the Local Affordable Housing Incentive Program requires the provision of a higher amount of affordable housing units than is currently required under 65915, in exchange for greater incentives, while the provisions and incentives of 65915 would remain available.

## FINDINGS

### Project Location

The Project Area comprises the entire area within the boundaries of the existing Cornfield Arroyo Seco Specific Plan (CASP), which is located within the Downtown, Northeast Los Angeles, and Silver Lake-Echo Park-Elysian Valley Community Plan areas. The Project Area is located entirely within Los Angeles City Council District One and is generally bordered by the neighborhoods of Chinatown to the west, Lincoln Heights to the east, and Cypress Park to the north. The Project Area is approximately 600 acres (0.93 square miles) and is located within the original floodplains of the Los Angeles River and Arroyo Seco water bodies, which are part of the lower Los Angeles River Watershed.

Interstate 5 (I-5) and State Route-110 (SR-110) bisect the northern portion of the Project Area. Entrances and exits to and from SR-110 are located on the northern perimeter of the Project Area. Entrances and exits to I-5 are located at North Broadway/Pasadena Avenue and at Avenue 26 across from Lacy Street. Other major arterials located in the Project Area include Figueroa Street in the northern portion of the Project Area, San Fernando Road in the central portion of the Project Area, and Spring Street, Broadway Avenue, and Main Street in the southern portion of the Project Area. The Los Angeles County Metropolitan Authority (LA Metro) A Line (formally L Line and Gold Line) cuts across the northern portion of the Project Area, including the Chinatown Station and Lincoln Heights / Cypress Park Station.

### **I. Finding Requirements for General Plan Amendments and Zoning Ordinances**

#### City Charter Findings

**Charter Section 555** – Charter Section 555 provides that the City Council may amend the General Plan in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has a significant social, economic, or physical identity. No legislative findings are required to amend the General Plan. The Proposed Project proposes amendments to two elements of the General Plan: (1) amendments to the General Plan Land Use Map for the Downtown Los Angeles and Northeast Los Angeles Community Plan Areas, and (2) amendments to the Framework Element. All the amendments to the City's General Plan are related to areas of the City within the Project Area, an area which has a significant social, economic, and physical identity as reflected in this report and the Attachments and the whole of the record on the Proposed Project.

**Charter Section 556 and 558** – Charter Section 556 and 558 require the City Planning Commission and the City Council to adopt the following findings when taking any action to (i) create or change a zone or zoning district created for the purpose of regulating the use of land, or (ii) zoning the permissible uses, height, density, bulk, location or use of buildings or structures, size of yards, open space, setbacks, building line requirements, and other similar requirements, including specific plan ordinances (collectively zoning ordinances):

- (1) The zoning ordinance is in substantial conformance with the purposes, intent, and provisions of the General Plan.
- (2) The zoning ordinance is in conformity with public necessity, convenience, general welfare, and good zoning practice.

Based upon this, the above findings are required for all of the following ordinances which are part of the Proposed Project: the amendment to the City's Zoning Map, the repeal of the Existing CASP and the establishment of the Proposed CASP, the amendments to the New Zoning Code, the amendment to the Cypress Park and Glassell Park Community Design Overlay (CDO)

boundaries, and the rescission of the CASP Floor Area Payment Trust Fund (collectively, “Implementing Zoning Ordinances”).

### **LAMC Section 12.32 C Findings**

All the Implementing Zoning Ordinances must also comply with the procedures in LAMC Section 12.32 C, which provides procedures for zoning ordinances. Section 12.32 C incorporates the Charter findings in Section 556 and 558. It requires the CPC to adopt a finding that a proposed zoning ordinance is in conformity with public necessity, convenience, general welfare, and good zoning practice. The City Council is required to make the same finding before adopting the zoning ordinance, as well as a finding that the zoning ordinance is consistent with the General Plan.

### **State General Plan Consistency Requirements**

In addition to the requirement for zoning ordinances to be consistent with the General Plan (vertical consistency), state law also requires that the General Plan must have internal consistency among its elements (horizontal consistency). The City of Los Angeles has the responsibility to maintain and implement the City’s General Plan. Community Plans comprise the Land Use Element of the City’s General Plan and are the final determination of land use categories, zoning, development requirements, and consistency findings. The updated Community Plan(s) and amended Framework Element must be consistent with the other elements and components of the General Plan. Those elements are Land Use, Circulation (Mobility), Housing, Conservation, Open Space, Noise, Safety, and Health Element. In addition to the eight mandated elements, the City’s General Plan include a Framework Element, an Infrastructure Systems Element, a Public Facilities and Services Element, and an Air Quality Element. State law does not require the City to adopt consistency findings or any other findings to amend a Land Use element. The findings below for Section 556 and 558 and LAMC Section 12.32 also discuss internal consistency of the Proposed Project and the amended Framework Element with each other and with the rest of the City’s General Plan. This consistency discussion is provided for the City Planning Commissions consideration in approving and recommending the Proposed Project and its implementing zoning ordinances and its determination that the Proposed Project is consistent with the City’s General Plan.

## **II. Findings for the Implementing Zoning Ordinances Under Charter Section 556 and 558 and LAMC Section 12.32**

For all of the reasons provided below and based on the whole of the record of proceedings, the adoption of the amendment to the City’s Zoning Map, the repeal of the Existing CASP and the establishment of the Proposed CASP, the amendments to the New Zoning Code, the amendment to the Cypress Park and Glassell Park Community Design Overlay (CDO) boundaries, and the rescission of the CASP Floor Area Payment Trust Fund (collectively, “Implementing Zoning Ordinances”) are:

- (1) in substantial conformance with the purposes, intent, and provisions of the General Plan.
- (2) in conformity with public necessity, convenience, general welfare, and good zoning practice.

The findings for the amendment to the City’s Zoning Map, the repeal of the Existing CASP and the establishment of the Proposed CASP, and the amendments to the New Zoning Code are discussed together in one section. The findings for each of the other remaining ordinances mentioned above are discussed in individual sections.

## A. Findings for Adoption of the Amendments to the Zoning Code and Maps and the Repeal of the Existing CASP and Establishment of the Proposed CASP

### Charter and Code Findings

#### Framework Element

The following “findings” are listed under categories similar to the categories found in the Framework Element, which although it does not mandate any particular policy or program be included in a Specific Plan, helps to guide Specific Plan updates:

With respect to ***distribution of land use***, the General Plan Framework Element states the following:

*Objective 3.1: Accommodate a diversity of uses that support the needs of the City’s existing future residents, businesses, and visitors.*

*Policy 3.1.1: Identify areas on the Long-Range Land Use Diagram and in the Community Plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.*

*Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.*

The Proposed Project provides for a variety of land uses to meet the diverse needs of the community, including housing that accommodates varying household sizes, and commercial and industrial businesses that contribute to the local and regional economy. The Proposed Project includes a recommended pattern of land use that directs future growth to areas of the Project Area best served by existing transportation infrastructure and facilitates mixed-use development along corridors and near transportation nodes. Incentivizing new, locally-serving small businesses through a Community Benefits Program further allows current and future residents of the Project Area to access household goods and grocery items within walking or biking distance of their homes, reducing reliance on vehicle travel. The Proposed Project directs new housing growth in blocks near fixed rail transit stations and in proximity to schools and jobs, which reduces the number and length of vehicle trips, thus reducing greenhouse gas emissions associated with local trip generation in accordance with recent legislation (Senate Bill 375).

