



DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: October 14, 2021

Time: After 8:30 a.m.

Place: In conformity with the Governor's Executive Order N-29-20 (March 17, 2020) and due to concerns over COVID-19, the CPC meeting will be entirely conducted telephonically by Zoom [<https://zoom.us/>]. The meeting's telephone number and access code number will be provided no later than 72 hours before the meeting on the meeting agenda published at:
<https://planning.lacity.org/about/commissions-boards-hearings> and/or by contacting cpc@lacity.org.

Case No.: CPC-2020-1365-GPA,

CPC-2021-5499-GPA

CEQA No.: ENV-2020-6762-EIR

Incidental Cases: None

Related Cases: None

Council No.: All - Citywide

Plan Area: All - Citywide

Applicant: City of Los Angeles

Public Hearing: Limited Public Hearing Required.

Initial Public Hearings held on
September 21, 2021 and
September 22, 2021.

PROJECT LOCATION: Citywide

PROPOSED PROJECT: 2021-2029 Update to the Housing Element of the General Plan

In compliance with California state law, the Housing Element presents a comprehensive assessment of local housing needs and lays out a series of goals, objectives, policies and programs to assist the City in meeting those identified needs. The Housing Element also describes how the Regional Housing Needs Assessment (RHNA) for the City (456,643 units) is to be accommodated by existing zoning capacity and through a Rezoning Program.

Updates to the Safety Element and the Health Element of the General Plan

A targeted update to the Safety Element to meet recent state requirements around climate change and related disasters, including wildfires and flooding, in addition to limited updates to reflect current disaster mitigation and planning practice. The proposed technical amendments to the Plan for a Healthy Los Angeles (Health Element) will serve to clarify its role as the primary compilation of environmental justice policies and programs for the City.

Unless expressly provided otherwise, the updates to the Housing Element, Safety Element and Health Element shall be collectively referred to as the "Proposed Plans."

RECOMMENDED ACTIONS:Actions for the 2021-2029 update to the Housing Element of the General Plan and the updates to the Safety Element and the Health Element:

1. **Conduct** a limited public hearing on the Proposed Plans, 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, and **direct** staff to prepare the Final EIR, Environmental Impact Report (EIR) Findings, a Statement of Overriding Considerations, and a Mitigation Monitoring Program (MMP) for City Council consideration.
4. **Find** the City Planning Commission has reviewed the Draft EIR (City EIR No. ENV-2020-6762-EIR and State Clearinghouse No. 2021010130), as shown in Exhibit N.
5. **Recommend** the City Council adopt the Resolution in Exhibit M to certify the EIR, adopt EIR Findings and a Statement of Overriding Considerations, and adopt a Mitigation Monitoring Program; or in the alternative, if the Resolution to certify the EIR has been adopted in a prior action by the City Council and the Housing Element Update and/or the Safety Element Update and/or the Health Element Update has been approved, find that the Housing Element Update and/or the Safety Element Update and/or the Health Element Update, was considered in the EIR and pursuant to CEQA Guidelines Sections 15162 and 15164, no subsequent EIR or supplemental EIR, or addendum is required.

Actions for the 2021-2029 Housing Element Update of the General Plan:

6. **Approve and Recommend** that the Mayor **approve** and the City Council **adopt** the Resolution in Exhibit A to amend the Housing Element of the General Plan, as shown in Exhibit B.
7. **Authorize** the Director of Planning to present the Resolution (Exhibit A) and General Plan Amendment (Exhibit B) to the Mayor and City Council, in accordance with City Charter Section 555 and LAMC Section 11.5.6.

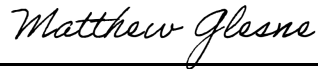
Action for the Update to the Safety Element and the Health Element of the General Plan:

8. **Approve and Recommend** that the Mayor **approve** and the City Council **adopt** the attached Resolution in Exhibit F to amend the General Plan as follows:
 - a. Amend the Safety Element, as shown in Exhibit G, including incorporation by reference of the Local Hazard Mitigation Plan (LHMP) and subsequent updates, as shown in Exhibit H.
 - b. Amend the Health Element, as shown in Exhibit J.
9. **Authorize** the Director of Planning to present the Resolution (Exhibit F) and General Plan Amendments (Exhibits G and J) to the Mayor and City Council, in accordance with City Charter Section 555 and LAMC Section 11.5.6.

VINCENT P. BERTONI, AICP
Director of Planning



Nicholas P. Maricich, Principal City Planner



Matthew Glesne, Senior City Planner



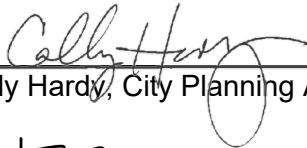
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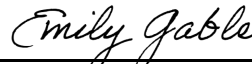
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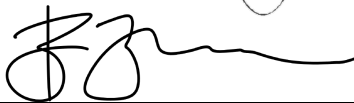
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PROJECT ANALYSIS

Project Summary

The Housing and Safety Elements are two of eight state-required components of every city's General Plan in California. Unlike other General Plan elements, the Housing Element is required to be updated on a consistent (8-year) schedule and, in order to be found in compliance, must be approved by the state's Department of Housing and Community Development (HCD) upon City adoption. Given the sustained housing crisis facing the region, the Housing Element has undergone an ambitious update that significantly strengthens citywide housing policy and programs and confronts issues of housing affordability, equity and sustainability.

The Housing Element plays a unique role in charting the course for a more fair, equitable, and just Los Angeles for future generations. It identifies local housing needs and obstacles to meeting those needs, as well as updates goals, objectives, policies, and programs so that the necessary housing can be provided. This Housing Element Update prioritizes key concepts such as addressing the overall housing shortage while maximizing the creation of affordable housing, advancing housing stability and anti-displacement policies, centering racial equity, and providing greater access to areas with high opportunity as well as fostering greater livability, sustainability and resilience in housing policies.

Recent changes to state law require the City to review and update the Safety Element of the General Plan when the Housing Element is updated. While the Housing Element is undergoing a comprehensive update, the Safety Element is undergoing a targeted update. Many of the amendments focus on issues such as climate change and related disasters like wildfires and floods. This staff report describes the proposed Safety Element in addition to the proposed 2021-2029 Housing Element, though the focus is on the Housing Element as the more substantial portion of this update. Additionally, the simultaneous update of two General Plan Elements triggers a state requirement that the General Plan adopt an environmental justice element (which may be combined with one or more other elements) to meaningfully address environmental justice. In the City of Los Angeles, the majority of the General Plan's environmental justice goals, policies and programs are contained in the Plan for a Healthy Los Angeles (Health Element), though the topic is also addressed in the Housing and Safety Elements and other elements such as Mobility and Land Use. This update effort includes a minor amendment to the Health Element to clarify its role in meeting state environmental justice legislation, along with updates to the maps of the related Health Atlas to provide more current data and information.

This report provides background on the Housing, Safety, and other General Plan requirements under state law, gives an overview of the 2021-2029 Housing Element, 2021 Safety Element, Health Element amendments and summarizes key changes to the Proposed Plans, and presents a summary of the public discussion and input received to date. Additionally, the report includes recommendations on requested actions for the adoption of the Proposed Plans, and related environmental clearance.

Background on the General Plan

In the State of California, all cities are required to develop a General Plan, and the Housing and Safety Elements are a required component of every city's General Plan. The General Plan can be thought of as a city's "constitution for development," or the foundation upon which all land use decisions are to be based. It establishes policies and programs that assist decision makers as they review planning approvals for a new project or consider a proposed ordinance or policy. As

such, the General Plan provides the foundational guide for planning, outlining how land is to be used and how the City allocates its resources.

The Los Angeles General Plan includes a total of 12 elements, covering specific aspects of land use and planning, such as ecological conservation and infrastructure provision. The General Plan is maintained by the Department of City Planning but intended to capture the work of all City Departments that have a role in land use and development decisions.

Housing Element Update

The 2021-2029 Housing Element Update provides the City's policy response to a challenging time for housing in Los Angeles, particularly with regard to housing security, housing scarcity, racial equity, and homelessness. Los Angeles faces some of the most distressing housing characteristics in the country. Angelenos pay more of their income on housing, live in more overcrowded conditions, and have the highest rates of unsheltered homelessness of any city in the country. These burdens are disproportionately borne by women, those with lower incomes and communities of color.

At its core, the purpose of the Housing Element is to provide an analysis of a community's housing needs for all income levels and household types, and identify strategies to respond to and provide for those housing needs. Since 1969, housing elements have been considered mandatory components of local general plans in California, because providing housing for all Californians is considered by the state legislature to be a matter of vital statewide importance. In addition, the Housing Element is a key part of the City's overall General Plan and provides critical guidance to all housing-related decisions undertaken by the City.

The Housing Element Update embodies the existing goals and policies of other General Plan elements and identifies the more detailed strategies the City will implement to achieve them with regards to housing. The update also ensures that housing goals, objectives and policies are integrated and consistent with all the other elements of the General Plan.

The 2021-2029 Housing Element Update was prepared jointly by the Department of City Planning (DCP) and the Los Angeles Housing Department (LAHD, formerly the Housing and Community Investment Department, or HCIDLA). The Update included close collaboration with all City departments and agencies involved with housing issues, including the Housing Authority of the City of Los Angeles (HACLA) and the Los Angeles Homeless Services Authority (LAHSA). While fulfilling the statutory requirements of state Housing Element law, the policies and programs herein foster on-going partnerships among City departments, with other governmental agencies, and with the private sector to respond to ever-changing housing demands and market conditions. The Update provides policy guidance relating to housing issues to decision makers at all levels of City government.

Housing Element Requirements

Statutory requirements for the Housing Element are delineated in California State Government Code Sections 65580 – 65589.11. The Housing Element is required to be updated every eight years in accordance with a specific schedule of dates established by the State. This Housing Element therefore covers the period of October 15, 2021 through October 15, 2029. Beyond serving as a key policy and planning document, housing elements also include important requirements meant to ensure all communities in California are doing their fair share around planning for housing needs.

Pursuant to state law, the Housing Element must include the following key components:

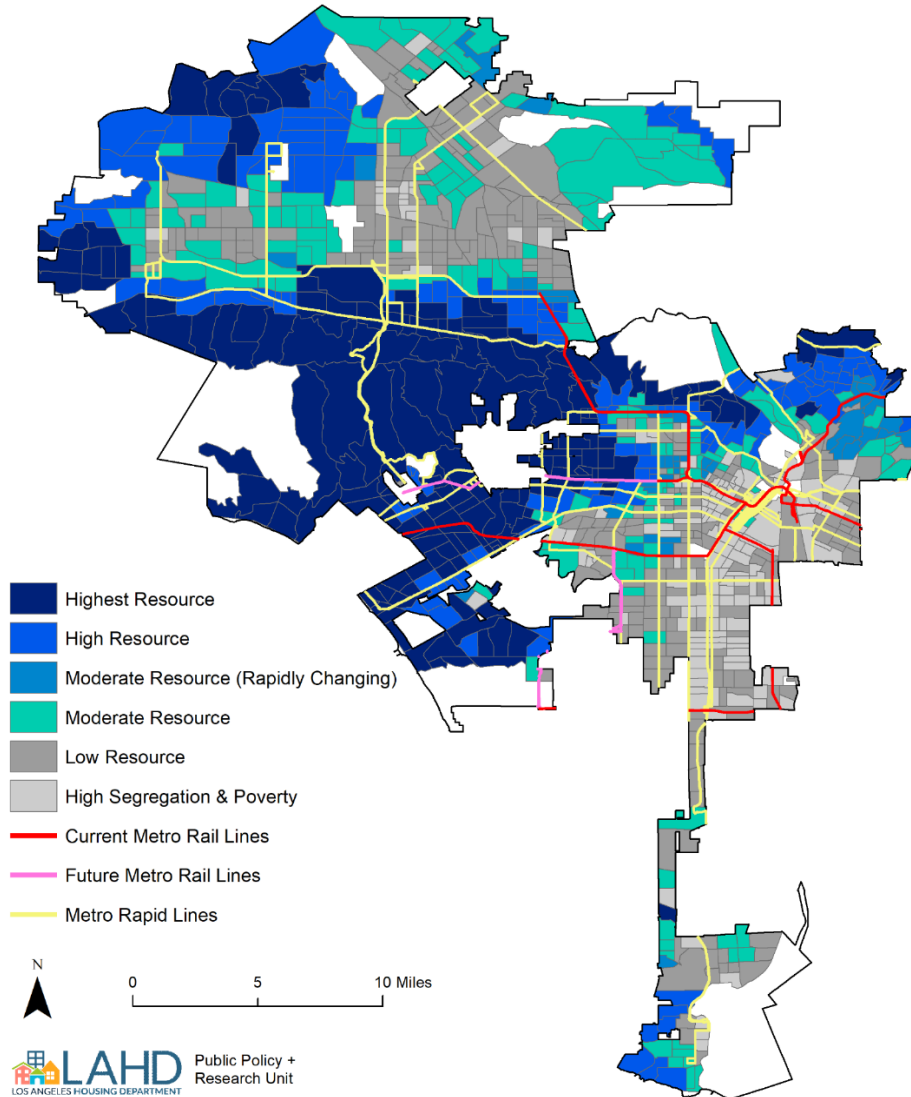
- An analysis of existing and projected housing needs

- An analysis of potential constraints on housing
- An analysis of assisted housing developments that are “at-risk” and eligible to change from low-income housing uses
- An inventory of sites suitable for housing development
- An analysis of the plan’s conformance with affirmatively furthering fair housing (AFFH) requirements
- An analysis of any special housing needs
- An analysis of opportunities for residential energy conservation
- An evaluation of the previous Housing Element
- Goals, objectives, policies, and implementation programs

As part of these requirements, the Housing Element must plan for the City’s Regional Housing Needs Assessment (RHNA) Allocation of 456,643 housing units. Of these, a total of 184,721 should be affordable for lower income households. Additional information on the RHNA Allocation is provided in the *Regional Housing Needs Assessment* section, below.

Because housing needs are recognized as a matter of statewide concern, the State, through the Department of Housing and Community Development (HCD), must certify the compliance of every jurisdiction’s housing element upon adoption. A non-compliant housing element could result in significant consequences, including loss of (or lower scoring on applications for) several state funding sources, reduced local zoning control, as well as more abbreviated timelines for rezoning and future Housing Element updates. State housing element law has been significantly strengthened in recent years. HCD also now has statutory authority to revoke housing element compliance and refer jurisdictions to the Office of the Attorney’s General if the local government’s actions do not comply with state housing law.

Pursuant to Assembly Bill 686 (2018), the Housing Element must include an analysis and determination of consistency with Affirmatively Furthering Fair Housing (AFFH) requirements. AFFH is defined as “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” To assess current disparities, the Housing Element includes a detailed Assessment of Fair Housing (see Appendix 1.1), as well as an analysis of both the inventory of adequate sites suitable for housing development to meet the RHNA as well as the Rezoning Program (see Chapter 4). A key part of the Housing Element Update is to expand housing opportunities in higher resource (referred to as “Higher Opportunity”) areas of the city, which offer the best critical life outcomes with a high concentration of good schools, jobs, health and life expectancy. These areas are mapped (see Map 1 below) and the focus of much of the AFFH direction from the State. A summary of the meaningful actions included in the plan that are expected to achieve a material positive change that affirmatively further fair housing are identified in Program 124 (AFFH).

Map 1 - HCD/TCAC Opportunity Map (2021)

Housing Element - Context and Key Concepts

The tumultuous events of 2020, coupled with the COVID-19 pandemic, have been a moment of reckoning for the City. Not only have Los Angeles's long-standing housing needs been exacerbated by the pandemic, the city's widespread housing disparities have been magnified. In addition, there has been growing recognition of the historic and ongoing role that planning and housing policies have played in creating and implementing discriminatory practices, including those that have resulted in communities of color being more likely to experience homelessness and displacement, and having more limited access to opportunities, advancement, and achievement.

To ensure that Los Angeles's varied housing needs were addressed in the Draft Housing Element, staff consulted a Housing Element Task Force representing 63 local housing-related organizations and subject matter experts representing a wide variety of perspectives and communities. Task Force members participated in 16 meetings with City staff, during which time

they were able to provide guidance and detailed feedback on the topics covered by the Housing Element. Additionally, the City invited public feedback through various outreach efforts across five key phases (Launch, Vision, Concepts, Draft and Adoption). The *Public Hearing and Participation* section of this staff report below provides a more thorough discussion of the Plan's outreach efforts.

The Housing Element Update was guided by the development of the initial Vision and six key “*Concepts*,” which were developed based on feedback from the public alongside state law to describe how the City intends to meet ambitious housing goals. The *Concepts* focus on how the Housing Element will address housing-related issues in the City. All six *Concepts* respond to urgent housing needs including: addressing the housing shortage, advancing racial equity and access to opportunity, and promoting sustainability and resilience. The six *Concepts* are:

1. *Housing Stability and Anti-Displacement*: To protect Angelenos—especially persons of color—from indirect and direct displacement, and ensure stability of existing vulnerable communities.
2. *Housing Production*: To increase the production of new housing, particularly affordable housing.
3. *Access to Opportunity*: To increase access to opportunities and proactively desegregate the City by planning for more affordable and mixed-income housing in higher-resource areas.
4. *Homelessness*: To prevent and end homelessness in a manner that centers human dignity and respect by developing early interventions, significantly expanding permanent housing options, and providing appropriate services and support.
5. *Built Environment*: To design and regulate housing to promote health and well-being, increase access to amenities, contribute to a sense of place, foster community and belonging, and plan for a sustainable future.
6. *Meeting the Needs of all Angelenos*: To 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.

The draft Housing Element was released for review by the public and the Housing Element Task Force on July 1, 2021. At that time, the draft was also submitted to HCD for initial review. On September 3, 2021, the City received comments on the draft from HCD (see Exhibit O). Brief descriptions on how the revised Housing Element responds to the HCD comments are also included in Exhibit O. Two staff-level Public Hearings took place on September 21, 2021 and September 22, 2021 and these comments are reflected in the Summary of Impact Comments section below.

The Housing Element Update largely follows the organization of the current 2013-2021 Housing Element. Sections were revised as necessary to reflect changes in demographics, housing conditions, local needs and departmental priorities. The Housing Element Update is organized into an executive summary, six core chapters, and a series of appendices. Detailed summaries of the plan chapters are provided below.

Housing Element Chapter Summaries

Chapter 1 - Housing Needs Assessment

Chapter 1 contains a comprehensive assessment of the various factors that influence and affect the City's housing needs. Understanding the unique housing needs of the City is vital to the development of housing policies and programs that further the City's housing goals for all residents. Factors including population characteristics, household characteristics, income and

employment trends, housing stock characteristics, housing costs, and the Regional Housing Needs Assessment (RHNA) are all included.

Among other findings, the analysis contained in this chapter indicates that Los Angeles has a higher percentage of cost burdened households than any other major American city, with almost half of all households spending more than one-third of their income on rent. The city also has the highest rate of overcrowding nationally, with the second fewest available homes per adult. Increased housing demands have resulted in higher prices for renters and prospective home buyers, with the median home costing \$860,000 and a two bedroom rental costing \$2,700 per month. Ownership rates are declining with younger Angelenos unable to live alone, buy homes, or afford to raise children in the city. Among the most stark consequences of Los Angeles's housing crisis is the over 40,000 Angelenos that are currently experiencing homelessness. Due to rapid increases in rents over the last decade, the city is experiencing a rapid loss of existing lower-rent housing. These trends are compounded by demographic and employment factors such as rapid aging of the population, the continued prevalence of poverty, and low-wage employment.

Chapter 1 also introduces and summarizes the concept of Affirmatively Furthering Fair Housing (AFFH - discussed above). Appendix 1.1 provides an extensive assessment of fair housing practices, including a summary of fair housing issues in Los Angeles, an analysis of patterns, trends, and disproportionate housing needs as well as a list of contributing factors to fair housing issues based on the analysis. This analysis is connected to a list of concrete actions in the form of programs to affirmatively further fair housing in Program 124 of Chapter 6. The City currently has a Federally adopted Assessment of Fair Housing Plan (2018-2023) that informed the analysis. This analysis is summarized at the end of Chapter 1.

Chapter 2 - Constraints on Housing Maintenance, Improvement and Development

Chapter 2 provides a summary of governmental constraints, non-governmental constraints, and constraints for housing for people with disabilities and special needs. This chapter also includes an analysis of the preservation of at-risk expiring affordable units. Many housing constraints are out of the City's direct control, while others are due in part to the local requirements and conditions that pose constraints to the production and preservation of housing. Some of the most important constraints include: governmental regulations such as zoning, land use requirements, entitlement and permitting procedures, infrastructure requirements, and fees; as well as non-governmental constraints such as market conditions, financing, source of funding requirements, opposition to housing, and environmental conditions. There are often sound policy reasons for current fees and regulations, so any changes should be carefully considered with regards to expected effectiveness to meet housing needs and the potential impacts to other General Plan goals. For a more comprehensive discussion of housing constraints, refer to Appendix 2.1 of the Housing Element Update. In addition to the discussion of governmental and non-governmental constraints, the chapter also summarizes the City's existing strategies to address them. The City continues to proactively explore additional responses to these housing obstacles in the form of new efforts and programs, including those identified in Chapter 6.

Chapter 3 - Opportunities for Conservation in Residential Development

State Housing Element law requires cities to identify opportunities for energy and water conservation in residential development. The City has broadened this analysis to include energy conservation, water conservation, alternative energy sources, and sustainable development which supports conservation and reduces demand. These efforts reduce development costs and improve the long-term affordability of housing units. Specific City programs include providing rebates for energy efficient appliances, shifting the time of energy use, using alternative sources of energy (e.g., solar power), installing green roofs, requiring more sustainable landscaping and

site design, and adopting General Plan land use designations and zoning that facilitate higher-density, compact, infill development near transit.

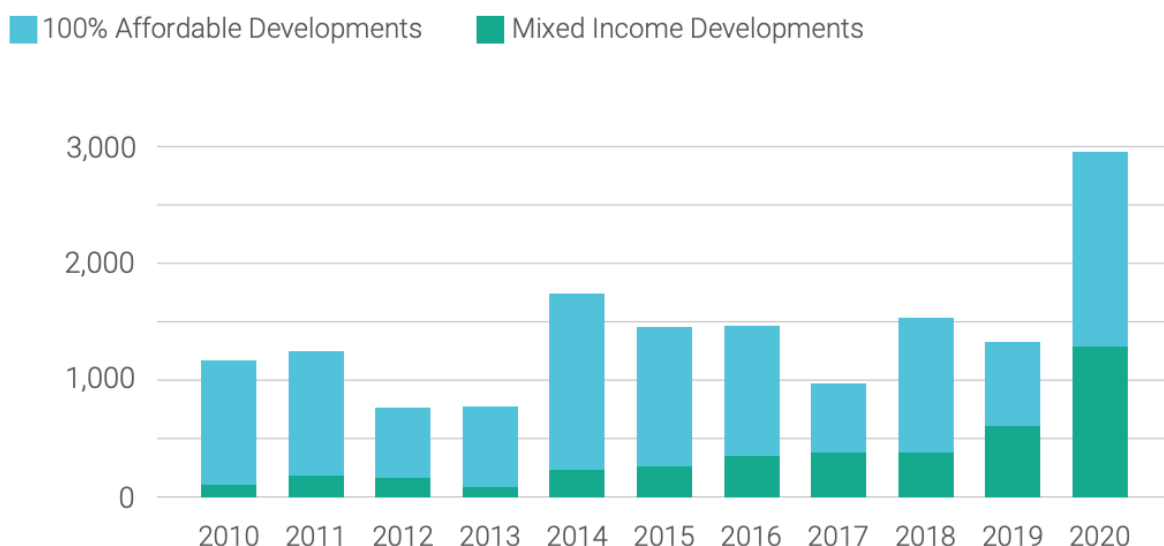
Chapter 4 - Adequate Sites for Housing

State Housing Element law requires the City to show that it has adequate land zoned to accommodate the housing units needed to meet expected population growth as well as to alleviate existing need for housing. For the 6th Cycle, the number of housing units estimated to be needed in Los Angeles, or the “RHNA Allocation,” is 456,643 units. Chapter 4 identifies the City’s inventory of land suitable for residential development without the need for any legislative action by the City, identifies additional alternative methods of satisfying the RHNA, provides an analysis of the inventory’s compliance with AFFH requirements, and identifies the need for rezoning programs to accommodate the RHNA allocation. The analysis demonstrates that, during the 6th cycle, the City has an anticipated unit potential of 230,964 units, of which 72,650 units are Lower Income. As a result, the Plan identifies the need for a Rezoning Program to accommodate 255,415 units. The Housing Element sites analysis and Rezoning Program are discussed in more detail in the following section.

Chapter 5 - Review of 2013-2021 Housing Element

Preparation of the Housing Element Update included the important step of evaluating the previous 2013-2021 Housing Element in order to evaluate the effectiveness of current policies and programs. Information was shared with the public to help solicit input on the progress of current strategies. To analyze overall the effectiveness of housing production, the review examined progress in meeting the current RHNA target of 82,002 units. The City has permitted more than 117,088 new housing units through 2020, meaning the overall RHNA goals have been exceeded. However, the City has not produced enough housing to meet the RHNA need in the lower and moderate income categories. This is due to vastly insufficient public funding for deed-restricted affordable housing. The City has also failed to prevent and end homelessness, which has grown significantly in recent years. The review did find progress in increasing affordable housing production over the prior period, particularly in (unsubsidized) mixed-income developments, which increased significantly over the planning period (see Chart 1).

Chart 1. Affordable Housing Production by Source of Affordability | 2010-2020



The review notes that some important objectives were not sufficiently emphasized, including preventing displacement and undoing past discriminatory housing practices by providing more access to areas of greater opportunity. The prior Housing Element's statement of goals and objectives was found to still be largely relevant, but is modified to create a new goal (Goal 2) focused specifically on affordable housing preservation and housing stability and a significantly revised Goal 4 to foster racially and socially inclusive neighborhoods and correcting the harms of past discrimination. Significant new and updated objectives, policies and programs are described in the following section of this staff report. A complete listing of proposed changes to goals, objectives, policies and programs can be found in Exhibit E.

Chapter 6 - Housing Goals Objectives, Policies, and Programs

Chapter 6 delineates the updated housing goals and new citywide priorities, and the specific objectives, policies, and programs that City departments will work to implement over the next eight years. The objectives, policies, and implementation programs under each goal speak to the diverse housing needs across the city and respond to the review of progress and effectiveness in Chapter 5. The five goals are oriented around five issues: housing production; housing preservation; livable and sustainable communities; housing opportunities for all; and ending homelessness. These are elaborated in more detail in the following section of the report.

Housing Element Goals, Objectives, Policies and Programs

As discussed, the Housing Element is an important General Plan policy document for the City of Los Angeles. Central to this function is the development of a robust set of housing goals, objectives, policies, and programs. Some have been carried forward from the current Housing Element, while others have been amended or added. Staff worked with the public to develop the overall Vision for the Housing Element, which guided the development of more detailed goals, policies and objectives:

“It is the overall housing vision of the City of Los Angeles to create housing opportunities that enhance affordability, equity, livability and sustainability by remedying discriminatory housing practices and creating a city with a range of housing types, sizes, and costs in close proximity to jobs, transit, amenities, and services. In keeping with a fundamental belief that housing is a human right, the City will work towards ensuring that housing stability and affordability is provided to all residents.”

In line with this vision, all goals, policies and objectives are intended to further certain Citywide Housing Priorities, defined below to include:

- *Addressing the Housing Shortage:* Increase the production of new housing, particularly affordable housing.
- *Advancing Racial Equity & Access to Opportunity:* Proactively address racial and economic segregation in the city by creating housing opportunities that address historic patterns of discrimination and exclusion.
- *Preventing Displacement:* Protect Angelenos—especially persons of color—from indirect and direct displacement, and ensure stability of existing vulnerable communities.
- *Promoting Sustainability & Resilience and Environmental Justice through Housing:* Design and regulate housing to promote health and well-being, increase access to amenities, contribute to a sense of place, foster community and belonging, and protect residents from existing and future environmental impacts.

The five goals that guide the 2021-2029 Housing Element are as follows:

GOAL 1: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs.

GOAL 2: A City that preserves and enhances the quality of housing and provides greater housing stability for households of all income levels.

GOAL 3: A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos.

GOAL 4: A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present.

GOAL 5: A City that is committed to preventing and ending homelessness.

