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June 17, 2026

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Attention: PLUM Committee

Dear Honorable Members:

**SUPPLEMENTAL REPORT AND REVISED FINDINGS FOR THE LOW-RISE ORDINANCE
(CF 25-1083-S3) AND THE SENATE BILL (SB) 79 PHASED IMPLEMENTATION
ORDINANCE (CF 25-1083-S4)**

At its meeting on May 14, 2026, the City Planning Commission (CPC) unanimously approved and recommended that the City Council adopt the Low Rise Ordinance and the SB 79 Phased Implementation Ordinance with modifications. On May 19, 2026, the Department of City Planning transmitted the Proposed Low-Rise Ordinance and the Proposed SB 79 Phased Implementation Ordinance to the respective Council Files, as described in the Letter of Determination from the Los Angeles City Planning Commission, dated May 19, 2026. Subsequently, on May 26, 2026 the Planning and Land Use Management (PLUM) Committee approved the items with amendments. The Report from the PLUM Committee was adopted at City Council's regular meeting on June 3, 2026, with instruction that the City Attorney prepare and transmit the proposed Low-Rise and SB 79 Phased Implementation Ordinances.

This memorandum provides the recommended actions for adoption of the Low Rise and Phased Implementation Ordinances and a summary of the revisions to the Findings and associated components of the Staff Recommendation Report for approval in conjunction with the proposed ordinances prepared by the City Attorney:

Recommendation Actions for the Low Rise Ordinance

City Planning has prepared the following list of **recommended actions** for the City Council to take to adopt the proposed Low-Rise Ordinance (CF 25-1083-S3):

1. FIND in the independent judgment of the decision maker, in consideration of the whole of the record, the Project is statutorily exempt from the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21080.085(b), and was

assessed in the Housing Element Environmental Impact Report No. ENV-2020-6762-EIR (State Clearinghouse No. 2021010130) certified on November 29, 2021, Addendum No. 1 (ENV-2020-6762-EIR-ADD1) approved on June 14, 2022, and Addendum No. 2 (ENV-2020-6762-EIR-ADD2) approved on December 10, 2024 (collectively, EIR), and no subsequent or supplemental EIR is required pursuant to CEQA Guidelines Sections 15162 and 15164;

2. ADOPT forthwith the Draft Ordinance amending Chapter I of the Los Angeles Municipal Code, transmitted by the City Attorney's Office to the City Council file, approved as to form and legality, to implement the City's Low-Rise Program; and
3. ADOPT the Supplemental Report and Revised Findings, titled, "Supplemental Report and Revised Findings for the Low-Rise Ordinance and SB 79 Phased Implementation Ordinance," with attachments (revised Exhibit 3) dated June 17, 2026.

Recommendation Actions for the SB 79 Phased Implementation Ordinance

City Planning has prepared the following list of **recommended actions** for the City Council to take to adopt the proposed SB 79 Phased Implementation Ordinance (CF 25-1083-S4):

1. FIND in the independent judgment of the decision maker, in consideration of the whole of the record, the Project is statutorily exempt from the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21080.085(b), and was assessed in the Housing Element Environmental Impact Report No. ENV-2020-6762-EIR (State Clearinghouse No. 2021010130) certified on November 29, 2021, Addendum No. 1 (ENV-2020-6762-EIR-ADD1) approved on June 14, 2022, and Addendum No. 2 (ENV-2020-6762-EIR-ADD2) approved on December 10, 2024 (collectively, EIR), and no subsequent or supplemental EIR is required pursuant to CEQA Guidelines Sections 15162 and 15164;
2. ADOPT forthwith the Draft Ordinance, transmitted by the City Attorney's Office to the City Council file, approved as to form and legality, to permanently exclude sites from the City's capacity obligation in certain TOD Zones pursuant to California Government Code Section 65912.160(e), and to pause effectuation of the provisions in California Government Code Sections 65912.155-65912.162 inclusive citywide; and
3. ADOPT the Supplemental Report and Revised Findings, titled, "Supplemental Report and Revised Findings for the Low-Rise Ordinance and SB 79 Phased Implementation Ordinance," with attachments (revised Exhibit 3, Exhibit 4, Appendix 1 and Appendix 3) dated June 17, 2026.

Summary of Revised Findings, Exhibit 3, Appendix 1, and Appendix 3 of the CPC Staff Recommendation Report:

Overview to Revised Findings and Appendix 1 to Address Updated Capacity Analysis

Revisions to the Staff Recommendation Report include updates to address changes related to eligibility mapping and citywide capacity analysis. Amendments to the approach and methodology of the Phased Implementation Model were incorporated in the Revised Appendix 1 of the Staff Recommendation Report to be reflected in future model outputs as Transit Oriented Development (TOD) Zone eligibility is finalized by Southern California Association of Governments (SCAG). The Department of City Planning has produced a preliminary map titled "SB 79 TOD Zone Eligibility" (found in Exhibit 3 of the staff recommendation report) and has used this draft map to inform the development of and results associated with the SB 79 Phased Implementation Model as well as identify eligibility for the Low Rise Ordinance. The Phased

Implementation Ordinance and the Low Rise Ordinance gives the Director of Planning the authority to update SB 79 eligibility maps to align with SCAG's eligibility maps (Section 3 of SB 79 Phased Implementation Ordinance; 12.22 A.38 (j)(7)(i)(c)). The City's analysis found 145 TOD zones.

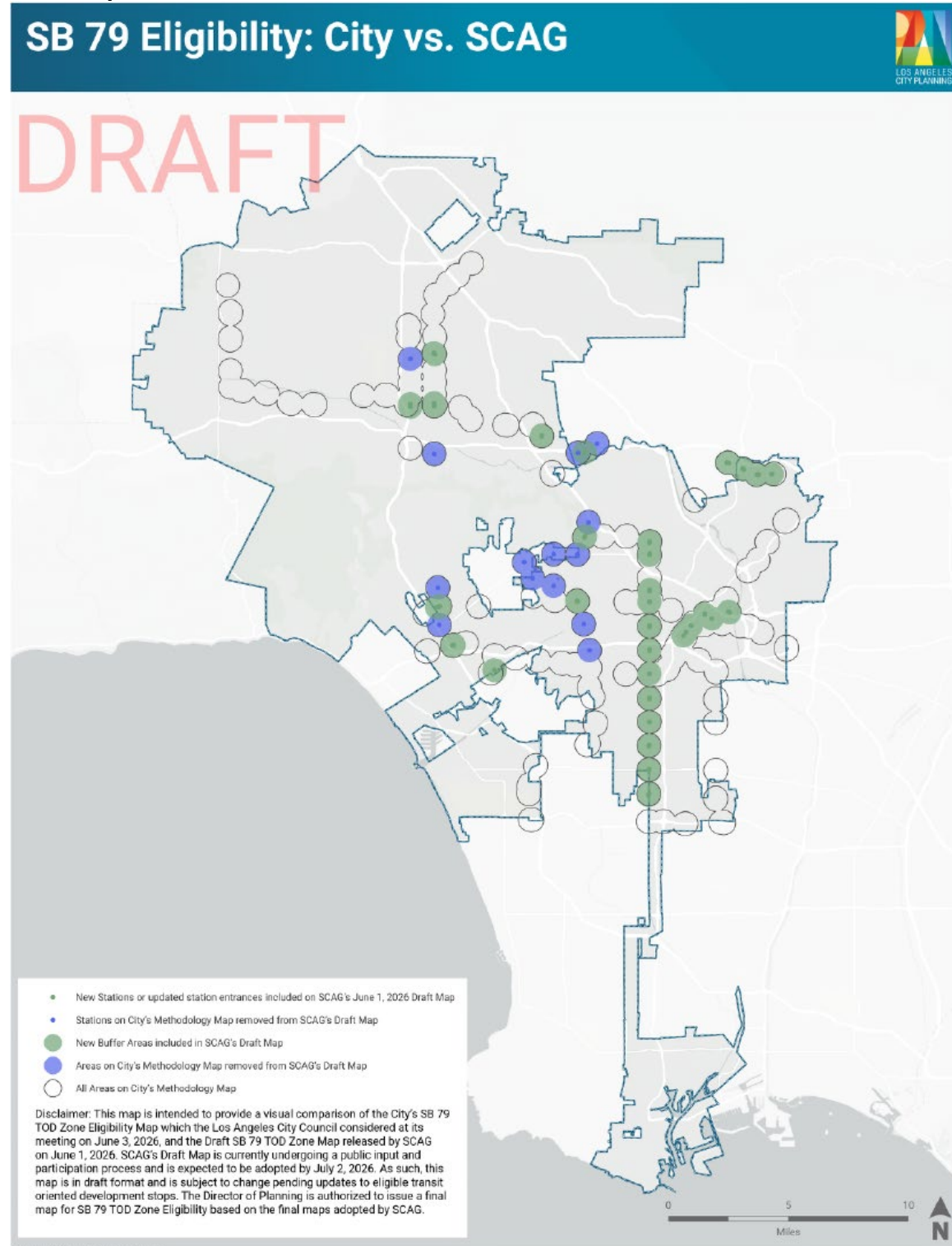
SB 79 requires Metropolitan Planning Organizations (MPOs), like the Southern California Association of Governments (SCAG), to develop and to maintain a map identifying TOD Zones eligible for SB 79 (Government Code Section 65912.160(f)). On May 22, 2026, SCAG released a draft SB 79 Mapping Approach and Methodology, describing assumptions, approach, and definitions for the preparation of a map. On June 1, 2026, SCAG released its preliminary draft map, "The Senate Bill 79: Transit Oriented Development Map", identifying qualifying transit stops and corresponding TOD zones across the SCAG region. This map was produced as an informational map, and the map and methods are currently undergoing a public comment process, with an anticipated release of SCAG's final methodology on July 2, 2026 by the SCAG Regional Council. SCAG's draft map and methodology includes differing interpretations from the City's draft map on the identification of a locally preferred alternative, commuter rail, pedestrian access points, future transit eligibility, grouping of transit hubs, and on certain station eligibility. The following table and map provides a summary of differences between the City's draft map and SCAG's draft map.

Table 1: Comparison of Eligible SB 79 TOD Zones on the City's Draft Map and SCAG's Draft Map

TOD Stop Name	Included on City's June 3, 2026 Draft Map	Included on SCAG's June 1, 2026 Draft Map	Description of Change
Metro 33 - Motor/Venice	No	Yes	The Department was made aware of the eligibility of this TOD zone through SCAG's Draft Map. As a result of a new Culver Bus Line on Motor Avenue, eligibility may be established for the Metro 33 stop at Motor/Venice. The TOD zone heavily intersects with three adjacent TOD zones and is primarily composed of high density residential and commercial zones.
NoHo to Pasadena BRT - W Alameda Avenue	Yes	No	SCAG's draft map found that the NoHo to Pasadena BRT - W Alameda Avenue bus route was shifted from the intersection of W Alameda and S Naomi St and no longer meets requirements to be compliant with SB 79 definitions.
NoHo to Pasadena BRT - Riverside Drive	Yes	Yes	SCAG's Draft Map shifted the location of the bus stop entrance and TOD buffer zone from the intersection of N Pass Avenue and W Riverside Drive to the intersection of W Olive Avenue and N Hollywood Way.