With respect to ***population and employment growth***, the General Plan Framework Element states the following:

*Objective 3.3: Accommodate projected population and employment growth within the City and each Community Plan Area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.*

The State of California requires that cities plan for changes in population, housing demand and employment. If growth is anticipated, each city must accommodate a share of the region’s projected growth. These projections are developed by the Southern California Association of Governments (SCAG), the Metropolitan Planning Organization for the six-county region. SCAG is mandated by federal and state governments to prepare the Regional Transportation Plan (RTP), a long-range regional transportation plan that addresses regional growth, air quality and other issues, based on an analysis of past and future regional trends. The RTP informs SCAG’s

projection of growth for the region. State and federal regulations require that local plans be consistent with the Regional Air Quality Plan and the Regional Mobility Plan.

Consistent with the above objective contained in the Framework Element, the Proposed Project accommodates projected population and employment growth within the Project Area and includes strategies that are aimed at providing a balance of land uses for the projected population and employment growth. The Proposed Project's zoning capacity is estimated to reasonably accommodate approximately 56,000 residents and 20,000 dwelling units by 2040, providing enough capacity to accommodate the SCAG projections for the area of 14,000 residents and 5,000 dwelling units, while the Proposed Project's zoning capacity for employment is reasonably anticipated to be 8,000 jobs compared to SCAG's projections of 9,000 jobs by 2040. Moreover, the City has discretion in how it allocates growth across the City, and within Community Plan Areas, to meet various objectives and has historically allocated more growth to the Project Area than SCAG has. This allocation is also consistent with SCAG's 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) and 2020-2045 RTP/SCS goals of reducing Vehicle Miles Traveled (VMT) by accommodating a majority of new housing in areas within half a mile of major transit stops or high-quality transit corridors, as well as SCAG's objective of generally directing future growth to High Quality Transit Areas (HQTAs).

In addition, the Proposed Project meets the requirements of the Sustainable Communities Strategy adopted by SCAG as part of the latest update to the Regional Transportation Plan (RTP) in accordance with Assembly Bill 32, the California Global Warming Solutions Act of 2006, and Senate Bill 375. These legislative acts require that California cities lay out a vision for regional growth that considers the relationship of land use to transportation in reducing vehicle trips to achieve greenhouse gas emission reduction targets. Since SCAG anticipates this level of growth in the Project Area, along with other transit-served communities in the City and adjacent to Downtown Los Angeles, the Proposed Project's increases in development potential are growth-accommodating rather than growth-inducing, consistent with policies in the General Plan Framework. The Proposed Project accommodates population and employment growth primarily in areas served by transit and along mixed-use transit corridors, consistent with the Framework Element's policies.

With respect to ***economic development***, the Framework Element states the following:

*Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.*

*Policy 7.2.8: Retain the current manufacturing and industrial land use designations, consistent with other Framework Element policies, to provide adequate quantities of land for emerging industrial sectors.*

*Policy 7.2.11: Ensure that the City has sufficient quantities of land suitable to accommodate existing, new and relocating industrial firms, whose operations are appropriate to a specific location in Los Angeles.*

*Policy 7.3.2: Retain existing neighborhood commercial activities within walking distance of residential areas.*

*Policy 7.9.2: Concentrate future residential development along mixed-use corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements.*

*Policy 7.10.2: Support efforts to provide all residents with reasonable access to transit infrastructure, employment, and educational and job training opportunities.*

Consistent with the above policies, the Proposed Project supports sustainable development principles to promote economic development throughout the Project Area. The zoning strategies of the Proposed Project seek to promote jobs, housing, and visitor serving and enhance commercial districts with a diversity of uses that serve the needs of the community. The Proposed Project encourages development that enhances commercial areas by supporting industry clusters, neighborhood retail, and local employment, including provisions to support small businesses and new industries.

The Proposed Project seeks to preserve employment areas with a concentration of jobs, while supporting small and/or legacy businesses, and new productive uses and employment spaces such as light industrial and general commercial uses. The Proposed Project maintains most of the existing hybrid industrial land as part of the local employment base, recognizing the importance of the industrial sector as a source for employment opportunities and in proximity to Downtown. Urban Innovation and Urban Center Use Districts would continue to prioritize commercial and light industrial uses that provide a wide range of employment opportunities through a minimum floor area requirement for non-residential uses. The Proposed Project also incentivizes community benefits such as grocery stores, health centers, civic facilities, schools, and small and/or legacy business space through the Community Benefits Program, which provide community-serving local employment opportunities. The Proposed Project increases access and connectivity to jobs through zone changes that facilitate residential, light industrial, and commercial development capacity in areas that are in close proximity to transit stations and transit corridors. The proposed zoning would allow for a flexible mix of uses that can also allow for adaptation to a changing economy over time while allowing for introduction of compatible residential uses and amenities.

The Proposed Project is consistent with the Framework Element in that it concentrates future growth around transit stations and encourages the development of complete communities with a range of employment and housing opportunities supported by services and amenities. The Proposed Project accommodates population and employment growth along major commercial transit corridors, consistent with the Framework Element's policies.

With respect to **transit stations**, the General Plan Framework Element states the following:

*Goal 3K: Transit stations to function as a primary focal point of the City's development.*

*Objective 3.15: Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.*

*Policy 3.15.3: Increase the density generally within one quarter mile of transit stations, determining appropriate locations based on consideration of the surrounding land use characteristics to improve their viability as new transit routes and stations are funded in accordance with Policy 3.1.6.*

*P18: Amend the Zoning Ordinance to implement the policies and standards of the General Plan Framework Element. The revisions provide tools needed to which are described below and are representative of the actions that may be taken.*

*b. Establish incentives to stimulate the types of use desired (e.g., mixed-use, community facilities in centers, districts, and boulevards, and other) and*



*development in appropriate selected targeted growth areas as defined in the community plans, such as density bonuses for mixed-use development, parking in proximity to transit stations and transit corridors, "by-right" entitlements with administrative review and approval for traffic or other necessary studies and mitigation, and other.*

The Proposed Project includes zoning regulations that concentrate the highest development potential near transit stations and promote a mix of uses that are accessible to transit. The Proposed Project directs commercial and neighborhood serving uses towards walkable and accessible corridors. The Proposed Project primarily encourages growth around fixed-rail transit stations, primarily increasing floor area regulations in areas within a half-mile of the Metro A Line stations, such as the areas around the Chinatown, Lincoln/Cypress, and Heritage Square stations. This growth is balanced by preserving existing surrounding lower-density residential areas of the community from redevelopment, using zoning tools and plan policies to reduce the development impact on residential neighborhoods, such as the retention of the RD1.5 and RD2 zone and removing those parcels from the proposed CASP's boundaries. In addition, the Proposed Project includes development incentives through the Community Benefits Program, such as bonuses for mixed-income and 100 percent affordable housing developments, with a bonus of up to 5.0 FAR near transit stations, to achieve the goal of more affordable housing development within the Project Area.