Beneath each housing goal below is a general description of the objectives and policies that correspond, as well as a more detailed listing of new, updated or otherwise noteworthy policies and programs. Specific changes to current objectives and policies can be found in Exhibit E, and are summarized below. A summary of major changes and important elements are presented in the next section, by Goal.

Goal 1. Housing Production

Goal 1 emphasizes the importance of overall housing production in order to result in an ample supply of housing to better meet existing and projected housing needs. This goal recognizes that rates of housing production have historically been insufficient and that in order to combat overcrowding and cost-burden, more housing options are needed, at all income levels. A lack of adequate funding for deed-restricted affordable housing and other subsidies has limited the ability of the City to provide a critical social safety net for those at greatest risk of experiencing housing insecurity and homelessness. This requires the City to prioritize the creation of as many unsubsidized affordable units in mixed-income housing as possible, including at the deepest levels.

To meet the 2021-2029 RHNA Allocation, the City needs to permit about 57,000 units per year; however, since 2014 the City has produced an average of 16,700 units per year, indicating substantial changes are needed to achieve these housing goals. This need is most pronounced when considering the lower income Allocation. Of the City's total 2021-2029 RHNA, about 23,000 units per year should be affordable to lower income households (80% of the area median income, or AMI, and below); however, the City has only produced an average of 1,650 affordable units per year since 2014. While significantly more housing at all income ranges is needed to address the current shortage of available and affordable housing, there will likely be significant challenges in meeting the needs of those with the lowest incomes. Therefore, the particular importance of housing production that is affordable to lower income households is emphasized throughout Goal 1, while Goal 2 emphasizes that production must be balanced with strong preservation, replacement and tenant rights policies.

Objectives within the housing production goals are divided into three areas: forecasting and planning for changing housing needs (Objective 1.1), facilitating housing production, especially for affordable housing and housing meeting citywide housing priorities (Objective 1.2), and promoting a more equitable geographical distribution of affordable housing (Objective 1.3). The overall policies within these objectives emphasize the importance of planning for enough housing

to alleviate existing housing needs and future growth, as well as maximizing the amount of affordable housing being produced.

Updated, new and noteworthy Policies (Pol.) related to housing production can be summarized as follows:

- Plan for ample housing to meet existing and projected needs (Pol. 1.1.1, 1.1.2)
- Account for existing housing needs when planning by developing and incorporating a buffer above household projections (Pol. 1.1.3)
- Prioritize the development of new affordable housing in all communities, particularly those that currently have fewer affordable units (Pol. 1.2.10)
- Rezone for affordable housing densities in every geography (Pol. 1.1.7)
- Maximize affordable housing in different market area, facilitate a greater a mix of incomes and ensure a net gain of affordable housing (Pol. 1.2.1, 1.2.6)
- Prioritize those with the lowest incomes (Pol. 1.2.1, 1.2.8)
- Explore requiring longer affordability terms on mixed-income projects (Pol. 1.2.8)
- Introduce more flexible zoning and incentives for existing lower density residential areas to provide “missing middle” housing (Pol. 1.1.8)
- Facilitate a range of different housing types to address the City’s diverse households (Pol. 1.2.2)
- Create flexibility for affordable housing in project review and planning (Pol. 1.2.9)

Updated, new and noteworthy Programs (Pr.) supporting housing production can be summarized as follows:

- Update citywide growth strategy to meet housing needs (Framework Element) (Pr. 50)
- Expand/improve local affordable housing incentive programs (Pr. 48, 81, 125)
- Expedite and streamline affordable housing (Pr. 54, 55)
- Explore smaller lot sizes and easier lot splits and permit small subdivisions (Pr. 3)
- Require higher levels of affordable housing and other community benefits for projects that receive major entitlements like Zone Changes, Devt. Agreements, etc. (Pr. 7)
- Expand public land development for affordable housing (Pr. 15)
- Pursue new models to developing affordable housing on public land (Pr. 16)
- Establish new revenue sources for redevelopment tools (Pr. 66)
- Explore options for generating funds locally for affordable housing, including a progressive real estate documentary transfer tax, vacancy/speculation tax (Pr. 20)
- Expand mobile homes, RVs and tiny homes (Pr. 26)
- Encourage the utilization of parking alternatives that lower the cost of housing, support climate goals and recognize the emergence of new mobility options (Pr. 21)
- Facilitate housing innovation (Pr. 12, 59, 64, 65)
- Promote ADU development and missing middle standard plans (Program 63)
- Repeated selected inventory sites will receive by-right processing if 20% of the units are affordable, per state law (Pr. 46)

Goal 2. Housing Preservation and Housing Stability

The Housing Element Update establishes a new Goal 2 focused on housing preservation and tenant protections in order to elevate critical City priorities around housing stability. This new goal is a recognition of the importance of maintaining existing affordable housing, enforcing existing and newly adopted tenant protections, keeping people housed, and preventing displacement. It also reflects the cost benefits to preserving existing affordable units, in balance with the very real need to increase our production of affordable housing.

Objectives within the housing preservation and stability goal are divided into three topic areas: strengthening renter protections and preventing displacement (Objective 2.1), promoting more affordable ownership opportunities and ownership retention strategies (Objective 2.2), and conserving and improving the quality of housing (Objective 2.3). The overall policies within these objectives emphasize the importance of protecting the most vulnerable Angelenos from housing instability and the preservation of affordable housing.

Updated, new and noteworthy Policies (Pol.) supporting housing preservation and housing stability can be summarized as follows:

- Strengthen the protection of tenants' rights through enhanced RSO enforcement and legal assistance (Pol. 2.1.4)
- Expand right of first refusal and ensure a no net loss of affordable units (Pol. 2.1.5)
- Promote acquisition and extension of expiring covenants (Pol. 2.1.5)
- Limit short-term rentals, residential conversions to hotels and vacancies (Pol. 2.1.6)
- Develop local anti-displacement strategies with big investments (Pol. 2.1.7)
- Expand individual and community ownership opportunities (Pol. 2.2.1)
- Prioritize wealth generation for underserved communities (Pol. 2.2.3)
- Protect communities, especially communities of color, from predatory lending, land acquisition, speculative real estate transactions (Pol. 2.2.5)

Updated, new and noteworthy Programs (Pr.) supporting housing preservation and housing stability can be summarized as follows:

- Expand and improve the Affordable Housing Registry (Pr. 8)
- Extend the Eviction Defense Program (Pr. 88)
- Expand housing replacement and right to return to more types of projects (Pr. 29)
- Explore the adoption of a Just Cause ordinance (Pr. 85)
- Implement the new Tenant Anti-Harassment Ordinance and conduct outreach and education to inform the public on what constitutes tenant harassment (Program 86)
- Apply no net loss and replacement policies to all sites on the Sites Inventory, per state law (Program 46)

Goal. 3 Healthy, Livable, Sustainable, and Resilient Communities

Goal 3 emphasizes the important role of housing in creating a city that offers healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos. The goal is connected to an array of policies and actions that both enhance the quality of life and well-being of communities throughout Los Angeles as well as promote overall sustainability and resilience.

The objectives under this goal relate to the use of quality design (Objective 3.1), environmental sustainability (Objective 3.2), and promoting disaster and climate resilience in citywide housing efforts (Objective 3.3). The design objective recognizes that housing can promote healthy communities and well-being, increase access to amenities, contribute to a sense of place, and foster community and belonging. Advancing environmentally sustainable residential buildings and land use patterns creates the path towards a low-carbon City, green energy future, and implements the City's Green New Deal (Sustainability pLAn) and Citywide Resilience Strategy. The policies and programs under this goal promote sustainable neighborhoods and lessen impacts on natural resource consumption by directing housing toward jobs and transit and by employing green-building techniques. The Housing Element Update places an added focus on health, while the plan's existing focus on safety is more explicitly linked to disaster resilience.

Updated, new and noteworthy Policies (Pol.) supporting healthy, livable, sustainable, and resilient communities can be summarized as follows:

- Use design to create a sense of place, promote health and promote racially and socially inclusive neighborhoods. (Objective 3.1)
- Promote environmentally sustainable buildings and land use patterns that support a mix of uses, housing for various income levels and provide access to jobs, amenities, services and transportation options. (Objective 3.2)
- Promote disaster and climate resilience in citywide housing efforts. (Objective 3.3)
- Provide incentives to support the preservation of historic residential structures. (Policy 3.1.1)
- Establish development standards that promote positive health outcomes for the most vulnerable communities and populations. (Policy 3.1.6)
- Promote new multi-family housing, particularly affordable and mixed income housing, in areas near transit, jobs and Higher Opportunity Areas (Policy 3.2.2)
- Promote affordable and mixed-income housing near transit and jobs to facilitate a better jobs-housing balance, help shorten commutes, and reduce greenhouse gas emissions. (Policy 3.2.2)

Updated, new and noteworthy Programs (Pr.) supporting healthy, livable, sustainable and resilient communities can be summarized as follows:

- Expand opportunities for adaptive reuse (Pr. 13)
- Promote historic preservation incentives especially in lower-income areas (Pr. 43)
- Incorporate development and design standards to promote pedestrian safety and preserve architectural context (Pr. 58)
- Enable redevelopment of brownfields sites (Pr. 14)
- Provide grants and education for property owners to keep properties lead safe and healthy (Pr. 35)
- Prepare disaster resilience and recovery programs (Pr. 53)
- Facilitate temporary housing during disaster response (Pr. 113)
- Provide outreach and training for emergency preparedness and response (Pr. 114)
- Improve housing and ecology to respond to unique ecological needs of the City and respond to the climate crisis (Pr. 79)
- Offer energy efficiency and water conservation upgrade opportunities for residential customers (Pr. 76)
- Establish building design and materials guidelines for sustainable housing (Pr. 74)
- Continue recycling collection in residential development (Pr. 75)
- Expand the urban tree canopy (Pr. 73)
- Establish land use and building code policies to support aging in place and special needs housing (Pr. 11)
- Continue the handyworker program to improve safety, security and comfort for older adults. (Pr. 23)

Goal 4. Advancing Equity, Inclusion, and Access to Opportunity

Goal 4 strives towards a City that fosters racially and socially inclusive neighborhoods and corrects the harms of racial, ethnic, and social discrimination of the past and present. This goal recognizes that impacts of the affordable housing crisis are not equitably experienced by all Angelenos due to historic and ongoing structural inequities such as redlining, racially restrictive covenants, and exclusionary zoning. The effects of past systematic segregation and exclusion in housing are still apparent in many areas of Los Angeles today. Communities of color remain largely segregated and excluded from areas with better access to opportunities such as high performing schools and jobs. Lower income households, particularly Black, Indigenous, and People of Color, also have much higher rates of housing insecurity and a greater need for affordable housing.

The objectives under this goal relate to ensuring that housing opportunities are accessible to all residents without discrimination (Objective 4.1), promoting outreach and education on fair housing practices and accessibility (Objective 4.2) and a new affirmatively furthering fair housing objective committing to taking proactive measures to promote diverse, inclusive communities that grant all Angelenos access to housing in Higher Opportunity Areas (Objective 4.3). The policies and programs under this goal promote and facilitate equal opportunity practices in the construction, provision, sale and rental of housing.

Updated, new and noteworthy Policies (Pol.) supporting the advancement of *equity, inclusion, and access to opportunity* can be summarized as follows:

- Allocate housing targets across Community Plan Areas (Pol. 1.1.6)
- Rezone for affordable housing densities in every geography (Pol. 1.1.7)
- Prioritize housing capacity, resources, policies and incentives to include affordable housing in residential development, particularly near transit, jobs, and in higher opportunity areas (Pol. 1.3.1)
- Explore the feasibility of inclusionary zoning (Pol. 1.2.6)
- Integrate anti-displacement strategies in land use and planning (Pol. 1.1.9)
- Prioritize underrepresented voices, through programs, planning, and outreach efforts (Pol. 1.1.10, 1.3.3)
- Facilitate equal opportunities in rental, for sale, lending, and the receipt of housing vouchers (Pol. 4.1.1)
- Eliminate housing barriers and assist populations experiencing discrimination (Pol. 4.1.4)
- Expand ownership models that increase the ability for households to attain homeownership (Pol. 2.2.1)
- Develop strategies that support current homeowners in retaining their homes, protect tenants from eviction if a property is foreclosed, and prevent neighborhood instability resulting from foreclosures (Pol. 2.2.2)
- Partner with homeowners and community organizations, especially in communities of color, to expand knowledge and dialogue about land use regulations and individual and community equity (Pol. 2.2.4)

Updated, new and noteworthy Programs (Pr.) supporting the advancement of *equity, inclusion, and access to opportunity* can be summarized as follows:

- Focus RHNA required rezoning in higher opportunity areas (Pr. 121)
- Pursue the creation of a community housing needs assessment process that allocates the citywide RHNA to Community Plan Areas based on a methodology that reflects citywide priorities (Pr. 49)
- Expand access to opportunity through Community Plans (Pr. 65)
- Explore inclusionary zoning (Pr. 81, 126)
- Affirmatively Further Fair Housing (AFFH) (Pr. 123, 124)
- Education on housing topics including: growth, discriminatory housing practices, housing need, mixed use and mixed-income neighborhoods (Pr. 67)
- Expand individual and community ownership opportunities (Pr. 1, 2, 4)
- Strategies for preserving naturally occurring affordable housing (NOAH) (Pr. 30)
- Provide resolution to illegal housing discrimination through a Citywide Fair Housing Program (Pr. 84)
- Implement the Affordable Housing Accessible Housing Program (Pr. 8)
- Provide rental assistance to very low-income families in the form of vouchers to expand their access to opportunity areas (Pr. 41)
- Computerized Information Center/Information & Referrals for Persons with Disabilities

Goal 5. Preventing and Ending Homelessness

Goal 5 commits the City to preventing and ending homelessness based on the longstanding principle that housing is a human right. This goal requires that every individual and family is housed, and promotes strategies to prevent residents from losing their housing and to rapidly rehouse those who do fall into homelessness. The drastic shortfall of affordable housing available to people with the lowest incomes throughout the region has contributed to more people experiencing homelessness in recent years, even as the homeless services system has scaled up significantly and become more effective and efficient in response.

The homelessness-related objectives build upon the multi-layered approach adopted by the City during the prior eight years. Objective 5.1 recognizes the need to provide sufficient temporary and emergency shelters to meet short-term needs, while working toward a rapid return to more stable housing or permanent supportive housing over the longer-term. Objective 5.2 emphasizes the need for significant outreach and education efforts, which seek both to inform people experiencing homelessness about housing and service opportunities as well as increase awareness for all City residents about homelessness. This approach is reflected in the enhanced Comprehensive Homeless Strategy (CHS), adopted by the Mayor and City Council on March 19, 2019, which describes ongoing responsibilities and measurable actions City Departments are taking to achieve the City's goal to achieve functional zero homelessness. The enhanced CHS builds upon the original CHS adopted in February 2016.

Updated, new and noteworthy Policies (Pol.) supporting the prevention and ending of homelessness can be summarized as follows:

- Pursue a Housing-First approach and coordinate service provision
- Ensure there are enough temporary and permanent housing options
- Facilitate prevention to reduce entry into homelessness
- Expand supportive services and provide greater outreach
- Identify and remove barriers to permitting, preserving, and expanding licensed community care facilities
- Invest in additional services + facilities such as water fountains, showers, kitchen facilities, storage, and restrooms
- Provide opportunities for communities to dialogue and learn about root causes of homelessness, ways to help, and effective approaches to preventing and ending homeless

Updated, new and noteworthy Programs (Pr.) supporting the prevention and ending of homelessness can be summarized as follows:

- Comprehensive Homeless Strategy
- Coordinated Entry System (CES)
- Street Outreach (United Homeless Response Center)
- Homelessness Prevention and Rapid Re-Housing Program (HPRP)
- Emergency Shelter and Transitional Housing Facilities
- Zoning for Health-Based Residential Facilities
- Zoning and Development Standards for Homeless Housing
- Assistance for Homeless Persons in Accessing Housing and Services
- Homeless Management Information Systems (HMIS) Data Collection
- Access New Resources and Services for the Homeless
- Homeless Housing and Services Coordination (No Wrong Door)
- Permanent Supportive Housing For Homeless Persons
- Rental Assistance for Homeless Households
- Job Training and Placement for Homeless Individuals

- Veterans Affairs Supportive Housing (VASH)
- Family Solutions System
- Overnight Shelter (Winter Shelter and Year-Round Shelter)

RHNA Allocation for Los Angeles

Under California state law, every jurisdiction is obligated to plan for and accommodate its "fair share" of regional housing need through a demonstration of available zoning capacity. The jurisdiction's "fair share" is determined through the RHNA Allocation process.

The RHNA Allocation process begins with a regional determination issued by the State (HCD) to the Southern California Association of Governments (SCAG) region. This figure represents the total number of housing units needed to meet housing needs in the SCAG region. SCAG is then responsible for developing a methodology to allocate the RHNA to each jurisdiction within the region. In prior Housing Element cycles, the regional determination figure was based solely on *projected* housing need during an eight-year planning period. Recent changes to state law added a requirement that *existing* housing needs must be incorporated in the regional determination. This is done by considering specific indicators such as cost burden, vacancy rates and overcrowding. This has led to a significant increase in the RHNA allocation this cycle, particularly in areas like Los Angeles experiencing an acute housing affordability crisis.

On August 22, 2019, HCD issued a final regional determination of 1,341,827 units to the SCAG region for the 6th cycle. This figure is more than three times the prior regional allocation from eight years ago and is reflective of the need to alleviate the high rates of cost burden and overcrowding in the SCAG region.

Through their RHNA Allocation methodology, SCAG has assigned the City of Los Angeles a RHNA of 456,643 units. This allocation is over five times greater than the City's 82,002 unit-allocation issued for the 5th cycle. The RHNA Allocation is further distributed across very low, low, moderate, and above moderate income categories as shown in Table 1, below. Of the 456,643-unit total allocation, over 40% are allocated to lower income units (which includes very low and low income).

Table 1

City of Los Angeles RHNA Allocation (2021-2029)					
	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
Number of Units	115,978	68,743	75,091	196,831	456,643

Under the RHNA allocation, the City is required to provide the realistic zoned capacity to accommodate the development of at least 456,643 residential units using various land use planning strategies. The process of demonstrating this realistic zoned capacity takes place as part of the Adequate Sites Inventory in the Housing Element. If a shortfall of existing sites is found, the RHNA must be accommodated within three years through a rezoning program. To demonstrate capacity for lower income households, the State requires that the RHNA analysis demonstrate that the City has enough parcels zoned at sufficiently high densities (30 units per acre).

Senate Bill 166 (No Net Loss Law, 2017, 2018) requires sufficient sites to be available at all times throughout the RHNA planning period to accommodate the RHNA. During the 8-year cycle if sites

are developed with a non-residential use, developed with a lower number of units at each income level than identified in the Sites Inventory, or are rezoned to lower densities, the City must demonstrate that there are adequate remaining sites in the inventory to accommodate the remaining RHNA Allocation. If the City finds there is insufficient remaining capacity at each income level, it would be subject to additional rezoning requirements as part of allowing future development.

To ensure that sufficient sites are available in the Housing Element throughout the planning period, in line with state law, a target capacity is proposed that is 10% higher than the RHNA for lower income units, and 15% higher than the RHNA for moderate income units. The buffers are intended to ensure that future projects will not trigger rezoning requirements. They result in a target capacity for the Adequate Sites Inventory and Rezoning Program of 486,379 units (29,736 units higher than RHNA). The target capacity by income category is summarized in Table 2.

Table 2

Target Capacity for Inventory of Sites and Rezoning Program			
Income Category	RHNA Allocation	Target Buffer (% above RHNA)	Target Capacity
Lower Income	184,721	10%	203,193
Moderate Income	75,091	15%	86,355
Above Moderate Income	196,831	0%	196,831
Total	456,643	7%	486,379

Adequate Sites Inventory

The Adequate Sites Inventory (Appendix 4.1 through 4.3 and 4.8) presents an inventory of land suitable and available for residential development to meet the City's RHNA Allocation at all income levels. The analysis demonstrates that, between 2021-2029, the City has an anticipated development potential of 230,964 units, of which 72,650 units are Lower Income. This includes sites that were identified through three key components, including expected development potential on vacant and underutilized sites, planned and approved development projects, and non-site-specific development potential that provide additional alternative means of meeting the RHNA. These sites are shown on Map 2 below.

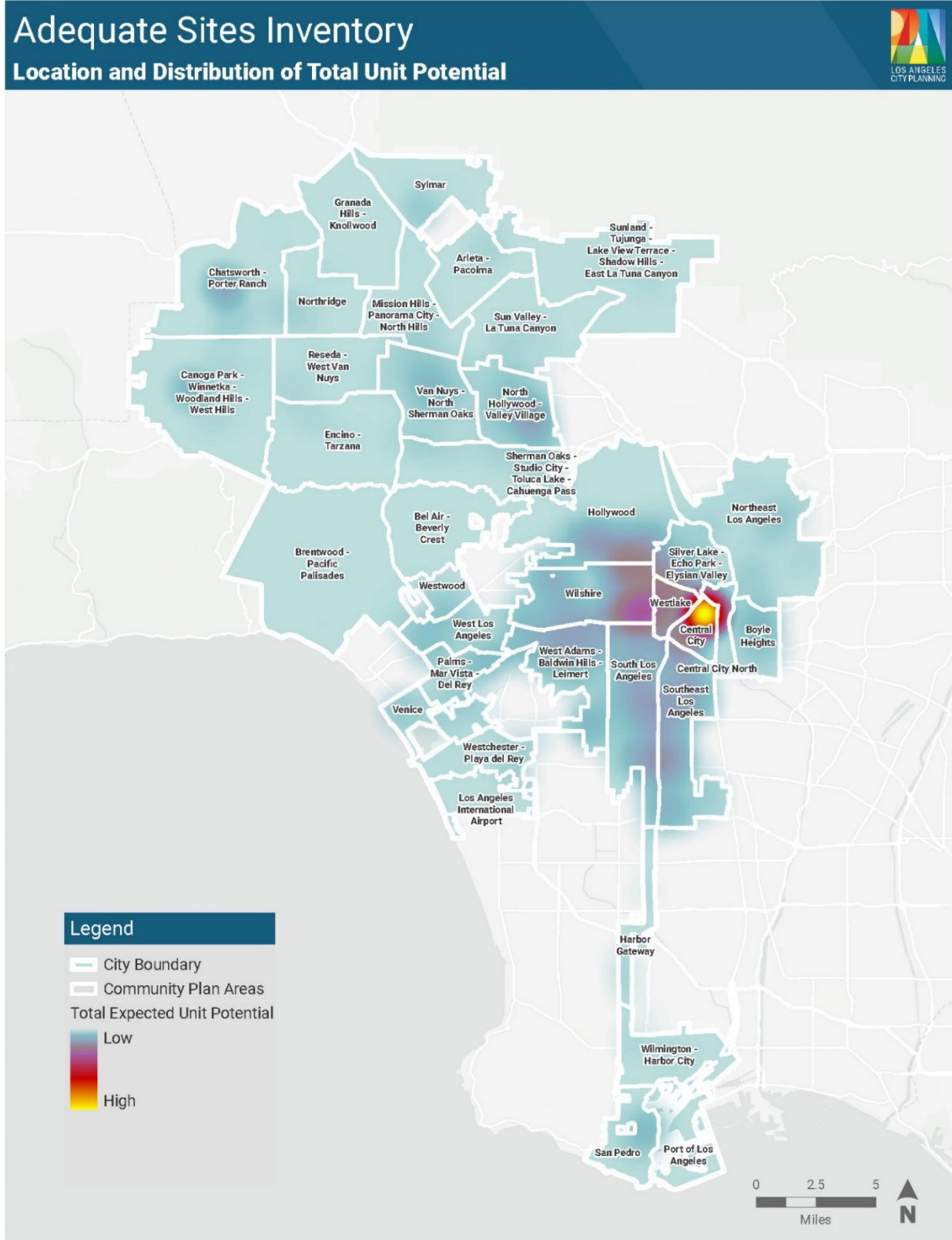
For the 6th Cycle, there are several key changes to state Housing Element law which have strengthened the requirements pertaining to the Adequate Sites Inventory. In particular, AB 1397 (2017) requires that, for each site included in the inventory, the City identifies the realistic development potential for the site within the 8-year planning period. In instances where non-vacant sites comprise over 50% of the Adequate Sites Inventory, such as in the City's Housing Element, existing uses are presumed to impede development unless findings are provided that the use is likely to be discontinued. The City of Los Angeles is predominantly built out, and the majority of sites are non-vacant; therefore, the methodology used to identify realistic development potential must consider factors such as existing uses, past development trends, market conditions, and the availability of regulatory and/or other development incentives, and cannot simply provide a measure of available zoned capacity.

To comply with strengthened state requirements to provide substantial evidence that a vacant or underutilized non-vacant site will redevelop with housing, the plan includes a predictive model prepared by the Turner Center for Housing Innovation at the University of California at Berkeley

to determine the realistic development potential. The model accounts for a parcel's actual zoned capacity before and after development bonuses, as well as market conditions and various other factors which impact the likelihood for a site to develop into housing, including those the City is required to address per state law. This analysis results in a total figure of 42,781 units over the 8-year period. In addition, due to the build out limitation in the Warner Center Specific Plan Area and the current rate of development activity in the area, the inventory considers this Specific Plan Area as one site with a total development potential of 10,491 units during the 8-year period.

The plan then identifies units permitted, built, entitled, or pending that may occur through planned and approved projects that are already in the development pipeline, including public and private development projects. This results in a total development pipeline of 125,705 units.

Lastly, the plan identifies additional alternative means of meeting the RHNA, including housing units that are anticipated to occur through programmatic or other non-site-specific activities. This includes anticipated Accessory Dwelling Unit (ADU) production, an expansion of Project Homekey, and new public land development programs, resulting in an additional 51,987 units.

Map 2. Location and Distribution of Expected Unit Potential

Rezoning Program

Under state Housing Element law, when insufficient sites are identified to accommodate the RHNA during the eight-year planning period, the Housing Element must include a Rezoning Program to identify and make available additional sites to accommodate those housing needs early within the planning period. Rezoning should be complete no later than three years and 120 days from the beginning of the planning period (October 15, 2021). A one-year extension to the deadline to complete required rezoning may be allowed if a local government has shown sufficient progress in rezoning.

After consideration of all three components of the Adequate Sites Inventory, the Housing Element identifies a total development potential of 230,964 units, which is insufficient to accommodate both the RHNA Allocation of 456,643 units and the target capacity of 486,379 units. As a result, the Housing Element Update identifies a shortfall of 255,415 units, which must be accommodated by a rezoning program.

The Housing Element's Rezoning Program (see Program 121 in Ch. 6) identifies the concepts and strategies that were used to identify candidate sites that have the potential to be rezoned for housing at different income levels. Rezoning ordinances must be adopted separately through the processes prescribed in the Los Angeles Municipal Code and will include extensive outreach and community input and participation to refine the strategies in the Rezoning Program. The Rezoning Program includes existing work efforts such as updates to up to 16 Community Plans (four West Los Angeles plans, three Southeast Valley plans, three Southwest Valley plans, two Downtown plans, the Boyle Heights plan, the Hollywood plan, the Harbor-Gateway plan and the Wilmington plan), three neighborhood Plans (the Orange Line Transit Neighborhood Plan (TNP), the Cornfields Arroyo Seco Specific Plan (CASP) and the Slauson TNP), as well as new citywide zoning ordinances and updates to affordable housing incentive programs (e.g. Density Bonus, Transit Oriented Communities (TOC)).

In alignment with the proposed citywide priorities, goals, objectives, and policies, the Housing Element proposes an equitable rezoning strategy that focuses the majority of additional capacity in Higher Opportunity Areas and areas near jobs and transit, protects vulnerable populations from displacement and housing pressures, and avoids additional capacity in environmentally sensitive communities — such as areas vulnerable to sea level rise and Very High Fire Hazard Severity Zones (VHFHSZs). The program also envisions higher affordable housing requirements than are typically achieved through existing incentive programs, particularly in the Higher Opportunity Areas. It will also explore the provision of additional enhanced community benefits for rezoned properties, including longer affordability terms, a greater income mix, strengthened housing replacement and right of return requirements, sustainability features, as well as additional incentives for housing being developed by community land trusts, public agencies, cooperatives, and nonprofits.

The Inventory of Candidate Sites for Rezoning (Appendix 4.7, in Exhibit B) identifies potential sites for future rezoning along with information on each of the properties, including the realistic number of housing units that can be accommodated on each site, as required by state law. Sites identified to be rezoned to meet the lower income RHNA must meet additional requirements. In particular, these sites must be zoned to permit multifamily use by-right for projects that include at least 20% of the units for lower-income households, and must be zoned with a minimum density and development standards that permit at least 20 units per acre and 16 units per development site. Additionally, at least 50% of the lower income rezoning need must be accommodated on sites designated for residential use (R zones).