TOD Stop Name	Included on City's June 3, 2026 Draft Map	Included on SCAG's June 1, 2026 Draft Map	Description of Change
10 K Line Northern Extension Stops	Yes	No	These proposed K Line stations are part of Metro's locally preferred alternative in the Draft Environmental Impact Report. SCAG's draft methodology states, "SCAG will treat a planned project as having sufficient certainty where the project has completed full environmental clearance under the California Environmental Quality Act (CEQA) and, when required, the National Environmental Policy Act (NEPA)". Two of these stops (K Line - Hollywood/Highland and K Line - Wilshire/Fairfax) intersect with other transit lines and remain eligible TOD Zones. The remaining 8 TOD Zones associated with K Line Northern Extension stops are removed from SCAG's Draft Map.
7 Sepulveda Transit Corridor Stops	Yes	No	These proposed Sepulveda Transit Corridor stations are part of Metro's locally preferred alternative in the Draft Environmental Impact Report. As a Final EIR has not been certified, stations were not included in SCAG's draft methodology. Four of these stops (SP-Van Nuys Metrolink, SP - Van Nuys/Oxnard, SP-Westwood/UCLA, and SP - Expo/Sepulveda) intersect with other transit lines and remain eligible TOD Zones with modified Tier designations. The remaining 3 TOD zones associated with the Sepulveda Transit Corridor are removed from SCAG's Draft Map.
Metro 234 - Saticoy Street	Yes	No	The Metro 234 meets frequency, bus only lane, and major transit stop requirements as the LADOT DASH Panorama City/Van Nuys intersects the Metro 234 with 20 minute frequencies compliant with Major Transit Stop definitions. The SCAG draft map fails to include this station.

Map 1: Comparison of Eligible SB 79 TOD Zones on the City's Draft Map and SCAG's Draft Map



On June 3, 2026 the Department provided a public comment letter to SCAG's Community, Economic, & Human Development (CEHD) Committee identifying desired corrections to the methodology and maps including, removal of the NoHo to Pasadena BRT - Riverside Drive station and restoration of the Metro 234 - Saticoy Street station. On June 4, 2026 SCAG's

CEHD Committee considered and recommended that the Regional Council approve the SB 79 Approach and Methodology. In the CEHD Committee presentation, SCAG staff identified that corrections to the draft methodology and map would be presented to the Regional Council, including revisions to pedestrian access points, updates to ½ mile buffers in cities with populations under 35,000, and technical feedback from public comment. SCAG intends to address any corrections to the map by July 1, and publish the final methodology upon Regional Council action on July 2, 2026.

The Department of City Planning has developed a model to determine eligibility for permanent exclusion or temporary exemption from SB 79. Results from the model demonstrating that the City qualifies for phased implementation of SB 79 citywide was released with the Staff Report on May 5th. The May 5th model run was analyzed with the TOD Zones determined under the City's analysis, since SCAG had not yet released a draft map. Re-mapping eligible TOD Zones based on the methodology and data provided in the SCAG draft map (released June 1, 2026) is a highly complex and technical task. Since SCAG's release of the draft map, SCAG has indicated publicly there will be substantive revisions to pedestrian access points and therefore TOD zone buffers. SCAG has also confirmed on its website that it does not intend to adopt a map methodology until July 2, 2026 -- after the City's adoption of the Low-Rise and Phased Implementation Ordinances. (SCAG News, posted June 1, 2026 - <https://scag.ca.gov/news/scags-sb-79-draft-map-now-available>.) As such, it is expected that further parcel identification and station refinement will be needed after SCAG releases its final map on or after July 2, 2026 to align with SCAG's final map.

Due to the evolving nature of the draft map, this report does not replace the Maps in Exhibit 3 and analysis in the Staff report does not reflect the changes indicated in SCAG's draft TOD Zones. SCAG's current draft "Senate Bill 79: Transit Oriented Development Map" includes fewer TOD stops and zones than analyzed by the City's Draft Map, with 14 less stations, one new TOD stop at the intersection of Motor Avenue and Venice Boulevard, and a relocated W Riverside TOD stop. The following sections are provided as supplemental information to describe the City's anticipated changes to applicability that may result upon finalization of SCAG's methodology.

SCAG's Draft Map included the removal of 10 K Line Northern Extension stations, 7 Sepulveda Transit Corridor stations, the NoHo to Pasadena BRT - W Alameda TOD stop, and the Metro 234 - Saticoy Street stop. The K Line Northern Extension and Sepulveda Transit Corridor stops were removed from SCAG's Draft Map as they are part of Metro's locally preferred alternative in the Draft Environmental Impact Report, which according to SCAG's draft mapping approach and methodology as summarized in Table 1 above, do not meet the requirements for eligibility at this time. As a result of these changes, 8 K Line Northern Extension TOD Stops would be removed from the City's eligibility map, including the: K Line - Highland/Odin, K Line - La Brea/Santa Monica, K Line - Fairfax/Santa Monica, K Line - Santa Monica/Palm, K Line - La Cienega/Beverly, K Line - Fairfax/3rd, K Line - San Vicente/Pico, K Line - Crenshaw/Adams. Two of the K Line Northern Extension stops, the K Line - Hollywood/Highland and K Line - Wilshire/Fairfax, intersect with other eligible transit, and would remain SB 79 Tier 1 TOD Zones.

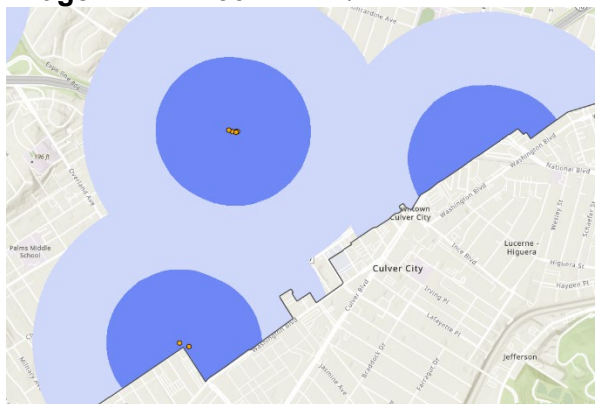
Furthermore, 3 Sepulveda Transit Corridor TOD Zones would be removed from the City's eligibility map, including: Sepulveda Line - Santa Monica, Sepulveda Line - UCLA/Ackerman Union, and Sepulveda Line - Ventura/Van Nuys. The following four of these stops intersect with other eligible transit and would remain on the City's eligibility map, including Sepulveda Line - Van Nuys Metrolink, Sepulveda Line - Van Nuys/Oxnard, Sepulveda Line - Westwood/UCLA, and Sepulveda - Line Expo/Sepulveda. However, the TOD Zones at Sepulveda Line -

Expo/Sepulveda, SP Line - Van Nuys/Oxnard, and Sepulveda Line - Van Nuys Metrolink would shift from SB 79 Tier 1 TOD Zones to Tier 2 TOD Zones. The TOD Zone at SP-Wilshire/Westwood would remain SB 79 Tier 1 as it intersects with the PURex - Westwood/UCLA stop.

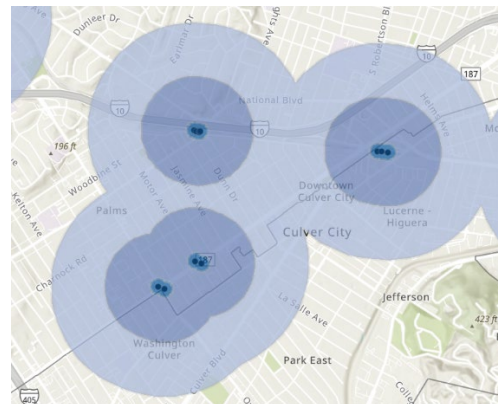
SCAG's Draft Map excluded the NoHo to Pasadena BRT - W Alameda TOD stop, as the bus route and stop shifted from the intersection of W Alameda and S Naomi St and no longer meets requirements to be compliant with SB 79 definitions. As a result of this shift, the City plans to remove the NoHo to Pasadena BRT - W Alameda stop from the eligibility map. The SCAG Draft Map also excluded the TOD stop Metro 234 - Saticoy Street. However, the City confirmed the Metro 234 meets frequency, bus only lane, and major transit stop requirements as the LADOT DASH Panorama City/Van Nuys intersects the Metro 234 with 20 minute frequencies compliant with Major Transit Stop definitions. The City submitted a comment to SCAG on this TOD Zone, and pending SCAG's response, the Metro 234 Saticoy Street TOD Zone is anticipated to remain on the City's eligibility map. Further, 25 TOD zones on SCAG's Draft Map had shifted pedestrian access points in comparison to the City's Draft Map, and would require future TOD Zone buffer adjustments on the City's Draft Map.

As described above in Tables 1 and 2, SCAG's Draft Map included an additional TOD stop at the intersection of Motor Avenue and Venice Boulevard, adjacent to the border of Culver City. The half-mile buffer distance of this additional TOD stop overlaps with the Expo - Palms Station and the Metro 33 - Venice Boulevard stop at the intersection of Venice Boulevard and Overland Avenue. As illustrated in Image 2, below, the addition of this TOD Zone would only include a few commercial and multi-family parcels south of Venice Boulevard, between Dunn Drive and Watseka Avenue; all other parcels are included in the June 5th analysis for existing capacity. With the new station, parcels within a ¼ mile of the stop will be remodeled to account for additional SB 79 capacity. The zones within the half mile buffer of the new Motor/Venice TOD zone are primarily composed of multi-family and commercial zone classes, and it is anticipated that this TOD Zone (along with Expo-Palms and Metro 33 Venice) meets the temporary exemption criteria for sufficient existing capacity pursuant to Government Code Section 65912.161(b)(1)(B)(i).

Image 2. Metro 33 - Motor/Venice



Draft City's Eligibility Map from June 3, 2026

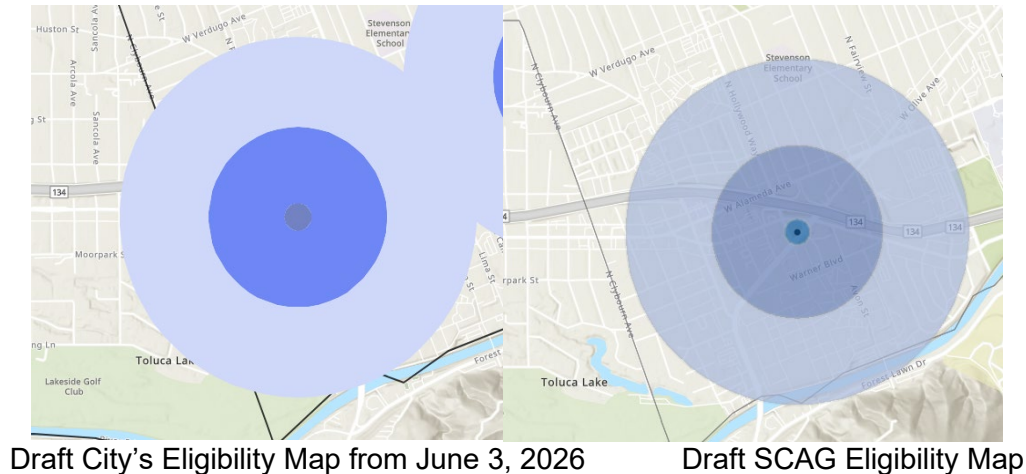


Draft SCAG Eligibility Map

For the NoHo to Pasadena BRT - W Riverside TOD stop, SCAG's Draft Map shifted the location of the bus stop entrance and TOD buffer zone from the intersection of N Pass Avenue and W Riverside Drive to the intersection of W Olive Avenue and N Hollywood Way. As depicted in Image 3 below, the change shifted the half-mile buffer to the east, outside of the boundary of the City of Los Angeles. The only parcels that remain within the boundaries of the City of Los Angeles are located adjacent to the Los Angeles River and north of Forest Lawn Drive, and are

zoned A1-1XL-RIO and have a General Plan Land Use of Open Space. These parcels would be designated as exempt from SB 79, per the methodology described on page F-45 of the Revised Findings of the Staff Recommendation Report.

Image 3. NoHo to Pasadena BRT - W Riverside



Upon effectuation of the Low Rise and Phased Implementation Ordinances eligibility maps, parcel-specific information will be made publicly available on the Zoning Information Mapping Access System (ZIMAS) and transmitted to the Council Files. Following finalization and any subsequent revision of SCAG's maps and methodology, revisions to ensure consistency will be made available to the Council Files and ZIMAS. Further, the Department will also submit a copy of the City's Phased Implementation and Low Rise Ordinances to the Department of Housing and Community Development within 60 days of enactment, as required by Government Code Section 65912.160(d)(2).