With respect to **industrial lands**, the General Plan Framework Element states the following:

*Goal 3J: Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.*

*Objective 3.14: Provide land and supporting services for the retention of existing and attraction of new industries.*

*Policy 3.14.3: Promote the re-use of industrial corridors for small scale incubator industries.*

*Policy 3.14.6: Consider the potential re-designation of marginal industrial lands for alternative uses by amending the community plans based on the following criteria:*

- a. Where it can be demonstrated that the existing parcelization precludes effective use for industrial or supporting functions and where there is no available method to assemble parcels into a unified site that will support viable industrial development;*
- b. Where the size and/or the configuration of assembled parcels are insufficient to accommodate viable industrial development;*
- c. Where the size, use, and/or configuration of the industrial parcels adversely impact adjacent residential neighborhoods;*
- d. Where available infrastructure is inadequate and improvements are economically infeasible to support the needs of industrial uses;*
- e. Where the conversion of industrial lands to an alternative use will not create a fragmented pattern of development and reduce the integrity and viability of existing industrial areas;*

*f. Where the conversion of industrial lands to an alternative use will not result in an adverse impact on adjacent residential neighborhoods, commercial districts, or other land uses;*

*g. Where it can be demonstrated that the reduction of industrial lands will not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts; and/or*

The Proposed Project includes land use designations and zoning districts that support job opportunities by establishing regulations that allow the City to prioritize and retain land for light industrial, live/work, and supporting uses in the Proposed CASP Area. The Project Area contains a significant amount of industrial space, mainly composed of warehousing uses, along with numerous vacant or underutilized industrial properties. In more recent years traditional manufacturing jobs have declined in the Proposed CASP Area, while growth in warehousing has primarily occurred outside of the Specific Plan, due to the Proposed CASP Area's more aged inventory of industrial buildings with smaller floorplates and parcel sizes than the new warehouses being developed today. To promote the development of employment-focused districts, while taking into consideration the evolution of industrial uses in the greater CASP Area, the Proposed Project has a Hybrid Industrial land use designation. The proposed zoning would allow for a flexible mix of uses to support a variety of employment opportunities including light industrial uses in tandem with live/work and limited residential uses, consistent with policies to provide land for the retention and attraction of new industries but prohibit new heavy industrial uses that pose health risks. For example, both the Urban Innovation and Urban Center Use Districts require that a minimum of 15 percent of floor area or 0.5 FAR, whichever is greater, be allocated to productive uses such as Light Industrial within any mixed-use development that contains dwelling units or live/work units. The range of light industrial uses permitted under this scenario is more job dense than the existing warehousing uses that comprise the majority of industrial buildings in the Project Area today. Through the proposed zoning, which requires a baseline level of job-producing uses, the Proposed Project affirms an employment focus for the Proposed CASP Area, while also responding to the need for a greater diversity of uses other than warehousing to ensure the viability of future employment. The Proposed Project includes zoning tools for these areas that allow for a flexible mix of uses to support economic development including light industrial, commercial, live/work, and limited residential uses consistent with the policies above to providing land for the retention and attraction of new industries.

With respect to **residential neighborhoods**, the General Plan Framework Element states the following:

*GOAL 3C: Multifamily neighborhoods that enhance the quality of life for the City's existing and future residents.*

*Objective 3.7: Provide for the stability and enhancement of multifamily residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.*

The Proposed Project encourages and directs new mixed-use housing development in areas closest to fixed-rail transit and bus lines to help enhance the quality of life for residents and expand access to amenities, services, and employment opportunities. The proposed zoning includes open space, sustainability, and development standards that further enhance the quality of life of residents. The proposed zoning would also require a 1:1 ratio of replacing demolished RSO units with Lower Income units in a new development, covenanted for a term of 99 years when a project uses the proposed Community Benefits Program or another incentive program such as Density

Bonus. This ensures that in cases where RSO units may be lost, affordable units are included as part of the new development. The Proposed Project's Community Benefits Program introduces a requirement that mixed-income projects include 20 percent of units in a new development as 2-bedroom units or greater and introduces a new income category for Acutely Low Restricted Affordable Units, for households making 0-15 percent of the Area Median Income (AMI). This introduces affordable housing that is affordable to households in Boyle Heights and requires new mixed-income developments utilizing the program to include units that can accommodate multi-generational and other larger household sizes.

With respect to **Regional Centers**, the Framework Element states the following:

*GOAL 3.F: Mixed-use centers that provide jobs, entertainment, culture, and serve the region.*

*Objective 3.10: Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.*

A Regional Center is a hub of regional commerce and activity that serves a large area and contains a diversity of uses such as retail, commercial, government buildings, major entertainment and cultural facilities, and professional offices. The Framework Element identifies the area near the Chinatown Metro A Line Station as a Regional Center within or adjacent to the Proposed CASP Area. The scale of development, including the range of Form Districts, and uses allowed in and around this area conforms with the Regional Center designation, including a mix of multi-family, commercial, and employment uses near transit.

With respect to **Community Centers**, the Framework Element states the following:

*Goal 3E: Pedestrian-oriented, high activity, multi- and mixed-use centers that support and provide identity for Los Angeles' communities.*

*Objective 3.9: Reinforce existing and encourage new community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work and visit, both in daytime and nighttime.*

A Community Center is a focal point for surrounding residential neighborhoods and includes a diversity of uses such as small offices and overnight accommodations, cultural and entertainment facilities, schools, and libraries, in addition to neighborhood-oriented services. The Framework Element identifies a Community Center along North Broadway, Daly Street, and West Avenue 26, east of the Los Angeles River. The Proposed Project includes zoning districts that support a mix of commercial and housing, including provisions for affordable housing, to promote a diverse mix of uses that contribute to pedestrian-oriented, high activity areas.

## **Other General Plan Elements**

The Proposed Project is in substantial conformance with the purpose, intent, and provisions of the General Plan in that they help to implement policies in a number of other General Plan

Elements in addition to the Framework Element discussed above, including the Conservation Element, the Housing Element, the Circulation Element (Mobility Plan 2035), and the Plan for a Healthy Los Angeles.

### **Conservation Element**

With respect to cultural and historic resources, the Conservation Element states the following:

*Conservation Element Objective (Chapter II, Section 5): protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.*

*Conservation Element Policy (Chapter II, Section 5): continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities.*

The Proposed Project would continue to protect important cultural and historic sites and resources by not introducing any features that would preclude implementation of or alter the regulatory control ordinances that locally designated historical resources or listed in or determined to be eligible for listing in the National or State Registrar are subject to, including the Cultural Heritage Ordinance and LAMC building permit regulations. As a result, these resources would continue to be subject to environmental review under the California Environmental Quality Act. Nothing in the Proposed Project would alter the current City's practice for any discretionary project, which involves the Office of Historic Resources (OHR) reviewing any project involving a property identified in SurveyLA as potentially eligible for listing, and requiring avoidance measures, unless OHR agrees the resource is not eligible for listing. The Office of Historic Resources typically recommends rehabilitation efforts that are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. Such modifications may include retention of significant character-defining features and adjustments to setbacks, step backs, and height, as well as other project features related to context-sensitive project design. If an impact is not avoidable, the Planning Department will require an Environmental Impact Report be prepared to assist in identifying potentially feasible measures to mitigate or avoid significant adverse changes to the significance of the resource.