Candidate Sites for rezoning were selected based on the criteria included in the Rezoning Program description in Chapter 6. Because many different strategies and work efforts are planned as a part of the program, the various components are broken out into unique rezoning strategies, which are individually discussed in Chapter 4 (See Rezoning Program Strategies and Key Assumptions). Plan updates anticipated over the next three years are included and combined to represent the largest rezoning strategy. In addition, strategies focus on residential and commercial corridors in Higher Opportunity Areas (Opportunity Corridors), expansion of existing Density Bonus and Transit Oriented Communities (TOC) incentives and incentive areas, missing middle strategies looking at R2 and RD zones as well as additional ADUs in some areas. Additional unique strategies include expanding adaptive reuse, micro unit development, and allowing multifamily housing in Parking (P) zones adjacent to commercial areas. Finally, a series of affordable housing specific strategies are included in the program, including an Affordable Housing Overlay strategy that would allow 50-100% affordable housing on faith-based (religious) owned properties, public land (PF Zones) as well as in a wider variety of residential areas (but not Lower Resource or High Segregation and Poverty Areas).

The various rezoning strategies include their own set of individualized assumptions regarding availability and suitability of sites and overall capacity. Sites where no reasonable likelihood or realistic capacity exists are either excluded from the inventory through the initial selection criteria, or heavily discounted according to a site-based series of suitability adjustment factors (see Table 4.18 in Chapter 4). Downward capacity adjustments were made for sites with high existing site utilization (> 2.0 FAR), a higher ratio of existing units compared to allowable ($< 4:1$), recently built buildings (< 25 years), as well as those with buildings subject to the RSO or designated as Historic Cultural Monuments. In addition to these exclusions and adjustments, expected capacity is typically reduced to 80% of a site's maximum allowable density based on results from the sites inventory regression model discussed below. Pre-adjusted capacities are calculated based on the difference between the number of existing units on a site, to establish potential net gain in units. If the net gain is less than or equal to zero, the site was removed from the list.

After these adjustments, a total of at least 243,587 sites with the potential for 1,444,413 units have been identified as part of the Rezoning Program. These units have been distributed to different income categories using the methodology summarized above. At least 24,587 sites containing 594,865 units have been identified as meeting the state law criteria as lower income, meaning they can accommodate at least 16 units per site and can include minimum densities of at least 20 units/acre. At least 130,543 units must be accommodated as lower income sites at these densities. Rezoning of lower income sites requires the site be permitted to allow a multi-family use by-right when at least 20% of the total units are dedicated as lower income affordable housing. As shown in Map 3, the Rezoning Program primarily creates new development potential in areas located within a Regional Center (such as Downtown Los Angeles), near public transit, along corridors and in areas of Higher Opportunity (such as in West Los Angeles and the South Valley).

Rezoning Candidate Sites

All Units, Distribution of Potential Units

This map illustrates the distribution of potential units across various community plan areas in Los Angeles. The map uses a color gradient to represent realistic capacity, ranging from low (light blue) to high (red). The map includes labels for numerous community plan areas, such as Sylmar, Granada Hills - Knollwood, Arleta - Pacoima, Sunland - Tujunga, Lake View Terrace - Shadow Hills - East La Tuna Canyon, Northridge, Mission Hills - Panorama City - North Hills, Sun Valley - La Tuna Canyon, Chatsworth - Porter Ranch, Reseda - West Van Nuys, Van Nuys - North Sherman Oaks, North Hollywood - Valley Village, Sherman Oaks - Studio City - Toluca Lake - Caluenga Pass, Hollywood, Northeast Los Angeles, Silver Lake - Echo Park - Elysian Valley, Westlake, Boyle Heights, Central City North, Southeast Los Angeles, Central City, West Los Angeles, West Adams - Baldwin Hills - Leimert, South Los Angeles, Venice, Palms - Mar Vista - Del Rey, Westchester - Playa del Rey, Los Angeles International Airport, Harbor Gateway, Wilmington - Harbor City, San Pedro, and Port of Los Angeles. A legend in the bottom left corner defines the symbols for City Boundary, Community Plan Areas, and Realistic Capacity (Low to High). A scale bar and north arrow are located in the bottom right corner.

Legend

- City Boundary
- Community Plan Areas
- Realistic Capacity
 - Low
 - High

0 2.5 5 Miles

N

It is important to note that the Inventory of Candidate Sites for Rezoning lists many more sites and potential units than are necessary to satisfy the RHNA requirements. This expansive approach is purposeful to allow the flexibility for future refinement of the rezoning strategies and sites. As such, sites included on the list should be considered as potential sites for rezoning consideration, not a final list of sites that will be rezoned. Other sites may be added, and listed sites may be removed or amended. A public review process will help guide future recommendations as to which sites are rezoned at which densities but should follow the Housing Element's objective of an equitable rezoning program that furthers fair housing goals.

The City has three years to complete required rezoning, and many of the work efforts under the larger Rezoning Program are only now being initiated and developed and will be refined through a community engagement process. Additionally, there is a need for more public deliberation and policy development to determine important details, such as affordable housing requirements and more nuanced development standards, which are critical to the success of the Rezoning Program. Rezoning ordinances will undergo a more thorough review to ensure citywide policies are being properly considered, in consultation with stakeholders, prior to consideration by decision makers.

Analysis of Adequate Sites Inventory and Candidate Sites for Rezoning

In addition to identifying sites to accommodate the RHNA Allocation, cities must evaluate the sites to determine consistency with requirements to Affirmatively Further Fair Housing (AFFH). Specifically, the plan must contextualize the distribution of sites in relation to historical patterns and trends of socio-economic characteristics and racial/ethnic concentrations of poverty and affluence. The goal is to have identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, and ultimately transforming racially and ethnically concentrated areas of poverty into areas of opportunity. In line with guidance provided by the state, the plan utilizes the TCAC/HCD Opportunity Map (see Map 1 above) and index to analyze the distribution of identified sites and unit potential in relation to the overall citywide distribution of areas with higher and lower resources (or opportunity). In addition, the analysis utilizes other key data sources, including the U.S. Census American Community Survey (ACS), Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs), Racially Concentrated Areas of Affluence (RCAAs), transit access, and a displacement vulnerability index (see Chapter 4 for maps and descriptions).

Because the Adequate Sites Inventory is reliant on existing zoning capacity and recent development patterns, the AFFH analysis finds that it is largely a reflection of existing conditions in the city. While it does not exacerbate existing conditions related to fair housing and patterns of segregation, it does not actively improve them. Rather, it reflects existing disparities in the City's zoning and development patterns. To improve conditions, which is required to affirmatively further fair housing, the plan identifies programs that should be implemented alongside the Rezoning Program.

The results of the rezoning analysis show that, with implementation of the Rezoning Program, there would be an overall improvement to existing conditions from an equity and AFFH perspective. The Rezoning Program places a strong emphasis on expanding housing capacity — especially affordable housing capacity — in Higher Opportunity Areas. As a result of this emphasis, the analysis finds that the Rezoning Program provides substantially more affordable housing opportunities in Racially Concentrated Areas of Affluence.

The Rezoning Program will also add capacity in areas considered High Segregation and Poverty and areas considered Racially/Ethnically Concentrated Areas of Poverty; however, most of the added capacity in these areas is proposed through the current Community Plans underway, in particular Downtown. Community Plans can be more responsive to the place-based needs of

residents and plan for other amenities such as increased green space, mobility improvements, and employment centers. Thoughtful planning for additional housing and amenities in majority low-income, Black, Indigenous, and People of Color neighborhoods is essential in meeting the needs of these communities' residents and essential in meaningfully advancing fair housing choice.

With implementation of the Rezoning Program, it is anticipated that the plan will affirmatively further fair housing and work to create a more equitable set of land use regulations for the City. However, due to the pervasive risk of displacement, the analysis concludes that it is critical that the Rezoning Program is paired with a robust set of programs aimed at addressing other constraints, as well as ensuring equity, protecting existing housing stock and increasing tenant protections.

Altogether, the analysis provided in the Housing Element Update provides support for a strong set of anti-displacement policies and programs, paired with the need for a citywide Rezoning Program that focuses on creating significant new opportunities for housing development, particularly affordable housing development, in areas of Higher Opportunity. The rezoning program is also accompanied by a set of goals, objectives, policies, and programs to complete the City's housing action plan for the 2021-2029 planning period.

Safety Element and Health Element Background

The update of the Housing Element triggers requirements that the City review, and update as necessary, related Elements of the General Plan. Specifically, the City must demonstrate compliance with all recent state legislation on the topics of hazard planning and environmental justice.

Los Angeles addresses hazard planning through its General Plan Safety Element and Local Hazard Mitigation Plan (LHMP). The Los Angeles Safety Element was first adopted in 1975 and underwent a comprehensive update in 1996. The LHMP was first adopted in 2004, with subsequent updates in 2010 and 2018. The overall structure and content of the 1996 Safety Element and 2018 LHMP satisfies the majority of state requirements that relate to hazard planning, but could more fully address recent state legislation around planning for climate change and related disasters. The City has articulated its approach to planning for climate change through several related long-range documents. Therefore, the Safety Element is undergoing a limited update to integrate content from existing documents, and more accurately reflect other established city work programs that have been instituted since the last update. The LHMP is also proposed to be formally incorporated into the Safety Element of the General Plan by reference.

In Los Angeles, the topic of environmental justice is addressed in several General Plan elements, including Housing, Safety, Mobility, and Land Use (Community Plans). However, the Plan for a Healthy Los Angeles (Health Element), is the General Plan Element that satisfies specific state requirements as they pertain to Environmental Justice. Targeted updates to the background section of the Health Element will clarify this compliance with state legislation and will also reflect new environmental justice content developed through the Housing and Safety Element updates.

State Law Framework

Statutory requirements for the Safety Element are delineated in California State Government Code Section 65302(g), which requires a Safety Element that protects "the community from any unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to mudslides

and landslides; subsidence; liquefaction; and other seismic hazards... flooding; and wildland and urban fires.”

State law requires both the “mapping of known seismic and other geologic hazards”, as well as the inclusion of policies that address relevant hazards. The law also contains the requirements to: update the Safety Element as necessary alongside the most recent update to the Housing Element (Sec. 65302(g)(2)) and identify hazards and hazard abatement provisions to guide local decisions related to zoning, subdivisions, and entitlement permitting. New state legislation also requires that cities include goals, policies, objectives, and feasible implementation measures that place a greater emphasis on climate change and the related disasters of wildfires and flooding (SB 379, AB 162, SB 1241, SB 1035, Sec. 65302(g)(4)(B) and (C)). In addition to expanded climate change policy requirements, safety elements must now include a vulnerability assessment, a requirement that can be satisfied by incorporating the Local Hazard Mitigation Plan into the safety element by reference (Sec. 65302(g)(4)). Additionally, state requirements on the topic of evacuation routes in hazard areas have been expanded (SB 99, AB 747). Detailed information on these requirements, and how the Safety Element satisfies specific provisions of the California Government Code is available in Exhibit I.

Content and structure from the previous 1996 Safety Element, which continues to satisfy the bulk of state mandates for Safety Elements, has been carried over into the current update. While the Housing Element is undergoing a comprehensive update, the updates to the Safety Element are focused on compliance with recent state legislation. This staff report focuses on sections of the Safety Element that are proposed to be added or amended during this update, with less emphasis on content that is carried over from the 1996 Safety Element.

Under Sec. 65302(h) the State requires cities with “disadvantaged communities” to “adopt or review the environmental justice element, or the environmental justice goals, policies, and objectives in other elements” upon the update of two or more other General Plan Elements. Environmental justice is defined in California law as the “fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies” (Sec. 65040.12(e)). The Environmental Justice Element or environmental justice goals, policies, and objectives integrated into other General Plan Elements are required to identify disadvantaged communities as well as objectives, policies, and programs to reduce the unique health and safety risks they face, meaningfully promote civic engagement and public decision-making processes, and address the needs of disadvantaged communities.

The City of Los Angeles is already demonstrating consistency with these requirements through the City’s Health Element and related Health Atlas. Targeted amendments to highlight compliance are outlined below.

Plan for a Healthy Los Angeles (Health Element) Summary of Updates

The *Plan for a Healthy Los Angeles* (Health Element) is a General Plan Element adopted in 2015 that guides growth and development decisions through the lens of health and wellbeing. The Health Element includes a focus on equity in land uses and the built environment, parks and open space, recreation, healthy food, education, economic prosperity, climate change exposure, and climate change resilience. The Health Element also contains a list of implementation programs that are being executed by the City now or are proposed in the short-term, mid-term, and long-term as funding and staff are available. The Plan is accompanied by the 2013 Health Atlas for the City of Los Angeles which includes spatial data for health indicators, health outcomes, and health disparities in the city.

The update of two or more general plan elements triggers a state requirement to adopt or review an environmental justice element or the environmental justice goals, policies, and objectives in other elements, under the provisions of Senate Bill (SB) 1000. Therefore, the City is required to review existing environmental justice policies to ensure compliance with state law. Although the Health Element was adopted prior to SB 1000 passing in 2016, it addresses environmental justice consistent with the requirements of state law. The proposed technical amendments to the Health Element, shown in Exhibit J, will serve to clarify its role as the primary compilation of environmental justice policies and programs for the City.

When the Health Element was prepared, the City chose to forego the term “disadvantaged communities” and chose instead to use the term “vulnerable communities;” the proposed text is updated to reflect this approach and demonstrate compliance with 65302(h)(1) requirements to identify disadvantaged communities (as defined in 65302(h)(4)(A)). One updated and two new programs highlight equitable civic engagement and the work of City Planning’s Office of Racial Justice, Equity, and Transformative Planning, which began in 2020. New references to goals and policies from the Mobility Plan 2035, 2021-2029 Housing Element, and Safety Element also highlight the equity and environmental justice aspects of these related General Plan Elements. Finally, a new edition of the Health Atlas reflecting updated data and map sets is being prepared as supplemental information, providing an updated resource to address environmental and social disparities for all City departments and community members. A selection of updated maps, which includes the Health Atlas’s Hardship Index, Median Household Income, Life Expectancy at Birth, and Pollution Burden Index, is provided for reference as Exhibit L.

Safety Element Background

The Safety Element of the General Plan addresses protection from unreasonable risks associated with natural and human-caused disasters and hazards, including fire, flooding and earthquakes. As required by recent state law, the Safety Element and Local Hazard Mitigation Plan (LHMP) must now additionally address the effects of climate change, including sea level rise, more frequent extreme heat and wildfires, and prolonged drought. The City must also describe efforts to address the root causes of climate change, primarily greenhouse gas (GHG) emissions. The Safety Element does not address police or law enforcement matters except in the context of disaster preparedness, response, and recovery. As a General Plan Element, the Safety Element offers a high-level overview of how the City plans for disasters, and references readers to other documents where they can find more detailed information. The LHMP includes background information and mapping of local hazards, as required by state law and Federal Law.¹

The Safety Element is maintained by the Department of City Planning and implemented by several City departments, through the goals and policies (Chapter 3) and as detailed in the implementation programs (Chapter 4). Several City departments draft and implement additional long range plans and code provisions that address safety and disaster planning. Specifically, the Emergency Management Department (EMD) has a lead role in implementing the Safety Element and producing documents that offer more specific and operational details related to disaster response. The Background Chapter (Chapter 2) describes the related resources produced by EMD and other City departments that collectively articulate the City’s approach to disaster management.

¹ Cal. Gov. Code Sec. 8685.9 and 65302.6; 42 U.S.C. Sec. 5165(a) (Disaster Mitigation Act of 2000); 44 CFR Part 201.

The Safety Element provides a contextual framework for understanding the relationship between hazard mitigation, response to a disaster, and initial recovery from a disaster. The overall purpose and intent of the Safety Element has been consistent since it was first adopted in 1975. The proposed Safety Element, shown in Exhibit G, wholly replaces the current Safety Element, adopted in 1996. Because this is a targeted update, the overall format and much of the content from the 1996 Element has been reproduced in the 2021 version, with limited amendments to address recent state legislation, reflect changes to city structure and process since the last update, and reduce repetition across citywide planning documents.

Interdepartmental Review

The Proposed Plans were circulated for review among over 40 City departments, bureaus, and offices to collect and integrate feedback, as well as to confirm or add to the roles and implementation expectations for each City entity. This review by City entities is particularly valuable due to the specialized and technical aspect of the Safety Element (see the Housing Background and Public Input sections for feedback received on that element). For the Safety Element, Los Angeles Fire Department (LAFD), Emergency Management Department (EMD), and Los Angeles Department of Building and Safety (LADBS) are extensively involved in its implementation and undertake annual review of Emergency Plans. Los Angeles World Airports (LAWA), Port of Los Angeles (POLA) and Department of Water and Power (LADWP) also have individual safety procedures and activities developed specifically for their unique safety operations. Other City entities providing public services have opportunities for innovative implementation of the Element, such as libraries, parks and other facilities that serve as community resilience resources year-round, and are repurposed to serve emergency needs such as shelters and cooling centers during and immediately following a disaster or extreme heat event.

In particular, the following departments provided updated information for Safety Element Chapter 2 Existing Conditions, Hazard Issues and Mitigation History and provided the details to complete the compilation of Programs in Chapter 4: Emergency Management Department (EMD), Los Angeles Fire Department (LAFD), Los Angeles World Airports (LAWA), Los Angeles Department of Building and Safety (LADBS), Convention and Tourism Development (CTD), Information Technology Agency (ITA), Department of Neighborhood Empowerment (DONE), Los Angeles Police Department (LAPD), Bureau of Engineering (BOE), Bureau of Sanitation (LASAN), Bureau of Street Services (Streets LA), Department of Transportation (LADOT), Department of Water and Power (LADWP), Recreation and Parks (RAP), Department on Aging, Port of Los Angeles (POLA), Civil + Human Rights and Equity Department, Zoo Department, Fire and Police Pensions, and Los Angeles City Employees' Retirement System (LACERS).

For the Safety Element, two new programs, one focused on mobility and one on mutual aid, were added. Departments shared related plans to be integrated into Safety Element programs, including: LADWP's Wildfire Mitigation Plan, Los Angeles 100% Renewable Energy Study (LA100), Port of Los Angeles Actions to Reduce Greenhouse Gas Emissions by 2050, Los Angeles Fire Department Standards of Cover, and LAWAs Sustainability Action Plan. Of the 27 Departments that responded, 20 reported work programs that relate to climate change. Their efforts, which include projects to harden critical infrastructure, efforts to pursue more sustainable sources of power and water, and disaster response outreach campaigns targeting vulnerable residents like the unhoused, older adults and people with disabilities, are now captured in the Safety Element programs. Additions and clarifications were captured prior to releasing the September draft of the Safety Element.

Health Element feedback focused on new work programs advancing equity and environmental justice. 22 Departments reported equity work programs, mostly commonly citing the appointment of a Racial Equity Officer and/or development of a Racial Equity Action Plan. Many responses

that focused on addressing climate change in the Safety Element also noted the importance of identifying and involving communities vulnerable to disasters in preparing for emergencies, indicating an understanding of the safety connection to environmental justice. These responses will help to drive continued efforts to implement the Health Element.

State Agency Review

In addition to interdepartmental review, the 2021 Safety Element, 2021-2029 Housing Element, and Health Element amendments were submitted to several state agencies on July 15, 2021, including the Governor's Office of Emergency Services, California Department of Forestry and Fire Protection (CAL FIRE), and the California Department of Conservation Geological Survey as required reviewers. The drafts were also sent to the Governor's Office of Planning and Research and California Department of Justice.

Comments were received from CAL FIRE related to policies and programs for which the State provides guidance. Comments were accepted and incorporated by the City of Los Angeles. The Goals, Policy and Objectives section below details how the draft was modified in response to CAL FIRE's comments. The Board of Forestry and Fire Protection reviewed the Los Angeles Safety Element at their meeting on September 21, 2021. Comments from CAL FIRE staff and the Board have been addressed, as shown in Exhibit G.

As of the date of this staff report, no comments were received from the Governor's Office of Emergency Services, California Department of Conservation, the Governor's Office of Planning and Research, or the California Department of Justice.

Safety Element Summary of Updates

The Safety Element update process began with a review of recent state requirements and several long range citywide plans and programs that relate to safety, including: the Local Hazard Mitigation Plan (LHMP), Emergency Operations Plan (EOP), Floodplain Management Plan (FMP), Floodplain Management Ordinance, Green New Deal (Sustainability pLAn) and Resilient Los Angeles Plan. Collectively these plans provided best practices and background information to inform the Safety Element updates detailed below.

The following three main components of the Safety Element targeted update are summarized below:

1. Integration of updated background information and mapping;
2. Amendments to goals, policies, and objectives; and
3. Incorporation of programs from other citywide planning documents.

Background Information and Mapping

The State requires that general plans include background information and supporting exhibits within the Safety Element or LHMP to identify potential hazards, including slope instability, seismic risk, flooding, wildland and urban fires, and to identify approaches to climate adaptation and resilience. Information on most of these hazards, including supporting exhibits, is currently included in both the Safety Element and the LHMP. This is because the LHMP was adopted after the last update to the Safety Element, with initial adoption in 2004 and subsequent updates in 2010 and 2018. To reduce duplication, the City has replaced repetitive descriptions and exhibits within the Safety Element with references to the LHMP (as allowed by Sec. 65302(g)(4)(D)).

In keeping with the structure of the 1996 Safety Element, Chapter 1 and 2 of the amended element provide background information on state requirements including background on recent state legislation and a description of the City's current approach to disaster resilience. Additionally, both

chapters are proposed to be amended to reflect changes in City governance. Most notably, a dedicated Emergency Management Department (EMD) was formed after the last update to the Safety Element, which is now reflected in the 2021 Safety Element. Previously, the Safety Element and LHMP each contained a set of hazard maps, produced on different timelines. To reduce duplication, maps in the Safety Element have been replaced with a reference to the LHMP, creating a single set of hazard maps. Background and historic information found in both documents has also been replaced by a reference to the LHMP.

Many of the existing background sections have been amended to highlight how the City executes best practices recommended by the state. Previously, the Safety Element described disaster mitigations as they pertain to specific hazards. In the updated Element, a section describing general disaster prevention, response and recovery has been added. This section offers background on topics including the siting of critical facilities, planning for evacuation, mass sheltering following a disaster, and consideration of community vulnerability.

Hazard-specific descriptions from the 1996 Safety Element have largely been carried over, with some additions to reflect current practice. The discussion of hazards covers code provisions that relate to urban fire districts (Fire District 1) and the Very High Fire Hazard Severity Zone (VHFHSZ), including the various strategies already employed by the City to mitigate fire risk. Flood hazard information covering flood mapping, issues exacerbated by climate change including sea level rise, and a more ecological approach to stormwater management are also described in Chapter 2. The document continues to satisfy requirements to address seismic hazards and safety with state-required mapping, while adding descriptions on new programs such as the City's new soft-story and non-ductile concrete retrofit programs.

A new section in Chapter 2 addresses the increasing challenge and hazards associated with climate change. Familiar safety hazards and natural disasters are becoming more frequent and severe, while new, unique weather and health hazards arise. The updated Safety Element refers to the Adverse Weather and Drought sections of the LHMP, as well as water supply and management guidance in plans produced by BOE, Bureau of Sanitation (LASAN), and the Department of Water and Power (LADWP). The updated element also references readers to information in the Resilient Los Angeles and Green New Deal plans as valuable sources of background information.

Goals, Policies and Objectives

The third chapter of the 2021 Safety Element includes a policy framework to guide decision making. The 1996 Safety Element includes three goals, which illustrate the City's intent to prevent, respond to, and recover from disaster events. The framework established by these three goals remains relevant, and has been carried over from the 1996 Safety Element. These goals, as amended for the 2021 Safety Element, are provided below for reference:

SE Goal 1: Hazard Mitigations - A city where potential injury, loss of life, property damage and disruption of the social and economic life of the City due to hazards is minimized.

SE Goal 2: Emergency Response - A city that responds with the maximum feasible speed and efficiency to disaster events so as to minimize injury, loss of life, property damage and disruption of the social and economic life of the City and its immediate environs.

SE Goal 3: Disaster Recovery - A city where private and public systems, services, activities, physical condition and environment are reestablished as quickly as feasible to a level equal to or better than that which existed prior to the disaster.

The only substantive amendment to these goals is within Goal 1. The 1996 version of this goal specified disruptions “due to fire, water related hazard, seismic event, geologic conditions or release of hazardous materials disasters.” The 2021 version of this goal speaks more broadly to “hazards” as defined in the LHMP, expanding the overall policy reach of the document and standardizing hazard definitions across the 2021 Safety Element and LHMP.

The overall policy intent of the three objectives and 18 policies is carried over from the 1996 Element. Previously, Many of the policies included repetitive text that the policy be implemented “to the extent feasible and within the resources available.” This clause was moved to the beginning of the Goals and Policies introduction to improve readability. Additionally, program descriptions included as a parenthetical at the end of each policy have been consolidated into the new programs chapter (Chapter 4, detailed below).

A new objective and thirteen new policies have been added under the first goal to reflect the City’s approach to climate mitigation. These new policies, listed below for reference, are drawn from the existing language in each of the 13 corresponding chapters of the Green New Deal.

SE Objective 1.2

Confront the global climate emergency by setting measurable targets for carbon reduction that are consistent with the best available methods and data, center equity and environmental justice, secure fossil free jobs, and foster broader environmental sustainability and resiliency.

SE Policies

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.

1.2.2 Renewable Energy. Aggressively pursue renewable energy sources, transitioning away from fossil based sources of energy and toward 100% renewable energy sources.

1.2.3 Local Water. Continue to lead in water conservation and smart water policy through improvements to per capita water use, watershed management, and wastewater and stormwater recycling.

1.2.4 Clean and Healthy Buildings. Design, build and rebuild buildings using passive energy principals, advanced efficiency measures, and on-site renewable energy.

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

1.2.6 Mobility. In keeping with the Mobility Plan, build a comprehensive and integrated transportation network that changes how Angelenos get around and reduces car dependency.

1.2.7 Zero Emissions Vehicles. In keeping with the Mobility Plan, work toward zero emissions transportation and goods movement and increase zero emissions infrastructure including charging.

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.

1.2.9 Waste and Resource Recovery. Harvest waste as a resource, stimulate economic innovation, and create green jobs by improving and expanding existing systems of trash and recycling.

1.2.10 Food Systems. In keeping with the Plan for a Healthy LA, ensure access to healthy, sustainable food in a changing climate, especially in communities already facing food access disparities.

1.2.11 Urban Ecosystem and Resilience. In keeping with the Conservation and Open Space Elements, create a more temperate biodiverse city with more green space for people and habitat.

1.2.12 Prosperity and Green Jobs. Leverage investments in green infrastructure and systems to create inclusive economic opportunities for the city's workforce.

1.2.13 Lead by Example. Leverage government owned properties and publicly-driven investments to realize broader climate change goals.

Some policies have been revised to reflect the City's increased focus on ecological, systems based resilience.

1.2.3 Local Water. Continue to lead in water conservation and smart water policy through improvements to per capita water use, watershed management, and wastewater and stormwater recycling, incorporating more ecological, systems-based approaches to water management.

A few policies have been modified or added to better integrate the City's increased focus on equity and planning for vulnerable communities. For example, Policy 1.1.7 below has been drafted using language developed for the Resilient Los Angeles Plan, as well as language suggested by CAL FIRE.

1.1.7 Building Community Capacity. Build social cohesion and increase local resilience through community collaboration and education. Provide outreach and education on topics including: local hazard designations, disaster prevention and preparation and evacuation procedures.

Several policies have been modified at the suggestion of CAL FIRE. Language was added to Policy 1.1.3 to encourage the location of critical facilities and infrastructure outside of hazard areas. Policy 1.1.6 was expanded to ensure that state and federal standards are regularly adopted into the Los Angeles Municipal Code, along with the addition of language encouraging existing non-conforming structures and evacuation routes to meet modern compliance standards. Policy 2.1.5 was expanded to capture the City's commitment to staff training and preparedness. Additionally, Policy 1.1.8 was added to reflect the City's commitment to maintaining low density zoning designations in very high fire hazard severity zones.

1.1.8 Land Use. Consider hazard information and available mitigations when making decisions about future land use. Maintain existing low density and open space designations in Very High Fire Hazard Severity Zones. Ensure mitigations are incorporated for new development in hazard areas such as VHFHSZs, landslide areas, flood zones and in other areas with limited adaptive capacity.