Overview of Revised Findings, Exhibit 3, and Appendix 3 to Address Revisions to Analysis on Industrial Areas of Los Angeles and Changes to Industrial Employment Hubs Mapped pursuant to Government Code Section (GCS) 65912.160(e)(2)

Revisions to the Staff Recommendation Report include updates related to the proposed "industrial employment hubs" that qualify for permanent exemptions under the proposed SB 79 Phased Implementation Ordinance and GCS 65912.160(e)(2). In particular, Section B (General Plan Consistency Findings) and Section C (Senate Bill 79 Discussion (California State Government Code Section 65912.155 – 65912.162) of the Findings, as well as "Appendix 3: Impacts of Senate Bill (SB) 79 on Industrial Areas of Los Angeles," reflect additional analysis conducted to ensure consistency with statutory requirements.

These updates include revisions to the "Downtown / Southeast Los Angeles" industrial employment hub; additional discussion on principally permitted versus conditionally permitted uses within Los Angeles' industrial zones; and further analysis on a total of eight sites in the industrial employment hubs that are partially zoned CM. In addition, the Findings include supplementary analysis on land use goals, policies, and objectives in the Community Plan Areas that intersect with the City of Los Angeles six proposed industrial employment hubs and how they help each industrial employment hub fulfill the "employment lands area" requirement in GCS 65912.160(e)(2). This analysis has resulted in a revised acreage calculation for the "Downtown / Southeast Los Angeles" industrial employment hub (866 acres, see page F-49 of Revised Findings and page 11 of Appendix 3) and a revised number of sites eligible for permanent exemption in the SB 79 Phased Implementation Ordinance due to their designation

as part of an industrial employment hub (see page F-59 of Findings and page 10 of Appendix 3).

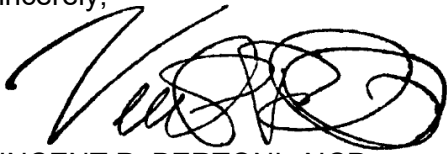
Lastly, the mapping associated with the industrial employment hubs was updated to reflect the change to the Downtown/Southeast Los Angeles industrial employment hub. See the Revised Exhibit 3 attached to this memorandum for additional information.

Conclusion

This report provides recommended actions for the adoption of the Low-Rise and SB 79 Phased Implementation Ordinances in addition to responses to new mapping information and analysis, a summary of revisions to proposed Findings, Exhibit 3, Appendix 1, and Appendix 3 of the Staff Recommendation Report dated May 19, 2026. As stated in the Department's Staff Recommendation Report, the Low-Rise Ordinance and Phased Implementation Ordinance meet state law requirements while advancing objectives to affirmatively further fair housing and local equity and climate goals by facilitating the largest expansion of affordable housing incentive tools into under utilized land, including single family zones, near some of the region's most transformative transit investments. The Department will continue to work with local agencies and monitor new legislation proposed in preparation for implementing this critical initiative.

For questions regarding this report, please contact Blair Smith, Senior City Planner, at blair.smith@lacity.org, in the Department of City Planning.

Sincerely,

A handwritten signature in black ink, appearing to read 'Vincent P. Bertoni', with a large, stylized circular flourish at the end.

VINCENT P. BERTONI, AICP
Director of Planning

VPB:AV:JM:BS:EC:TT:AO:AM:CB

Attachments

- Revised Findings of Staff Recommendation Report (CF Nos. 25-1083-S3, 25-1083-S4)
- Revised Appendix 1: SB 79 Phased Implementation Model Methodology (CF 25-1083-S4)
- Revised Appendix 3: Impacts of Senate Bill (SB) 79 on Industrial Areas of Los Angeles (CF 25-1083-S4)
- Exhibit 3: Revised SB 79 Map Inventory (CF Nos. 25-1083-S3, 25-1083-S4)
 - Map 4A: SB 79 Industrial Employment Hubs
 - Map 4D: Downtown/Southeast LA SB 79 Industrial Employment Hub
- June 3, 2026 Communications from the Department of City Planning to the Community, Economic, and Human Development Committee of the Southern California Associations of Governments.

Revised Findings

CPC-2026-1798-MSC, CPC-2026-1797-CA

June 17, 2026

FINDINGS

Program Findings and Discussion

Several sets of findings are required to adopt the Low-Rise Ordinance and the SB 79 Phased Implementation Ordinance, including consistency with the General Plan, (including but not limited to the Land Use, Housing and Circulation Elements), SB 79 and State Density Bonus Law.

A. City Charter Findings

City Charter Section 253 - City Charter Section 253 allows for City Council to adopt an urgency ordinance that takes effect upon publication, so long as the ordinance is required for the immediate preservation of the public peace, health or safety and passes by at least a three-fourths vote of Council.

Both the Low-Rise and Phased Implementation Ordinances are necessary for the immediate preservation of the public peace, health and safety, and to ensure compliance with State law. SB 79 is a State mandate that would otherwise apply unless the City elects to temporarily delay effectuation of the SB 79's development standards, in conjunction with the adoption of the City's Low-Rise Ordinance that allows for a more tailored development approach to concentrate density close to transit.

By permanently excluding certain industrial sites and sites more than a mile walking from eligible transit stations, and by temporarily exempting and protecting sensitive sites such as low-resource neighborhoods as designated by the California Tax Credit Allocation Committee (TCAC), Very High Fire Hazard Severity Zones, and industrial zones from increased residential capacity as otherwise would be mandated by California Government Code Section 65912.161(b)(1), adoption of these ordinances to phase implementation of SB 79 effectuation provides additional time for the City to evaluate alternative plan options and to balance health, safety, and displacement concerns in conjunction with the development of increased housing stock. The Low-Rise Ordinance allows the City to comply with State-mandated requirements, while continuing to address Los Angeles' housing crisis by increasing capacity in a manner consistent with the City's certified Housing Element, and improves housing access by affirmatively furthering fair housing using locally tailored value capture.

These proposed ordinances, as discussed further below, are consistent with the City's 2021-2029 certified Housing Element that commits the City of Los Angeles to plan for housing in a way that addresses past patterns of discrimination and exclusion and strives for greater affordability, equity, and sustainability citywide through prioritizing growth in areas shown to

have positive life and health outcomes by encouraging infill development in High Opportunity Areas near access to jobs, transit, amenities, and neighborhood services. If the Program is not adopted, the City would be subject to immediate effectuation of SB 79 on every eligible site, permitting the full use of applicable incentives offered by the bill without the opportunity to implement in a manner that considers General Plan goals and establishes protections for areas vulnerable to displacement or environmental risks.

Provided the ordinances pass with a three-fourths vote by Council, they shall become effective upon publication.

City Charter Sections 556 and 558 and LAMC Section 13B.1.3 - City Charter Sections 556 and 558, and LAMC Section 13B.1.3 require the City Planning Commission and the City Council to adopt the following findings, when taking any action to amend zoning or other land use regulations concerning permissible uses, height, density, bulk, location or use of buildings or structures, size of yards, open space, setbacks, building line requirements, and other similar requirements:

- (1) The zoning ordinance is in substantial conformance with the purposes, intent, and provisions of the General Plan;
- (2) The zoning ordinance is in conformity with public necessity, convenience, general welfare, and good zoning practice; and,
- (3) Other findings as required by law.

Although the SB 79 Phased Implementation Ordinance does not amend the zoning code, change conditions, or amend land use regulations pursuant to the referenced sections above, the following analysis demonstrates that the ordinance is in substantial conformance and is provided here for informational purposes.

Pursuant to City Charter Sections 556 and 558, and LAMC Section 13B.1.3, the proposed Low-Rise Ordinance and SB 79 Phased Implementation Ordinance are in substantial conformance with the purpose, intent and provisions of the General Plan, as analyzed in the findings below. Other findings required by law are included in subsequent sections, including findings affirming City's eligibility for permanent and temporary exclusions from SB 79 effectuation pursuant to GCS 65912.160(e) and GCS 65912.161(b)(1) in Section C, consistency with State Housing Element Law pursuant to GCS Sections 65580- 65589.11 in Section D, and compliance with State Density Bonus Law pursuant to GCS 65915- 65918 in Section E.

Both ordinances herein collectively referred to as the "Program" are in conformance with public necessity, convenience, general welfare and good zoning practice because the SB 79 Phased Implementation Ordinance enables a phased implementation Citywide, which will allow the City additional time to plan for and ensure general welfare and good zoning practice for SB 79 implementation within impacted geographies. The phased approach enacted through this

ordinance will also enable the City to implement SB 79 and its increased development capacity in a way that is consistent with the goals of the 2021-2029 Housing Element through the adoption of a future TOD alternative plan. The Low-Rise Ordinance proposes eligibility and feasibility changes to the Mixed Income Incentive Program (MIIP codified at LAMC Sec. 12.22 A.38) that expands missing middle development opportunities to low-density residential sites near quality transit in Moderate and Higher Opportunity Areas. These eligibility and feasibility amendments are intended to increase the number of proposed projects for the Low-Rise Incentive Area, as there have been no filed applications for the previously named Corridor Transition Incentive Area since adoption in 2025, while also promoting positive economic, health, and equity outcomes that support the City's general welfare and good zoning practice. In particular, the Program responds to the City's acute housing crisis, which negatively impacts the general welfare with high rates of homelessness, overcrowding and unaffordable rents. Incentives for new housing with deed restricted affordable units facilitates an increase in the housing supply in strategically selected areas according to good zoning practice. These areas are characterized as having strong transportation service, existing infrastructure, access to jobs and amenities, and existing resources linked to better life outcomes for residents.

B. General Plan Consistency Findings

General Plan Consistency Requirement – State law requires that the General Plan have horizontal internal consistency among its general plan elements (California Government Code Section 65300.5). The City Charter Sections 556 and 558 and California Government Code Section 65860(d) also require the City's zoning ordinances to be vertically consistent with the General Plan.

The Low-Rise Ordinance proposes amendments to the MIIP, adopted as part of the Citywide Housing Incentive Program (CHIP) Ordinance in 2025, to expand eligibility and improve project feasibility. The CHIP Ordinance was found to possess internal consistency with the General Plan at the time of ordinance adoption. Those findings are hereby updated to demonstrate the vertical consistency between the proposed Low-Rise Ordinance and the General Plan.

The proposed SB 79 Phased Implementation Ordinance does not amend the zoning code or general plan elements. Enactment of the phased implementation of SB 79, however, ensures the City has sufficient time to strategically align SB 79 implementation with General Plan goals, in particular goals for preservation of industrial land, open space, and protection of historic resources. The ordinance will also allow the City additional time to develop implementation strategies that are consistent with General Plan considerations regarding development in environmentally sensitive areas, including hillside areas vulnerable to fire risk. Furthermore, the proposed ordinance enacts a permanent exemption for industrial employment hubs, consistent with the General Plan's industrial preservation goals.

This following discussion demonstrates the Program's consistency with the General Plan in compliance with City Charter Sections 556 and 558, and LAMC Section 13B.1.3, in that they are

compatible with the objectives, policies, general land uses, and programs of the General Plan and will not inhibit or obstruct their attainment. The General Plan findings below are provided for the City Planning Commission's consideration in approving and recommending the Low-Rise and SB 79 Phased Implementation Ordinances and its determination that these ordinances are consistent with the City's General Plan.

For all the reasons provided below, the proposed Program is consistent with the City of Los Angeles General Plan, in that it is compatible with the objectives, policies, general land uses, and programs of the General Plan and will not inhibit or obstruct their attainment.

The Housing Element

The Program is in substantial conformance with the purpose, intent, and provisions of the General Plan in that the ordinances and its amendments support the goals, objectives, policies, and programs of the 2021-2029 Housing Element as outlined in detail below.