### **Housing Element (2021-2029)**

With respect to housing, the Housing Element states the following:

*Policy 1.1.1: Collect, report, and analyze existing housing needs (such as overcrowding, cost burden and vacancy rates) and use this information to project and plan for housing needs at a local and citywide level balancing other factors such as job and transit access.*

*Policy 1.1.9: Develop and integrate anti-displacement strategies that further Citywide Housing Priorities into land use and planning strategies.*

*Policy 1.2.6: Create new citywide and local land use incentives and programs that maximize the net gain of affordable housing and produce housing that meets Citywide Housing Priorities. Explore varied affordability ratios, the feasibility of inclusionary zoning requirements, and a greater mix of incomes based on market areas.*

*Policy 1.2.10: Prioritize the development of Affordable Housing on public land.*

*Policy 2.1.1: Incentivize and/or require the preservation and replacement of affordable housing, so demolitions and conversions do not result in the net loss of the City's stock of accessible, safe, healthy and affordable housing.*

*Policy 3.1.5: Develop and implement environmentally sustainable urban design standards and pedestrian-centered improvements in development of a project and within the public and private realm such as shade trees, parkways and comfortable sidewalks.*

*Policy 3.1.7: Promote complete neighborhoods by planning for housing that includes open space, and other amenities.*

*Policy 3.2.2: Promote new multi-family housing, particularly Affordable and mixed-income housing, in areas near transit, jobs and Higher Opportunity Areas, in order to facilitate a better jobs-housing balance, help shorten commutes, and reduce greenhouse gas emissions.*

*Policy 4.3.2: Ensure that all neighborhoods have a range of housing typologies to provide housing options for residents to remain in the same community, when and if their needs change.*

*Policy 4.3.3: Examine land use practices that perpetuate racial exclusion and inequities including but not limited to: single-family / low density zoning, minimum lot size requirements, location of noxious uses, and subjective design review standards. Introduce context specific reforms that further Citywide Housing Priorities.*

The Proposed Project is in substantial conformance with the policies and objectives of the Housing Element of the General Plan. The Proposed Project addresses housing needs through a multi-pronged approach, encouraging and directing new housing development in areas closest to fixed-rail transit and bus lines, as well as near jobs. The proposed zoning addresses existing concerns of overcrowding and retention of existing Rent Stabilization Ordinance (RSO) and affordable housing units, allowing for infill development and additional housing units to be built on properties with units subject to the RSO. The proposed zoning also requires a 1:1 ratio of replacing demolished RSO units with Lower Income units in a new development, covenanted for a term of 99 years. This ensures that in cases where RSO units may be lost, affordable units are included as part of the new development. The Proposed Project's zoning regulations increase the development potential of areas adjacent to a Regional Center, conforming with Housing Element policies to direct new housing close to jobs, and by addressing exclusionary zoning practices.

The Proposed Project prioritizes housing and neighborhoods that promote wellness, longevity, and sustainability, by requiring Lot Amenity Space and Residential Amenity Space as part of projects with residential uses, through zoning requirements for landscaping, and through standards encouraging street trees and improvements to the public realm. Finally, the Proposed Project's Community Benefits Program introduces a requirement that projects include 20 percent of units in a new development as 2-bedroom units or greater and introduces a new income category for Acutely Low Restricted Affordable Units, for households making 0-15 percent of the Area Median Income (AMI). This introduces affordable housing that is affordable to households in the Project Area and requires new mixed-income developments utilizing the program to include units that can accommodate multi-generational and other larger household sizes.

## **Safety Element**

With respect to community health and wellbeing, the Safety Element states the following:

*Policy 1.2.1 Environmental Justice: In keeping with the Plan for a Healthy LA, build a fair, just and prosperous city where everyone experiences the benefits of a sustainable future by correcting the long running disproportionate impact of environmental burdens faced by low-income families and communities of color.*

*Policy 1.2.5 Housing and Development: In keeping with the Housing Element, create housing opportunities that enhance affordability, equity, livability, sustainability and resilience.*

*Policy 1.2.8 Industrial Emissions and Air Quality Monitoring: In keeping with the Air Quality Element, ensure that every Angeleno can breathe clean, healthy air by addressing air pollution from all sources, with a particular emphasis on prioritizing the health and wellbeing of overburdened families and delivering environmental justice.*

The Proposed Project is consistent with the Safety Element. The Proposed Project addresses long-standing issues of environmental injustice in the Project Area by addressing zoning incompatibility, adding standards for new light industrial and general commercial uses, and improving housing affordability.

### **Circulation Element (Mobility Plan 2035)**

The City's Circulation Element (Mobility Plan 2035) contains a number of important policies related to the Proposed Project, including:

*Policy 1.2 Complete Streets: Implement a balanced transportation system on all streets, tunnels and bridges using complete streets principles to ensure the safety and mobility of all users.*

*Policy 2.3 Pedestrian Infrastructure: Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.*

*Policy 2.14 Street Design: Designate a street's functional classification based upon its current dimensions, land use context, and role.*

*Policy 3.1 Access for All: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement – as integral components of the City's transportation system.*

*Policy 3.3 Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.*

*Policy 4.13 Parking and Land Use Management: Balance on-street and off-street parking supply with other transportation and land use objectives.*

*Policy 5.2 Vehicle Miles Traveled (VMT): Support ways to reduce vehicle miles traveled (VMT) per capita.*

The Proposed Project is consistent with the Mobility Plan. The Proposed Project improves mobility and access by directing future employment and housing near transit stations and frequent bus transit and promoting the development of mixed-use neighborhoods, thereby helping to reduce vehicle trip generation and improve air quality. The Proposed Project includes zoning strategies that would reduce per capita VMT and increase the mode share of transit, walking, and bicycling.

in the Proposed CASP Area. The Proposed Project includes standards that promote pedestrian friendly building design, does not include minimum automobile parking requirements, and incentivizes inclusion of publicly accessible open spaces within new development. The Proposed Project supports land uses that promote a pedestrian-oriented environment and utilize the public right-of-way for pedestrian-oriented uses as well as projects that expand the public realm. The Streets chapter of the Proposed Plan Project in particular sets forth standards for new development including requirements to implement Basic Streetscape Improvements and provides policy direction for the future implementation of Major Streetscape Improvements that enhance the pedestrian and bicycle experience.