Policy 3.1.5, which focuses on recovery following a disaster, has been modified to reflect a more contemporary approach to rebuilding. The policy, as revised, also places more emphasis on ensuring that vulnerable communities are able to return to rebuilt housing. Again, modified language is largely drawn from Resilient Los Angeles, reflecting the significant citywide

interdepartmental coordination and community engagement already undertaken as part of that effort.

3.1.5 Restoration. Look to the future and rebuild based on the lessons of the past. Prior to a disaster, develop and establish procedures for securing assistance and expediting inspection and permitting activities to facilitate the rapid repair and rebuilding of those parts of the private and public sectors which were damaged or disrupted as a result of the disaster with an added consideration of future safety. Develop and establish procedures to enhance the resilience of buildings and infrastructure that are rebuilt following a disaster. Develop tools to ensure that vulnerable residents and business owners are included in community rebuilding efforts.

Finally, Policy 2.1.6 previously contained specific standards that relate to fire suppression. The policy has been revised to reflect more standard policy language, while specific information on fire suppression standards has been added to Chapter 2 and Program 16: Resilience in Wildfire Safety.

2.1.6 Standards/Fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression, including enforcement of peak water supply requirements and minimum roadway widths and clearances for evacuation and fire suppression.

Safety Element Programs

In the 1996 Safety Element, specific programs were considered the responsibility of the Emergency Operations Organization (EOO) and were generally described as comprising all the functions of the EOO. Chapter 4 of the 2021 Safety Element adds a new Programs section to satisfy CA Government Code Section 65302(g)(2)(C) to “Establish a set of feasible implementation measures designed to carry out the goals, policies, and objectives” of the updated Element. In addition to meeting state law, this program list helps to illustrate the role diverse City departments and agencies have in implementing the Safety Element.

Programs were primarily drawn from the related plans described above. The programs list synthesizes the hundreds of programs and projects described in these plans. The level of detail across these programs has been standardized, and programs have been tied to the mitigation, response, and recovery framework of the Safety Element’s goals, policies, and objectives. Some implementation programs are ongoing while others are recommended should funding and staff become available in the future. Collectively, this listing of programs highlights the City’s multi-faceted and interdepartmental approach to disaster planning and climate mitigation. The full list of programs is available for review in Exhibit G; however, a few examples are described below to illustrate the revised approach to accounting for implementation programs.

Program 6 below consolidates the many related oil, gas and air emissions efforts being undertaken and identifies the multiple departments engaged in efforts to address those and associated risks.

Program 6: Identify, Analyze, and Mitigate Local Oil and Gas Risks. Collaborate across city, county, and state agencies concerning oil & gas facilities within the City of Los Angeles, primarily on non-compliance issues and nuisance activities. Support the Office of Petroleum & Natural Gas Administration and Safety (within the Department of Public Works) with annual reports for neighborhood drill and production sites and assist in identifying any potential risks from their permitted scopes of work. Support the Office of Petroleum & Natural Gas Administration and Safety and relevant agencies in annual on-site inspections for the City's neighborhood drill and production sites. Investigate nuisance complaints and alleged violations. If necessary, request an operator file for a discretionary

review so that the City Planning department can assign corrective measures in the interest of public health concerns.

Facilitate broader community engagement in oil and gas discretionary review under the provisions of ZA Memorandum No. 133. Evaluate the feasibility of requesting operators to cease operations based on an amortization study. Explore the feasibility of deeming all existing oil & gas extraction activities as non-conforming uses that cannot be expanded or intensified. End all ministerial approvals of oil & gas extraction and production sites and require discretionary approval with mitigating environmental conditions. Work with state enforcement agencies that oversee oil & gas facilities and review public records to ensure that operators are abiding by all regulatory standards.

Policies: 1.1.4, 1.2.1, 1.2.8

Timeframe: Medium

Responsible Departments: DPW (OPNGAS), LAFD, LACP, Mayor, AQMD, LA County, LA SAN, LADBS, CAO

In some instances, programs are used to outline the City's intention to continue improving disaster response. For example, state law brings an increasing focus on evacuation routes in hazard areas. Program 47 outlines how several departments will continue to work on this topic following the update of the Safety Element.

Program 47: Evacuation Plans. Maintain and update evacuation plans for areas potentially affected by hazards as a part of the Emergency Operations Plan, Evacuation Functional Support Annex, including procedures related to residential developments in a Very High Fire Hazard Severity Zone (VHFHSZ) or other hazard areas that do not have at least two emergency evacuation routes and/or are located on streets less than 20 feet in width. Utilize Hillside Task Force/working group (which is convened by BOE and includes LACP, LADOT, LADBS and other relevant departments) to study hillside access, develop procedures and advance recommendations to be coordinated with appropriate agencies (LAPD, LADOT, Access Paratransit, LACP, LA County, etc.). Evaluate how best to regulate infill and retrofit existing non-conforming development when creating a 20 foot wide improved access road is not feasible (per LAMC 12.21 C.10(i)(3)). Collaborate across key agencies to provide emergency transportation, traffic control, parking enforcement, and other services during planned incidents and emergencies. Identify infrastructure that can assist in provisioning emergency response and evacuation in these areas, such as specialized vehicles.

Policies: 2.1.4

Timeframe: Ongoing

Responsible Departments: EMD, LAFD, LAPD, LADOT, LAHSA, BOE

Discussion of Key Issues: Housing Element

The Housing Element Update provides the City's policy response to an important moment for housing in Los Angeles, particularly with regard to housing security, scarcity, racial equity, and homelessness. The analysis performed as part of the Housing Element indicates that, without bold action, the City's housing needs are unlikely to improve significantly. The Housing Element addresses these immense challenges by adding and realigning many policies and objectives, suggesting modifications to current programs, and proposing the exploration of many new ideas for housing programs.

Following is a discussion of several key issues that have been raised throughout the public engagement and plan development process, including those raised by members of the public and the City Council.

RHNA Rezoning Program

As discussed in the Background section of this report, the plan includes a Rezoning Program (Program 121) to rezone for a minimum of 255,415 units by 2024, as well as an Inventory of Candidate Sites for Rezoning (Appendix 4.7 in Exhibit B). The Rezoning Program is needed due to a shortfall of adequate and available sites with sufficient zoned capacity (per State criteria) to accommodate the RHNA Allocation. Rezoning has been a central topic raised by the public comments that have been received. Below is a discussion of the key issues that have been raised relating to the Rezoning Program.

Rezoning Target

The City has received various comments from members of the public and the City Council relating to the rezoning target number. Some comments have suggested that the City has adequate zoned capacity and should not need to rezone, while others have suggested that the City should aim for a higher rezoning target of at least 300,000 units. A letter was received from several members of the City Council specifically requesting this higher target. As discussed under the RHNA and Sites Inventory discussion above, the Housing Element is required to include rigorous analysis that demonstrates not only available zoned capacity, but also the likelihood of housing development under existing zoned conditions. Due to these state legal requirements, the City is unable to demonstrate adequate capacity, and therefore must pursue a Rezoning Program to accommodate the shortfall.

The City's rezoning target of 255,415 units does not reflect a maximum number for all future rezoning efforts; rather, it reflects the minimum capacity needed to accommodate the RHNA Allocation during the planning period. Cities may elect to zone for higher amounts than are required to meet the RHNA. The Inventory of Candidate Sites for Rezoning (Appendix 4.7) shows the potential for 1.44 million units of additional capacity that may be achieved through full implementation of the Rezoning Program. The amount of actual rezoning that occurs during the next three years is likely to be in between the minimum required and maximum shown - and will be subject to future legislative decisions. Program 50 (Update to the Citywide Growth Strategy to Meet Housing Needs) includes a provision to evaluate total citywide capacity for housing in relation to a larger future growth strategy update.

AFFH, Rezoning and Growth Targets by Community Plan Area

As discussed in the background section, the duty to Affirmatively Further Fair Housing (AFFH) is a central component of Housing Element law. AFFH is defined in Government Code Section 8899.50 as:

“Taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. These actions must, taken together, address significant disparities in housing needs and in access to opportunity, replace segregated living patterns with truly integrated and balanced living patterns, transform racially and ethnically concentrated areas of poverty into areas of opportunity, and foster and maintain compliance with civil rights and fair housing laws.”

As part of the AFFH requirement, the City’s Inventory of Adequate Sites for Housing (Appendix 4.1), as well as the Inventory of Candidate Sites for Rezoning (Appendix 4.7), were analyzed through the lens of furthering fair housing. The analysis presented in Chapter 4 of the plan shows that because the adequate sites inventory is so reliant on existing zoning capacity, selected sites are largely a reflection of these existing zoning conditions, which includes a disparity in the city’s location of multifamily zoning. Therefore, while the Sites Inventory does not exacerbate existing conditions, there is significant opportunity for programs and rezoning efforts to improve these conditions from an AFFH perspective.

The Rezoning Program, consistent with state law mandates, places a strong emphasis on expanding housing capacity — especially higher density affordable housing capacity — in Higher Opportunity Areas of the City. As a result of this emphasis, the analysis finds that the Rezoning Program would provide substantially more affordable housing opportunities in historically exclusive areas, including those identified as Racially Concentrated Areas of Affluence (RCAAs). With implementation of the Rezoning Program, it is anticipated that the plan will affirmatively further fair housing and work to create a more equitable set of land use regulations for the City, consistent with state Housing Element law.

Rezoning Program Strategies, Candidate Sites and Availability of Information for the Public

Several comments were received on the usability and timing of the release of the Candidate Sites Inventory for Rezoning (Appendix 4.7). While the initial draft plan released on July 1, 2021 included details on the proposed Rezoning Program, including the strategies and anticipated geographic areas where rezoning is expected to occur, and this information was featured prominently in public materials, the initial draft did not include the inventory of potential sites for rezoning because it was not yet completed. Staff sought to get initial public and City Council feedback on the broad rezoning strategies before embarking on the data-heavy work program to develop the list of candidate sites. City Council adopted the Housing Element recommendations regarding the Rezoning Program on August 17, 2021. Developing the list and creating the necessary set of assumptions and methodology was time consuming based on the size of the city and the large number of sites (about 250,000). The final RHNA allocation was received from SCAG on March 22, 2021, which also contributed to an overall compressed timeline for preparation of the Housing Element. The revised plan released September 2021 included details on each of the proposed rezoning strategies (see Chapter 4) as well as the Candidate Sites Inventory for Rezoning (Appendix 4.7). In order to be responsive to comments received and to facilitate better public understanding of this large list of sites, City Planning is developing a webapp map tool allowing the public to view the distribution of sites at a citywide or local level, by strategy or overall, and to zoom into parcels to view specific information for each site.

The Rezoning Program must be completed within three years and 120 days from the October 15, 2021 adoption date in order for the City to maintain Housing Element compliance. As described in more detail above (under Rezoning Program), sites included on the list should be considered as potential sites for rezoning consideration, not a final list of sites that will be rezoned. A public review process will help guide which sites are rezoned at which densities. In many respects, the rezoning strategies are more important than the list of potential sites, as the sites are subject to future revision based on a more detailed, site-level analysis. The Housing Element also leaves room for particular Rezoning Program strategies to be removed but the Program should follow the Housing Element's objective of an equitable rezoning program that affirmatively furthers fair housing goals and fosters inclusive and racially integrated communities for all residents.

Maximizing Affordable Housing and Value Capture of Rezoning

The need to maximize affordable housing creation is a core issue discussed throughout the Housing Element Update and a concern that is shared by many members of the public. The City is committed to ensuring that the mix of affordability requirements and incentives result in the highest number of affordable units produced as possible, in relationship to the value of the rezoning being provided through different rezoning strategies.

The significant provision of affordable housing is assumed through the various components of the Rezoning Program. This includes an expectation that rezoned properties would require more affordable housing than is typically achieved through existing incentive programs, particularly in Higher Opportunity Areas. City Planning has secured funding to carry out a feasibility study in connection with rezoning to ensure affordability levels are maximized throughout the various zoning strategies, taking into account the value added and different market areas of the City. In addition, Program 126 calls for the exploration of a citywide inclusionary zoning program, beyond the existing Affordable Housing Linkage Fee. This City has begun the process of carrying out a study to evaluate the feasibility and potential value-add of a new inclusionary program, and to study how such a program would work in the context of the City's existing incentive-based programs and the Linkage Fee.

Relationship of Rezoning to Community Plan Updates and General Plan Framework Element

As discussed above, the Rezoning Program will be rolled out over the next three years, and will be conducted through both local and citywide planning initiatives, including Community Plan Updates. Community Plans establish neighborhood-specific goals and implementation strategies to achieve the broad objectives laid out in the City's General Plan, including the Housing Element and Framework, which establishes a vision for the long-term development of the City of Los Angeles. The 35 Community Plans collectively comprise the Land Use Element of the General Plan. Like all components of the City's General Plan, the Housing Element, Land Use Element and Framework must be consistent. While the Housing Element lays the groundwork for citywide housing policy and programming, the Community Plan Updates continue to carry out those policies and programs at the local level. There are currently 16 active Community Plan Updates, and staff working on the Housing Element continue to closely collaborate with community planning teams. Community Plan Updates adopted within the rezoning period may be eligible to count towards the City's overall RHNA rezoning need, and their current draft concepts are reflected in the Rezoning Program alongside other citywide rezoning strategies. In some cases, these overlapping concepts may be reconciled in the Plan Updates, and in other cases, a citywide strategy may be adopted through a separate zoning ordinance.

Some members of the public have made comments regarding capacity numbers in the Housing Element in comparison to those in Community Plans or the Framework Element. It is important to understand that capacity figures noted in the proposed Housing Element's Inventory of Sites and

Rezoning Program are estimates produced for a specific state law purpose with a set of detailed (recently revised) requirements and time horizons and will *not be comparable* to other figures used in the Community Plans, the Framework Element or even the prior Housing Element. However, the figures are *not incompatible*. In addition, the Framework Element and Community Plans do not establish limitations to housing production and call for meeting the housing needs of the population. Because of the state law restrictions on Housing Element housing capacity estimates, the estimates are generally lower than those found in the Framework Element. The Community Plans provide different estimates of existing capacity and use a different methodology to determine their reasonable expected development during the plan horizon.

To ensure equity and citywide policy priorities are embedded within Community Planning, the Housing Element calls for adopting a methodology to distribute citywide housing targets across Community Plan areas (Policy 1.1.6 and Program 49), ensuring equity and anti-displacement concerns are centered alongside traditional growth factors such as population projections, transit and job access. This important and complex future work program would be most appropriately developed and adopted as part of the pending growth strategy update to the Framework Element called for in Program 50. This Program also calls for an evaluation and update of total citywide residential capacity as well as its distribution, to ensure the land use strategy aligns with citywide goals around housing affordability, equity and sustainability. This is an example of the way the Housing Element lays the groundwork for changes to land use policy but is refined and executed through implementation of other Elements. The Program aligns with Goal 3A of the Framework that calls for a balanced distribution of land uses and an equitable allocation of public resources such as affordable housing.

Low Density and Single Family Zoning

Low density zoning, including single-family zoning, has been a central topic raised in Housing Element outreach and public comments. Many comments have expressed the desire to increase housing capacity in the City's lower density neighborhoods as a key strategy to expand housing opportunities in areas with a history of social exclusion and to avoid areas with existing RSO housing stock, particularly in areas near high quality transit and jobs. Other comments have called for all single-family areas to be preserved.

It is important to recognize that state law regarding single-family zoning has been significantly changed with SB 9 (2021), recently signed into law. Under SB 9, most single-family lots in Los Angeles will be able to construct a two-unit duplex as well as split their lot into two, each with a maximum of two units. This allowance expands upon the ADU reforms of several years ago, which already allowed an ADU and a Junior ADU on most single-family lots statewide. There may be a desire to explore whether any local amendments can improve upon the law and address community concerns, including creating more affordable ownership and rental options (as discussed in Program 3 and the Chapter 4 discussion of rezoning strategies).

As noted in Chapter 2 and discussed throughout the Housing Element participation process, over 70 percent of the City's residential land is zoned for single-family housing and only 17% is zoned for densities that can support affordable housing development. Due to the significant need to create more affordable housing opportunities and affirmatively further fair housing, the Housing Element proposes relevant policy updates, including Policy 1.1.8 that promotes the introduction of "more flexible zoning and incentives for existing lower density residential areas to create opportunities for more "missing middle" low-scale housing typologies, particularly in Higher Opportunity Areas." In addition, under Goal 4, Policy 4.3.3 has been added, which calls for examining "local 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.” Neither policy calls for wholesale change but does recognize that goals such as affordability and equity must be considered alongside other land use policy objectives.

The Rezoning Program puts forth several strategies that would touch on single-family lower density zoning, most of which would be limited to Higher Opportunity Areas. For example, an extra “Opportunity ADU” could be permitted on lots of a certain size in these areas, which could add flexibility and achieve better results compared to four units on a split lot under SB9. Up to six units per lot is proposed on certain “Opportunity Corridors” (residentially zoned Avenues), which is intended to facilitate new missing middle forms, including historical/contextual typologies from Los Angeles such as bungalow courts or even new types of rowhouses or other low rise perimeter block housing with generous backyard open space. The highest densities (mid-rise) are reserved for areas with the best transit, including major Boulevards and residentially zoned TOC Tier 3 and 4 areas ineligible for TOC today due to being zoned for lower densities. It is important to understand that these Opportunity Corridors and TOC Areas will be subject to further refinement at a parcel and street level in a future rezoning effort.

Housing Stability

The housing needs assessment provided in Chapter 1 of the Housing Element Update indicates that Los Angeles residents experience the highest rates of housing cost burden and overcrowding in the nation, along with one of the lowest homeownership rates and rapid loss of existing lower-rent housing. These trends are compounded by demographic and employment factors such as rapid aging of the population, the continued prevalence of poverty, and low-wage employment, which too often leads to housing instability, precariousness and displacement among (mostly renter) Angelenos. The review of the current Housing Element with the public helped identify that many of these topics had not been sufficiently addressed. In response, the Housing Element Update has comprehensively revised and reinforced its goals, policies and implementation programs to protect tenants from displacement, preserve affordable housing and ensure greater access to ownership and the stability it provides. Policies around anti-displacement are incorporated into many objectives and policies through the incorporation of the Citywide Housing Priorities concept throughout, which includes housing stability and anti-displacement as a core objective.

Specifically, the new Goal 2 related to preservation has been structured to reflect the broader emphasis on promoting housing stability, which requires a combination of affordable housing preservation, habitability code enforcement, tenant protections, and ownership strategies (discussed in detail above). There is an overall increased emphasis on preventing displacement and protecting/empowering communities of color, which was not explicitly discussed in the current Housing Element. New tenant protection strategies include an Eviction Defense Program, a Just Cause Eviction Program, a Tenant Anti-Harassment Ordinance, a Housing Stability Program, strengthening enforcement of the Ellis Act and RSO, development of new models of affordable housing (e.g., social housing) and acquisition, and expanding “no net loss” requirements and a tenant’s right to return to new housing. The production policies and programs, including the Rezoning Program, are also purposeful in not targeting areas with high displacement risk.

An important way to ensure housing stability is through ownership. In recognition of the difficulty for most in the city to attain ownership, these policies were updated to reflect new models of shared equity, land subdivision and community stewardship as well as the importance of ownership retention (see Policies 2.2.1, 2.1.3, 2.2.2, 2.2.4 and 4.3.2).

Housing Production Vs. Affordable Housing Production

The City has received several comments pertaining to the question of whether additional market rate housing production is needed in Los Angeles, or assertions that only new affordable housing is needed. While the Housing Element certainly acknowledges that there is a much greater need for affordable housing compared to market rate housing, state law requires that cities demonstrate adequate sites exist for new housing development at all income ranges to meet the RHNA. The Housing Element includes policies to both maximize the number of affordable units as well as address the overall shortage of homes. The Housing Element views these two goals as complementary and not in opposition. Both strategies are necessary in order to ensure affordability is widespread and available to all, not just those fortunate enough to be living in deed-restricted housing.

Los Angeles has the fewest number of homes per capita (persons aged 18+) at the metropolitan area level and second lowest at the city level. The scarcity of affordable and available units is not experienced equally, as those renters with the lowest incomes are most typically impacted by the lack of housing. High home costs compared to incomes is directly related to high rates of homelessness, overcrowding, worsening inequality and rapid decline of housing units that are affordable to low- and moderate-income residents. The situation is exacerbated by severely insufficient housing subsidies to support all those in need.

Housing Element law requires that zoning must allow for sufficient densities (at least 30 dwelling units per acre) to allow for the realistic production of lower-income affordable housing. This reflects the importance of having ample higher density zoned capacity in order to accommodate the housing need. In Los Angeles, most new multifamily construction now includes certain levels of affordable housing. The few projects that choose not to include on-site units are required to pay an Affordable Housing Linkage Fee of up to \$19.36 per square foot. The amount of unsubsidized mixed-income housing almost matched total subsidized housing produced in 2020, and is dispersed much more equitably than subsidized housing. In this way the creation of mixed-income market rate housing directly increases the production of equitable affordable housing. However, new production should be paired with strong anti-displacement provisions.

The Housing Element provides key guidance on how to balance these various considerations in order to maximize citywide housing priorities through the form of objectives, policies and implementation programs linked to Goal 1. Due to the limited availability of public funding sources to support the production of affordable housing, there is a continued need to expand available land and land use incentive programs to facilitate both 100% affordable housing, as well as areas where affordable mixed-income housing can be constructed. In line with Policy 1.2.6, land use incentives and programs should maximize the net gain of affordable housing and explore concepts such as varied affordability ratios, the feasibility of inclusionary zoning requirements, and a greater mix of income based on market areas. Policies and programs should be reviewed and refreshed as necessary to ensure they are producing as much affordable housing as possible.

Preservation of At-Risk Affordable Housing

As discussed in the Housing Element Appendix 2.2, the preservation of existing deed-restricted affordable units is critical to maintain an adequate stock of affordable housing and ensure housing stability. The City currently has 9,412 housing units at risk of losing their affordability use restrictions between October 1, 2021 and September, 30 2031. These units were designated as at-risk based on the affordability restrictions established by the primary government funding program used to build or rehabilitate the unit, use agreement, covenant and/or rental subsidy program. In 2020, the average rehabilitation cost per unit to preserve an affordable multi-family

building was approximately \$108,000 and the construction cost per unit for a new affordable multi-family building in Los Angeles was \$353,000. A combination of financial and non-financial strategies is necessary to preserve affordable housing facing expiring restrictions.

The affordability of the City's affordable housing units is not permanent. Based on the analysis of the current expiring portfolio in Appendix 2.2 of the Housing Element, the three major threats to preservation in the City are prepayment or maturity of federally-subsidized mortgages, expiration and termination of subsidy contracts (Project-Based Section 8 rental subsidy contracts), and the expiration of use restrictions of City-funded projects.

With most of the at-risk developments under ownership of private entities and the high demand for housing at all income levels across the City, expiring affordable units are at serious risk of converting to market rate units. Units identified to be most at-risk of converting to market-rate housing are properties with affordability covenants expiring in one to five years, which have no overlapping subsidies that extend affordability, and where the property is not owned by a stable mission-driven non-profit developer. The continuous demand for rental housing leads to higher rents and therefore a more compelling incentive for non-mission driven property owners who own buildings with at-risk affordable units to pursue opportunities for market-rate rents. Preservation of these at-risk units requires strong preservation programs, as well as strategies to increase the available stock of new housing at all income levels, to alleviate pressure and incentives for conversion. The Housing Department's preservation program tracks and looks at strategies for preserving units that are income-restricted. With revenues from the City's Linkage Fee Program and an infusion of funding through the State's SB 2 grants, the City will be expanding those efforts. In the coming months, the Housing Department will be releasing a report looking at priorities for the City's preservation program.

Assumptions and Methodology for Inventory of Adequate Sites

The Inventory of Adequate Sites for Housing has been a topic of many diverse public comments, often with a particular focus on the assumptions and methodology used to develop the Inventory, as described in Chapter 4. Below is a discussion of key comments and questions.

Realistic Development Potential

Some comments have raised concerns that the methodology utilized in the inventory is overly conservative, particularly the regression methodology utilized to determine the realistic development potential on vacant and non-vacant sites. As discussed in the *Background* section of this report, there are significant new requirements in state Housing Element law which require jurisdictions to provide a more rigorous analysis, backed by findings supported with substantial evidence, to demonstrate that a given site is likely to develop with housing during the planning period. In particular, non-vacant sites are by default presumed to have impediments to their development, unless the jurisdiction can demonstrate, based on a variety of factors, that the site is expected to develop. Due to these requirements, it is not sufficient to list the maximum zoned capacity for each site.

Due to the complexity of the new statutory requirements, the large size of the City's RHNA Allocation, and the scope of analysis needed for the large number of potential vacant and underutilized parcels (over 700,000 potential residentially zoned sites), the City found a need to identify an alternative methodology that can be applied on a citywide level, while still complying with the statutory requirements. As a result, staff consulted with the Turner Center for Housing Innovation, an academic research center at UC Berkeley, to assist in development of an econometric approach for estimating realistic development potential based on the City's past experience, as reflected in building permit data. The model incorporates a number of factors which

are designed to address the state requirements for non-vacant sites. The result of this approach is the creation of a rigorous, data-driven model that is able to identify each parcel's likelihood of housing development, as well as how many housing units are likely to be built if development occurs. This result is consistent with the state requirements for identifying realistic expected development potential.

Private Development Pipeline

As provided by Government Code Section 65583.1, the Housing Element may satisfy its RHNA requirement through a variety of methods, including the identification of units permitted, built, entitled, or pending that are realistically expected to be built during the planning period. The City received several comments on the assumptions used to develop the realistic expected pipeline, both from members of the public as well as from HCD. In particular, the comments raised concerns about the assumptions about past completion rates that were applied to the overall development pipeline, indicating that the Housing Element should include supporting information for past completion rates and identify the actual completion rate applied to pipeline projects. In addition, comments requested additional demonstration of the affordability of pipeline projects based on anticipated or actual sale prices, rent levels, or other mechanisms ensuring affordability (e.g., deed restrictions).

In response to these comments, the City has incorporated additional discussion of the pipeline assumptions in the revised plan (Chapter 4 in Exhibit B). In addition, the City has refreshed and finalized the list of potential pipeline development projects, in order to reflect the latest information. As a result of these changes, the revised plan includes a new estimated development potential that is anticipated to occur as a result of pipeline development - a total of 117,814 units. This number is about 26,000 units lower than the initial estimate provided in the July 1, 2021 draft plan.

Accessory Dwelling Unit (ADU) Assumptions

Cities may consider the potential for accessory dwelling units (ADUs) in determining their capacity to meet the RHNA. The City received comments on these assumptions from members of the public as well as from the state HCD. The Housing Element estimates ADU potential using the HCD-approved "safe-harbor" methodology, which utilizes the trends in ADU construction since January 2018 to estimate new production. To establish this trend, the Housing Element utilizes the average number of ADU permits issued from 2018 to 2020. As HCD notes, this is a conservative option to only account for the effect of new ADU laws that have passed since 2017, without accounting for local promotional efforts or incentives.

The plan additionally includes programs that aggressively promote and incentivize ADU construction (Programs 63 and 64), including the City's newly launched ADU Standard Plan Program, the ADU Accelerator program that incentivizes the creation of new ADUs to house lower-income seniors, and a future amendment to the City's ADU ordinance to remove additional barriers. In addition, production data from 2018-2020 does not reflect added ADU development potential in multifamily buildings as a result of changes to state law that went into effect at the beginning of 2020. As a result of all of these facts, the plan includes an assumption that ADU development will increase by approximately 25% per year during the planning period. This results in an estimated ADU development potential of 40,987 ADUs, which is a few thousand units lower than in the July 1 Draft. Consistent with comments received from HCD, the revised plan has been amended to correct inconsistencies in ADU permit data with that maintained by the state.

Scaling Up Public Land Program

The inventory includes an additional 10,000 units of anticipated development potential that is expected to occur within five years as part of LAHD's new public land program, Scaling up Equitable Affordable Housing on Public Land. This program has been awarded a Local Early Action Planning (LEAP) Grant and will streamline and scale up the production of affordable housing on public land, beyond the current levels of anticipated pipeline development. The plan focuses on using 300 acres of public land to drive a scaled housing solution that would create ten housing development opportunities with 1,000 units each. The plan would also create a \$500 million infrastructure fund to address funding gaps. The program is currently in the planning process, and no sites have been secured at this time.