The Low-Rise Ordinance, if adopted, would continue the implementation of Program 121 of the 2021-2029 Housing Element by including more flexible zoning and incentives for existing single-family and lower density residential areas to create opportunities for a variety of "missing middle" low-scale housing typologies. The ordinance also implements Programs 21, 48, 54, 55, 57, 65, 103, and 124, as discussed in the Housing Element Program section below.

The SB 79 Phased Implementation Ordinance enacts permanent and temporary exemptions from bill enactment to certain sites sensitive to disaster risk, promoting the City's goals of positive health outcomes, safety in planning for housing, as well as goals to affirmatively further fair housing through enabling local value capture strategies.

As a core implementation program of the 2021-2029 Housing Element, the Program strongly furthers its goals, objectives, policies and programs. The five goals that guide the 2021-2029 Housing Element are listed below, along with the most relevant objectives and policies.

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.

Objective 1.1: Forecast and plan for existing and projected housing needs over time with the intention of furthering Citywide Housing Priorities.

Policy 1.1.7: Incentivize production of mixed-income and 100% Affordable Housing projects by rezoning for more inclusive development at densities that enable their construction in every geography.

Policy 1.1.8: Introduce 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.

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

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

Policy 1.2.1: Expand rental and for-sale housing for people of all income levels. Prioritize housing developments that result in a net gain of Affordable Housing and serve those with the greatest needs.

Policy 1.2.2: Facilitate the construction of a range of different housing types that addresses the particular needs of the City’s diverse households.

Policy 1.2.3: Facilitate innovative housing models and promote regulatory reforms that reduce the costs of housing production while also promoting broader Citywide Housing Priorities.

Policy 1.2.4: Strengthen the capacity of housing providers to build Affordable Housing.

Policy 1.2.5: Streamline the housing approval process, particularly for Affordable Housing, throughout City departments.

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

Policy 1.2.8: Develop and implement new land use and financing tools to promote more housing that is affordable to those with the lowest incomes and for longer periods of time.

Policy 1.2.9: Allow for zoning flexibility for Affordable Housing at the project review and planning levels when broader Citywide Priorities are being advanced.

Objective 1.3: Promote a more equitable distribution of affordable housing opportunities throughout the city, with a focus on increasing Affordable Housing in Higher Opportunity Areas and in ways that further Citywide Housing Priorities.

Policy 1.3.1: Prioritize housing capacity, resources, policies and incentives to include Affordable Housing in residential development, particularly near transit, jobs, and in Higher Opportunity Areas.

Policy 1.3.2: Prioritize the development of new Affordable Housing in all communities, particularly those that currently have fewer Affordable units.

Low-Rise Ordinance

The Low-Rise Ordinance expands eligibility for MIIP's missing middle incentives associated with the Low-Rise Incentive Area, formerly called Corridor Transition (CT) Incentive Area, adding capacity for affordable housing in single-family and other low-density zoned sites where these types of incentives were previously not permitted. These amendments enable construction of mixed-income, multi-family housing in lower-density zoned sites within Opportunity Station Areas, permitting multi-family homes in geographies that, at present, are restricted to single-family zones or other low densities. The expansion of these incentives support the Housing Element goal of allowing zoning flexibility for projects providing affordable housing (Policy 1.2.9), alongside additional amendments targeting increased missing middle project feasibility (Policy 1.1.8), including consolidating incentive tiers, adjusting affordability requirements, updates to the Multi-Bedroom Base Incentive, and allowances for rooftop open space. These proposed changes create new opportunities for increased housing capacity, addressing the City's housing needs in transit-rich areas of the City where affordable housing is most needed (Policy 1.3.1). Furthermore, the incentive structure centered on increases in affordability advances affordable unit goals for populations with the greatest need (Policy 1.2.1 and Policy 1.2.8), and supports goals of creating innovative housing models (Policy 1.2.3). In particular the incentive structure enables affordability to scale based on the number of units provided to ensure adequate value capture regardless of site or project size.

The Low-Rise Incentive Area eligibility expansion to all residential sites within Opportunity Station Areas supports the objective to increase affordable housing in Higher Opportunity Areas (Objective 1.3, Policy 1.3.1). Higher Opportunity Areas have a dense concentration of place-based opportunities such as access to transit, and high-performing schools, with higher rates of employment and education, and lower exposure to environmental pollutants, among other indicators. By concentrating eligibility expansion to areas with transit qualifying for SB 79 incentives and within Moderate or Higher Opportunity Areas, these amendments aim to improve equitable access to Moderate and Higher Opportunity Areas of the City and promote affordable housing opportunities near higher performing schools, jobs, and transit-rich areas. The proposed amendment to change the TCAC mapping frequency from annually to every five years

will further strengthen this approach by providing greater consistency in the level of incentives available in Moderate and Higher Opportunity geographies within the Housing Element planning period.

In addition to expanding incentives to areas that have greater access to place-based opportunities, the Low-Rise Ordinance focuses housing capacity increases in low-density zones that have historically developed less multi-family housing. This strategy to add capacity reduces displacement risk within established multi-family neighborhoods and areas of the City that have experienced a higher share of housing development due to applicable underlying zoning containing less restrictions on multi-family construction (Policy 1.1.9).

The Low-Rise Ordinance further contributes to the goals of increased streamlining and affordability (Policy 1.2.5) by increasing the number of sites that are eligible for the Low-Rise Incentive Area, thereby expanding the geographic areas within the City that are eligible for the significant streamlining pathways available through the program. This eligibility change also directly impacts the potential number of affordable units citywide, and even more so within these lower-density zoned geographies, by increasing the achievable density while requiring a percentage of affordable units. Furthermore, the ordinance adjusts affordability requirements for eligible project types to increase feasibility, promoting the production of affordable units by increasing probability that these projects can be financed and constructed. These amendments therefore support the goals of expanding access to housing for people of all income levels , prioritizing development that results in the production of affordable housing (Policy 1.2.1), and strengthening the capacity of housing providers to build affordable housing (Policy 1.2.4).

Furthermore, Low-Rise Incentive Area Projects are granted relief from certain zoning standards, including minimum lot area, width, and access requirements, lot coverage, setbacks, open space, calculation of residential FAR, and massing requirements. These zoning standards are selected for relief to decrease challenges related to building multi-family housing within zones that have requirements designed for single-family housing. Including this relief creates crucial zoning flexibility for affordable housing (Policy 1.2.9) and strengthens the capacity of housing providers to produce affordable housing (Policy 1.2.4), particularly missing middle typologies (Policy 1.18).

SB 79 Phased Implementation Ordinance

By enacting permanent and temporary exemptions to SB 79, the SB 79 Phased Implementation Ordinance enables the City to plan for housing capacity growth through strategies that affirm Citywide Housing Priorities (Objective 1.1). In particular, the ordinance allows the City additional time to exercise discretion regarding local value capture strategies tied to housing capacity growth, rather than defaulting to the bill's affordability requirements. In this way, the City can strategically calibrate affordability standards for areas with added housing capacity to implement the bill, giving the option to require higher affordability than required in SB 79 (Objective 1.2).

This will enable the City to more thoroughly implement housing growth required by the bill that is aligned with the affordability considerations in Goal 1, including promoting the creation of affordable housing to those with the greatest need (Policy 1.2.1) and prioritizing new affordable housing in communities that have fewer affordable units, particularly Higher Opportunity Areas (Policies 1.3.1 and 1.3.2).

Goal 2

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

Objective 2.1: Strengthen renter protections, prevent displacement and increase the stock of affordable housing.

Objective 2.2: Promote more affordable ownership opportunities and ownership retention strategies, with an emphasis on stability and wealth building for underserved communities.

Policy 2.2.1: Expand ownership models that increase the ability for households to attain homeownership, including alternative forms of shared- and limited-equity ownership.

Low-Rise Ordinance

The Low-Rise Ordinance supports the goal of increasing the stock of affordable housing (Objective 2.1) by expanding the geographic eligibility of the Low-Rise Incentive Area, which requires the provision of affordable units in order to use the program. This creates more opportunity for the production of affordable housing in areas in which this is currently less feasible due to zoning restrictions. The ordinance focuses housing capacity increases in low-density zones with less existing units, therefore reducing direct displacement impacts and prioritizing expanding housing access in more places to alleviate indirect displacement throughout the city. The Low-Rise Ordinance further offers tailored Incentives to expand home ownership opportunities and equity building for more households, offering increased density alongside reduced lot sizes, setbacks, and access requirements when covenanted affordable units are provided. The proposed expansion of both eligibility and intensity of incentives to a wider geographic radius creates heightened opportunities for homeownership through increasing the number of eligible sites in new geographic areas of the City (Objective 2.2).

SB 79 Phased Implementation Ordinance

The permanent and temporary exemptions enacted through the SB 79 Phased Implementation Ordinance will allow the City more time to plan for increased housing capacity aligned with City's value capture goals, including increasing the stock of affordable housing, instead of defaulting to the bill's affordability standard. The ordinance specifically enacts temporary exemptions for sites

and TOD Zones designated as low-resource, which aids in displacement prevention in vulnerable communities during the process of adding housing capacity in alignment with the bill (Objective 2.1).

Goal 3

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

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

Policy 3.1.1: Provide incentives and financial support for the preservation of historic residential structures, particularly for lower-income households.

Policy 3.1.2: Promote new development that furthers Citywide Housing Priorities in balance with the existing architectural and cultural context.

Policy 3.1.3: Develop and implement design standards that promote quality residential development.

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.

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

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 3.2.9: Consider accommodating new residential uses, including live/work and mixed-use, in less-productive industrial, office, and commercial areas when the site can accommodate housing in keeping with citywide industrial land, jobs-housing and jobs preservation priorities, and when sites have been appropriately tested and remediated, if necessary.

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.

Low-Rise Ordinance

The Low-Rise Ordinance encourages affordable housing production near transit and in Moderate and Higher Opportunity Areas through expanding eligibility for missing middle incentives in areas of the city with transit access and access to opportunity. Residential growth in these areas will help shorten commutes and facilitate a better jobs-housing balance (Policy 3.2.2) while also furthering citywide goals concerning health outcomes, livability, sustainability, resilience, and affordability. This eligibility expansion in Opportunity Stations, majority Moderate and Higher Opportunity station areas, focuses growth in areas with sufficient infrastructure to expand housing capacity, including suitable access to amenities, services, and transportation options as stated in Objective 3.2.

The Low-Rise Ordinance promotes health focused design outcomes by enforcing specific design standards around common open space and street-facing entrances that are modeled to ensure sufficient open space and pedestrian orientation while still scaling with the surrounding low-density neighborhood. The ordinance further introduces amendments to the common open space options for Low-Rise Incentive Area projects to increase feasibility of the provision of suitable open space for a missing middle typology on lower-density zoned sites, including allowing for common open space on a rooftop or intermediate level and within the front yard instead of the rear yard (Policy 3.1.7).

The Low-Rise Ordinance upholds the Housing Element goals of integrating housing with other compatible land uses, at the building and neighborhood level (Policy 3.2.1). Expanding geographic eligibility using Opportunity Station Areas, which comprise the half-mile radius around a qualifying transit station, planning holistically in a station area instead of by census tract boundaries to create greater consistency in the built environment. The ordinance supports neighborhood consistency considerations by extending MIIP eligibility to parcels in Fire

Restriction Areas or the Coastal Zone if they are abutting, across the street or alley, or share a common corner with a MIIP eligible site that is not within a Fire Restriction Area or the Coastal Zone ensuring consistency in incentive eligibility on a block. The ordinance also proposes to update the mapping frequency of TCAC Opportunity Areas from annually to every five years. This would ensure consistency throughout the planning period, maintaining compatible development and ensuring consistent development potential for the development community.