### **Health Element (Plan for a Healthy Los Angeles)**

With respect to livable neighborhoods, the Health Element (Plan for a Healthy Los Angeles) states the following:

*Policy 1.5 Plan for Health: Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.*

*Policy 2.1 Access to Goods and Services: Enhance opportunities for improved health and well-being for all Angelenos by increasing the availability of and access to affordable goods and services that promote health and healthy environments, with a priority on low-income neighborhoods.*

*Policy 2.7 Access to Health Services: Encourage the equitable distribution of health service providers: including federally qualified health centers, hospitals, pharmacies, urgent care, and mental health services, to ensure that every Angeleno has access to preventive care and medical treatment.*

*Policy 5.2 Reduce negative health impacts for people who live and work in close proximity to industrial uses and freeways through health promoting land uses and design solutions.*

*Policy 5.4 Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.*

The Proposed Project's zoning regulations address longstanding impacts of environmental injustice in the Project Area. To better address land use compatibility, the Proposed Project further regulates the types of light industrial and commercial uses allowed in its various Use Districts. In response to concerns raised about truck trips and the other deleterious impacts of warehousing uses on surrounding residential neighborhoods and schools, the Proposed Project adds a new limitation on new wholesale trade or warehousing uses to 25,000 square feet in size and applies additional standards including use enclosures. Any new proposed wholesale trade or warehousing use in excess of that size would be required to obtain a Conditional Use Permit from the Zoning Administrator, subject to required findings about compatibility, to regulate the scale and intensity of such uses and ensure public participation in the review process. These limitations on new warehouses serve to address the impact of large warehousing uses on diesel emissions by further minimizing potential truck trips. The Proposed Project also places limits on new auto repair, auto body shops, and gas stations and does not allow for new outdoor storage of cargo containers, commercial vehicles, motor vehicle impound, and auto scrap yards, which is a use presently found in the Project Area adjacent to existing dwelling units. Under the Proposed Project, all new light-industrial uses would be subject to use standards that require screening when adjacent to sensitive and residential uses, as well as requirements to be fully indoors to minimize impact from operational activities. Moreover, new textile uses that involve processing

and manufacturing of fabrics will not be permitted, due to the high potential of pollution from dyes and chemicals and intensive processing methods.

The Proposed Project would also embed “Clean Up Green Up” (CUGU) standards and regulations (Ordinance No. 184246), which were originally devised for environmental justice communities affected by industrial uses, into the Proposed Project’s zoning. The CUGU regulations include buffering and landscape standards to better separate noxious uses from sensitive uses, locational standards such as requiring mechanical equipment or loading areas to be oriented away from sensitive uses, and use limitations for certain noxious uses if other similar uses exist within a defined radius. In addition, the CUGU program resulted in changes to the Building Code that required specified air filtration methods for residential projects adjacent to freeways. This standard remains in effect citywide.

Further, recognizing the impact of access to housing on community and individual health, the Proposed Project introduces tailored incentives that facilitate the production of mixed income and 100 Percent Affordable Housing and requirements to maintain rent stabilized units and existing affordable housing stock. Moreover, the Proposed Project’s Community Benefits Program would enhance access to goods and services, as well as access to health services, by incentivizing Community Facilities such as schools, social services, public facilities, daycare services, libraries, and grocery stores.

### **Downtown Community Plan**

The Proposed Project is consistent with the policies of the Downtown Community Plan, including the following:

*Policy 1.3: Establish an incentive zoning system that delivers public benefits such as affordable housing, public open space, historic preservation, and community facilities to Downtown communities.*

*Goal 2: Housing production and preservation through public and private action that results in a housing supply to meet projected growth in a manner that is safe, livable, and affordable to a full range of income levels; reinforces the character of neighborhoods; and adds to the vitality of Downtown.*

*Policy 2.2: Provide incentives and simplify zoning regulations where possible to expedite the production of housing.*

*Policy 2.3: Expand the areas where housing is permitted to meet projected housing needs.*

*Policy 2.7: Promote preservation and maintenance of existing housing stock at the foundation of the community’s affordable housing supply.*

*Goal 3: Accessible, healthy, and safe housing opportunities affordable to lower income households.*

*Policy 3.2: Facilitate the preservation of existing residential units, and avoid displacement of current Downtown residents.*

*Policy 4.6: Incentivize the creation of housing options that are affordable to and occupied by lower income households, especially housing at the deepest levels of affordability, near transit.*



*Policy 5.3: Prioritize the development of permanent supportive housing and affordable housing at extremely low and deeply low-income levels for residents transitioning out of supportive housing.*

*Policy 7.5 Create flexible zoning tools that can respond to future innovation while supporting communities current needs.*

*Policy 8.7: Incentivize mixed-use and commercial developments to provide long-term leases and reduced rent to community-serving small businesses to prevent the displacement of community-serving small businesses as a result of new development.*

*Policy 9.9: Encourage mixed-use and commercial development to provide retail spaces conducive to community serving small businesses and business incubation.*

*Policy 34.4: Support walkable neighborhoods with an active and livable street life that is shared by all modes, including pedestrians, cyclists, and transit users.*

*Policy 49.5: Encourage tree planting and landscaped screening in areas with industrial uses to improve air quality.*

The Proposed Project establishes a Community Benefits Program for the Proposed CASP Area that delivers public benefits such as affordable housing, public open space, and community facilities, in conjunction with adopting and implementing the New Zoning Code, which simplifies zoning regulations to expedite the production of housing. The Proposed Project accommodates growth in the Proposed CASP Area to meet the needs of current and future residents, increasing residential zoning capacity by approximately 7,000 housing units reasonably anticipated by 2040 compared to the Existing CASP. The proposed zoning concentrates future development in close proximity to transit stations and areas with underutilized or vacant land that have no existing residents, promoting sustainable infill growth and reducing vehicle trips per capita while also relieving development pressures on existing residential neighborhoods. The Proposed Project's zoning accommodates a diverse mix of commercial, residential, and light industrial uses, and allows for multiple uses within the same structure. Moreover, the Proposed Project includes a new Community Benefits Program that promotes the provision of housing for various income levels as well as for various household sizes, by including FAR incentives for development projects that set aside units for Acute Low, Extremely Low, Very Low, and/or Low Income households and including a requirement that at least 20 percent of units have two bedrooms or more. The Proposed Project also includes comprehensive strategies that minimize both the direct and indirect displacement of residents, such as concentrating growth in areas with underutilized or vacant land that do not have existing residents and expanding the production of deed-restricted affordable housing, and future development projects would be subject to unit replacement and tenant protection measures that would continue to be in effect under the Proposed Project. The Proposed Project includes a new Acutely Low Income category as part of its incentive zoning system and supports the production of 100 percent affordable and permanent supportive housing. The proposed zoning would allow for a flexible mix of uses to support a variety of employment opportunities including light industrial and commercial uses in tandem with live/work and residential uses, consistent with policies to provide land for the retention and attraction of new industries but prohibit new heavy industrial uses that pose health risks. The Proposed Project includes a FAR incentive for the provision of below-market rent for small and/or legacy businesses within a development project, Frontage Districts and Development Standards Districts that promote a pedestrian-oriented environment, tree planting and landscaping screening standards to improve air quality, and streetscape standards that encourage street trees.