The City has received comments from members of the public as well as from HCD, indicating that additional supporting information is needed in order to count this anticipated development as part of the overall expected development potential to meet the RHNA. The draft plan shown in Exhibit B has been revised to include a list of publicly-owned parcels currently being considered for the program, and an analysis of their suitability for redevelopment to housing. In addition, Program 15 has been revised to clarify that the Rezoning Program will undertake site-level rezoning, as needed, to facilitate this development.

Units Subject to the Rent Stabilization Ordinance (RSO)

The City has received a number of comments from members of the public indicating concern that the inventory of sites should not include any sites containing housing units subject to the Rent Stabilization Ordinance (RSO). The comments come from a concern that these sites should not be targeted for redevelopment. Staff understands there is particular concern with a new state provision allowing by-right development that applies to lower income sites identified in a prior Housing Element when redeveloped with at least 20% affordable housing. These sites must be rezoned within three years to include the by-right provisions. The City shares concerns for protecting RSO housing stock and approached this question with these concerns in mind.

Importantly, the Housing Element law (§ 65583.2(g)(3)) has been changed to expand "no net loss" affordable housing replacement requirements to all sites included in the inventory of adequate sites that have existing residential uses, consistent with the requirements already applied to Density Bonus and TOC projects pursuant to Health and Safety Code §65915(c)(3)(A). These replacement requirements provided a compelling anti-displacement reason to include RSO units on the Inventory of Sites. However, to ensure the by-right provision does not adversely affect or result in the targeting of existing RSO housing units, the City has made an effort to assign any identified RSO sites in the inventory as above-moderate income (not lower income, even if qualified as such), thereby avoiding this consequence as it only applies to lower income sites. The RSO replacement provisions will be included on all selected sites with residential uses. The revised Housing Element has been amended to better clarify these points.

Affordable Housing Covenant Length

The topic of affordability covenant length has been raised by several members of the public as well as the City Planning Commission. Affordable housing is typically recorded for a term of 55 years, based on length of terms stipulated by public funding sources or requirements of incentive programs. Based on research into this topic and in line with recently approved legislation (AB 634), the Housing Element includes a new policy (1.2.8) that speaks to the development of new incentive and funding tools that promote longer affordability periods. In addition, Program 48 (Update Density Bonus and Affordable Housing Incentive Programs) and Program 121 (Rezoning Program) include more specific language on exploring permanent or 99-year affordability terms

for affordable units in mixed-income projects. This aligns with recent direction from the City Planning Commission regarding the Downtown Community Plan and is in line with AB 634, which exempts (typically 100%) affordable housing created through low income housing tax credits, given the funding requirements that make longer terms infeasible. The Departments will continue to work with affordable housing stakeholders and members of the public as we explore changes to the length of affordability covenants.

Housing Replacement and Right to Return Policies

The topic of affordable housing replacement and a tenant's right to return to a new unit when redevelopment occurs on sites with existing rental housing has been a continued topic of discussion throughout the update process. Replacement policies ensure there is no net loss of affordable housing, while a right to return ensures a tenant has the right to move into a comparable unit at an affordable cost in a new building once constructed. The Housing Element recognizes the recent significant expansion of these policies at the state level through the enactment of SB 8 this legislative session. SB 8 extends the replacement and right to return provisions of the Housing Crisis Act of 2019 (SB 330) to all multifamily housing developments through 2029. Previously, the provisions only applied to discretionary projects, and only through 2025. All Density Bonus and TOC projects are also subject to the same replacement requirements (CA HSC §65915(c)(3)), without a statutory sunset date.

The Housing Element includes several policies and programs that generally call for strengthening and extending these provisions. Policy 2.1.1 calls for incentivizing and/or requiring 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 2.1.5 calls for expanding the right of first refusal to ensure displaced households may occupy replacement housing units that are comparable in size, location, cost, and rent control protection. Program 29 (Enforcement of No Net Loss and Housing Replacement Requirements) references existing implementation efforts and proposes consideration of extending the replacement and right to return requirements past the 2029 sunset date. It also calls for studying the financial and programmatic feasibility of amending the City's policy regarding replacement of RSO units to require 1:1 replacement as lower income units under the existing optional provisions of CA HSC §65915(c)(3)(A). The latter is identified as being conducted as part of the update to the Density Bonus/Affordable Housing Incentives (Program 49) as well as the Rezoning Program (121). The right to return provision is also mentioned as a component of both programs.

Housing and the COVID-19 Pandemic

Many commenters, particularly earlier in the outreach process, have asked how the Housing Element plans to address the COVID-19 pandemic. The effects of the pandemic have highlighted the importance of housing in ensuring overall health and wellbeing, as well as the complex housing challenges that the City faces, including addressing barriers to housing opportunities, housing insecurity and homelessness. The pandemic has particularly highlighted equity issues in terms of how lack of housing affordability disproportionately affects communities of color and the need to reexamine land use and zoning decisions to ensure that they do not perpetuate these inequities. This Housing Element presents an opportunity to refine and broaden the City's approach to housing to meet the needs of our most vulnerable community members.

There is growing consensus among public officials that overcrowded housing - and the economic reasons that drive high rates of overcrowding - put individuals and neighborhoods at risk of COVID-19. Overcrowding arises when there are not enough housing units available and affordable for all the people who want their own homes. Lower-income individuals and families are disproportionately more likely to live in overcrowded conditions. The economic insecurity

brought about by the pandemic has also focused attention on the importance of housing stability, resulting in City action to provide strong COVID-19 rental protections and emergency rental assistance. Lower-income individuals and families are more likely to work in “essential industries” that cannot be performed from home and are more likely to have pre-existing health conditions.

Although we are still understanding the short- and long-term implications of the current public health crisis, the Housing Element acknowledges that Los Angeles is home to some of the most overcrowded neighborhoods in the country. Like other markers of instability such as homelessness and paying too much for housing, overcrowding is primarily a response to the region’s housing shortage and particularly the lack of affordable housing. The Housing Element Update seeks to plan to address these existing housing shortages and reduce overcrowding in a way that addresses public health issues. In addition, several policies and programs relating to disaster resilience and healthy housing have also been added and strengthened in the Housing Element Update under a new Objective 3.3. These includes policies to identify risks to our housing stock related to disasters and other unplanned events (Pol. 3.3.1), establishing plans and programs to promote positive health outcomes for communities most at risk (Pol. 3.3.2), planning for emergency housing needs (Pol. 3.3.3) and providing assistance to mitigate the impacts and financial disruption of emergencies in order to support Angelenos to stay in their homes (Pol. 3.3.7).

Recent State Legislation (SB 9 and SB 10)

Many commenters have asked how the recent passage of significant statewide housing legislation (particularly SB 9 and SB 10) affects the Housing Element. Some have asked if the laws will affect the City’s RHNA obligations or whether the Housing Element includes a programmatic response to their passage.

The Department has requested clarification from the State but does not have reason to believe that zoning capacity allowed per SB 9 on January 1, 2022 can be considered as part of Inventory of Sites to meet the RHNA. Staff also understands that state legislation cannot be counted as part of a local jurisdiction’s Rezoning Program, as state law refers to actions by a city or county, but further clarification is being sought. However, it is anticipated that any added capacities will be able to be accounted for in future Housing Element cycles and units will be able to be counted towards meeting the RHNA each year. The revised plan does acknowledge the passage of SB 9 by recognizing there may be a desire to try to improve upon the state law and maximize potential benefits while addressing community concerns that prompted City Council opposition. A Council Motion requesting a report back on SB 9 from City Planning was recently introduced by Council President Martinez to explore ways in which the law may be able to be used to create more affordable housing opportunities, promote community land trusts and address overcrowding concerns. SB 10 is a bill that creates an optional process to streamline certain smaller rezonings (10 units or less) that would need to be approved by the City Council to take effect.

Livable Communities Initiative

The Livable Communities Initiative (LCI) is a proposal and potential Housing Element program put forward by a citywide group of housing and mobility/bike/transit advocates that aims to holistically address affordable housing, mobility and climate, by focusing coordinated efforts onto certain corridors. The LCI proposes pairing mid-rise housing on corridors while simultaneously transforming the street, by adding wide sidewalks, a tree canopy, al fresco dining, bike lanes, and fast and frequent transit -- making it a "Complete Street" or linear "15 Minute City."

The Housing Element is aligned with the goals of the LCI and its comprehensive vision of mixed-income transit-rich corridors. The LCI comment letter acknowledges some overlap between many

of the policies and programs in the Housing Element, particularly the “Opportunity Corridor” Rezoning Program strategy (also see Policies 3.1.5, 3.2.1, 3.2.2 and Programs 9, 21, 58, 62, 65, etc.). Staff has met with staff from LADOT and shared the comments with Metro, while exploring additional ways to better reflect efforts to integrate corridor level transit and housing planning. There may be ways to better integrate rezoning and community planning efforts with existing initiatives such as efforts to implement the Mobility Plan 2035, LADOT's Planning for Stress Free Networks, or Metro's Transit Oriented Communities program. Staff has also taken note of recent significant federal budget reconciliation bill additions that could provide funding for the type of strategic investments across housing, transit, infrastructure and sustainability called for by the LCI. Rezoning, including updates to Community Plans, also presents opportunities to plan for streetscape and mobility improvements that can complement new housing opportunities. The Coastal Transportation Corridor and West LA Transportation Improvement and Mitigation Specific Plans and Parks Dedication and Fee Program require new development to contribute a fee towards completing needed transportation and park improvements, in addition to completing required project specific mitigations (or improvements/dedications). To reflect these important connections between housing and the public realm, a new Program 131 Livable Communities Initiative has been added to the proposed Housing Element.

CEQA Streamlining

Several comments raised concern with proposed Program 55, which reflects the City's continued commitment to ensure CEQA is implemented in a way that balances environmental stewardship and housing production, in line with state law. Concerns have been raised that the program would unduly erode environmental protections and remove public participation from decision making processes. While CEQA is an important tool to ensure that environmental effects of projects are appropriately analyzed and mitigated, Chapter 2 of the Housing Element (Analysis of Constraints to the Production, Maintenance and Improvement of Housing) discusses how the CEQA review process can oftentimes result in a constraint to the development of housing, especially affordable housing. CEQA lawsuits are the main way that residential projects are opposed and litigated, even for projects that meet all objective zoning standards. This significantly raises the risk and cost of building new homes, particularly in Higher Opportunity areas of the City where CEQA lawsuits are more common and land costs are higher.

Under state law, the Housing Element must identify programs to alleviate constraints to housing and facilitate production to meet the RHNA. Program 55 groups various efforts to implement existing statewide CEQA law (such as the Sustainable Communities Environmental Assessment, or SCEA) as well as potential local efforts that may be available to further streamline environmental review of housing development projects that meet Citywide Housing Priorities, such as 100% affordable housing developments and those that further fair housing goals. CEQA streamlining efforts are typically not available for development projects that would be noncompliant with existing zoning regulations or would entail unique environmental circumstances (for example, projects that involve a historic resource); rather, they are intended to provide efficiencies in the project review process and reduce duplicative review, while still ensuring appropriate environmental protections are met. Moreover, the City is constrained to create new CEQA streamlining tools for any project based on what is allowed under the CEQA statute and the guidelines.

Discussion of Key Issues: Safety Element and Health Element

The general structure and content of the 2021 Safety Element is carried over from the existing 1996 Safety Element. The Safety Element continues to identify hazards and vulnerabilities and relies on a framework of prevention, response, and recovery. State guidance has been revised since the Safety Element was last updated, prompting the city to undertake a targeted update of the element to better address climate change impacts, disaster mitigations, and place an increased focus on social equity. The following section describes key impacts addressed by the revisions to the document. For a full listing of state-required issues and how they are addressed by the Safety Element please see Exhibit I on state law compliance. For a summary of public comments on safety and environmental justice topics please see Public Hearing and Communications. This section focuses on key issues explored through proposed amendments to both the Safety and Health Elements.

Climate Change Impacts

Los Angeles is already experiencing the effects of climate change. The City can expect hazards and disasters to increase in severity and frequency, especially wildfires, flooding, drought, extreme heat, and sea-level rise. The State has taken action through SB 379 (land use: general plan: safety element) and SB 1035 (climate resilience) to direct jurisdictions to improve local climate change planning through tools including: a climate vulnerability assessment, General Plan policies specific to climate change, mitigation planning, emergency response, and data reporting. Public input has been supportive of these changes at the state level, as residents have made comments to echo these concerns and encourage the City to take aggressive action against climate change.

The Safety Element, in alignment with concurrent City policy and planning efforts, places additional emphasis on recognizing and preparing for climate change hazards and their impact across the City. These include known hazards which have intensified due to climate change as well as previously unknown impacts and threats. The Safety Element provides new background information on climate change hazards and language to address these threats and hazards among its goals, objectives, and policies.

The Safety Element brings high level recommendations for resilient infrastructure and communities, environmental justice, and sustainable jobs from the Mayor's Green New Deal into the adopted General Plan and planning process. The Safety Element also draws from the Resilient Los Angeles plan which uses state-recommended hazard planning tools such as Cal-Adapt. Additional state-required mapping of Disadvantaged or Vulnerable Communities using CalEnviroScreen was previously conducted for the Local Hazard Mitigation Plan (LHMP) and the Health Atlas of the Health Element and is incorporated into the Safety Element Update. Each of these planning processes has involved robust public engagement, through public meetings, workshops, task forces, websites and collecting public input that will be integrated in the City's General Plan through this update.

The Safety Element Update represents a key milestone in documenting and tracking the City's commitment to addressing climate change and its related impacts. However, the City will need to continue and expand climate change planning efforts in the future. The Programs Chapter outlines efforts to do that by compiling both existing and recommended future implementation actions to meet climate adaptation goals. In particular, Program 2 "Implement and Maintain Local Hazard Mitigation Plan" reflects the need for expanded vulnerability assessments that further integrate climate considerations. Safety Element Policy 1.2.1 "Environmental Justice" addresses the disparate impacts of environmental hazards across communities. Policy 1.2.8 "Industrial Emissions and Air Quality Monitoring" details that every Angeleno should be able to breathe clean air and that the City address air pollution of all kinds, focusing on the most highly impacted

communities. Particularly, Program 6 “Identify, Analyze, and Mitigate Local Oil and Gas Risks” calls for the identification of air quality and other environmental risks from the location, development, and operation of fossil fuel extraction and processing. Program 17 “Urban Forest” and Program 18 “Cool Neighborhoods” call for the environmental and public health benefits of trees and other cooling efforts being brought to the most climate impacted areas in the City.

The amended Health Element provides background and calls for increased emphasis on how past planning decisions have created conditions in the built environment that place disproportionate burdens, including of climate change, on low income communities and communities of color where land use and mobility infrastructure patterns may contribute to or exacerbate the impacts of climate change. The updated Health Atlas continues to provide data to facilitate identification of communities vulnerable to climate change and comparisons on a number of subjects including environmental hazards (e.g., Map 113: Pollution Burden Index).

Climate Change Mitigation

During this update many stakeholders expressed concern that the impacts of climate change are already impairing safety within their communities. Residents expressed support for limiting the factors that contribute to climate disasters through policy and design changes in the built environment to limit global warming. Across the General Plan the City’s primary climate mitigation strategy has been to focus growth around transit served areas in a way that reduces greenhouse gas emissions (GHGs) as envisioned in Framework Element, and consistent with SB 375 and the Sustainable Communities Strategy. The Safety Element adds a climate change mitigation objective, as noted in the Goals, Policies and Objective section of this staff report.

The update to the Safety Element also advances these efforts through a number of Programs that address climate change mitigation. Program 2 “Implement and Maintain Local Hazard Mitigation Plan (LHMP)” is critical to mitigation as well as identifying impacts. Program 3 “Expand Homeless Services” can mitigate climate change impacts on the most vulnerable Angelenos. Program 4 seeks to continue to transform the LA River back into a community environmental asset. Program 6 calls to mitigate as well as to identify impacts from fossil fuel development near sensitive uses. Programs 7, 10, 11, 12, 13, and 14 each detail how watershed and floodplain management, local water use and recycling, and resilient infrastructure avoid and lessen the impacts of climate change. Heat and fire related Programs 16, 17, and 18 promote cool neighborhoods, increased urban forest, and wildfire safety and resilience. Program 28 calls for the increased production and use of renewable energy for the City.

Program 15 Land Use Regulations in Hazard Areas calls for the consideration of all hazards, including climate change hazards, to shape zoning decisions, develop and evaluate City ordinances, and expand land use and building code tools.

The Safety Element also calls for the coordination and implementation of climate change vulnerability assessments for facilities and infrastructure. The Element recognizes the increasing application of green infrastructure principles to mitigate safety hazards such as flooding and extreme heat and to manage local resources sustainably and equitably.

Climate change mitigation through community-based resilience is implemented through Program 23 “Advance Planning for Disaster Response,” Program 24 “Citywide Economic Resilience,” Program 26 “Climate Adaptation and Preparedness Plan,” Program 27 “Implement Resilience and Sustainability Actions with Communities,” and Program 33 “Building Social Cohesion and Community Preparedness.”

Disaster Mitigation

Several members of the public expressed fears surrounding potential disaster impacts, with an emphasis on wildfire and flooding and the disproportionate impacts these hazards pose to renters and vulnerable communities. The impact or severity of safety emergencies and disasters can be avoided or minimized with preparation and effective response. While many city departments are actively involved in preparing for disasters, as described in Chapter 2, disaster mitigation is also recognized as dependent on community capacity to avoid hazards and foster resilience. The Safety Element calls for long-term support and response networks to keep communities safe, stable, and secure.

The Safety Element includes land-use planning (zoning), building code, and fire code policies for mitigation, resilience, and sustainability. The redundancy and maintenance of critical facilities and infrastructure is emphasized to limit hazards and service interruptions. It is an ongoing policy that such emergency facilities and critical infrastructure be mapped and considered for improvement to avoid service interruption.

Programs 1 and 2 related to the Emergency Operations Master Plan and the Local Hazard Mitigation Plan are both critical to the implementation of coordinated, multi-hazard mitigation for disasters of all kinds. This is also true for Safety Element Program 15 “Land Use Regulations in Hazard Areas”, which details how the City can continue to build upon existing zoning and building code hazard mitigations and applies to disasters of all kinds. Program 20 “Seismic Retrofits” has been updated to include the City’s new soft-story and non-ductile concrete retrofit program. Key disaster mitigation is also a component of Program 35 “Resilience in Capital Improvements Planning and Facilities Maintenance”, Program 42 “Emergency Sheltering,” and Program 44 “Emergency Preparedness Communication.”

Evacuation Routes

Stakeholders expressed particular fear about the availability of evacuation routes in the event of a fire, flood or tsunami. The State echoes this concern and has placed an increased emphasis on planning for evacuation in hazard areas, especially within Very High Fire Hazard Severity Zones. In the event of a disaster or safety emergency, the City has developed a dynamic approach to evacuation response to various threats across different and diverse areas. Details are included in the City EOP Evacuations Annex as well as individual hazard Annexes and department emergency protocols. Evacuation routes are pre-selected and mapped, but which route is utilized will vary according to the emergency type and location. Some routes are signed, such as tsunami evacuation routes in the city’s coastal areas. However, fire or flood events are more unpredictable and response varies as to those precise locations and routes. During an emergency, several departments, including LAFD, LAPD, and LADOT have established procedures to notify residents of the correct evacuation route and direct traffic to ensure a safe evacuation. NotifyLA is one alert notification program that the City has established to aid in safe evacuation. Additionally, programs like Ready Your Los Angeles Neighborhood (RYLAN) encourage citizen participation in emergency response procedures, including becoming more familiar with evacuation protocols and coordinating with neighbors to ensure effective execution. Evacuation plans are updated and maintained to respond to different emergencies and to coordinate between all agencies involved in response. Chapter 2 of the revised Safety Element has been updated to reference readers to these related resources. Program 47 has been added to identify next steps to continue improving evacuation planning.

Equity and Environmental Justice

The topic of environmental justice featured prominently in discussions of both housing and safety. In response to this advocacy, the updated Safety Element places a stronger emphasis on equity

and environmental justice. Policy 1.2.1 states, “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.” In addition, language centering community capacity and the needs of vulnerable communities has been added to several of the policies, with an added focus on preventing displacement in the event of a disaster.

State law requires municipalities to identify “disadvantaged communities” that experience unique and compounding health risks as a result of disproportionate exposure to environmental hazards. This is done through several documents in the City of Los Angeles including the Safety Element, the Health Element, and the Health Atlas. The plans call for climate adaptation for the City’s most vulnerable communities to reduce local health and wellness disparities while increasing economic security for all Angelenos. Program 27 of the Safety Element directs the City to “Engage communities that have been most impacted by historic planning injustices in future climate change planning” which includes outreach, decision making, engagement with community groups, and other participation making communities more aware of and responsive to potential climate-related hazards.

The Health Element is the primary location of environmental justice goals, objectives, and policies in the General Plan, which together contribute to more equitable disaster resilience. Health Element Program 60 is updated and newly added Program 90 calls for increased and improved community engagement and capacity-building in historically underserved communities which are foundational to equity in disaster resilience, environmental justice, and practically all civic and built-environment issues. Health Element Program 89, which is also added through the update, supports the establishment of the Office of Racial Justice, Equity, and Transformative Planning in the Department of City Planning to develop and implement an overarching strategy to address racial justice and equity issues in planning and to ensure that the Department’s internal and external communication reflects principles of racial justice, equity, and restorative planning. The Health Element contains an appendix of equity and environmental justice goals and policies found in other General Plan elements and has been updated through the targeted amendments to include those found in the proposed plans as well as the Framework, Open Space and Mobility Elements.

Housing in Hazard Areas

Los Angeles is working to confront the simultaneous need to build more housing and ensure the safety of people who occupy that housing. In many cases hazard mitigation can be achieved through building code modifications, as advancements in building technology allow for the wider implementation of tools like earthquake bracing and fire sprinklers. For example, specific building provisions are required of projects in areas designated Very High Fire Hazard Severity Zones (VHFHSZs). In addition, zoning designations have been made with consideration of underlying hazard conditions. Parcels in VHFHSZs are usually designated for open space and low density residential development.

As the region continues to see greater and more frequent disaster impacts of climate change, the City will need to determine how best to utilize tools in the building, zoning and fire codes and ensure the safety of residents. Safety Element Policy 1.1.8 calls for hazards and mitigations to be considered in future land use decisions. The Housing Element specifically excluded any VHFHSZ areas from the Inventory of Candidate Sites for Rezoning (Appendix 4.7). The programs below are included in the Safety Element to outline next steps in planning to ensure the safety of housing units in hazard areas.

Safety Element Program 15 “Land Use Regulations in Hazard Areas” outlines multiple approaches to better regulate housing location and development in a way that is responsive to current and future hazard conditions and is protective of human life, the environment, and property. These include the consideration of all hazards, including climate change hazards, to shape zoning decisions and Community Plans, develop and evaluate City ordinances, and expand land use and building code tools. Program 19 “Retrofit, Acquisition, or Relocation of Existing Non-Conforming Structures” directs the City to support retrofit, acquisition, or relocation of structures in hazard-prone areas.

Safety Element Program 16 “Resilience in Wildfire Safety” focuses on wildfires, which can occur across a variety of built and unbuilt landscapes in Los Angeles. The program calls for continued prevention and maintenance activities and for integrating more sustainable practices to minimize wildfire hazards to housing through native landscaping and proper land management. As mentioned previously, Program 20 focuses on seismic retrofits. Program 23 “Advance Planning for Disaster Response” addresses what happens to structures and communities in the period following a disaster and outlines flexible reuse and redevelopment policies, community planning that improves recovery and resists displacement when disasters occur, and improved planning processes and services especially in more vulnerable areas.

Environmental Analysis/CEQA

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15082, a Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) (ENV-2020-6762-EIR; SCH. No. 2021010130) was issued on January 13, 2021, by the City for a 30-day public review period, with a closing date of February 15, 2021. The public scoping meetings were held on January 26 and January 28, 2021. The purpose of the scoping meetings 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, including mitigation measures and alternatives to be considered. During the Scoping Period, the City received a total of 252 written and verbal comments and letter responses to the Initial Study-NOP, including comments from public agencies, groups, and individuals. A summary of the comments received during the Scoping Period is available in the Draft EIR, as well as copies of all scoping comments received (Appendix B of the Draft EIR provided in Exhibit N). Information, data, and observations from these written comments are addressed throughout the Draft EIR, where relevant. The Draft EIR analyzed the following environmental impact areas:

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

- Utilities & Service Systems
- Wildfire

The Draft EIR was circulated for a 45-day review period. The review period began on July 22, 2021, with a closing date of September 7, 2021. As the lead agency, the City of Los Angeles received 80 written comments on the Draft EIR during the review period from public agencies, groups, and individuals.

Responses to all comments that raise significant environmental issues on the Draft EIR received during the comment period will be included in the Final EIR in compliance with CEQA. The Final EIR will be made available at least 10 days prior to City Council certifying the EIR and approving the Proposed Plans, consistent with CEQA Guidelines Section 15088(b).

Conclusion

The Housing Element is a comprehensive planning and policy document that seeks to chart a course for the City's housing strategies for the next eight years. Timely adoption and certification of a Housing Element, Safety Element, and Health Element is required under state law and is necessary for eligibility and scoring for certain funding sources the City relies upon. The 2021-2029 Los Angeles Housing Element reflects the City's housing aspirations as expressed through its policies and programs, particularly to serve those with lower incomes and special housing needs. The Safety Element advances efforts around disaster resilience and climate change mitigation, two topics of growing concern for the City. The Health Element addresses topics that influence the wellbeing of the community, including, but not limited to, equity, environmental justice and health. Following the City Planning Commission public hearing and recommendation to City Council, the City Council will also conduct a public hearing prior to considering adoption of the Housing and Safety Elements. After adoption, the Housing Element will be submitted to HCD for final certification.

FINDINGS

Project Location: The Los Angeles Citywide Housing Element 2021-2029 Update, Safety Element Update, and Health Element Amendments (the Proposed Plans) will apply to the entire geographic area located within the boundaries of the City of Los Angeles, which encompasses 467 square miles.

Finding Requirements for General Plan Amendments

City Charter Requirements

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 significant social, economic, or physical identity. No legislative findings are required to amend the General Plan. The Proposed Plans propose amendments to three elements of the General Plan: (1) updating the Housing Element of the General Plan, including a new policy document and related Rezoning Program, (2) amendments to the Safety Element of the General Plan, and (3) amendments to the Health Element (Plan for a Healthy Los Angeles) of the General Plan. All the amendments to subject elements of the City's General Plan apply citywide.

State General Plan Consistency Requirement

State law requires that the General Plan have internal consistency among its elements (Government Code Section 65300.5). The updated Housing Element, Safety Element and the Health Element must be consistent with the other elements and components of the General Plan. Those elements are the 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 includes a Framework Element, an Infrastructure Systems Element, a Public Facilities and Services Element, and an Air Quality Element. State Housing law does provide an exception to consistency where the Housing Element includes a program to bring the other elements into consistency with the Housing Element where necessary to make adequate provision for the housing needs of all economic segments of the community (Gov. Code Section 65583(c)(8).)

Neither state law nor local law (City Charter and Code) requires the City to adopt consistency findings or any other findings to amend a general plan element. The consistency discussion is provided for the City Planning Commission's consideration in approving and recommending the Proposed Plans and its determination that the Proposed Plans are consistent with the City's General Plan.

State Housing Element Findings

If a Housing Element relies on non-vacant sites to accommodate 50 percent or more of its RHNA for lower income households, the non-vacant site's existing use is presumed to impede additional residential development, unless the Housing Element describes findings based on substantial evidence that the use will likely be discontinued during the planning period. The City must make findings stating the uses on non-vacant sites identified in the inventory to accommodate the RHNA for lower income is likely to be discontinued during the planning period and the factors used to make that determination (Gov. Code, § 65583.2, subd. (g)(2)). These findings are provided in Section B, below.

Housing Element Consistency Discussion and Findings

A. General Plan Consistency Discussion

For all the reasons provided below, the Housing Element Update contains goals, objectives, policies, and programs that are consistent with the City of Los Angeles General Plan.

The Framework Element

The Housing Element Update is consistent with and carries out the long-range growth goals, objectives, and policies of the Framework Element of the General Plan. This section contains a discussion showing the consistency between the Housing Element and Framework Element.