Furthermore, the proposed Low-Rise Ordinance builds off of the MIIP eligibility framework, which excludes development in areas with high environmental risk where residential growth would not facilitate the creation of healthy and resilient communities. The ordinance establishes a definition for Fire Restriction Areas, which encompasses hillside and VHFHSZ areas and amends program eligibility. The City has adopted fire hazard mitigation measures that are required for all projects in the VHFHSZ, pursuant to existing State Fire Code standard building standards and State Minimum Fire Safety regulations. With the incorporation of these state codes, development in the VHFHSZ will make structures more fire safe and create more fire resilient areas over time (Policy 3.3.2). The Fire Restriction Area is consistent with the fire eligibility restrictions that were in Executive Directive 1 (ED 1) as currently codified in the Affordable Housing Streamlining Ordinance (Ordinance No. 188788) (LAMC 12.22 A.40). This eligibility limitation ensures areas with greater environmental vulnerabilities are restricted from program eligibility, including areas egress issues and substandard streets, while simultaneously permitting MIIP eligibility in non-hillside VHFHSZ areas like Atwater Village, Ventura Boulevard in Sherman Oaks, and Glendale Boulevard bolstering new fire-resilient development subject to updated building code standards in fire zone adjacent areas.

Low-Rise Incentive Area eligibility expansion ensures growth is tied to a tailored Incentive structure that excludes eligibility of local historic sites within Opportunity Station Areas, unless sites were previously eligible for the program due to proximity to an Opportunity Corridor, encouraging the preservation of historic resources (Policy 3.1.1). For eligible state and national register historic sites, Low-Rise restricts demolition, does not override standard historic review procedures for alteration, and further limits the scale of Incentives the site is eligible for.

The ordinance also contains tailored eligibility considerations for industrial areas that may be eligible for SB 79. Although MIIP generally does not permit program eligibility in manufacturing zones and the ordinance further introduces new eligibility restrictions to MR zones, sites that are otherwise ineligible for temporary exemption are granted limited eligibility through this ordinance in order to maintain citywide eligibility for phased implementation. This could result in industrially zoned sites gaining eligibility for the Low-Rise Incentive Area. The Department is currently seeking guidance from HCD on the overall eligibility of industrial land for SB 79. If HCD affirms eligibility, the Department recommends procedural changes be implemented for projects proposed on industrially zoned sites, including a required discretionary approval process and/or expanded environmental protection measures. These recommended procedural requirements

support Policy 3.2.9's consideration of appropriate testing and remediation when accommodating housing on industrially zoned land.

SB 79 Phased Implementation Ordinance

The SB 79 Phased Implementation Ordinance promotes climate resilience and reduced disaster risk through enacting temporary exemptions from full SB 79 implementation for sites within VHFHSZ and one-foot of sea level rise (Objective 3.3). This allows the City additional time to plan for adding housing capacity in compliance with appropriate health and environmental risk considerations.

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.

Objective 4.3: Affirmatively further fair housing in all housing and land use programs by taking proactive measures to promote diverse, inclusive communities that grant all Angelenos access to housing, particularly in Higher Opportunity Areas, increase place-based strategies to encourage community revitalization and protect existing residents from displacement.

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

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

Policy 4.3.4: Advance place-based strategies that create opportunities and financial strength in areas of disinvestment and with a history of predatory financial practices through asset-building shared equity homeownership that creates stability and mitigates displacement pressures through community control

Low-Rise Ordinance

The proposed Low-Rise Ordinance will create new development opportunities for mixed-income projects that will foster more racially and socially inclusive neighborhoods. The 2021-2029 Housing Element findings affirmed that achieving the goal of affirmatively furthering fair housing requires an honest examination of land use practices that have perpetuated racial exclusion and

inequities as well as an exploration of the development of more affordable housing types that are compatible with low-density neighborhoods. The Low-Rise Ordinance amendments prioritize expanding housing options to single-family and low-density zones in Opportunity Station Areas to proactively expand housing opportunities in transit rich majority Moderate and Higher Opportunity station areas creating more equitable and affordable housing options for City residents. The expansion of Low-Rise Incentive Area eligibility to lower-density zones supports the 2021-2029 Housing Element findings that acknowledge that equity goals must be considered alongside other land use policy objectives, in this case as a means to add development capacity exceeding Senate Bill 79 requirements in order to strategically incentivize housing near transit infrastructure and higher and moderate resource areas.

The proposed Low-Rise Ordinance further creates a new pathway for a variety of housing typologies within lower-density areas near quality transit where previously only single-family development may have been permitted. This allowance for a range of housing typologies where previously not permitted provides missing middle housing opportunities alongside existing higher or low density contexts providing transitional density. Furthermore, expanding housing options provides new opportunities for housing mobility in their community and reduces displacement risk for residents (Policy 4.3.2). This Low-Rise Incentive Area program itself also incentivizes housing that ranges in scale and density, with Base Incentives ranging from six-unit homes with two-story height up to sixteen units per lot with four-story heights. In instances where multiple lots are consolidated, the Low-Rise Incentive Area scales density while maintaining the same building volume standards. For consistency with SB 79, the Low-Rise Ordinance guarantees eligible projects half of density and FAR permitted by California Government Code Section 65912.157(a) ensuring incentives are always equivalent or in excess of the bill provisions.

SB 79 Phased Implementation Ordinance

The SB 79 Phased Implementation Ordinance enacts permanent and temporary exemptions that grant the City additional time to plan for housing capacity growth in alignment with strategies that affirmatively further fair housing (Objective 4.3). In particular, phasing implementation in low resource neighborhoods provides time to develop place-based strategies to mitigate displacement pressures (Policy 4.3.4), consider community needs, and develop context specific reforms that address historical land use practices (Policy 4.3.3).

Housing Element Programs

The Low-Rise and SB 79 Phased Implementation Ordinances support the implementation of a number of Housing Element Programs, as described below:

Program 3

Program 3 establishes objectives to facilitate the development of 800 market-rate and 90 lower-income units each year, and to amend the zoning code to further innovate in subdivisions.

The Low-Rise Ordinance establishes density and lot standard incentives to facilitate subdivision developments with affordable units, provide both innovate in subdivision standards and facilitate the production of unit targets

Program 21

Program 21 includes objectives to incorporate updated parking strategies that support VMT goals and recognize the emergence of shared and alternative mobility, particularly in transit-rich areas. The Low-Rise Ordinance offers no parking minimum as a Base Incentive for projects within Opportunity Station Areas, supporting Program 21's goals.

Program 48

Program 48 comprises updating density bonus and affordable housing incentive programs. The CHIP Ordinance adopted in 2025 implemented this program through the creation of the State Density Bonus Program (12.22 A.37), the Mixed Income Incentive Program (12.22 A.38), and Affordable Housing Incentive Program (12.22 A.39). The Low-Rise Ordinance builds on this effort by amending the MIIP to expand eligibility, as well as bringing forward amendments to improve the feasibility of projects utilizing the program.

Program 55

Program 55 calls for implementing CEQA streamlining measures, and projects using the Low-Rise Incentive Area within MIIP are covered under the Housing Element EIR. Therefore, the MIIP eligibility expansion proposed in this Low-Rise Ordinance opens new areas of the City that can receive environmental streamlining for mixed income housing development, supporting Program 55.

Programs 54 and 57

The Low-Rise Ordinance builds on the procedural streamlining framework established through the CHIP Ordinance to continue implementation of Program 54, which aims to expedite affordable housing projects, and Program 57, which promotes improvements to development processing. The Low-Rise Incentive Area eligibility expansion increases the number of parcels and geographic areas within the City that will have access to ministerial pathways for affordable housing.

Program 62

The Low-Rise Ordinance builds on the innovation in housing types established through the CHIP Ordinance to continue implementation of Program 62.

Program 103

Program 103 states that the Department will introduce flexible zoning standards and incentives to create opportunities for more 'Missing Middle' housing typologies, particularly in Higher

Opportunity Areas. The Low-Rise Ordinance's expansion of the Low-Rise Incentive Area eligibility to all sites within Opportunity Station Areas directly implements this goal, allowing for lower- scale, multi-unit housing in low-density, Moderate and Higher Opportunity areas of the City where this typology is not currently permitted. Further, the Low-Rise Incentive Area's affordability requirements implement the value capture approach that Program 103 planned for, ensuring increases in density are tied to covenanted affordable housing that reduce barriers and create long-term housing opportunities for low-income residents.

Program 121

Program 121 comprises the RHNA Rezoning program aimed at a citywide rezoning to meet RHNA Targets. The Citywide Housing Incentive Program (CHIP) Ordinance adopted in 2025 was the primary implementation of Program 121, and included the MIIP. Minimum Objectives for this program were completed with the adoption of the CHIP, Hollywood Community Plan and Downtown Community Plan in 2025, however the full program description continues to be implemented through various work efforts including the Adaptive Reuse Ordinance and the Low-Rise Ordinance. The proposed Low-Rise Ordinance amends the MIIP to enable eligibility and project feasibility within existing lower-density and single-family residential areas to create opportunities for missing middle, low-scale housing typologies. Specifically the program states, "Specific Rezoning Program strategies (described in greater detail in Chapter 4 of the 2021-2029 Housing Element) that will be further developed with significant community input include focusing rezoning on commercial and residential corridors, areas zoned for Parking (P), transitional residential areas off commercial boulevards, in existing regional centers, on public and religious-owned land, and in other areas where multifamily, and therefore affordable housing, is not permitted today. The Rezoning Program may also include more flexible zoning and incentives for existing single-family or lower density residential areas to create opportunities for a variety of "missing middle" low-scale housing typologies including fourplexes, townhomes/ rowhouse, additional affordable ADUs, bungalow courts, and other contextual Los Angeles typologies". Therefore, the Low-Rise Ordinance furthers the rezoning strategies within Program 121 by expanding where multi-family housing is permitted and facilitating missing middle housing.

Program 124

Both the SB 79 Phased Implementation and Low-Rise Ordinances support the goals of Program 124 to Affirmatively Furthering Fair Housing (AFFH). The AFFH Program (Program 124) of the 2021 - 2029 Housing Element established the following specific strategy and actions to address the primary AFFH issue areas:

Strategy A. Prioritize and expand housing choices for those with the greatest housing needs, including those with the lowest incomes, persons with disabilities, seniors, large families, and victims of domestic violence.

Program 81: Create tailored affordability incentives that account for identified local needs such as insufficient senior, large family units, or multigenerational

living, as local plans are adopted. Ensure local plans increase the production and availability of Affordable and accessible housing.

Strategy D. Promote a more equitable distribution of affordable housing opportunities throughout the city, with a focus on incentivizing or requiring Affordable Housing in Higher Opportunity Areas.

Programs 48, 65 and 121: Create a tailored set of streamlining and development incentives to prioritize 100% affordable housing projects. Expand where mixed-income projects may be created, with a particular focus in Higher Opportunity Areas, by 2024. Introduce context specific reforms to zoning and land use practices to increase housing choices and affordability, particularly in Higher Opportunity Areas (see figures in Chapter 4, the candidate sites for rezoning in Appendix 4.7 and associated website maps). Target more than half of rezoning efforts in Higher Opportunity Areas.

The proposed Low-Rise Ordinance implements Strategy D by directly expanding the areas of the City in which mixed-income projects can be created. The Low-Rise Ordinance further supports this goal by focusing these eligibility expansions in Moderate and Higher Opportunity Areas, creating housing capacity tied to affordability in areas of the City with greater health, education, and economic outcomes. The Ordinance additionally furthers Strategy A by offering additional FAR and Height incentives for projects providing three-bedroom units to increase the availability of large family units.

The SB 79 Phased Implementation Ordinance supports Strategy D by enacting permanent and temporary exemptions that permit the City additional time to make considerations regarding the equitable distribution of affordable housing opportunities within the City. Instead of defaulting to minimum affordability standards required by SB 79 effective July 2026, the ordinance exemptions allow the City additional time and discretion to tie housing capacity growth to value capture strategies that incentivize affordable housing in areas aligned with City goals.