## **Northeast Los Angeles Community Plan**

The Proposed Project advances the following goals, objectives, and policies of the Northeast Los Angeles Community Plan:

*Goal 1: A safe, secure, and attractive residential environment for all economic, age, and ethnic segments of the community.*

*Objective 1-1: To preserve and enhance existing residential neighborhoods.*

*Policy 1-1.1: Protect existing stable single-family and other lower density residential neighborhoods from encroachment by higher density residential and other uses that are incompatible as to scale and character or would otherwise diminish the quality of life.*

*Policy 1-2.2: Locate higher residential densities near commercial and institutional centers, light rail transit stations, and major bus routes to encourage pedestrian activity and use of public transportation, providing that infrastructure, public service facilities, utilities, and topography will fully accommodate this development.*

*Policy 1-2.3: Encourage mixed-use development in selected commercially zoned areas.*

*Objective 1-6: To promote and ensure the provision of fair and equal housing opportunities for all persons regardless of income and age groups or ethnic, religious, or racial background.*

*Policy 1-6.1: Promote individual choice in type, quality, price, and location of housing.*

*Policy 1-6.2: Promote mixed use in all multiple-family residential projects in commercial zones.*

*Policy 1-6.3: Ensure that redevelopment activity minimizes displacement of residents.*

*Objective 2-1: To conserve and strengthen potentially viable commercial areas in order to stimulate and revitalize existing businesses and create opportunities for appropriate new commercial development.*

*Objective 3-1: To resolve conflicts between industrial uses and other adjacent uses.*

*Policy 3-1.1 Preserve existing industrial areas that have the greatest viability and compatibility and the least adverse impact on nearby uses.*

*Objective 3-3: To retain industrial plan designations in order to attract appropriate industrial development to maintain the industrial employment base for community residents.*

Through a Community Benefits Program, the Proposed Project will help to ensure the provision of housing for different segments of the community, including low-income households as well as multi-generational households. The proposed zoning strategy concentrates development away from existing residential neighborhoods and removes existing lower density RD1.5 and RD2 zoned portions of the Project Area from the proposed Specific Plan boundaries to prevent encroachment. The Proposed Project also includes comprehensive strategies that minimize both the direct and indirect displacement of residents, such as concentrating growth in areas with underutilized or vacant land that do not have existing residents and expanding the production of deed-restricted affordable housing, and future development projects would be subject to unit

replacement and tenant protection measures that would continue to be in effect under the Proposed Project. The Proposed Project promotes a mix of commercial, residential, and light industrial uses, which strengthens the viability of employment uses. Moreover, the Proposed Project includes numerous environmental justice measures, such as use limitations and standards, to resolve conflicts between industrial uses and other adjacent uses, and it includes a Hybrid Industrial land use designation throughout the Proposed CASP Area to support the growth of future industries that do not have noxious emissions or otherwise pose a health risk to surrounding uses.

### **Silver Lake-Echo Park-Elysian Valley Community Plan**

The Proposed Project supports the following goals, objectives, and policies of the Silver Lake-Echo Park-Elysian Valley Community Plan:

*Goal 5: A community with sufficient open space in balance with new development to serve the recreational, environmental, and health needs of the community.*

*Objective 5-1 Preserve existing and develop new open space resources.*

*Policy 5-1.1 Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan area.*

*Program: The Plan Map designates areas for open space, thus protecting them from encroachment by more intense uses.*

The Proposed Project would revise the boundaries of the CASP to exclude the only few parcels in the Silver Lake-Echo Park-Elysian Valley Community Plan that are within the existing CASP. These vestigial parcels are currently zoned Greenway, and they would be rezoned as OS (Open Space) consistent with their existing Open Space General Plan Land Use Designation in the Silver Lake-Echo Park-Elysian Valley Community Plan Map. The proposed OS zoning would continue to designate the area for open space, consistent with the Community Plan.

### **Conformity with Public Necessity, General Welfare and Good Zoning Practice**

The Proposed Project is in conformity with public necessity, convenience, general welfare, and good zoning practice in that the Proposed Project includes objective development standards to address incompatible uses and focuses development potential in strategic areas around transit accessible infrastructure, including three Metro A Line rail stations. The Proposed Project establishes a permanent affordable housing incentive system that will provide community benefits, along with clear standards and procedures to support the production of much-needed housing in the Proposed CASP Area.

### **B. Findings for Amendments to the Cypress Park and Glassell Park Community Design Overlay (CDO)**

The Proposed Project will amend the Cypress Park and Glassell Park Community Design Overlay (CDO) to omit from its boundaries the portion of the existing CASP that is within the CDO. The CDO is a supplemental use district that provides guidelines and standards for public and private development projects, with the intent of providing guidance and direction in the design of structures. The Proposed Project incorporates objective standards for urban design that regulates site planning, building design, landscaping, mechanical features, and signage similarly to the CDO. Retaining the CDO within the Proposed CASP Area would result in redundant regulations

and review processes for the Project Area, which is inconsistent with the Proposed Project's goal of supporting housing production and improving ease of implementation.

### **Charter and Code Findings**

With respect to urban form and neighborhood design, the Framework Element states the following:

*Objective 5.5: Enhance the liveability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.*

*Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.*

The Cypress Park and Glassell Park CDO Amendment is in substantial conformance with the purpose, intent, and provisions of the General Plan because it continues to support the General Plan's objective of upgrading the quality of development and improving the quality of the public realm. The Proposed Project incorporates objective standards for urban design that regulates site planning, building design, landscaping, mechanical features, and signage similarly to the CDO. The Proposed Project's Frontage Districts in particular will help to ensure buildings have pedestrian-oriented design.

The Cypress Park and Glassell Park CDO Amendment is in conformity with public necessity, convenience, general welfare, and good zoning practice because it incorporates existing urban form and design measures intended to support the quality of development and the public realm into the regulatory system of the Proposed Project.

### **C. Findings for Recission of the Floor Area Payment Trust Fund Ordinance**

The Proposed Project would rescind the existing Cornfield Arroyo Seco Specific Plan (CASP) Floor Area Payment Trust Fund Ordinance (No. 182618). This Ordinance was adopted in 2013 in conjunction with the existing CASP, which established a Transfer of Floor Area (TFAR) program to allow the floor area rights of properties within the Project Area be transferred from one property to another. TFAR funds that are paid to the City of Los Angeles, as a result of a transfer of floor area rights from a City-owned site to a privately-owned receiver site, are to be placed into the CASP Floor Area Payment Trust Fund. Under the Ordinance, disbursement of funds shall be for the purpose of providing community benefits to the existing Cornfield Arroyo Seco Specific Plan area, such as the provision of affordable housing units.

Since the adoption of this Ordinance, the existing CASP's TFAR program has not been utilized by applicants, and no monies have been paid into this trust fund. The Proposed Project would rescind the CASP Floor Area Payment Trust Fund, replacing the existing CASP TFAR program with the proposed Community Benefits Program to ensure the provision of community benefits such as affordable housing would occur on-site.

### **Charter and Code Findings**

With respect to creating community benefits, such as affordable housing, the Housing Element states:

*Objective 1.2: Facilitate the production of housing, especially projects that include Affordable Housing and/or meet Citywide Housing Priorities.*

*Policy 1.2.6: Create new citywide and local land use incentives and programs that maximize the net gain of affordable housing and produce housing that meets Citywide Housing Priorities. Explore varied affordability ratios, the feasibility of inclusionary zoning requirements, and a greater mix of incomes based on market areas.*

The CASP Floor Area Payment Trust Fund Rescission Ordinance, as described more in full above, is in substantial conformance with the purpose, intent, and provisions of the General Plan. By replacing the existing CASP TFAR program with the proposed Community Benefits Program, the Proposed Project would better facilitate the production of housing that includes affordable units. Moreover, the new Community Benefits Program would provide incentives that maximize the net gain of affordable housing.

The CASP Floor Area Payment Trust Fund Rescission Ordinance is in conformity with public necessity, convenience, general welfare, and good zoning practice because it would replace the existing CASP TFAR program with a Community Benefits Program that delivers greater predictability, more affordable housing units, and enhanced ease of implementation compared to the existing system, which has not been utilized by any applicant since the CASP TFAR program was established.