The General Plan Framework Element sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding the following categories: growth and capacity, land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Therefore, the following discussion is organized by the categories found in the Framework Element below:

Growth and Capacity

With regards to **growth and capacity**, the State of California requires that cities accommodate a share of the region's projected growth based on a RHNA allocation every eight years as part of the Housing Element. In 2020, SCAG determined that the City must accommodate a RHNA allocation of 456,643 housing units with 184,721 units of the RHNA allocation at lower income levels. While this number of housing units exceeds the Framework Element's 2010 estimates, which corresponded to SCAG's forecast for 2010, the accommodation of the RHNA reflects a 2029 time horizon. The Framework Element states that it is a plan to accommodate whatever growth occurs in the future and that the population and housing estimates used by the plan do not represent maximum or minimum levels of growth to be permitted. The 2010 Framework population and household figures still have not been reached in 2021 and remain relevant, as do the Framework policies, even if housing needs anticipated by the RHNA exceed these figures. Therefore, the growth and capacity figures in the Housing Element are not inconsistent with the Framework Element goals, policies and objectives. The Housing Element accommodates the City's forecasted growth and existing need for housing and does not induce unplanned growth.

Land Use

With respect to the **Land Use**, the General Plan Framework Element states the following:

Framework GOAL 3A

A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more liveable city.

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

Policy 3.1.4 Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram.

Policy 3.1.6 Allow for the adjustment of General Plan Framework Element land use boundaries to account for changes in the location or introduction of new transit routes and stations (or for withdrawal of funds) and, in such cases, consider the appropriate type and density of use generally within one quarter mile of the corridor and station to reflect the principles of the General Plan Framework Element and the Land Use/Transportation Policy.

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.

Policy 3.2.2 Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.

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.

Policy 3.3.1 Accommodate projected population and employment growth in accordance with the Long-Range Land Use Diagram and forecasts in Table 2-2 (see Chapter 2: Growth and Capacity), using these in the formulation of the community plans and as the basis for the planning for and implementation of infrastructure improvements and public services.

Objective 3.4 Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.

Policy 3.4.1 Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram (Figure 3-1 and 3-2).

Policy 3.4.3 Establish incentives for the attraction of growth and development in the districts, centers, and mixed-use boulevards targeted for growth that may include:

- a. Densities greater than surrounding areas,
- d. Streamlined development review processes,
- e. "By-right" entitlements for development projects consistent with the community plans and zoning,
- f. Modified parking requirements in areas in proximity to transit or other standards that reduce the cost of development, and
- g. Pro-active solicitation of development.

The proposed Housing Element supports and is consistent with the Framework Element land use Goal 3A because its policies describe planning for local and citywide housing needs in balance with factors such as jobs and transit (Pol. 1.1.1), in alignment with the General Plan and the Citywide Housing Priorities (Pol. 1.1.2) and with an emphasis on achieving a more equitable distribution of affordable housing opportunities throughout the city, particularly in Higher

Opportunity Areas that lack it today (Pol. 1.18, 1.3.1 and 1.3.2). The emphasis on Higher Opportunity Areas is in line with the Goal's first direction to balance land uses (housing is out of balance in these areas) as well as more equitably distribute public resources such as affordable housing. It also aligns closely with the Framework's overall Housing Goal 4A discussed below. The proposed Housing Element acknowledges that a focus on Higher Opportunity Areas need to be balanced with other growth considerations outlined in the General Plan, including the location of high-quality transit, jobs, hazard areas, and ecologically sensitive areas. The Plan also supports the preservation and enhancement of the quality of housing (Goal 2, Obj. 2.3, Pol. 3.1.4) as well as the conservation of sensitive areas. The Rezoning Program generally emphasizes corridors and boulevards, Regional Centers, new and forthcoming transit centers, as well as access to jobs and Higher Opportunity Areas. Overall, the Housing Element seeks to support the vision of an equitable, livable, sustainable city that meets the needs of the population through a thoughtful balanced distribution of different types of housing types.

The policies and programs contained in the Housing Element Update encourage housing at different densities, sizes, affordability levels, and in different areas of the City's to meet the housing needs of all the segments of its diverse population. The proposed Housing Element also calls for the adoption of updates to Community Plans, Transit Neighborhood Plans, Specific Plans, and Citywide ordinances to establish appropriate land uses, densities, and mixes of housing types and levels of affordability in areas that are well served by public transit and are employment/activity centers, and where the potential for displacement is minimized, particularly in Higher Opportunity Areas. Those updates will be consistent with the Long-Range Land Use Diagram in the Framework Element or will include amendments. The proposed Housing Element supports the identification of areas of opportunity for future housing development, while ensuring protection of environmentally sensitive areas. Areas where new housing is anticipated would be served by sufficient public infrastructure and services in the City.

Single-Family Neighborhoods

With respect to Single-Family Neighborhoods, the General Plan Framework Element states the following:

Framework GOAL 3B

Preservation of the City's stable single-family residential neighborhoods.

Objective 3.5 *Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.*

Policy 3.5.3 *Promote the maintenance of existing single-family neighborhoods and support programs for the renovation and rehabilitation of deteriorated and aging housing units.*

Objective 3.6 *Allow for the intensification of selected single-family areas that directly abut high-density development as "transitions" between these uses.*

Policy 3.6.1 *Ensure that the new development of "duplex" or multi-family units maintains the visual and physical character of adjacent single-family neighborhoods, including the maintenance of front property setbacks, modulation of building volumes and articulation of facade to convey the sense of individual units, and use of building materials that characterize single-family housing.*

Policy 7.9.3 *Preserve existing single-family neighborhoods throughout the City to assure a continuing supply of variously priced single-family homes from the existing inventory.*

The proposed Housing Element is consistent with the Framework Element's in that it promotes new development that furthers Citywide Housing Priorities in balance with the existing architectural context and aims to ensure a variety of ownership models that increase the ability for households to attain homeownership (Pol 3.1.2 and 2.2.1). Citywide Housing Priorities include designing and regulating housing to contribute to a sense of place and balance with architectural context (Obj. 3.1 and Pol. 3.1.2). Proposed Policy 1.1.8 promotes the introduction of "more flexible zoning and incentives for existing lower density residential areas to create opportunities for more "missing middle" low-scale housing typologies, particularly in Higher Opportunity Areas." This is expressed through programs to address better transitions between single family and multi-family development, accessory dwelling units (ADUs), low-scale multi-family housing (such as duplexes, fourplexes, and bungalow courts), and rehabilitation projects (see Programs 58, 63, 59, 103, 23). In this regard it may also be noted that state law has changed the nature of single-family zoning in recent years with the ADU reforms and SB 9 going into law in January 2022. The Housing Element Update also contains policies and programs that reflect the overarching need (and state law) to create more affordable housing opportunities and in a broader array of areas in a way that affirmatively furthers fair housing. This requires an honest examination of land use practices that have perpetuated racial exclusion and inequities (Program 130) as well as an exploration of the development of more affordable housing types housing that are compatible with low-density neighborhoods (4.3.3 and Policy 1.1.8). Neither policy calls for wholesale changes to single-family zoned areas but does recognize that goals such as affordability and equity must be considered alongside other land use policy objectives. Where intensification of lower density areas is considered proposed through the Rezoning Program, it is in alignment with other Framework policies regarding transit, mixed-use boulevards, urban form, transitions, and equitable distribution of public resources like affordable housing (see Policies 3.1.6, 3.13.2, 5.3.6, Objective 3.6, Goal 3A and 4A). The Housing Element includes several programs that support Framework single-family policies such as Programs 23, 58, 63, etc. Therefore, the Housing Element Update is consistent with the Framework Element policies, goals, and objectives for Single-Family Neighborhoods.

Multi-Family Neighborhoods

With respect to Multi-Family Neighborhoods, the General Plan Framework Element states the following:

Framework GOAL 3C

Multi-family 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 multi-family 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.*

Policy 3.7.1 *Accommodate the development of multi-family residential units in areas designated in the community plans in accordance with Table 3-1 and Zoning Ordinance densities indicated in Table 3-3, with the density permitted for each parcel to be identified in the community plans.*

Policy 3.7.3 *Allow the reconstruction of existing multi-family dwelling units destroyed by fire, earthquakes, flooding, or other natural catastrophes to their pre-existing density in areas wherein the permitted multi-family density has been reduced below the pre-existing level.*

The proposed Housing Element is consistent with the Framework Element in that it encourages multi-family housing that enhances the quality of life (Pol. 3.1.1, 3.1.2, 3.1.3, Programs 58, 59, 60, 63, 64, etc.). The Housing Element Update contains policies and programs that promote the

new multi-family housing, particularly affordable and mixed-income housing, in areas near transit stations, jobs, and in higher opportunity areas. Furthermore, the Housing Element Update also supports the ability to reconstruct and ensure a right of return to existing residents if their housing is retrofitted or reconstructed after a disaster (Pol. 3.3.4. Program 53). The Rezoning Program proposes candidate sites for potential future rezoning actions, which will include updates to Community Plans as well as citywide zoning ordinances and affordable housing incentive programs.

Transit Stations

It is the intent of the General Plan Framework Element to encourage new development in proximity to rail and bus transportation corridors and stations. Within these areas, the highest development intensities are targeted generally within one quarter mile of the transit stations. It is intended that a considerable mix of uses be accommodated to provide population support and enhance activity near the stations.

With respect to **Transit Stations**, the General Plan Framework Element states the following:

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.*

The proposed Housing Element is consistent with the Framework Element in that it contains policies and programs that encourage multi-family and mixed-use residential development, particularly affordable housing, in areas of the City that have quality transit stations and a range of employment opportunities supported by commercial services and amenities (Pol. 1.1.1, 1.3.1, 3.2.2). The Housing Element Update supports the adoption of updates to Community Plans, Transit Neighborhood Plans, Specific Plans, and Citywide ordinances to establish appropriate residential land uses, densities, and mixes of housing types and levels of affordability in areas that are well served by public transit (Pr. 65).

With respect to **Urban Form and Neighborhood Design**, the General Plan Framework Element state the following:

Framework GOAL 5A

A liveable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.

Policy 5.1.1 *Use the Community Plan Update process and related efforts to define the character of communities and neighborhoods at a finer grain than the Framework Element permits.*

Objective 5.2 *Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.*

Policy 5.2.3 *Encourage the development of housing surrounding or adjacent to centers and along designated corridors, at sufficient densities to support the centers, corridors, and the transit system. While densities and distances will vary based on local conditions,*

the following residential density standards, which are based on the City's adopted Land Use/Transportation Policy, should be used as a general guide when updating community plans through a public participation process:

- a. Four-stories over parking (R4) within 1,500 feet of grade-separated (subway or arterial) fixed rail transit stations;*
- b. Three-stories over parking (R3) within 1,500 feet of at-grade fixed rail transit stations;*
- c. Two-stories over parking (RD1.5) within 750 feet of major bus corridor intersections;*
- d. Where appropriate, two units per lot (R2) may be considered within 750 feet of major bus corridors.*

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

Policy 5.5.3 *Formulate and adopt building and site design standards and guidelines to raise the quality of design Citywide.*

Objective 5.8 *Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented sub-areas 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.*

Policy 5.8.3 *Revise parking requirements in appropriate locations to reduce costs and permit pedestrian-oriented building design:*

- a. Modify parking standards and trip generation factors based on proximity to transit and provision of mixed-use and affordable housing.*
- b. Provide centralized and shared parking facilities as needed by establishing parking districts or business improvement districts and permit in-lieu parking fees in selected locations to further reduce on-site parking and make mixed-use development economically feasible.*

The proposed Housing Element is consistent with the Framework Element because it promotes and encourages livable buildings and neighborhoods with a range of housing types for diverse communities that builds on their strengths while also meeting citywide needs. The Housing Element policies and programs encourage a wide range of different densities and scales, balanced by architectural context, of high-quality design and offering pedestrian-friendly, (Policies 3.1.2, 3.1.3, 3.1.5). The Housing Element Update contains policies and programs that are focused on promoting mixed use and affordable and mixed-income housing particularly within close proximity to public transit stations and major bus corridors (Policies 3.2.1 and 3.2.2) The Housing Element Update also supports residential design standards that reduce housing costs, create a sense of place, and foster livable, resilient, and sustainable communities throughout the City (Pol. 3.1.2, 3.1.3, Programs 58, 59, 60, 63, 64, etc.)

Economic Development

With respect to **Economic Development**, the General Plan Framework states the following:

Policy 7.2.1 *Identify the characteristics of any surplus City-owned land and determine the appropriateness of designating this land for public, commercial, industrial, or residential uses.*

Policy 7.8.3 *Encourage mixed-use development projects, which include revenue generating retail, to offset the fiscal costs associated with residential development.*

Framework GOAL 7G*A range of housing opportunities in the City*

Objective 7.9 *Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's workforce to both live and work in the City.*

Policy 7.9.1 *Promote the provision of affordable housing through means which require minimal subsidy levels and which, therefore, are less detrimental to the City's fiscal structure.*

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.*

Objective 7.10 *Program resources in a manner that encourages appropriate development, housing opportunities, transit service and employment generation in all areas of the City, with particular emphasis on those portions of the City which historically have not received a proportional share of such opportunities, consistent with the City's overall economic policies.*

The Framework Element recognizes the critical link between economic development and housing, particularly between jobs and housing. The proposed Housing Element is consistent with the Framework Element in that aims to enable the City's workforce to both live and work in the City, by encouraging an ample supply of housing for residents and workers and promoting an array of housing types at different costs, including affordable and mixed income housing in areas with transit stations, a range of employment opportunities, and commercial services and amenities (Pol. 1.1.1, 1.1.2, 1.1.3, 1.2.1, 1.2.2, 1.3.1, 3.2.2). The Plan also promotes identification of appropriate public land for affordable housing, and supports mixed-use development (Obj. 3.2, Policies 1.2.10, 3.1.1, 3.2.9, Programs 15, 16, 60 and 67) and lowering the cost to build affordable housing by supporting incentives and streamlining for 100% affordable housing (Policy 1.2.4, 1.2.5, 1.2.8, 1.2.9, 1.2.10) as well as promoting an *emphasis on those portions of the City which historically have not received a proportional share of housing opportunities, including Higher Opportunity Areas (Obj. 1.3 and 4.3 and Pol. 1.3.1 and 3.2.3).*

Housing

The Framework Element furthers goals stated in Housing Element and provides policy direction for future amendments to the Housing Element. The Framework Element acknowledges that housing production has not kept pace with the demand for housing leading to increased overcrowding and states that the “City must strive to meet the housing needs of the population in a manner that contributes to stable, safe, and livable neighborhoods, reduces conditions of overcrowding, and improves access to jobs and neighborhood services, particularly by encouraging future housing development near transit corridors and stations.”

With respect to **Housing**, the General Plan Framework includes the following overall Housing **Goals and Objectives**:

Goal 4A: *An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.*

Objective 4.1 *Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the*

projected housing needs by income level of the future population to the year 2010 (Per Table 2-1, the Framework Plan 2010 population is 4,306,500 persons).

Policy 4.1.1 *Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City subregion to meet the twenty-year projections of housing needs (see Figure 4-1).*

Policy 4.1.2 *Minimize the overconcentration of very low- and low-income housing developments in City subregions by providing incentives for scattered site development citywide.*

Policy 4.1.3 *Minimize the over concentration of public housing projects in a City subregion.*

Policy 4.1.4 *Reduce overcrowded housing conditions by providing incentives to encourage development of family-size units.*

Policy 4.1.5 *Monitor the growth of housing developments and the forecast of housing needs to achieve a distribution of housing resources to all portions of the City and all income segments of the City's residents.*

Policy 4.1.6 *Create incentives and give priorities in permit processing for low- and very-low income housing developments throughout the City.*

Policy 4.1.7 *Establish incentives for the development of housing units appropriate for families with children and larger families.*

Policy 4.1.8 *Create incentives and reduce regulatory barriers in appropriate locations in order to promote the adaptive re-use of structures for housing and rehabilitation of existing units.*

Policy 4.1.9 *Whenever possible, assure adequate health-based buffer zones between new residential and emitting industries.*

Objective 4.2

Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.

Policy 4.2.1 *Offer incentives to include housing for very low- and low-income households in mixed-use developments.*

Objective 4.3

Conserve scale and character of residential neighborhoods.

Objective 4.4

Reduce regulatory and procedural barriers to increase housing production and capacity in appropriate locations.

Policy 4.4.1

Take the following actions in order to increase housing production and capacity:

- a. Establish development standards that are sufficiently detailed and tailored to community and neighborhood needs to reduce discretionary approvals requirements.*
- b. Streamline procedures for securing building permits, inspections, and other clearances needed to construct housing.*
- c. Consider raising thresholds for categorical exemptions for CEQA clearances for projects conforming to the City's development standards, particularly when housing is combined with commercial uses in targeted growth areas.*
- d. Consider establishing City service which assists applicants in processing applications for housing projects.*

The proposed Housing Element supports and is consistent with the Framework Element housing goal 4A as it strongly promotes a more equitable distribution of housing opportunities throughout the updates (e.g., Goal 2, 4, Obj. 1.3, 4.3, Pol.1.1.8, 1.3.1, 3.2.2, and various programs listed under Program 124 - AFFH). The Rezoning Program (Program 121) also significantly supports this goal, by focusing rezoning in Higher Opportunity Areas that have seen less than their fair share of housing opportunities.

The Housing Element aligns with the Framework's Objective 4.1 and associated policies with its focus on planning for capacities to provide a supply to make housing available at affordable types and costs (Pol. 1.1.2), while alleviating overconcentration of affordable housing (Obj. 1.3), overcrowding (Pol. 1.1.1), creating incentives and priorities for affordable housing (Pol. 1.1.8), adaptive reuse (Pol. 3.2.8), large families (Pol. 1.1.2 and Program 49) and health buffers (Pol. 3.1.4). The Plan also continues to emphasize transit as a key location for growth (Pol. 1.3.1 and 3.2.2) in alignment with Objective 4.2, the reduction of barriers to production in appropriate locations (Pol. 1.2.3, 1.2.5., 1.2.9) as well as to continue to balance production goals with preservation and conservation policies (Goal 2, Obj. 2.3, Pol. 3.1.2). The Rezoning Program is consistent in that it is necessary to provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost to meet projections of housing needs and plans to minimize the overconcentration of very low- and low-income housing developments in City subregions by providing incentives for scattered site development citywide, particularly in Higher Opportunity areas that have seen less affordable housing production than others.

Other General Plan Elements

The proposed Housing Element is consistent with the purpose, intent, and provisions of the General Plan in that it helps to implement policies contained in a number of other General Plan Elements in addition to the Framework Element discussed above, including the:

- Circulation Element (Mobility Plan 2035)
- Health Element (Plan for a Healthy Los Angeles)
- Air Quality Element
- Conservation Element
- Safety Element

Mobility Plan 2035 (Circulation Element)

The City's Mobility Plan 2035 (Circulation Element) provides the policy foundation for achieving a transportation system that balances the needs of all road users and incorporates "complete streets" principles and lays the policy foundation for how future generations of Angelenos interact with their streets. This includes the strong link between residential land uses to transportation.

The City's Mobility Plan 2035 contains a number of important policies related to the proposed Housing Element, including:

Mobility Objective 3.1

Ensure that 90% of households have access within one mile to the Transit Enhanced Network by 2035.

Mobility Objective 3.2

Ensure that 90% of all households have access within one-half mile to high quality bicycling facilities by 2035. (*protected bicycle lanes, paths, and neighborhood enhanced streets)*

The Housing Element Update is consistent with the City's Mobility Plan 2035 in that it contains policies and programs that support the strong link between residential land uses and transportation, particularly public transit stations (Policies 1.1.1, 1.3.1 and 3.2.2). Incentivizing housing, particularly affordable housing, near transit stations ensures that transit-dependent residents have access to housing and employment opportunities, education, quality healthcare, and other amenities. These policies and programs acknowledge the ample opportunities for transit-oriented development that can support new housing (particularly affordable housing) as a result of significant transit infrastructure investments occurring in multiple neighborhoods of the City.

Plan for a Healthy Los Angeles (Health Element)

The Plan for a Healthy Los Angeles (Health Element) lays the foundation to create healthier communities for all Angelenos. As an Element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health and environmental justice as a priority for the City's future growth and development. It acknowledges that access to safe, affordable, accessible, and healthy housing is of paramount importance to living a healthy life.

The proposed Housing Element is consistent with the Health Element and furthers the following goals, objectives, and policies:

Health Element Policy 1.6 *Reduce the debilitating impact that poverty has on individual, familial, and community health and well-being by: promoting cross-cutting efforts and partnerships to increase access to income; safe, healthy, and stable affordable housing options; and attainable opportunities for social mobility.*

Policy 1.7 *Reduce the harmful health impacts of displacement on individuals, families, and communities by pursuing strategies to create opportunities for existing residents to benefit from local revitalization efforts by: creating local employment and economic opportunities for low-income residents and local small businesses; expanding and preserving existing housing opportunities available to low-income residents; preserving cultural and social resources; and creating and implementing tools to evaluate and mitigate the potential displacement caused by large-scale investment and development.*

Health Element Goal 2

A city that is built for health uses design, construction, and public services to promote the physical, mental, and social well-being of its residents. A healthy city has neighborhoods where health-promoting goods and services are abundant and accessible, so that the healthy choice is the easy choice for all residents. Health is further supported by safe multi-modal corridors that offer active transportation alternatives, access to a diverse housing stock that offers options for all ages and incomes, ample opportunities for recreation, healthy food options, and a vibrant economy that offers quality employment opportunities.

Policy 2.2 *Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.*

Policy 5.7 Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.

The proposed Housing Element is consistent with the Health Element goals, objectives, and policies related to housing in the City in that it prioritizes affordable housing, anti-displacement policies and orienting housing development around health, economic stability, and well-being (Obj 1.2, 2.1, 3.1 and Policies 1.1.7, 1.2.1, 1.2.6, 2.1.1, 2.1.7, 3.1.5, 3.1.6, 3.3.2 etc.). The focus on health has increased in the Housing Element Update, with new policies guiding development to better orient building siting and features toward beneficial uses and away from polluting or hazardous features (Pol. 3.1.4).

Air Quality Element

The Air Quality Element sets forth the goals, objectives, and policies which guide the City in its implementation of its air quality improvement programs and strategies. A number of these goals, objectives, and policies are relevant to land use development, and relate to traffic mobility, discouraging single-occupancy vehicle trips, and increasing energy efficiency in City facilities and private developments.

The proposed Housing Element is consistent with the City's Air Quality Element and furthers the following goals, objectives, and policies:

Air Quality Element Goal 2

Less reliance on single-occupant vehicles with fewer commute and non-work trips

Air Quality Element Goal 4

Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

Objective 4.2 Reduce vehicle trips and vehicle miles traveled associated with land use patterns

Policy 4.2.1 Revise the City's General Plan / Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.

Policy 4.2.3 Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

Air Quality Element Goal 5

Energy Efficiency through land use and transportation planning, the use of renewable resources, and the implementation of conservation measures such as site orientation and tree planting.

Objective 5.1 Increase energy efficiency of City facilities and private developments.

The proposed Housing Element is consistent with the Air Quality Elements' goals, objectives, and policies related to housing development in the City in that it encourages housing locations near jobs and transit, as well supports various green-building and other sustainability efforts (Pol. 1.1.1, 1.3.1, 3.2.2, 3.2.3, 3.2.6). These efforts facilitate high quality, healthy housing in neighborhoods that mix uses, incomes and improve accessibility to jobs and services, which reduces vehicle miles traveled (VMTs) and therefore improves air quality. These programs and policies are also aligned with the regional and state mandates of improving air quality. The Housing Element supports providing technical assistance and disseminating information and guidelines to the

residential development community to encourage the use of quality building materials, sustainable materials and practices to protect air quality, water conservation, and energy efficiency. The proposed Housing Element also supports improved air quality in residential development by encouraging residential developers to use building orientations that take advantage of natural ventilation opportunities, filtered air systems, landscaping, venting appliances to the outside, and the use of low-emitting construction and finish materials (Programs 70-74, 76 and 79).

Conservation Element

The Conservation Element states that the City has a primary responsibility for identifying and protecting its cultural and historical structures, natural features or sites of historic, architectural, cultural or aesthetic significance.

Conservation Element Objective 4 *Protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.*

Policy 4.1 *Continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities.*

The proposed Housing Element is consistent with the Conservation Element in that it seeks to maintain and protect important cultural and historic resources while allowing for the development and preservation of housing in the City. The Housing Element Update contains policies and programs that incentivize the preservation and reuse of historic structures for the purposes of providing housing, particularly with affordable housing units. The proposed Housing Element supports exploring the provision of additional incentives for the rehabilitation of affordable housing and for low-income homeowners of historic properties in HPOZs Policies (see Chapter 6, Policies 3.1.1 and 3.1.8). The Housing Element Update supports the prioritization of the initiation of proactive nominations of new Historic-Cultural Monuments that reflect the histories of communities of color within Los Angeles. Policies and programs are also included that encourage expanding designation of historic, architectural, and cultural resources in neighborhoods with a high concentration of historic properties and few historic protections, particularly in communities of color (see Chapter 6, Policies 3.1.1 and 3.1.8).

Safety Element

The Safety Element details a policy direction to prevent, respond to, and recover from disaster events. This direction is consistent across the 1996 Element and the proposed update. Updated policies of the Safety Element include:

SE Goal 1: Hazard Mitigations A city where potential injury, loss of life, property damage and disruption of the social and economic life of the City due to hazards is minimized.

Policy 1.1.5 Risk Reduction. Reduce potential risk hazards due to disaster with a focus on protecting the most vulnerable people, places and systems.

Policy 1.1.8 Land Use. Consider hazard information and available mitigations when making decisions about future land use. Maintain existing low density and open space designations in Very High Fire Hazard Severity Zones. Ensure mitigations are incorporated for new development in hazard areas such as VHFHSZs, landslide areas, flood zones and in other areas with limited adaptive capacity.

Goal 3: Disaster Recovery A city where private and public systems, services, activities, physical condition and environment are reestablished as quickly as feasible to a level equal to or better than that which existed prior to the disaster.

Policy 3.1.5 Restoration. Look to the future and rebuild based on the lessons of the past. Prior to a disaster, develop and establish procedures for securing assistance and expediting inspection and permitting activities to facilitate the rapid repair and rebuilding of those parts of the private and public sectors which were damaged or disrupted as a result of the disaster with an added consideration of future safety. Develop and establish procedures to enhance the resilience of buildings and infrastructure that are rebuilt following a disaster. Develop tools to ensure that vulnerable residents and business owners are included in community rebuilding efforts.

The proposed Housing Element is consistent with the updated policies above in that it seeks to mitigate the exposure of residents to hazard conditions and includes policy direction for equitable and resilient housing recovery following a disaster. Specifically Objective 3.3, which directs the City to promote disaster and climate resilience in citywide housing efforts, includes policies 3.3.1 through 3.3.7, which direct the city to identify disaster risks to housing stock and plan for post disaster housing recovery, including efforts to mitigate the impacts on vulnerable tenants.

B. State Housing Element Findings (California State Government Code Section 65580 – 65589.11)

Consistency with State Law — Statutory requirements for the Housing Element are delineated in California State Government Code Section 65580 – 65589.11. The Housing Element is required to be updated every eight years in accordance with a specific schedule of dates established by the California Department of Housing and Community Development (HCD). This Housing Element Update is part of the sixth cycle, which covers the period of October 15, 2021 through October 15, 2029 for the SCAG region.

Because housing needs are recognized as a matter of statewide concern, the State, through HCD, must certify the compliance of every jurisdiction's Housing Element upon adoption. The first draft Housing Element was submitted for HCD review on July 7th, 2021. On September 3, 2021, HCD provided comments on the proposed draft to the City (see Exhibit O). These comments were subsequently incorporated (as described in Exhibit O) and resolved in the revised draft, released on September 15, 2021 and shown in Exhibit B. Pending objection from HCD, the proposed Housing Element is consistent with state Housing Element law (California State Government Code Section 65580 – 65589.11) and no further findings are required.

Findings for Non-vacant Sites Identified to Accommodate the RHNA — Pursuant to Government Code Section 65583.2, the City finds, based on the factors described here, that the existing uses on the non-vacant sites identified in the site inventory to accommodate the lower income RHNA are likely to be discontinued during the planning period, and therefore do not constitute an impediment to additional residential development during the period covered by the housing element. The methodology used to determine the likelihood to discontinue and the development potential for each non-vacant site is described below along with a description of the facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts, which collectively support this finding.