The Framework Element

The proposed Low-Rise and SB 79 Phased Implementation Ordinances are both consistent with and implement the long-range growth goals, objectives, and policies of the Framework Element of the General Plan (adopted in 1996). This section contains a discussion showing the consistency between the Program 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, single-family neighborhoods, transit stations, urban form and neighborhood design, open space and conservation, economic development, and housing. 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 update the Housing Element of their General Plan every eight years to accommodate a share of their region's projected growth. This process is based on the City's RHNA allocation, which quantifies the need for housing within that jurisdiction over an eight year planning period. In 2020, the Southern California Association of Governments (SCAG) determined that the City must accommodate a RHNA allocation of 456,643 housing units, including 184,721 units at lower income levels. While this number of housing units exceeds the Framework Element's 2010 estimates that corresponded with SCAG's forecast for that year, the current RHNA allocation reflects a 2029 time horizon. The Framework Element is a plan to accommodate future growth – the population and housing estimates noted in the plan do not represent maximum or minimum levels of permitted growth. The Framework Element's estimated population and household figures for 2010 have yet to be reached and remain relevant, as do the Framework policies, even if housing needs anticipated by the RHNA exceed these figures.

The Low-Rise Ordinance is within the scope of the impacts analyzed within the Citywide Housing Incentive Program and would support the construction of homes consistent with the RHNA targets and Program 121 (RHNA Re-Zoning) of the 2021-2029 Housing Element. The Phased Implementation Ordinance does not increase the number of permitted homes, as it defers the impacts of Senate Bill 79 until a year after the next housing element, permitting time for the adoption of local implementation programs. Therefore, the Program's growth and capacity targets are not inconsistent with the Framework Element goals, policies and objectives. The Program accommodates the City's forecasted growth and existing need for housing and does not induce unplanned growth. More information on this can be found in the CEQA Findings section of this staff report.

Land Use

The Program is consistent with respect to the General Plan Framework Element's goals, objectives, and policies related to **Land Use**.

The Low-Rise Ordinance is consistent with the Framework Element's goals regarding Land Use. Since the MIIP does not alter the underlying land use of parcels to increase housing supply, but rather incentivizes additional housing where already permitted, the land use will remain balanced citywide except where the unbalanced lack of housing in Higher Opportunity Areas near quality transit will be corrected.

The SB 79 Phased Implementation Ordinance also supports the Framework Element's goals regarding land use by allotting the City more time to phase implementation of SB 79 in a strategic manner that considers existing underlying land use, neighborhood characteristics, supporting infrastructure and public services, market conditions, and historic resources.

With regard to 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 3.2.1 Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.

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.

Policy 3.2.3 Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.

Policy 3.2.4 Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.

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.

Low-Rise Ordinance

The Low-Rise Ordinance supports and is consistent with the Framework Goal 3A and its associated policies and objectives. The ordinance's expansion of the Low-Rise Incentive Area eligibility into lower-density zones within Opportunity Station Areas is in line with Goal 3A's first direction to balance land uses, as well as more equitably distribute public resources, such as affordable housing. The proposed amendments acknowledge that a focus on Moderate and Higher Opportunity Areas needs to be balanced with other growth considerations outlined in the Framework Element, including the importance of locating new housing near high-quality transit and jobs while avoiding hazardous and ecologically sensitive areas. For these reasons, the MIIP is not applicable in newly-defined Fire Restriction Areas, areas vulnerable to Sea Level Rise or the Coastal Zone

The Low-Rise Incentive framework that grants higher-scaled Incentives for housing nearest transit and the expansion of eligibility to lower-density zoned sites within Opportunity Station Areas advance Framework Element Policy 3.1.6 and Objective 3.2's emphasis on bringing housing closer to transit and job centers. This will aid in reducing vehicular trips, vehicle miles traveled, and corresponding air pollution. Overall, the Program seeks to support the vision of an equitable, livable, and sustainable city that meets the needs of the population through a thoughtful, balanced distribution of different housing types.

Objectives 3.3 and 3.4 are furthered by the Low-Rise Ordinance, which encourages housing at different densities, sizes, and affordability levels citywide to meet the housing needs of a diverse population around rail and bus transit. The Ordinance promotes low-rise building typologies (2-4 stories) but does not propose changes to the underlying zoning or land use which are used as the basis for new incentives, consistent with Framework Element Policy 3.4.1 and Policy 3.1.4 to accommodate growth in accordance with the designated land use and density of the Framework Element's Long-Range Land Use Diagram. Incentives largely encourage intensification of existing residential zones, maintaining commercial use limitations in place along primary transit corridors. Due to the ordinance's provision granting Low-Rise Incentive Area eligibility to sites otherwise ineligible for temporary exemption, non-residential zones may experience expanded intensification of residential uses. However, these zones will be in proximity to quality transit, and therefore the corresponding residential use expansion is aligned with part (b) of Policy 3.4.1.

The Low-Rise Ordinance incentivizes stable growth in areas with transportation and stronger resources typical of Moderate and Higher Opportunity Areas. Since new housing is being incentivized near transit infrastructure and in Moderate and Higher Opportunity Areas, it is

anticipated that this new development would be served by sufficient public infrastructure and services in the city.

Low-Rise Incentive Area Projects are required to comply with performance standards that enforce pedestrian-oriented design, including standards for street-facing entrances, reductions in required yards, regulation of the location of open space and parking on-site. These required design components ensure that projects emphasize pedestrian access in areas nearest to quality transit (Policy 3.2.3). Projects compliant with program standards are processed by-right consistent with Policy 3.4.3.

The ordinance also brings forward provisions that support Policies 3.2.1, 3.2.2, and 3.2.4 to consider surrounding use and scale in the integration of housing into newly eligible neighborhoods. Using the Low-Rise Incentive Area as a vehicle for the first phase of capacity expansion ensures that neighborhood scale is regulated in the process of adding density to lower-scale neighborhoods, requiring structured design standards and scaled limitations in FAR and height that correspond to lower-density neighborhoods and distance from transit. Though incentives linked to TCAC neighborhood designations typically apply at the tract level in the existing MIIP incentive areas, opting to structure the eligibility expansion per Opportunity Station Areas, which comprise the entirety of the half-mile buffer of a transit station, creates consistency in the built environment even when census tracts divide corridors and neighborhoods. Extending program eligibility for sites in Fire Restriction Areas or the Coastal Zone that are adjacent to MIIP eligible sites not within a Fire Restriction Area or the Coastal Zone further supports these goals by allowing for consistency of maximum development potential within a block. Lastly, changing the mapping frequency of TCAC Opportunity Areas from annually to every five years will increase the consistency of available incentives within a specific area from year to year and within the Housing Element planning period, further supporting considerations of surrounding scale and use in adding housing capacity.

SB 79 Phased Implementation Ordinance

The proposed SB 79 Phased Implementation Ordinance supports and is consistent with the Framework Goal 3A and its associated policies and objectives. By codifying both permanent and temporary exemptions, the ordinance allows the City more time to make a plan for full implementation of SB 79 that honors these considerations of context specific and equitable integration of land uses. The proposed ordinance facilitates a physically balanced distribution of land uses that contributes to the City's long-term fiscal and economic viability while ensuring the conservation of existing residential, commercial, and industrial areas. By opting for a local phased implementation of SB 79 instead of immediate effectuation, the action allows for land use categories and boundaries to be maintained for future refinement consistent with Framework priorities. This strategic approach ensures that projected population and employment growth is accommodated in a manner that is supported by transportation, utility infrastructure, and public services (Objectives 3.2 and 3.3).

Single-Family Neighborhoods

The Program is consistent with the goals, objectives, and policies related to **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 3.5.2 Require that new development in single-family neighborhoods maintains its predominant and distinguishing characteristics such as property setbacks and building scale.

Policy 3.5.4 Require new development in special use neighborhoods such as water-oriented, rural/agricultural and equestrian communities to maintain their predominant and distinguishing characteristics. (P1, P18)

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.

The proposed expansion of the Low-Rise Incentive Area incentives into single-family zones within the Opportunity Station Areas is consistent with the Framework Element single-family preservation goals, objectives and policies in that it permits new development in balance with the existing architectural context. The Low-Rise Incentive Area offers scaled building envelopes (FAR and height), as well as tailored design standards for open space, street-facing entrances, and location of parking that are crafted to correspond to a single-family neighborhood scale. The Low-Rise ordinance would amend a setback incentive to require a 15 foot front yard in lieu of the 10 foot front yard previously set by the CT program. The current front yard requirement in most single family zones is currently 20 feet or prevailing. The change to a 15 foot front yard responds to the significant expansion of the Low-Rise Incentive Area from 750 feet off a commercial corridor to all low density zones within a ½ mile radius of a TOD stop. The additional

front yard facilitates new multi-family development while preserving the predominant and distinguishing characteristics of single-family neighborhoods, aligned with Policies 3.5.2 and 3.6.1.

Additionally, Incentives offered in the Low-Rise Incentive Area are scaled according to distance from the Opportunity Corridor or Opportunity Station, with maximum density, FAR, and height decreasing the farther the project is from the qualifying point of transit. In this way, the Low-Rise Incentive Area is designed to facilitate a transition between uses (Objective 3.6) that is highly responsive in scale to neighborhood context, adding density without compromising the visual and physical character of single-family neighborhoods (Policy 3.6.1). Any development standards within overlays will still be applicable to these sites unless a Base Incentive offers relief from a standard, or an overlay development standard otherwise applicable to a site physically precludes the building envelope guaranteed by Low-Rise Incentive Area base incentives. Overlay development standards designed to maintain distinguishing characteristics of special use neighborhoods will be enforced for Low-Rise Incentive Area Projects in alignment with Policy 3.5.4. Further, where intensification of lower density areas is proposed through the Low-Rise Ordinance, it is in alignment with other Framework policies regarding transit, transitions, and equitable distribution of public resources like affordable housing.

Multi-Family Neighborhoods

The Program is consistent with the goals, objectives and policies related to Multi-Family Neighborhoods in the General Plan Framework Element. 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.

The proposed Program is consistent with the Framework Element in that it encourages multifamily housing that enhances quality of life. The Low-Rise Ordinance contains programs that promote new multifamily mixed-income housing, in areas near transit stations, jobs, and in Opportunity Station Areas.

Industrial

The Program is consistent with the goals, objectives and policies related to industrial lands in the General Plan Framework Element. With respect to industrial lands, the General Plan Framework Element states the following:

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

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

Policy 3.14.1 Accommodate the development of industrial uses in areas designated as "Industrial-Light," "Industrial-Heavy," and "Industrial-Transit" in accordance with Tables 3-1 and 3-9. The range and intensities of uses permitted in any area shall be determined by the community plans. (P1, P18)

Policy 3.14.4 Limit the introduction of new commercial and other non-industrial uses in existing commercial manufacturing zones to uses which support the primary industrial function of the location in which they are located. (P1, P38)

Low-Rise Ordinance

The MIIP currently excludes eligibility of industrial-zoned land. At the time of this report, the Department is awaiting guidance on the bill's applicability to industrial land which, in Los Angeles' regulatory framework, permit commercial uses. Though pending written guidance from HCD, per GCS 65912.157(a), SB 79 is permitted on "any site zoned for residential, mixed, or commercial development" within a half-mile of eligible TOD stops, and due to the allowance of commercial uses in the City's industrial zones, these sites could be eligible for the bill. Sites located within areas meeting the bill's criteria for industrial employment hubs pursuant to GCS 65912.160(e)(2), including compliance with the date of designation in the City's general plan, are able to be exempted from eligibility through the Phased Implementation Ordinance (as described below). However, due to the proposed provision allowing Low-Rise Incentive Area eligibility for any site that is ineligible for temporary exemption (12.22 A.38.(c)(10)(i)), certain industrial zoned sites may gain program eligibility if SB 79 industrial site eligibility is affirmed. In the case that industrial lands are deemed eligible, the Department recommends enacting procedural restrictions on industrial sites eligible for the Low-Rise Incentive Area, including mandating a discretionary review process and/or expanded environmental mitigation measures. In addition to mitigating negative health impacts, these procedures seek to preserve the city's industrial lands by limiting non-industrial uses (Policy 3.14.4) while still ensuring the City remains compliant with state residential use requirements. For further analysis on SB 79 applicability to industrial areas in the City, refer to the Senate Bill 79 Discussion of this Findings section and to Appendix 3 of this Staff Recommendation Report.