#### **D. Other Findings**

##### **State Law Restrictions on Zoning Actions under Housing Crisis Act SB 330**

On October 9, 2019, Governor Newsom signed into law SB 330, the Housing Crisis Act of 2019. The act amends existing state laws and creates new regulations around the production, preservation and planning of housing. The bill has been in effect since January 1, 2020, and sunsets on January 1, 2025. SB 8 extends key provisions of SB 330 until January 1, 2030. The goal of SB 330 is to create certainty in the development of housing projects, speeding up the review of these projects. The bill requires that the historic status or designation of any site be determined at the time an application for a discretionary action is deemed complete. Non-objective design review standards established after January 1, 2020, cannot be imposed or enforced. SB 330 also prevents zoning actions that reduce the capacity of housing. Plans that result in a net downzoning or otherwise reduce housing and population (except for specified reasons involving health and safety, affordable housing and voter initiatives) are prohibited. Moratoriums on housing development, or limits on approval, permits, or housing units cannot not be imposed by local jurisdictions. This does not apply to zoning efforts that reduce intensity for certain parcels as long as density is increased on other parcels and therefore results in no net loss in zoned housing capacity or intensity. The Proposed Project allows for the net increase of approximately 7,000 housing units compared to the existing CASP and therefore complies with this requirement.

Increasing housing, and particularly affordable housing, is a primary objective of the Proposed Project. The Project Area currently has a hybrid-industrial land use designation that allows for a mix of residential, commercial, and industrial uses, and the Proposed Project identifies additional areas where more housing growth is appropriate and reduces barriers to housing development through several zoning strategies.

The Proposed Project would increase the zoned capacity for housing in the Proposed CASP Area, principally by expanding the residential-emphasis Urban Village Use District to select areas within the Proposed CASP Area. As a mixed-use zoning designation, Urban Village allows for multi-family residential buildings, as well as some public, institutional, open space, recreation, light industrial, and general commercial uses. In total, the amount of Urban Village area would increase from 90 acres (19 percent of total land area) under the existing CASP to 135 acres (29 percent of total land area), an increase of approximately 50 percent. The new Urban Village areas present

new opportunities for housing in areas that do not have existing residential tenants and are uniquely situated near public transit, open space, and employment sites. The new Urban Village areas are zoned Urban Innovation under the existing CASP and are generally located in two sub-areas: 1) near the Los Angeles State Historic Park, closer to Chinatown and west of the Los Angeles River, and 2) in the area east of the Los Angeles River, west of Interstate 5.

The Proposed Project also introduces revisions to the allowable uses in Urban Village that are intended to support housing production. Whereas the existing CASP caps residential development to 90 percent of a project's total floor area in the Urban Village zone, the Proposed Project would allow for a purely residential development in Urban Village, increasing the feasibility of affordable housing units within a mixed-income project as well as for 100 percent affordable housing developments. The Proposed Project would also introduce changes to the Urban Innovation and Urban Center Use Districts, which continue to prioritize light industrial and commercial uses through a baseline non-residential floor area requirement, to allow for a higher proportion of residential uses within a mixed-use building. The Proposed Project also introduces a Community Benefits Program to incentivize the production of affordable housing in exchange for higher development potential. The program offers additional FAR and does not necessitate a discretionary process, providing additional opportunity for increased housing development. Overall, zoning regulations such as height, density, and floor area ratio, as well as open space, minimum setback, minimum frontage and maximum lot coverage limitations, which shape the built form and determine the intensity of any use, including housing, are thoughtfully formulated to cumulatively increase the Proposed CASP Area's housing development capacity.

Plans that result in a net downzoning or otherwise reduce housing and population (except for specified reasons involving health and safety, affordable housing and voter initiatives) are prohibited under SB 330. However, this does not apply to zoning efforts that reduce intensity for certain parcels as long as increased capacity on other parcels results in no net loss in zoned housing capacity or intensity. As described above, the Proposed Project increases the capacity for up to 18,000 new housing units by the year 2040, compared to existing regulations which can accommodate 11,000 more housing units over existing conditions within the same timeframe, and therefore the Proposed Project complies with this requirement.

## **Summary of CEQA Findings**

### **CEQA Findings**

The Proposed Project is intended to guide and regulate the growth and future development of the Proposed CASP Area, especially affordable, mixed-income, and permanent supportive housing, through the year 2040, and its adoption would not constitute a commitment to any specific project or development. Therefore, the EIR considered issues at a broader Specific Plan-level. Any future discretionary projects within the Proposed CASP Area would need to be approved individually in compliance with CEQA. The Draft EIR found that the environmental impacts of most of the issue areas were either less than significant without mitigation measures or less than significant with mitigation. Based on the analysis contained in the Draft EIR, the Proposed Project would result in unavoidable significant environmental impacts with regard to: Air Quality (Construction and Operation), Cultural Resources (Historical Resources and Cumulative Archeological), Noise (Construction and Stationary Mobile Sources), and Transportation (Off-ramp Queuing).

### **Recommended Plan**

The Proposed Project was analyzed in the Draft EIR. As discussed above, some changes have been made to the Proposed Project since the Draft EIR was published. However, these changes have been determined to not result in new significant impacts and do not add significant new information to the EIR. As such, the changes do not require recirculation.

**Final EIR**

Section 15088 of the CEQA Guidelines requires the lead agency, Department of City Planning, to evaluate comments on environmental issues received from public agencies and interested parties who review the Draft EIR and provide written responses. The lead agency received written comments on the Draft EIR from public agencies and community groups. Responses to all comments received during the comment period will be included in the Final EIR. Pursuant to Section 15025(c) of the CEQA Guidelines, the City Planning Commission as a recommending body on the Proposed Project, is required to consider the Draft EIR and make a recommendation to the City Council. The Final EIR and associated CEQA Findings and Statement of Overriding Consideration will be provided to, and considered by, the City Council prior to adoption of the Proposed Project and certification of the EIR.

## **PUBLIC HEARING AND COMMUNICATIONS**

### **Public Outreach**

Since the CASP update began in 2021, City Planning has hosted and attended various outreach events and meetings to gather feedback and share information about the Proposed Project. Initial focus group meetings were held at the early planning phase in January and February 2021 to engage with stakeholders and determine key issues and focus areas to include in the update. Four different focus group meetings were held with the following stakeholders: community-based organizations, affordable housing developers, market-rate developers, and institutional landholders. Discussions involved recommended stakeholder outreach, existing barriers to housing development, recommendations for building more affordable housing, and general land use or zoning concerns. Significant overarching themes drawn from the discussions were that more flexible development standards are needed to make housing development feasible within the CASP area, the City is also a large landholder with opportunity to develop, and planning work should prioritize transit-oriented communities and connecting them to more amenities and open space.

In addition to the initial focus groups, other outreach efforts leading up to the Public Hearing involved attending local neighborhood council meetings and meeting with individual stakeholders such as residents or interested parties when requested. City Planning attended multiple neighborhood council meetings both in-person and virtually throughout the update process from 2021 to 2023 for the Historic Cultural North Neighborhood Council, Lincoln Heights Neighborhood Council, and Greater Cypress Park Neighborhood Council, as well as meetings with other organizations such as the Southeast Asian Community Alliance (SEACA) and the Central City Association (CCA). During these meetings, City Planning staff presented an overview of the Proposed Project and answered questions about the proposed changes, such as the locations of where affordable housing and permanent supportive housing would be allowed and the process of determining affordable housing requirements in the Community Benefits Program.