Given the number of potential non-vacant sites to accommodate the lower income RHNA in the City of Los Angeles, and the variety of types of sites, in preparing the site inventory, the City secured pro-bono consulting services from the Turner Center for Housing Innovation at the University of California, Berkeley and senior fellow Issi Romem, Ph.D., of the economics research firm MetroSight (“consulting team”). The consulting team, representing academic experts in the field of econometric modeling, prepared an econometric model (“the model”) to estimate likelihood of housing development during the period and site capacity based on anticipated impediments based on the City’s past experience of housing development as reflected in data on housing

production and various site-specific factors related to existing uses, the market environment, and regulatory incentives based on the requirements of state law.

The model uses parcel-level data on permitting from 2015 to 2019 to model the likelihood of new units being permitted on each parcel and their number. The model accounts for parcel's zoned capacity before and after the awarding of any development bonuses, as well as the market conditions and various other factors (described below) which the city is required to address by state Housing Element law. The study then applies the model to current data, including changes in zoned capacity, market conditions and other factors, in order to predict that likelihood and unit number going forward from 2021 to 2029, conditional on the same variety of parcel attributes used in estimation, including existing uses - but updated to their values as of 2020.

The model consists of two steps to determine the realistic development potential that is expected to occur on each parcel during the planning period. Step One determines the likelihood of new units being permitted on each parcel using a logit regression model. Step Two determines the conditional number of new units expected to be permitted on each parcel if development occurs, using a fractional logit regression model. For each parcel, the results of Step One are multiplied by the outcome of Step Two, which results in the "unconditional" number of new housing units that can be expected to be built on each parcel during the planning period. The factors (covariates) included in the model are as follows:

Regression Model Variables		
Factors Considered in Model	Included in Step 1	Included in Step 2
Number of base-zoned units allowed on the parcel	✓	✓
Number of bonus-zoned units allowed on the parcel, considering any applicable development bonus	✓	✓
Ratio of existing units to base-zoned units on the parcel	✓	
Indicators for residential market area type	✓	✓
Existing use on the parcel	✓	
Age of existing structure on the parcel	✓	
Floor Area Ratio (FAR) utilization of existing structure on the parcel	✓	
Applicability of City's Rent Stabilization Ordinance (RSO) to existing structures on the parcel	✓	
Ratio of total permitted units to total based-zoned units in the Community Plan Area (CPA), over a 5-year period	✓	✓
Typical estimated home value in the zip code area	✓	✓
Typical estimated asking rent in the zip code area	✓	✓
Average rental vacancy rate in the Census Public Use Microdata Area (PUMA) during the prior 5-year period	✓	✓
Average remaining commercial lease duration in the CPA	✓	

Government Code Section 65583.2 requires a number of factors to be considered in the evaluation of non-vacant sites (item enumeration, bracketed text and emphasis added):

"Section 65583.2(g)(1) For [relevant non-vacant sites], the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including[:]

*[i] the extent to which **existing uses** may constitute an impediment to additional residential development,*
*[ii] the city's or county's **past experience** with converting existing uses to higher density residential development,*
*[iii] the current **market demand** for the existing use,*
*[iv] an analysis of any **existing leases** or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development,*
*[v] **development trends**,*
*[vi] **market conditions**, and*
*[vii] regulatory or other **incentives** or standards to encourage additional residential development on these sites."*

The correspondence between the model and factors i through vii required in the law is as follows.

- i. "The extent to which existing uses may constitute an impediment to additional residential development" is reflected by the conditioning of the model on existing use categories and on existing structures' age and FAR utilization, as well as being subject to the Rent Stabilization Ordinance and the remaining local commercial existing lease duration variable.
- ii. "The city's or county's past experience with converting existing uses to higher density residential development" is captured by the basic premise of the exercise: Predicting future permitting based on an empirical estimate that draws on the city's recent (5-year) experience. That experience consists primarily of converting existing uses--including less dense residential use--to higher density residential development.
- iii. "The current market demand for the existing use" is reflected in the existing use indicators, as well as the remaining local commercial existing lease duration variable and the local information on rental vacancy rates and on residential property values and rents.
- iv. "An analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development" is addressed in the model by the inclusion of the local remaining existing commercial lease duration variable. This is also addressed by subsequent steps which removed any sites from the Sites Inventory that have an existing regulatory agreement or other regulatory protection related to affordable housing units that would preclude the redevelopment of the site during the planning period.
- v. "Development trends" are captured by the basic premise of the exercise as explained in item II, and also by the local ratio of total permitted units to total base-zoned units over the prior 5-year period. That variable captures the recent level of permitting for housing in the area. (The division by total base-zoned units is necessary for that variable to not simply convey the size of the Community Plan Area, and to account for regulation-imposed differences in past permitting, as opposed to market-driven development trends.)
- vi. "Market Conditions" are captured by the local ratio of total permitted units to total base-zoned units over the prior 5-year period, as well as the local information on rental vacancy rates and on residential property values and rents, the remaining local commercial existing

lease duration variable, and the set of existing land use indicators, as well as the City's identification of four residential market area types.

- vii. "Regulatory or other incentives or standards to encourage additional residential development on these sites" are reflected by the distinction between base-zoned units and bonus-zoned units, as well as the inclusion of their ratio. The model results are further adjusted to consider the overall influence of the City's Transit Oriented Communities (TOC) Affordable Housing Incentive Program on site-level development outcomes.

The consulting team found that both Step 1 and Step 2 of the model have defensible predictive power, meaning that the model is successful at predicting site-level outcomes regarding housing development, when considering the above-described variables on each site. More information on the predictive values can be found in Appendix 4.6 of the proposed Housing Element (Exhibit B).

The outcome of the model is that each site is assigned an anticipated development potential that is well below the zoned capacity for the site, as there are many factors which make it difficult to identify precisely which sites will develop with housing over the 8-year period. It is not expected that all sites identified using this model will redevelop with their identified realistic development potential; rather, the much more likely outcome is that a smaller number of sites are developed with their expected build out (outcome of step 2 of the model). The model results are best understood that, given 100 similar sites, it would be expected that one site would develop with the expected build out during the planning period. As it is not possible to identify precisely which site would redevelop, the model indicates that each site has a small percent chance of redeveloping.

Furthermore, in its September 3, 2021 letter, HCD did not identify any necessary revisions to the above-described methodology; and therefore it is understood that the methodology satisfactorily complies with the requirements in Government Code Section 65583.2.

For these reasons, the City finds that the existing uses on the non-vacant sites identified in the site inventory to accommodate the lower income RHNA are likely to be discontinued during the planning period, and therefore do not constitute an impediment to additional residential development during the period covered by the housing element.

Safety and Health Element Findings

A. General Plan Consistency Discussion

For all the reasons provided below, the update to the Safety Element and Health Element (Plan for a Healthy Los Angeles) Amendments contain goals, objectives, policies, and programs that are consistent with the General Plan.

Safety Element Goal 1: Disaster Prevention

Zoning, Infrastructure and Mitigations in Hazard Areas

The updated Safety Element places an emphasis on mitigating disaster impacts by using a variety of tools in hazard areas, including: lower intensity zoning designations (such as open space, low density residential and industrial), building code mitigations, fire code requirements, and infrastructure planning that avoids and hardens infrastructure in hazard areas. This is consistent with several other Elements of the General Plan, including Framework, Open Space, and Housing.

With respect to general disaster prevention the **Framework Element** places a focus on using hazard designations to inform zoning decisions by setting aside hazard areas for low density development and open space.

The General Plan Framework Element states the following:

Framework Policy 6.1.1. *Consider appropriate methodologies to protect significant remaining open spaces for resource protection and mitigation of environmental hazards, such as flooding, in and on the periphery of the City, such as the use of tax incentives for landowners to preserve their lands, development rights exchanges in the local area, participation in land banking, public acquisition, land exchanges, and Williamson Act contracts.*

Policy 6.3.1. *Preserve flood plains, landslide areas, and steep terrain areas as open space, wherever possible, to minimize the risk to public safety.*

Framework Goal 9B.

A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.

Policy 9.5.1. *Develop a stormwater management system that has adequate capacity to protect its citizens and property from flooding which results from a 10-year storm (or a 50-year storm in sump areas).*

Policy 9.6.2. *Establish standards and/or incentives for the use of structural and non-structural techniques which mitigate flood-hazards and manage stormwater pollution.*

Policy 9.6.3. *The City's watershed-based approach to stormwater management will consider a range of strategies designed to reduce flood hazards and manage stormwater pollution. The strategies considered will include, but not necessarily be limited to:*

- a. Support regional and City programs which intercept runoff for beneficial uses including groundwater recharge;*
- b. Protect and enhance the environmental quality of natural drainage features;*
- c. Create stormwater detention and/or retention facilities which incorporate multiple-uses such as recreation and/or habitat;*
- d. On-site detention/retention and reuse of runoff;*
- e. Mitigate existing flood hazards through structural modifications (floodproofing) or property by-out;*
- f. Incorporate site design features which enhance the quality of offsite runoff; and*
- g. Use land use authority and redevelopment to free floodways and sumps of inappropriate structures which are threatened by flooding and establish appropriate land uses which benefit or experience minimal damages from flooding.*

Policy 9.16.1 *Collect appropriate fire and population development statistics for the purpose of evaluating fire service needs based on existing and future conditions.*

Policy 9.17. *Assure that all areas of the City have the highest level of fire protection and EMS, at the lowest possible cost, to meet existing and future demand.*

Policy 9.25.1. *Continue to actively participate in emergency planning.*

With respect to general disaster prevention, this update is consistent with the **Open Space Element** which identifies open space as beneficial to public health and safety and calls for the evaluation of open space designation as a mitigation for natural and manmade hazards to public safety.

The Open Space Element states the following:

Open Space Objective O-7. *To identify, preserve and/or conserve those lands necessary as open space land in order to protect the public health and safety.*

Policy 2.2. *Flood endangered areas should be set aside for appropriate open space uses.*

Policy 2.20. *Hazardous open space areas; including property especially subject to fire, steeply sloping hillsides and geologically unstable lands; are threats to the public safety. Proposals for their use should be evaluated in light of more restrictive grading requirements, better provision for access and lower densities and/or intensities of development.*

Policy 3.12. *Lands subject to natural or manmade hazards, detrimental to life and property should be left in their natural state, where feasible, and considered as open space.*

With respect to general disaster prevention, this update is consistent with the **2021-2029 Housing Element**, which works to analyze and plan for disaster-resistant housing and to provide for well informed and prepared residents.

The Housing Element states the following:

Housing Element Objective 3.3 *Promote disaster and climate resilience in citywide housing efforts.*

Policy 3.3.1 *Identify risks to our housing stock related to disasters and other unplanned events, especially those likely to accelerate as a result of climate change.*

Policy 3.3.2 *Establish plans, incentives, and development standards that eliminate or minimize disaster risk and promote positive health outcomes for communities most at risk.*

Policy 3.3.5 *Identifying funding and other resources to support the retrofitting of existing buildings to improve resilience and health.*

Policy 3.3.6 *Educate homeowners, tenants and landlords about disaster risk and mitigations.*

The Safety Element is consistent with the above policies from the Framework Element, Open Space Element and 2021-2029 Housing Element as they relate to disaster prevention because the Safety Element provides a background on how the city prevents disaster events and minimizes their impact when they do occur. Policies are included to ensure a consideration of disaster prevention while making land use decisions, most commonly by selecting lower zoning designations in Very High Fire Hazard Severity Zones and other designations and mitigations as appropriate for the relevant hazard area. Programs are included to improve future efforts to prevent and mitigate disasters, minimize climate change and associated hazards, and to ensure that communities are well-prepared ahead of disasters and emergencies. This update maintains a focus on mutual aid, coordination, and the protection of critical infrastructure.

Climate Change Mitigation

The Safety Element places an emphasis on mitigating the impacts of climate change and preventing climate disasters by reducing greenhouse gas emissions, which is consistent with policies found in the Framework Element, 2021-2029 Housing Element, Mobility Plan 2035 (Circulation Element) and Plan for a Healthy Los Angeles (Health Element).

With respect to climate change mitigation, this update is consistent with the General Plan **Framework Element** which sets the goal of using land use to create a sustainable and high quality built environment throughout Los Angeles, especially by locating land uses and transit infrastructure to reduce pollution and greenhouse gas effects associated with vehicle trips and emissions.

The Framework Element states the following:

Framework Goal 3A

A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more liveable city.

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.*

Framework Goal 3K

Transit stations to function as a primary focal point of the City's development.

Framework Goal 3L

Districts that promote pedestrian activity and provide a quality experience for the City's residents.

With respect to climate change mitigation, this update is consistent with the **2021-2029 Housing Element** which promotes sustainability in land use patterns, strategies to promote quality of life and make Angelenos more housing secure, and encourages green building design for housing stock.

The Housing Element states the following:

Housing Element Objective 3.2 *Promote environmentally sustainable buildings and land use patterns that support a mix of uses, housing for various income levels and provide access to jobs, amenities, services and transportation options.*

Policy 3.2.1 *Promote the integration of housing with other compatible land uses at both the building and neighborhood level.*

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 3.2.3 *Provide outreach and education to the public about the need to address housing needs in relation to other important outcomes, including health, transportation, and the environment, to support overall sustainability goals.*

Policy 3.2.4 *Provide streamlining, incentives and flexibility for residential buildings that promote energy and resource conservation particularly those that exceed existing green building standards.*

Policy 3.2.5 *Promote and facilitate reduction of water, energy, carbon and waste consumption in new and existing housing.*

Policy 3.2.6 *Promote outreach and education to property owners, tenants and homebuilders regarding environmentally sustainable residential development practices.*

Policy 3.2.7 *Provide environmentally sustainable development standards and incorporate sustainable best practice in building and zoning code updates.*

Policy 3.2.8 *Provide incentives and promote flexibility for the conversion of non-residential structures to new housing in order to reduce the carbon footprint resulting from demolition and new construction.*

With respect to climate change mitigation, this update is consistent with Mobility Plan 2035 (General Plan **Circulation Element**) which emphasizes active, environmentally sustainable mobility that limits the further impact of greenhouse gas emissions on the climate and climate change-related hazards.

The Mobility Plan states the following:

Mobility Plan Policy 5.1 *Sustainable Transportation: Encourage the development of a sustainable transportation system that promotes environmental and public health.*

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

Policy 5.3 *Alternative Metrics: Support a range of transportation metrics to evaluate the multiple purposes that streets serve.*

Policy 5.4 *Clean Fuels and Vehicles: Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.*

Policy 5.5 *Green Streets: Maximize opportunities to capture and infiltrate stormwater within the City's public right-of-ways.*

With respect to general disaster prevention and climate change mitigation, this update is consistent with the General Plan **Health Element** which states the following:

Health Element Policy 5.6. *In collaboration with public, private, and nonprofit partners, increase the city's resilience to risks (increasing temperatures and heat related effects, wildfires, reduced water supply, poor air quality, and sea level rise) resulting from climate change, and target resilience in the most vulnerable communities.*

The update to the Safety Element is consistent with the policies related to climate change in the Framework Element, Plan for a Healthy LA (Health Element), Mobility Plan (Circulation Element) and Housing Element as the Safety Element highlights efforts to address the underlying causes of climate change to mitigate its impacts. A new Objective 1.2 directs the City to set measurable targets for carbon reduction, build resilience to better navigate climate uncertainty, and to address the unequal burden of climate change impacts. Policies and Programs encourage the proper management, and if possible, the conservation of natural resources, systems, and services that make the city environment more resilient to disasters. There is increased emphasis on resilient and sustainable energy and water systems as well as a high-quality built environment and mobility system that minimizes greenhouse gas emissions and other burdens, especially those faced by low income families and communities of color. This is aligned with the emphasis on resources, capacity-building, social programs, and services to foster resilient communities.

Safety Element Goal 2: Emergency Response

The updated Safety Element emphasizes the need for rapid, effective and coordinated emergency response, which is constant with policies in the Framework Element.

With respect to general disaster response, this update is consistent with the General Plan **Framework Element** which includes coordinating rapid disaster response, minimizing interruptions of critical services, and quickly restoring services should they be interrupted in case

of a disaster. The Framework Element emphasizes that each neighborhood be informed and prepared for emergencies and that communities are able utilize available resources and coordinate with first responders.

The General Plan Framework Element states the following:

Framework Objective 9.4. *Ensure continued provision of wastewater collection and treatment after an earthquake or other emergency.*

Policy 9.4.1. *Restore minimal operations as soon as possible after an emergency, and full operations as soon as feasible.*

Policy 9.4.2. *Establish joint cooperation agreements with other jurisdictions for mutual assistance during emergencies.*

Objective 9.11. *Ensure, to the extent possible, the continued provision of water capacity, quality and delivery after an earthquake or other emergency.*

Policy 9.11.1. *Provide for the prompt resumption of water service with adequate quantity and quality of water after an emergency.*

Framework Goal 9I.

Every neighborhood in the City has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.

Objective 9.15. *Provide for adequate public safety in emergency situations.*

Policy 9.15.1. *Maintain mutual assistance agreements with local law enforcement agencies, state law enforcement agencies, and the National Guard to provide for public safety in the event of emergency situations.*

Framework Goal 9J.

Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.

Policy 9.19.1. *Maintain mutual aid or mutual assistance agreements with local fire departments to ensure an adequate response in the event of a major earthquake, wildfire, urban fire, fire in areas with substandard fire protection, or other fire emergencies.*

Policy 9.19.2. *Maintain special fire-fighting units at the Port of Los Angeles, Los Angeles International Airport, and Van Nuys Municipal Airport capable of responding to special emergencies unique to the operations of those facilities.*

Policy 9.19.3. *Maintain the continued involvement of the Fire Department in the preparation of contingency plans for emergencies and disasters.*

Objective 9.25. *Utilize park space in emergency situations.*

Policy 9.25.2. *Continue to utilize parks and recreation facilities as shelters in times of emergency.*

Objective 9.3. *Ensure continued electric service after an earthquake or other emergency.*

Policy 9.30.1. *The LADWP shall periodically examine its emergency response programs to ensure continued electrical service.*

Policy 9.35.1. *Support the special needs of urban emergency and public safety services and benefit the largest number of people.*

Policy 9.37.2. *Improve the City's existing emergency telecommunications systems so that it can better respond to and mitigate the impacts of various emergency situations.*

The Safety Element provides information on the activation of emergency procedures, including the response functions of the Emergency Management Department and the activation of

emergency roles by and for the Office of the Mayor. The Element articulates a goal of rapid and coordinated emergency response.

The Safety Element, and related plans including LHMP, the Emergency Operations Plan, and individual department emergency plans minimize disruption to critical infrastructure and city services in the event of an emergency or disaster and prepare agencies to coordinate responses and the provision of mutual aid. The Element additionally emphasizes the evaluation of neighborhood vulnerabilities and policies and programs to strengthen community disaster response capacity. Finally, the updated Safety Element reinforces the value of Mutual Aid Agreements and coordination between departments and surrounding jurisdictions.

Safety Element Goal 3: Disaster Recovery

The updated Safety Element places an emphasis on resilient and equitable restoration of public and private assets immediately following a disaster, which is consistent with both the 2013-2021 and 2021-2029 Housing Elements.

With respect to general disaster recovery, this update is consistent with the General Plan **2013-2021 Housing Element** which includes policies to provide emergency housing and facilitate the post-disaster reconstruction of housing at sufficiently high density.

The General Plan 2013-2021 Housing Element states the following:

Housing Element Policy 1.3.4. Plan for post-disaster reconstruction of housing.

Policy 4.1.5. Plan for emergency housing needs that will result from natural or man-made disasters.

Policy 3.7.3. Allow the reconstruction of existing multi-family dwelling units destroyed by fire, earthquakes, flooding, or other natural catastrophes to their pre-existing density in areas wherein the permitted multi-family density has been reduced below the pre-existing level.

Policy 3.12.3. Permit the re-construction of existing commercial structures destroyed by fire, earthquakes, flooding, or other natural catastrophes to their pre-existing intensity.

With respect to general disaster recovery, this update is consistent with the General Plan **2021-2029 Housing Element** which emphasizes planning for housing needs resulting from climate change events as well as promoting resilience to housing displacement among vulnerable Angelenos as a direct or indirect result of disasters.

The General Plan 2021-2029 Housing Element states the following:

Housing Element Policy 3.3.3 Plan for emergency housing needs that will result from disasters and climate events.

Policy 3.3.4 Plan for post-disaster housing recovery that promotes equity, resilience, environmental sustainability and safety. Work to ensure a right of return to existing residents if housing is retrofitted or reconstructed after a disaster.

Policy 3.3.7 Provide assistance to mitigate the impacts and financial disruption of emergencies in order to support Angelenos to stay in their homes.

The Safety Element sets Goals and Objectives for highly coordinated disaster recovery to restore the built environment, including housing, to conditions equal or better than those which existed prior to any disaster events. This is consistent with the General Plan Framework Growth Strategy. The Safety Element is consistent with Housing Element policies for post-disaster rebuilding and construction, adding further detail on when, where, and how to rebuild and construct housing that

is sustainable and disaster resilient. The Safety Element and Housing Element are also consistent in their additional consideration of anti-displacement Goals, Objectives, and Policies to promote equity in disaster impacts and resilience.

Plan for a Healthy Los Angeles (Health Element) Targeted Amendment Consistency Discussion

Targeted amendments to the Health Element are proposed to clarify that the Health Element meets state requirements that pertain to environmental justice. The amendments are limited to revised background text, updates to Health Atlas maps, and two new racial justice related Programs. The Goals, Policies, Objectives, and existing Programs within the document are not proposed to be altered, so the findings made at the time of adoption remain applicable. Complete findings for the Plan for a Healthy Los Angeles are available in the original staff report from its adoption in 2015, associated with Council File 15-0103. Below are findings specific to the amendments proposed in Exhibit J.

With respect to environmental justice and equity, the Health Element amendments are consistent with the General Plan **Framework Element**, which includes policies to assure fair treatment with respect to environmental and development laws and protections, affirmative efforts to inform and involve environmental justice stakeholders and community groups, and bring the environmental benefits of parks and open space to underserved communities.

The General Plan Framework Element states the following:

Framework Policy 3.1.9. *Assure that fair treatment of people of all races, cultures, incomes and education levels with respect to the development, implementation and enforcement of environmental laws, regulations, and policies, including affirmative efforts to inform and involve environmental groups, especially environmental justice groups, in early planning stages through notification and two-way communication. (P1, P18)*

Policy 4.1.9. *Whenever possible, assure adequate health-based buffer zones between new residential and emitting industries.*

Policy 6.4.2. *Encourage increases in parks and other open space lands where deficiencies exist, such as South East and South Central Los Angeles and neighborhoods developed prior to the adoption of the State Quimby Act in 1965 (As amended in 1972). (P1, P2, P54)*

Policy 9.23.2. *Prioritize the implementation of recreation and park projects in areas of the City with the greatest existing deficiencies. (P14)*

With respect to environmental justice and equity, the Health Element amendments are consistent with Mobility Plan 2035 (General Plan **Circulation Element**) which emphasizes sustainable, active mobility and transit infrastructure, especially for communities which have been heavily impacted by existing and past transportation plans, policies, and projects.

The Mobility Plan states the following:

Mobility Plan Objective 6. *Increase pedestrian safety improvements in the design and implementation of complete streets projects within the top 25% SB535 disadvantaged communities located in the City of Los Angeles or as subsequently identified through tools utilized by the City.*

Policy 4.3. Fair and Equitable Treatment: Ensure the fair and equal treatment of people of all races, cultures, incomes and education levels with respect to the development and implementation of citywide transportation policies and programs.

Policy 4.6. Data-Driven Prioritization of Projects: Make the most of limited financial resources by utilizing data to prioritize transportation projects based upon equity in safety, public health, access, social benefits, and/or economic benefits.

Policy 5.1. Sustainable Transportation: Encourage the development of a sustainable transportation system that promotes environmental and public health.

With respect to environmental justice and equity, the Health Element amendments are consistent with the General Plan **Open Space** Element which states the following:

Health Element Policy 2.37. Impacted areas should receive priority of funding for open space purposes, particularly in respect to providing recreational facilities.

With respect to environmental justice and equity, the Health Element amendments are consistent with the General Plan **Public Facilities and Services** Element which states the following:

Public Facilities and Services Element Policy 5. Park and recreation sites shall be acquired and developed first in those areas of the City found to be most deficient in terms of the recreation standards.

With respect to environmental justice and equity, the Health Element amendments are consistent with the General Plan **2021-2029 Housing** Element which promotes healthy neighborhoods and environments through community engagement, building standards and designs, and policies to correct for past discrimination and harms.

The Housing Element states the following:

Housing Element Objective 3.1. Use design to create a sense of place, promote health, foster community belonging, and promote racially and socially inclusive neighborhoods.

Policy 3.1.4. Site buildings and orient building features to maximize benefit of nearby amenities and minimize exposure to features that may result in negative health or environmental impacts.

Policy 3.1.6. Establish plans and development standards that promote positive health outcomes for the most vulnerable communities and populations.

Housing Element Goal 4.

A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present.

B. State Planning Requirements – Safety Element

Government Code Section 65302(g) and the other statutes that regulate Safety Elements do not require separate findings to amend the Safety Element. Please see Exhibit I for how the Safety Element complies with the state law.

Summary of CEQA Findings

The EIR analyzed the approval of the Proposed Plans. In regard to the Housing Element, the EIR analyzed the potential effect from the construction and operation of 420,327 housing units (full RHNA build out of 456,643 units minus the 36,316 housing units that have been approved but not built). The Draft EIR found that the environmental impacts of several of the issue areas were significant and unavoidable, even with imposition of mitigation measures. Based on the analysis in the Draft EIR, the EIR concluded the Proposed Project could result in unavoidable significant environmental impacts with regard to:

- Air Quality – Threshold 4.2-2 (Construction and Operational Air Criteria Air Pollutant Emissions: Project and Cumulative)
- Biological Resources – Threshold 4.3-1 (Special-Status Species: Project and Cumulative); Threshold 4.3-2 (Sensitive Habitats: Project and Cumulative); Threshold 4.3-3 (Wildlife Corridors: Project and Cumulative)
- Cultural Resources – Threshold 4.4-1 (Historic Resources: Project and Cumulative); Threshold 4.4-2 (Archaeological Resources: Project and Cumulative)
- Geology and Soils – Threshold 4.5-1 (Paleontological Resources: Project and Cumulative)
- Hazards and Hazardous Materials – Threshold 4.7-2 (Hazardous Materials Near Schools: Project and Cumulative); Threshold 4.7-3 (Hazardous Materials Sites: Project and Cumulative)
- Noise – Threshold 4.10-1 (Construction Noise: Project and Cumulative); Threshold 4.10-2 (Operation Noise: Project and Cumulative); Threshold 4.10-3 (Construction Vibration: Project and Cumulative)
- Public Services – Threshold 4.12-1 (Fire Protection: Project); Threshold 4.12-2 (Police Protection: Project); Threshold 4.12-3 (School Facilities: Project)
- Recreation – Threshold 4.13-1 (Deterioration of Recreational Facilities: Project and Cumulative); Threshold 4.13-2 and Threshold 4.13-3 (Construction of Recreational Facilities: Project and Cumulative)
- Transportation (Freeway Queuing: Project and Cumulative)
- Tribal Cultural Resources – Threshold 4.15-1 (Construction: Ground Disturbance during Construction: Project and Cumulative)
- Wildfire – Threshold 4.17-1 (Impair Emergency Response Plan: Project and Cumulative), Threshold 4.17-2 (Exacerbate Wildfire Risks in State Responsibility Area or VHFHSZ: Project and Cumulative), Threshold 4.17-3 (Require Infrastructure that may Exacerbate Fire Risk: Project and Cumulative), Threshold 4.17-4 (Expose People or Structures to Significant Risks in State Responsibility Area or VHFHSZ: Project and Cumulative), Threshold 4.17-5 (Expose People or Structures to Significant Risks Involving Wildland Fires: Project and Cumulative)

The Draft EIR has also identified the following significant impacts that are anticipated to be reduced to less than significant with identified mitigation measures: Air Quality (Construction TACs); Hydrology (Impeding or Redirect Flood Flows); and Transportation (Conflict with Circulation Plan, Policy, Ordinance; Hazard due to Geometric Design; Emergency Access).

Recommended Project

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. None of the changes affect the analysis or conclusions in the Draft EIR. In particular, while the Proposed Project has been revised to include a higher overall required rezoning need (increased to 255,415 units from 220,000 units), this changed number does not affect the analysis presented in the Draft EIR as the rezoning need is determined to be needed in order to accommodate build-out of the RHNA. The Draft EIR analyzed build-out of the RHNA, and therefore this and other changes do not result in new significant impacts or an increase in the severity of the significant impacts identified in the Draft EIR. As such, that change and the others to be described in the Final EIR do not result in significant new information as defined in CEQA Guidelines Section 15088.5 requiring recirculation.