SB 79 Phased Implementation Ordinance

The SB 79 Phased Implementation Ordinance supports the Framework Element's goals for retention of industrial lands through enacting a permanent exclusion for industrial employment hubs, which are defined by GCS 65912.160(e)(2) as areas of at least 250 contiguous acres dedicated as employment lands areas by the General Plan that are primarily dedicated to industrial land and where housing is not a permitted use. By enacting this permanent exclusion, the ordinance preserves crucial industrial land, maintaining existing economic opportunity tied to industrial land in alignment with Objective 3.14 and Policy 3.14.4. For further analysis on SB 79 applicability to industrial areas in the City, refer to the Senate Bill 79 Discussion of this Findings section and to Appendix 3 of this Staff Recommendation Report.

Transit Stations

The Low-Rise Ordinance is consistent with the intent of the General Plan Framework Element to encourage new development in proximity to **rail and bus transit stations**. This considerable mix of uses should 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:

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

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

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

Policy 3.15.4 Design and site new development to promote pedestrian activity and provide adequate transitions with adjacent residential uses.

The proposed Low-Rise Ordinance is consistent with the Framework Element in that it expands density through mixed-income multi-family residential development within Opportunity Station Areas that have access to quality transit. The Low-Rise Incentives are designed to provide a transition in density and project scale from Opportunity Corridors and Opportunity Stations to lower-density neighborhoods, thereby balancing the distribution of housing consistent with

existing density contexts and Objective 3.15. With regard to Framework Element Policy 3.15.4, the Low-Rise Incentive Area specifically incentivizes development near transit to promote walkability, requires adequate residential transitions, and imposes performance standards regulating open space, location of parking, yard reductions, and frontage requirements to promote a more vibrant and walkable streetscape.

Historic Districts

The Program includes sufficient historical resource protections to be consistent with the how the General Plan Framework Element seeks to balance the benefits of **historic assets** with the need for new housing capacity, as stated in the following goal and policy:

Framework Goal 3M

A City where significant historic and architectural districts are valued.

Objective 3.17 Maintain significant historic and architectural districts while allowing for the development of economically viable uses.

Policy 3.17.2 Develop other historic preservation tools, including transfer of development rights, adaptive reuse, and community plan historic preservation policies.

Low-Rise Ordinance

The Low-Rise Incentive Area excludes any Historic Preservation Overlay Zones (HPOZs) and sites with Historic Cultural Monuments (HCM) within Opportunity Station Areas unless the site was previously eligible for the program due to proximity to an Opportunity Corridor, promoting preservation of the City's historic resources. For state and national historic sites, the Low-Rise Incentive Area balances streamlined review processes and tailored incentives with protections for Designated and Eligible Historic Resources, requiring minimum historic review processes consistent with State Law while also including additional demolition and review protections for Designated and Surveyed Historic Resources. Furthermore, eligible historic projects are limited to LR-1 incentives to ensure compatibility with neighborhood scale.

SB 79 Phased Implementation Ordinance

The SB 79 Phased Implementation Ordinance enacts temporary exemptions for sites with local historic resources designated as of January 1st, 2025. This pause in implementation for historic resources allows the City additional time to develop a Local Alternative Plan that factors in tailored considerations for the preservation of historic resources that are aligned with these goals.

Housing

The proposed Program is consistent with the policies and objectives of the Framework Element **Housing** section, which provides much of its overall policy direction. 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:

Framework 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 4.1.4 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 4.1.9 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 Low-Rise Ordinance supports and is consistent with the Framework Element housing goal 4A as it strongly promotes a more equitable distribution of housing opportunities, with Low-Rise Incentive Area eligibility expanded to all sites within Opportunity Station Areas. As identified in the 2021-2029 Housing Element, affordable housing unit production has been heavily concentrated in Lower Opportunity Areas of the city. As such, the amendments to expand Low-Rise Incentive Area eligibility to previously ineligible single-family zoned sites in Opportunity Stations expands access to affordable housing and provides for a more equitable distribution of mixed-income development. By expanding eligibility in areas that have not previously permitted multi-family development, the Low-Rise Ordinance aligns with the Framework's Objective 4.1 and associated policies with its focus on planning to provide a supply of housing available at affordable types and costs while alleviating overconcentration of affordable housing and overcrowding.

The Low-Rise Incentive Area establishes Incentives to encourage a wider variety of housing types in lower-density neighborhoods by providing tailored Incentives for mid-scale development. The Incentives offered in the Low-Rise Incentive Area are crafted to integrate into existing neighborhood contexts, by offering height and FAR maximums in exchange for Incentives. Expanding eligibility for the Low-Rise Incentive Area will in turn expand the geography in which these Incentives can be applied, diversifying the variety of affordable housing typologies in lower-density neighborhoods while retaining scale that corresponds to surrounding low-density contexts in transition from the qualifying transit station. Furthermore, the Low-Rise Incentive Area will continue to center transit as a key location for growth in alignment with Objective 4.2, as stated in previous findings.

The ordinance also increases feasibility of the development family-size units in alignment with Policy 4.1.4 and 4.1.7. The current Multi-Bedroom Incentive grants additional FAR and height to projects providing 40% of total units as three or more bedrooms. The ordinance proposes to reduce this threshold to 20% to increase feasibility in response to developer feedback, and ultimately to encourage more development of family-sized units in conjunction with the eligibility expansion.

Streamlining and reducing development barriers is a key component of the Low-Rise Incentive Area policy framework, and aligns with Objective 4.4 and associated policies of the Framework Element. Access to the highest level of streamlined procedural review is provided to the Low-Rise Incentive Area in exchange for the public benefit of more affordable housing. Due to the curated Base Incentives and performance standards that ensure appropriate scale of development in lower-density contexts, projects utilizing the Low-Rise Incentive Area are ineligible to request Waivers or off-menu Incentives, and therefore are processed directly by Zoning Review without the standard ministerial Planning review process.

Urban Form and Neighborhood Design

The proposed Low-Rise Ordinance is consistent with the goals, objectives, and policies in respect to **Urban Form and Neighborhood Design** through the Low-Rise Incentive Area's current framework of tailored Base Incentives and performance standards. The General Plan Framework Element states the following regarding Urban Form and Neighborhood Design:

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.

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 5.2.1 Designate centers and districts in locations where activity is already concentrated and/or where good transit service is, or will be, provided.

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 5.7 Provide a transition between conservation neighborhoods and their centers.

Policy 5.7.1 Establish standards for transitions in building height and for on-site landscape buffers. (P18, P24, P25)

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 Low-Rise Ordinance 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 proposed Low-Rise Ordinance encourages a range of densities and scaled outcomes with Incentives that balance the need for more housing and quality urban form. The designation of Opportunity Station Areas for increased density aligns with Objective 5.2 to encourage transit-oriented development that function as centers for surrounding neighborhoods, the community, and the region, by offering building volume incentives within a ½ mile of heavy rail, light rail, and eligible bus only lanes. The program offers scaled heights ranging between 2-3 stories based on the proximity to and quality of transit, with potential for an additional story with the provision of family sized units.

Additionally, expanding Low-Rise Incentive Area eligibility within Opportunity Station Areas supports Objective 5.7 by increasing density around transit in a way that decreases in FAR and height further from the Opportunity Station, enabling a deliberate transition between lower-density neighborhoods and their higher-intensity centers with an SB 79 qualifying transit station.

The Framework Element also includes Objective 5.8 and Policy 5.8.3 to create pedestrian oriented areas and reduce parking. There are no required parking minimums for projects utilizing the Low-Rise Incentive Area, which supports this goal. Furthermore, the Low-Rise Incentive Area includes requirements for open-space provision and street-facing entrances intended to enhance pedestrian-oriented neighborhood design, including allowing common open space within the front yard or through provision a courtyard open to the street.

Open Space and Conservation

The proposed Low-Rise Ordinance is consistent with the goals, objectives, and policies in respect to **Open Space and Conservation** through enforcing performance standards around the design of open space. The General Plan Framework Element states the following regarding Open Space and Conservation:

Framework Goal 6A

An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses.

Objective 6.4 Ensure that the City's open spaces contribute positively to the stability and identity of the communities and neighborhoods in which they are located or through which they pass.

Policy 6.4.4 Consider open space as an integral ingredient of neighborhood character, especially in targeted growth areas, in order that open space resources contribute

positively to the City's neighborhoods and urban centers as highly desirable places to live

Low-Rise Incentive Area Projects are required to comply with open space standards that offer four different design typologies in which Common Open Space may be provided, including within a courtyard, paseo, front yard, or on the rooftop and intermediate levels. These open space design standards are curated to correspond to the surrounding lower-density neighborhood context while providing quality, functional open space for residents on site. Proposed amendments to these open space standards affirm the need for quality common open space while addressing feasibility challenges for projects building multi-family structures in lower-density neighborhoods, including allowing open space to be located in the front yard rather than the rear, and permitting rooftop and intermediate level open space with setback considerations for neighboring structures. Furthermore, projects are ineligible to request relief from open space design standards in conjunction with this program, ensuring open space remains a key component contributing to the stability and identity of neighborhoods experiencing housing capacity growth within Opportunity Station Areas (Policy 6.4.4).

Economic Development

The proposed SB 79 Phased Implementation and Low-Rise Ordinances are both consistent with respect to the Policies and Objectives related to Economic Development in the General Plan Framework Element. The proposed SB 79 Phased Implementation Ordinance upholds the Framework's goals of economic development by allotting the City additional time to design value capture strategies for effectuation of the bill that are responsive to market conditions of specific City geographies. By encouraging streamlined housing projects in areas of Moderate and Higher Opportunity and quality transit access, the Low-Rise Ordinance further supports the Framework's economic development priorities.

Regarding Economic Development, the Framework Element states the following:

Framework Goal 7A

A vibrant economically revitalized City.

Policy 7.2.3 Encourage new commercial development in proximity to rail and bus transit corridors and stations. (P1, P18)

Policy 7.2.4 Ensure that the City has enough capacity to accommodate the development of general commercial uses which support community needs in all parts of Los Angeles. (P1)

Objective 7.4 Improve the provision of governmental services, expedite the administrative processing of development applications, and minimize public and private development application costs.

Policy 7.4.1 Develop and maintain a streamlined development review process to assure the City's competitiveness within the Southern California region.

Policy 7.4.2 Maximize opportunities for "by-right" 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. (P1, P18)

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. (P1, P18)

Framework Goal 7H

A distribution of economic opportunity throughout the City.

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.

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

Low-Rise Ordinance

Framework Element Objective 7.4 encourages streamlined development procedures for a better business and economic environment citywide. The Low-Rise Incentive Area offers a by-right approval process for projects providing the public benefit of affordable housing in an effort to lower costs linked to the development process overall, while also closing the financial gap specific to affordable housing development. The expansion of Low-Rise Incentive Area eligibility will increase the number of parcels and geographies within the City that have access to this highest level of streamlining, increasing the feasibility of mixed-income affordable housing development through streamlined review in new areas of the City.

The Framework Element recognizes the critical link between economic development and housing, particularly between jobs and housing. The proposed Low-Rise Ordinance is consistent with the Framework Element Objectives 7.9, 7.10 and related policies in that it aims to enable the City's workforce to both live and work in the City. The eligibility revisions encourage an ample supply of housing for residents and workers to expand the range of available housing types at different costs, including both affordable and market rate housing in areas with transit stations and a range of employment opportunities. The mixed-income structure of affordability requirements in the Low-Rise Incentive Area aims to boost feasibility of affordable housing production without reliance on subsidies, in line with Framework Policy 7.9.1. The Low-Rise Ordinance alleviates housing concentration by promoting an emphasis on those portions of the City which historically have not received a proportional share of housing opportunities, and will Affirmatively Further Fair Housing near employment and educational resources. Furthermore, expanding housing capacity near transit stations will support economic vitality and build capacity for commercial amenities consistent with policies 7.2.3 and 7.2.4. The Low-Rise Incentive Area also expands opportunities for affordable for-sale, low-scale housing in single-family neighborhoods, aligning with the emphasis on various priced for-sale housing options as stated in Policy 7.9.3.