### **Open Houses**

Two virtual Open House events were hosted by City staff in 2021 and 2022 to provide opportunity for community members and residents of the Project Area or surrounding neighborhoods to give input and voice their questions and concerns. Flyers for the events were posted on the Department of City Planning's web page for the CASP updated and shared to emails listed on the Proposed Project's interested parties list.

On November 3, 2021, the first virtual Open House event was hosted via Zoom from 5:00 pm to 6:30 pm which consisted of a staff presentation and a Question and Answer (Q&A) session. An initial overview of the CASP, introduction to the proposed update concepts, update goals, and proposed changes to zoning and development standards were shared with 30 attendees at the event. Proposed concepts and maps were also made available for review in English, Spanish, and Simplified Chinese. Following the presentation, participants were welcomed to ask questions and provide suggestions on the proposed plan concepts, as well as the Community Benefits Program.

A Preliminary Draft of the CASP was released for public review in November 2022 on the project website, along with Fact Sheets and Summary Documents in English, Spanish, and Simplified Chinese. A second virtual Open House was held by staff on December 7, 2022 via Zoom to discuss the released Preliminary Draft Plan, provide information, and gather feedback on the Draft. The event took place from 6:00 pm to 7:30 pm and included a staff presentation on details of the draft plan, followed by a Q&A session.

Similar questions and comments were voiced at each Open House event. Questions involved a range of topics including Proposed Plan's strategies to address gentrification and displacement,



particularly in the surrounding neighborhoods of Lincoln Heights and Chinatown; opportunities for 100 percent affordable housing; the Proposed Plan boundaries; and the timeline of the update process. Other questions and comments were specific to proposed zoning districts and implementation of the Community Benefits Program in tandem with other relevant plans such as the Downtown Community Plan, or other housing incentive programs.

### **Information Session and Public Hearing**

City Planning held a Virtual Information Session and Public Hearing using Zoom on September 27, 2023. The Information Session took place from 6:00 pm to 6:30 pm and included a presentation by staff providing an overview of the proposed Plan updates, land use and zoning changes, and the new Community Benefits Program. The Public Hearing was held from 6:30 pm to 8:00 pm and provided a formal opportunity for participants to give their comments on the proposed update. Simultaneous interpretation was provided in Spanish for both the Information Session and Public Hearing portions. There were approximately 30 attendees for the event.

A Notice of Public Hearing was mailed out to approximately 6,900 addresses within the Project Area and 500-foot radius of the Project Area. The notice was also published on the Department's project website for the CASP, [Planning4LA.org/CASP-update](https://planning4la.org/CASP-update), and emailed to individuals on the CASP's interested parties list. The notice included Spanish translation as well.

### **Office Hours**

Following the Information Session and Public Hearing, City Planning hosted in-person Office Hours at Albion Park in Lincoln Heights on November 18, 2023, to provide further opportunity for stakeholders to engage with planners, ask questions, and learn more about the CASP Update. Office Hour appointment slots were available to be booked on the CASP website in 15-minute slots, in addition to walk-in appointments. Office Hours were held from 10:00 am to 1:00 pm outdoors in the park's courtyard, where staff was available at a table to meet with stakeholders one-on-one or in groups. The draft plan, zoning and land use maps, a DEIR copy, and a CASP fact sheet were also provided for reference and review. There were about 12 attendees total. Common concerns and questions heard revolved around incompatibility between residential neighborhoods and directly adjacent industrial uses that increase residents' health and safety risks, locations of rezoning and impact on surrounding neighborhood character, and the possibility of permanent supportive housing development within the Proposed Project Area. Multiple attendees expressed unease towards permanent supportive housing being allowable in most Use Districts but were otherwise supportive of having more 100 percent affordable housing development in the area.

### **Summary of Public Hearing Testimony and Written Communications**

Throughout the update and community engagement process, a number of comments were received via email, phone calls, and verbally during outreach events. At the virtual Public Hearing on September 27, 2023, 12 verbal comments were received about the Proposed Project. After the Hearing, additional written comments were received via email. The public comment period was open for two weeks following the public hearing for additional comment submissions, which were accepted until October 11, 2023. Topic areas that were raised ranged from inclusive community engagement, the Community Benefits Program, affordable housing requirements, concerns of displacement, and more general comments. A summary of comments and written comments received is provided below, presented by topic area:

**Community Engagement**

- Reach more low-income community members with language and technology barriers
- Center racial equity in the update process and include an outcome-focused racial equity analysis
- Provide additional in-person engagement opportunities for community members, especially in Lincoln Heights neighborhoods
- Not enough public education about the Plan update and more information should be mailed out in addition to the mailed notices

**Community Benefits Program**

- Add goals and strategies to support small/legacy businesses, including rent subsidies, street vending infrastructure, and existing business protections
- Include subsidized commercial space for legacy businesses, publicly accessible open space, parks, and recreation, schools, daycare, elder care, community/cultural centers, and 100% affordable housing
- For publicly accessible space amenities, include public restrooms, drinking water, shade, phone charging stations, encourage inclusive design for seniors, and prevent hostile architecture
- Level 2 benefits should better reflect real community needs; there are already many schools in the Plan area including six charter schools
- Increase affordable unit requirements under the development incentives

**Affordable Housing**

- 100% market-rate housing should not be allowed in Public Use zone. Projects on public land should prioritize permanent supportive housing, affordable housing, and community serving uses
- Maximize Acutely Low Income (ALI) and Extremely Low Income (ELI) units
- Support for new zoning updates that will bring more housing and balance between market-rate and affordable housing
- Include more incentives and opportunities for 100 percent affordable housing projects

**Gentrification and Displacement**

- Include specific anti-gentrification/anti-displacement goals, policies, and strategies, including no net loss of affordable housing in the plan area
- Include tenant protections, including relocation protections, afforded by recent state legislation
- Relocation assistance should be prioritized within the CASP and surrounding neighborhoods
- Hotels should not be allowed by-right, as they exacerbate gentrification
- The minimum job-producing FAR in the Urban Innovation and Urban Center should be bulk of total FAR requirements
- Definition of job-producing use should prioritize current employment uses, such as warehousing and light manufacturing
- Risk of displacement has indirect impacts on environmental conditions such as recreation, GHG emissions, transportation
- Displaced residents should be able to avoid double relocation under right-of-return provisions
- New housing may not be for current residents and will draw people from outside the area that could lead to displacement
- New housing brought into the CASP may have spillover gentrifying effects on nearby Chinatown neighborhoods

**Plan Boundaries**

- CASP should add the parcel between the Los Angeles State Historic State Park and Solano Canyon, which is slated for redevelopment, to its boundaries

**General/Other**

- Not guaranteed that current residents in the CASP will benefit from the Plan update and new development
- Population increase correlated with development impacts of Plan update will strain existing underfunded resources such as schools and public transit, and will negatively impact traffic, pedestrian safety, pollution