FINAL EIR

Section 15088 of the CEQA Guidelines requires the lead agency, Department of City Planning (DCP), to evaluate comments on environmental issues received from public agencies and interested parties who review Draft EIR and provide written responses. The City received written comments on the Draft EIR from public agencies, groups, and individuals. Responses to all comments received during the comment period will be included in the Final EIR.

CPC RECOMMENDATION

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 will be completed after the City Planning Commission meeting, and the Final EIR and associated CEQA Finding and Statement of Overriding Considerations will be considered by the City Council prior to adoption of the Proposed Project and certification of the EIR.

PUBLIC HEARING AND COMMUNICATIONS

Updating the General Plan requires vital public and stakeholder input that can only be collected through a diligent effort to achieve participation of all economic segments of the community. The Department of City Planning and the Los Angeles Housing Department engaged the public on the Housing Element Update through numerous digital and in-person events (prior to the Covid-19 pandemic), and through other innovative ways, to inform and collect the public's input. This outreach, participation and input has been essential to guide and inform the updating process of the Housing Element and is described in detail in the Housing Element's Executive Summary and summarized in Exhibit B. Later outreach events also included information on the targeted update to the Safety Element and the amendments to the Health Element.

Tens of thousands of Angelenos participated in the Housing Element Update outreach process and represented the City's diverse racial and ethnic communities, as well as age groups, income levels, and different housing experiences (i.e. renter versus home-owner). Particular efforts were taken by staff to provide outreach in Spanish to reach the City's large mono-lingual community in all activities. A total of thirteen in-person or online bilingual events were held, in addition to dozens of meetings with stakeholders such as Neighborhood Councils, Council Offices and community-based organizations. In addition, staff developed a set of innovative online tools, a statistically valid survey, educational videos and focus groups to solicit feedback and get the word out to harder to reach communities. All online events were recorded and made available for the public to view on their own time. The different public participation phases of the Housing Element Update are illustrated in Figure 1 and are described below.

Figure 1.



A core contributor and guide throughout the update process of the Housing Element has been the Housing Element Task Force. This 63-member Task Force is composed of a diverse group of housing professionals and community leaders, who were selected from over 280 applicants based on ensuring a diverse range of perspectives and geographies were represented. This group met 15 times to assist the City in evaluating the viability and impact of potential new and updated policies related to housing preservation and production, tenants' rights, homelessness prevention, zoning as it relates to housing matters, and other important housing-related issues. The Task Force has four subcommittees representing different themes and needs within the

Housing Element, including Housing Stability and Tenure, Housing Production and Construction Innovation, Livability, Sustainability, and Resilience and Homelessness and Special Needs.

Launch/Vision Phase

In October 2019, the City of Los Angeles launched the 2021-2029 update to the Housing Element, also referred to in public communications as the *Plan to House LA*. The Launch phase focused on the citywide introduction of the Housing Element Update and on informing the public on how it shapes housing outcomes in the City. The Task Force kick-off meeting was held in January 2020 hosted by the City's Director of Planning and General Manager of LAHD (HCIDLA at the time).

In early 2020, the City launched the Visioning phase for the Plan. This phase focused on broadening public participation in the housing conversation and on collecting public feedback and input critical to the Housing Element Update. Community engagement focused on understanding housing needs, reviewing existing goals, and developing a collective vision for housing in Los Angeles. Individuals were also asked to comment on which aspects of the current Housing Element worked well, and which considerations needed to be better emphasized or were missing entirely. The outreach events included three in-person open house Kick-Off Workshops in February and March 2020 attended by more than 150 residents. People who were not able to attend the in-person Kick-Off Workshops, were able to access a bilingual online workshop that provided the same information, materials, and opportunities to submit feedback, which was viewed more than 3,100 times. Finally, with the onset of the pandemic, the City hosted five webinars with live Q&A in May and June 2020, with over 300 people attending. Three webinars were held in English and two in Spanish.

Concepts Phase

In late 2020, the City launched the *Concepts* phase for the 2021-2029 Housing Element. During this phase, an ambitious outreach campaign helped to engage an unprecedented number of people through several targeted outreach efforts, including three webinars, neighborhood council and stakeholder meetings, a statistically valid poll, and a public survey. This phase focused on six key *Concepts* that were developed based on the feedback the City collected during the Vision phase. The *Concepts* focus on how the Housing Element will address housing-related issues in the city. All six *Concepts* respond to urgent housing needs including: addressing the housing shortage, advancing racial equity and access to opportunity, and promoting sustainability and resilience (discussed further above).

Between January and July 2021, tens of thousands of people clicked, viewed, interacted, and participated in the *Concepts* phase of outreach. The outreach events included a series of three bilingual webinars with live Q&A during the fall of 2020, which included interactive polls and Q&A sessions to encourage interactive participation from the 260 attendees. Staff also appeared at eight local stakeholder meetings through this period, including alliances of Neighborhood Councils, community organizations and other local groups. Staff shared the draft *Concepts* and spent as much time as was needed to answer questions and gather information on proposed housing strategies. Two bilingual scoping meetings for the Draft Environmental Impact Report (DEIR) were also held at different time slots during this period. In addition, the following innovative strategies were employed to try to reach a broader audience of Angelenos:

Online Survey

In December 2020, the City released an interactive online digital survey that introduced the six *Concepts* along with the proposed housing strategies and asked respondents to weigh in with their reactions and suggestions. The survey was made available in English and Spanish. Over 1,800 people responded to the survey. Within the survey, each of the

six *Concepts* received broad support from at least 70 to 80% of respondents. To better understand the survey results in light of some slight skewing towards older and whiter Angelenos, some answers were de-aggregated to evaluate differences in responses based on criteria such as race or status as a renter or homeowner (tenancy). The results of the survey were published on the Housing Element website in March 2021.

Statistically Valid Poll

The Department of City Planning partnered with FM3 Research to conduct a poll of over 800 randomly selected City residents from November 5th to 18th, 2020, to assess their opinions on housing related issues and many of the draft concepts and strategies. These polls were conducted in both English and Spanish via email and text message as well as through the use of landlines. To capture a statistically representative cross-section of residents, the poll respondents were consistent with the citywide racial, income, household size, renter, owner, and age demographics of the city. The vast majority of respondents expressed support for the strategy of increasing and accommodating more housing near jobs, transit, and services, and for prioritizing tenant rights and the sheltering of people experiencing homelessness. This balanced group showed a stronger desire than the online *Concepts* Survey to see more housing near public transit, near job opportunities, high-performing schools, parks, and other amenities, even in areas of the city that comprise mostly of single-family homes.

Educational Video

On February 18, 2018, an animated, minute and a half long educational video was launched on the YouTube channel and social media platforms of the Department of City Planning and Housing + Community Investment Department. The video explained the City's housing crisis, the ongoing update, and participation opportunities in an effort to bring new audiences into the housing conversation. The video highlighted housing-related issues and laid a foundation for the intent and capacity of the goals, policies and programs comprising the Housing Element Update. This video was viewed over 45,000 times and generated hundreds of comments and reactions on Youtube. The video was also broadcasted on DASH buses and on Channel 35 during City Council meetings.

Draft Phase

The Departments of City Planning and Los Angeles Housing Department continued the effort to maintain and broaden public engagement and participation during the current draft phase. The Housing Element was discussed at meetings of the City Council Housing Committee and Planning and Land Use Management (PLUM) Committee in June and September 2021, which provided important direction on the Rezoning Program and other opportunities to embed equitable distribution policies in the proposed Housing Element. In addition, three webinars with live Q&A to walk through the Draft Housing Element and Safety Element were held during the summer of 2021, with two in English and one in Spanish. An audience of over 500 people was reached across all three events. Interactive polls and Q&A sessions were held during the webinars to encourage interactive participation. This phase also featured a third-party organized set of focus groups across four different typically underrepresented communities in the City to gather feedback on the plan, as described below.

Community-Based Focus Groups

In August 2021, Liberty Hill Foundation conducted focus groups across four different communities in the City to gather feedback on the Draft Housing Element Plan released in July 2021. Participants were majority renters who reside in the communities of South LA, Pico Union, Westlake, Boyle Heights, Skid Row/Downtown, East Hollywood and North Hollywood. The curriculum, based on the Draft Housing Element, was developed for the program and

organizations leading each focus group were encouraged to tailor the presentations to respond to the socioeconomic and geographic context for each neighborhood. The report outlining feedback and recommendations from participants on the Draft Housing Element Plan can be found in Appendix 0.1 of the Draft Plan.

Summary of Vision, Concepts, and Draft Housing Element Input Comments

This section summarizes the comments and feedback received during the vision, concepts, and draft phases of outreach during the Housing Element Update process, spanning from January 2020 to September 8th, 2021. For organizational purposes, the comments and feedback are grouped by key emerging themes that Angelenos expressed interest in exploring. All public comments are available in full in the project case file.

PROTECTING RENTERS & REDUCE DISPLACEMENT

- Expand eviction protections through relocation assistance, eviction defense programs, and other tools
- Ensure residents can stay in their own communities
- Work with LA County to organize an LA County Rent-Registry
- Provide more information on affordable housing inventory
- Financially support non-profits that protect tenants from evictions (i.e. Unidad Coalition, People's Plan)
- Establish a right to counsel provision to ensure that evictions are fair and that protected classes are not being taken advantage of
- Replace RSO units at a one to one ratio which affordable units on top
- Develop protections for renters of units removed by TOC program
- Address vacancy through financial penalties (vacancy tax)
- Use community land trusts to ensure long term affordability for for-sale properties
- Preserve existing affordable housing and establish a goal to protect all expiring covenants
- Prohibit discrimination based on family size, age, race, and income
- Include developmental and intellectual disabilities in supportive programs including vouchers, eviction defense, and supportive developments
- Establish and enforce discrimination penalties for landlords
- Prohibit discriminatory lending practices
- Prioritize housing for extremely low income households
- Preserve housing for seniors
- Educate property owners about renting to section 8 residents
- Educate property owners about ADA needs and rights
- Encourage and facilitate local community engagement programs
- Expand housing education and offer in multiple languages
- Provide funding for frequent tenant's rights workshops
- Provide strong tenant protections as well as preservation of existing apartment buildings
- Discourage the demolition of RSO units
- Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement
- Address housing need while preserving and protecting the rights of current homeowners
- Encourage a policy that puts a halt to single rental unit conversions to hotels as long as vacancy rates are at a certain level

INCREASING PRODUCTION, ESPECIALLY AFFORDABLE PRODUCTION

- Include more housing at all income levels (but particularly for lower income households)
- Produce more market-rate and affordable housing in all areas of the city
- Provide a higher percentage of affordable units in private multi-family developments
- Make market rate housing and newer housing construction within reach of minorities

- Create more moderate/workforce income housing units
- Address missing-middle housing
- Plan for housing needs beyond the 8 year RHNA housing projection period
- RHNA targets are unreachable, the City should challenge RHNA calculations
- Site selection should also consider prioritizing areas for housing (preservation or production) on all-hazards risk - such as liquefaction zones, fault lines, flooding areas, wildfire risk, distance from highways, and urban heat
- Explore how the absence of restrictions and increased land values has affected housing development
- Incentivize homeowners who create ADUs with tax credits
- Provide financial incentives for ADU production (i.e. lower permit costs)
- Remove height restrictions for ADU's
- Look at utility constraints and creative ways to facilitate relocation to make housing development cheaper and faster
- Encourage and incentivize residential buildings in more affluent neighborhoods to portion some of their units to lower-income individuals
- Promote different housing typologies for different incomes and lifestyles
 - Allow microunits
 - Allow tiny homes
 - Support co-living developments (i.e. boarding houses)
 - Buy and allow shipping containers to be used for housing on public land
 - Allow bungalow courts with no parking
 - Allow conversion of strip malls into housing
 - Expand RV and trailer parks
 - Allow 3D printed and prefab homes to reduce housing costs
- Expand financing programs for all-affordable housing development projects
- Reduce construction costs for developers
- Establish a dedicated source of general funds for affordable housing production
- Divest or use eminent domain to acquire surplus property for use as 100% affordable housing and allow developers to remediate properties
- Create a framework for housing funding priorities
- Collaborate with businesses to produce affordable housing
- Utilize publicly-owned land for all-affordable housing development
- Consider how to facilitate the production of low income condos
- Encourage and facilitate local community engagement and education programs around land use
- Explore a variety of tools to increase the supply of affordable housing, including expanding incentives and increasing zoning capacity
- Expand affordable housing development incentives in Higher Opportunity areas, and increasing zoning capacity near public transit infrastructure
- Evaluate which areas might receive higher incentives for more housing development - high resource areas (wealthy/white) or TOD areas (low-income/BIPOC)
- Because of the inevitable displacement impacts of development, development should be more incentivized in wealthier areas that can absorb the shock
- Explore use of empty properties, especially city owned land
- Explore shared spaces/ shared housing as a strategy
- Make ADU's more affordable by providing incentives for their development
- The TOC bonus must be increased to equal the number of units removed without making the buildings bigger
- Provide more transparency in available affordable housing units

ZONING FOR INCLUSIVE COMMUNITIES

- Develop a mandatory inclusionary housing ordinance, paired with a grassroots neighborhood by neighborhood planning process
- Distribute affordable housing throughout the city
- Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods, and would require wealthy, high-opportunity areas to accommodate the most new housing
- Establish a housing goal (similar to RHNA) and requires each community plan area to zone for a specific level of housing, including market rate and affordable
- Include affordable housing in high-resource, high-opportunity neighborhoods
- Eliminate single-family zoning in areas with a history of exclusionary racial covenants
- Ensure representation of working class/middle class communities
- Encourage expansion of zoning for mixed-use- buildings, especially close to major resource infrastructures, like train stations, parks, large business campuses etc.
- Consider targeting the creation of 300,000 new homes through rezoning and land use reforms
- Allow 8-plexes citywide, increase by-right, allow multi-family development where it is prohibited today, eliminate parking minimums
- Consider implementing a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Consider expanding and merging TOC and the city Density Bonus program, including parcels where apartments are currently banned
- Repeal Proposition U and restore density corridors
- Evaluate the effectiveness of the linkage fee and whether more in lieu payments come from weather areas of the city.

SERVING THE MOST VULNERABLE

- Expand targeted services and early interventions to those at highest risk of homelessness, including: people impacted by the criminal justice system, people at risk of eviction, people with developmental, intellectual, and physical disabilities, and transition-aged-youth
- Provide more senior housing
- Prioritize housing for extremely low income households
- Protect and plan for undocumented residents/immigrants
- Develop affordable housing programs to retain younger residents in LA
- Explore and be aware of poverty in younger generations
- Help seniors age in place
- Prohibit discrimination based on family size, age, race, and income
- Establish and enforce discrimination penalties for landlords
- Prohibit discriminatory lending practices
- Encourage and facilitate local community engagement programs
- Provide supportive strategies to increase the supply of affordable and supportive housing for individuals who identify as Black, Latinx or renters who are more impacted by housing challenges and more.
- Consider outreach to individuals that require sign language, exhibit multilingual issues, blindness, etc.
- Address needs for senior housing and veterans
- Provide incentives for healthcare safety net providers to collocate in both nonprofits & private housing.
- Consider working with local community groups who have experienced working with marginalized communities who are at highest risk of losing housing.
- Develop outreach programs to marginalized communities who don't know about existing resources.

- Emphasize lessening racial segregation and gearing the plan toward the people with the greatest needs
- Consider requiring all new developments of 10+ units to include 50% affordable
- Consider addressing mental illness, drug addiction, cognitive decline, violence, job training, and creating communities of care as part of supportive housing shelter programming.

ADDRESSING THE HOMELESSNESS CRISIS

- Incorporate social services component of addressing homelessness
- Add language that focuses on the homeless
- End the criminalization of unhoused people
- Increase outreach directly to the homeless
- Conduct outreach to law enforcement and criminal justice agencies regarding homelessness community
- Communicate the public benefits of funding programs to house the homeless
- Educate community about homeless discrimination
- Renovate and upgrade commercial dwellings to house the homeless (adaptive reuse)
- Equally distribute shelters, supportive housing, and any other housing designated for the homeless needs in every Council District/Community Plan Area
- Diversify shelter/housing options

DESIGNING FOR LIVABILITY

- Increase visibility of community preservation and the importance of livable communities
- Embrace existing buildings, particularly historic ones, as an essential part of our housing stock
- Protect cultural resources
- Preserve the character of low density neighborhoods
- Allow more property tax to flow into the community
- Legalize non-conforming units
- Replace setbacks and parkways with usable space
- Allow more mixed-use buildings
- Require open space, landscaping and preservation of trees in any development
- Keep sidewalks and walkways clear and in good condition
- Design using the universal design standards, incorporate accessible design in future design guidelines
- Consider more retail space at street level
- Facilitate passive, living green buildings, and biophilic design
- Promote local educational programs for sustainable living
- Encourage adaptable, flexible, and sustainable design (i.e. all solar, LEED-certified)
- Give assessments to homeowners on how they can make their homes more sustainable
- Reduce design requirements
- Support design that increases sense of safety and community
- Provide more street lighting
- Provide new recreational areas that are not on school properties or designated for schools
- Explore converting office buildings to housing with work from home Covid adjustments
- Increase incentives to be an owner/manager instead of a LLC or Corporate buildings to increase affordable housing
- Ensure infrastructure of built environment is stable and secure enough for more housing production
- Consider increasing seismic codes as part of the new housing element
- Discourage bypassing of environmental reviews
- Discourage reducing front yards to increase densities and resulting in less pleasant neighborhoods

- Site buildings to reduce shade on the north side of buildings
- Include Very High Fire Hazard Severity Zone maps in the update
- Limit development and improve disaster mitigations in hazard areas, including Very High Fire Hazard Severity Zones and flood zones
- Improve data related to flood hazard areas
- Encourage park and green space equity in housing development

PROMOTING OWNERSHIP

- Prioritize single-family housing preservation
- Prioritize denser ownership models such as condominiums
- Explore alternative ownership models (Land trusts, Co-ops, social housing etc)
- Review all the things that contribute to the cost of building/owning in LA
- Fund Home Buyer Programs and other assistance programs for first-time buyers
- Focus on programs that will help residents invest and purchase in low-moderate income areas
- Educate single family homeowners about the development potential of their sites, including ADU or potential for a second unit
- Define housing/homeownership equity more clearly

Summary of Safety Element and Health Element Input Comments

This section summarizes comments received from outreach conducted for the Safety Element Update and Health Element amendments, including online Draft webinars and Q&A and communications received from public organizations and stakeholder groups. The comment summaries are grouped according to topic.

EVACUATION

- The Safety Element must address the evacuation problems we face during power failures or as a result of floods, tsunamis, fires, or earthquakes.
- Due to the lack of evacuation routes, additional density in fire zone areas with only 1 route of egress has been life threatening for many California communities.
- A responsible policy prohibiting further density in state-designated VHFHSZ (fire zone) areas, including ADU's, should be enacted, excluding by right zoning.
- AB 747 requires jurisdictions to review and update their safety elements as necessary to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios.
- SB 99 requires the Safety Element Update to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes. The Housing Element Update should use this required Safety Element information to inform its site selection process, removing from consideration for increased density any areas that do not have at least two emergency evacuation routes.

HAZARD MAPPING

- The 2018 Local Hazard Mitigation Plan (LHMP) does not include a flood map (Figure 10-7 on page 10-14 is missing from the version posted online).
- Does the City's Flood Map include Del Rey and the Ballona Wetlands?
- Where sensitive areas identified by the County fall within the City of Los Angeles, the City should coordinate its Housing Element and Safety Element policies with the County and likewise exclude these areas from its own site selection program, both to protect environmentally sensitive areas, however designated, and protect public safety based on existing threats that are only expected to increase in coming decades due to global climate change and local drought conditions.
- Show areas analyzed for future climate impacts.

- Flood risk maps do not account for climate change.

OIL AND NATURAL GAS FACILITIES

- Address oil and natural gas facilities in LHMP.
- The draft plan does not consider the tens of thousands of individuals in the City of LA who live in close proximity to an oil well.
- Draft HE fails to include man-made hazards (i.e., oil drilling).
- Plan should declare wells non-conforming and prohibit new drilling, hazard definition in housing should include oil wells.
- Phase out oil drilling within five years.

FIRE AND THE VERY HIGH FIRE HAZARD SEVERITY ZONE

- With respect to the Safety Element Update, it mentions several fire safety hazards but applies no safety related restrictions to mitigate these hazards.
- A responsible policy prohibiting further density in state-designated VHFHSZ (fire zone) areas, including ADU's, should be enacted, excluding by right zoning.
- Due to the high fire potential of adding frequent traffic to state-designated VHFHSZ, non-residential development should be specifically prohibited in such fire zone areas unless it is by right zoning as of August 31, 2021.
- Wildfire poses a significant threat to the region and the City's stated commitments to addressing the climate crises, protecting habitat, safeguarding human health and increasing access to open space.

LAND USE AND LIVABILITY

- Home-hardening existing communities should be a central component of the Update's Objective 3.3 "Promote disaster and climate resilience in citywide housing efforts."
- Protecting wildlife connectivity in the region is essential to preserving native biodiversity, mitigating against the climate crisis and prioritizing human health.
- Consider land uses, hazards, and mitigations. How are vulnerable communities accounted for?
- Concerned about the proposal to redevelop brownfield sites and oppose the false solution that community health and safety, and CEQA, must be sacrificed to build affordable housing.
- Remediation procedures and standards are not spelled out in Health Element.
- Limitations should be implemented as part of the Safety Element Update to ensure no new residential, commercial, institutional, or other development is permitted in areas where existing hazardous conditions makes such development unsafe for existing communities.
- Discourage development in high risk flood (coastal) and fire (hillside/ridgeline) areas, and near pollution, including freeways.
- Protect existing mature tree canopy to provide shade, sequester carbon, and mitigate urban heat island.
- Provide parks and open space to protect biodiversity and wildlife.

ENVIRONMENTAL JUSTICE

- Health Element is insufficient to meaningfully address the provisions of SB 1000.
- The Housing Element must further environmental justice, improve climate resilience and promote community health.
- Housing justice and environmental justice are linked.
- Further environmental justice, improve climate resilience and promote community health.
- Promote environmental justice and public health in development processes.
- Need to establish better goals and policies to promote positive health outcomes for low-income households.

- Address the impacts of disproportionate pollution on disadvantaged communities, including noise and congestion.
- Mandate air conditioning, requirement to install air when requested by tenants, and institutionalize cooling centers.
- Provide access to air filtration and air conditioning/cooling centers.

CLIMATE CHANGE AND ADAPTATION

- Desire evidence of evaluation of climate change projection in housing site selection.
- Focus on climate change adaptation and resilience; must incorporate future projections
- Show areas analyzed for future climate impacts.
- More heat and flooding mitigation in housing element.
- Concerns about substandard infrastructure, especially in hillside areas, noting power outages, water shortages, and a lack of fire protection resources.
- Concerns about tree infrastructure and heat island effect.

Adoption Phase

Public Hearing

Virtual Public hearings were held for the Housing Element, Safety Element and Health Element on September 21st and 22nd, 2021. Notification of the hearings was sent to the interest list on August 30th and published in the Los Angeles Daily Journal on September 1, 2021. A total of 67 people provided verbal comments with 200 members of the public in attendance. Approximately 500 additional comments were received via email. Translation services were available to facilitate public comments in Spanish.

Letters were received from the following organizations: Abundant Housing; Act-LA, Bel Air Beverly Crest Homeowners; Brentwood Alliance of Canyons & Hillsides; Brentwood Community Council; Brentwood Glen Association; Central City Association of LA; Citizens Coalition for A Safe Community; Coastal San Pedro Neighborhood Council; Coastal San Pedro Neighborhood Council Board; Disability Rights California; Empowerment Congress West Area; Greater Valley Glen Council; Heritage Properties; LA Conservancy; Legal Aid Foundation of Los Angeles; Mar Vista Community Council; Rampart Village Neighborhood Council; REACH for Community; The Two Hundred; United Neighborhoods Neighborhood Council (UNNC); Westside Neighborhood Council; and, Westwood South of Santa Monica Blvd. HOA.

Summary of Comments Received

Common concerns raised included the need for more affordable housing with equitable distribution across the City of Los Angeles, including in high resource areas; going further with addressing climate change and environmental justice; and the implementation of a comprehensive fair share re-zoning strategy. Additional common public comment topics included consideration of the Livable Communities Initiative, housing affordability and community displacement, programs, and support for accessing affordable housing, and alternative housing models including co-housing and land trusts. Several of the public comments reiterated the public need for the Housing Element to reinforce tenant protections, specifically in relation to eviction protection and education to facilitate greater understanding of tenant rights. Additionally, comments urged the City of Los Angeles to acknowledge its history of land use injustices and commit to center efforts around reversing racist land use designations.

Commenters stated that climate resiliency needs to be better addressed, including the urban heat island effect, and especially in environmental justice communities. They requested that oil drilling be prohibited and phased out in five years as well as shared concerns about infrastructure being

able to accommodate the anticipated housing growth. Some comments expressed concern about impacts on middle-income and single-family homes as well as concerns related to increased traffic and school-crowding with upzoning.

The majority of public comments pertained to the Housing Element, but topics related to the Safety and Health Elements including climate change, environmental justice, and limiting or prohibiting development in flood prone areas and Very High Fire Hazard Severity Zones. Some public comments overlapped the Housing, Safety, and Health Elements, including housing in hazard areas, the nexus of housing, environmental justice, and public health, and the capacity and resilience of city infrastructure for housing growth in the context of climate change.

A detailed listing of comments received is provided below:

- Protect property values
- Restrict investment groups that drive up the cost of housing by buying homes and apartments as investments and then keeping them off the market
- Maintain existing housing stock to reduce GHG impacts
- Mental disabilities should be removed from the document and replaced with developmental and intellectual disabilities
- Provide better services for those with developmental and intellectual disabilities
- Build housing in areas that have milder climates (i.e., near the coast)
- Rezone in high opportunity areas but invest in high segregation/poverty areas
- Developing “high-opportunity areas” entrenches disinvestment in our neighborhoods
- Expand the cooling shelter program
- The plan cannot supersede HOAs and CC&Rs, sites with these regulations should be removed from the inventory of Candidate Sites for Rezoning.
- Requests to remove geographies from Candidate Sites for Rezoning: Crenshaw, Park mesa, Baldwin Hills, Brentwood (hills), Century City, Century Glen, Westwood (hills), West LA, Palms/Mar Vista, Hollywood
- Requests to include geographies in Candidate Sites for rezoning: Westwood, Mid City, West LA, Sun Valley, North Hollywood, Van Nuys Station Area
- Request to rezone high-opportunity corridors
- Requests to rezone golf courses
- Analyze the impacts of SB 9 and SB 10
- The econometric model should utilize other sources such as the Embarcadero Institute
- Change the RSO cutoff date to 1995 and expand replacement to 1 to 1
- Maintain language on neighborhood character in the draft
- Restrict the conversion of residential to commercial
- Address environmental justice and pollution burden in minority communities
- Appendix 4.7 should be unlocked and filterable
- Planning should request an extension to allow for more time for public consideration
- Expedite adoption of the Wildlife Corridor in 2021
- Restrict exemptions for eldercare when replacing RSO
- Missing middle is an income group not a housing typology
- Utilize the public right of way for housing
- Support of inclusion of RSO sites on the inventory, which results in the expansion of tenant protections
- Provide additional support programs to access affordable housing
- Consider co-housing, land trusts, and other housing models
- Concern for recognized and unrecognized tribal lands in Los Angeles
- Ensure infrastructure is adequate to accommodate housing growth and is resilient to climate change
- Concerns regarding upzoning, including traffic and school crowding

- Acknowledge past policies resulting in segregation and divided communities

Most comments made during earlier outreach events were addressed in subsequent drafts of the Proposed Plans, but some comments were repeated. These include:

- Limit development and improve disaster mitigations in hazard areas, including Very High Fire Hazard Severity Zones and flood zones
- Explore converting office buildings to housing with work from home Covid adjustments
- Discourage bypassing of environmental reviews
- Ensure infrastructure of built environment is stable and secure enough for more housing production
- Consider targeting the creation of 300,000 new homes through rezoning and land use reforms
- Allow 8-plexes citywide, increase by-right, allow multi-family development where it is prohibited today, eliminate parking minimums
- Requiring an equitable distribution of housing targets across Community Plan areas
- Declare oil drilling a non-conforming use and restrict active oil uses adjacent to residential