SB 79 Phased Implementation Ordinance

The proposed SB 79 Phased Implementation Ordinance supports a vibrant and economically revitalized City by ensuring that housing production remains tied to locally calibrated value capture strategies that encourage appropriate development. By enacting permanent and temporary exemptions in order to phase the implementation of SB 79, the City can more effectively use program resources to encourage housing and employment generation areas that are aligned with citywide priorities (Objective 7.10). This pause on full SB 79 implementation allows the City additional time to implement a localized approach specifically tailored to Los Angeles' unique market dynamics, ensuring that new development contributes to the City's long-term fiscal health and equitable economic growth.

Other General Plan Elements

The proposed SB 79 Phased Implementation and Low-Rise Ordinances are consistent with the purpose, intent, and provisions of the General Plan in that they implement policies contained in a number of other General Plan Elements, including the:

- Circulation Element (Mobility Plan 2035)
- Health Element (Plan for a Healthy Los Angeles)
- Air Quality Element
- Conservation Element
- Safety Element
- Public Facilities and Services Element
- Land Use 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 supported by and consistent with the proposed Low-Rise Ordinance, including:

Mobility Element Goal 3

Access for All Angelenos.

Objective 3.1 Ensure that 90% of households have access within one mile to the Transit Enhanced Network by 2035.

Objective 3.3 Increase the percentage of 0/1 car ownership (car-light) households from 50% currently to 75% by 2035.

Policy 3.3 Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services

Objective 3.8 Increase the combined mode split of persons who travel by walking, bicycling or transit to 50% by 2035.

Mobility Element Goal 5

Clean Environments and Healthy Communities.

Objective 5.1 Decrease VMT per capita by 5% every five years, to 20% by 2035.

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

The proposed Low-Rise Ordinance supports the strong link between residential land uses and transportation. 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 while reducing Vehicle Miles Traveled per capita, which aligns with Mobility Objective 5.1, Policy 5.2. Consistent with AB 2097 and AB 2334 and in alignment with Objective 3.3, Policy 3.3, no projects proposed under the Low-Rise Incentive Area require parking, thereby increasing the public transit user base. Increasing housing capacity within Opportunity Station Areas will increase the number of residents who can accessibly travel by walking, bicycling, or by transit, aligned with Objective 3.8. 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 Low-Rise and SB 79 Phased Implementation Ordinances are consistent with the Health Element and furthers the following goals, objectives, and policies:

Health Element Goal 1

Los Angeles, a Leader in Health and Equity

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

Policy 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 5.1 Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.

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

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

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.

Low-Rise Ordinance

The proposed Low-Rise Ordinance is consistent with the Health Element goals, objectives, and policies related to housing in the City in that it encourages housing development that is oriented around health, economic stability, and well-being. As previously stated, expansion of Low-Rise Incentive Area eligibility increases housing opportunities near transit, which promotes decreased per capita greenhouse gas emissions and improved air quality due to reduced car usage as a mode of transportation (Policy 5.7). The Low-Rise Incentive Area further promotes a healthy built environment through required design standards around common open space and pedestrian-oriented entrances (Policy 2.2).

These amendments also expand housing capacity in Moderate and Higher Opportunity Areas, working to reduce the debilitating effects of poverty on welfare by providing more affordable housing options in areas with stronger life outcomes that have underproduced it, thereby implementing Health Element Policy 1.6. By adding housing capacity in the first phase of implementation within Moderate and Higher Opportunity Areas that have historically underproduced multi-family housing options, displacement risk within established higher-density multi-family areas is reduced, aligning with Health Element Policy 1.7.

The preservation of social and cultural resources (Policy 1.7) is also prioritized in this ordinance through the exclusion of HPOZs and HCMs within Opportunity Station Areas unless the site was previously eligible for the program due to proximity to an Opportunity Corridor, further restricting historic resource demolition and enforcing guardrails in procedures and Incentives for these eligible historic sites near Opportunity Corridors.

Additionally, the expansion of housing capacity through the Low-Rise Incentive Area framework restricts environmentally sensitive sites, including Fire Restriction Areas, Sea Level Rise Areas, and the Coastal Zone. These restrictions promote community health and well-being aligned with Health Element Policy 5.4. As discussed in this Staff Recommendation Report, the Department awaits guidance on the allowance of SB 79 in industrial zones. If HCD advises that industrial land is eligible, the Department recommends processes be developed to ensure environmental review and remediation for any industrial site proceeding under SB 79 authority, including but not limited to establishing discretionary processes and/or expanding the rules and procedures associated with local environmental protection measures. Establishing these procedural safeguards ensures that any project on an industrial or manufacturing zone that might gain access to the Low-Rise Incentive Area bonuses pursuant to section 12.22 A.38(c)(10)(i) of the draft Low-Rise Ordinance would need to conduct environmental review to mitigate health and safety impacts. This approach is consistent with Policy 5.2 and 5.4 of the Health Element to ensure land use allowances do not exacerbate existing or create new negative health impacts.

SB 79 Phased Implementation Ordinance

Permitting full effectuation of SB 79 in July of 2026 would have immediately permitted full SB 79 development in areas that may have negative health impacts, including areas sensitive to fire

risk and heavy industrial areas with potential noxious uses, as well as on sites with cultural and social resources that may warrant preservation considerations. Opting for a phased implementation of SB 79 as made effective by the proposed SB 79 Phased Implementation Ordinance allots the City more time to plan for added housing capacity with community health and preservation of cultural resources uplifted as core considerations in the decision-making process.

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 SB 79 Phased Implementation and Low-Rise Ordinances are consistent with the City's Air Quality Element and furthers the following goals, objectives, and policies:

Air Quality Element Goal 1

Good air quality and mobility in an environment of continued population growth and healthy economic structure.

Air Quality Element Goal 2

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

Objective 2.1 Reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.

Air Quality Element Goal 3

Efficient management of transportation facilities and systems infrastructure using cost-effective system management and innovative demand-management techniques.

Objective 3.1 Increase the portion of work trips made by transit to levels that are consistent with the goals of the Air Quality Management Plan and the Congestion Management Plan.

Objective 3.2 Reduce vehicular traffic during peak periods.

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 4.2.3 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.

Low-Rise Ordinance

The proposed Low-Rise Ordinance is consistent with the Air Quality Element's goals, objectives, and policies related to housing development and reducing vehicle trips in the City in that it encourages housing locations near jobs and transit through the Low-Rise Incentive framework. The Low-Rise Incentive Area specifically focuses on pedestrian-oriented design in street-facing entrances, aligned with Air Quality Element Policy 4.2.3. The program facilitates high quality, healthy housing in neighborhoods that improves accessibility to jobs and services, deploying a transportation demand management strategy to reduce vehicle miles traveled (VMT) and therefore improve air quality (Objective 4.2).

SB 79 Phased Implementation Ordinance

As mentioned in previous findings, enacting a SB 79 Phased Implementation Ordinance will allow the City additional time to plan further for health impacts related to added housing capacity in future SB 79 implementation, including air quality considerations.

Conservation Element

The proposed Low-Rise and SB 79 Phased Implementation Ordinances further the objectives and policies of the Conservation Element, specifically related to cultural and historical sites. 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 Goal 1

A city that preserves, protects and enhances its existing natural and related resources.

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.

Low-Rise Ordinance

The proposed Low-Rise Ordinance is consistent with the Conservation Element in that it seeks to maintain and protect important cultural and historic resources (Policy 4.1). The Low-Rise Incentive Area excludes any HPOZs and HCMs within Opportunity Station Areas, unless the site was previously eligible for the program due to proximity to an Opportunity Corridor. For currently eligible sites and for resources on the California Register of Historic Resources and National Register of Historic Places, the Low-Rise Incentive Area utilizes the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) for review of projects proposing alterations to Designated Historic Resources. Furthermore, these projects are ineligible for the Incentives if demolition of a Designated Historic Resource is proposed and are limited to LR-1 incentives to ensure a neighborhood context.

The Low-Rise Incentive Area also offers protections to eligible or Surveyed Historic Resources, requiring any Surveyed, eligible, or architectural historic resource identified for any protection or special consideration or review by an applicable Overlay or Specific Plan (South Los Angeles CPIO, Southeast Los Angeles CPIO, West Adams CPIO, San Pedro CPIO, Westwood Village Specific Plan, Echo Park CDO District, and North University Park Specific Plan) to be compliant with the Standards.

SB 79 Phased Implementation Ordinance

The proposed SB 79 Phased Implementation Ordinance is consistent with the Conservation Element in that it enacts temporary exemption on local historic sites that would otherwise have been immediately eligible for full SB 79 incentives. The additional time allotted through the proposed ordinance allows the City to continue to increase housing capacity within locally designed eligibility guardrails for historic sites, supporting the Conservations Element's goals of historic preservation.

Safety Element

The proposed SB 79 Phased Implementation and Low-Rise Ordinances are consistent with the goals and policies of the Safety Element regarding environmentally sensitive and hazardous sites, and sites that may be especially sensitive to climate change. The Safety Element details a policy direction to prevent, respond to, and recover from disaster events. Policies of the Safety Element include:

Safety Element 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.

Low-Rise Ordinance

The proposed Low-Rise Ordinance is consistent with the updated policies above in that it expands the Low-Rise Incentive Area eligibility while restricting eligibility for environmentally hazardous sites, including projects proposed in Fire Restriction Areas, the Coastal Zone, Sea Level Rise Areas, or on sites that may pose a hazardous risk to human health. The ordinance proposes updating MIIP eligibility from excluding any site within the VHFHSZ to excluding sites that are within both the VHFHSZ and a Hillside Area, newly defined as a Fire Restriction Area. The Fire Restriction Area exclusion aligns with the eligibility exclusion formerly in Executive Directive 1, and now codified within the Affordable Housing Streamlining Ordinance (Ordinance No. 188788) (LAMC 12.22 A.40).

Restricting development within Fire Restriction Areas ensures that areas most vulnerable to fire risk with substandard streets and ingress/egress challenges are shielded from added housing capacity that could create safety risks, while still allowing for redevelopment within adjacent urbanized flatlands that will strengthen structural resilience. The City has adopted fire hazard mitigation measures that are required for all projects in the VHFHSZ, pursuant to existing State Fire Code standard building standards and State Minimum Fire Safety regulations. With the incorporation of these state codes, development in the VHFHSZ will make structures more safe and create more fire resilient areas over time. This amendment also responds to the State's CAL FIRE expansion of the VHFHSZ, which would otherwise result in a loss of MIIP eligibility once locally adopted if unaddressed. The Fire Restriction Area eligibility update therefore complies with Policy 1.1.8 by considering hazard information in decisions about future land use, while still upholding risk reduction aligned with Policy 1.1.5.

SB 79 Phased Implementation Ordinance

Through enacting the proposed SB 79 Phased Implementation Ordinance, the City is able to temporarily exempt sites within VHFHSZs and areas within one-foot of sea level rise. The

ordinance further enables the City to attain additional time to make considerations around the extent of incorporation of sites within hazard areas in future implementation of SB 79, including sites within VHFHSZ.

Public Facilities and Services Element

The Public Facilities and Services Element contains several Master Plans for facilities and services of public interest in the City. It includes the Cultural and Historical Monuments Plan to guide the preservation of significant, beautiful, or interesting cultural and historic sites in The City of Los Angeles. The first objective in the Cultural and Historical Monuments Plan is:

Objective 1.1 To encourage the preservation and restoration of designated monuments.

See Conservation Element findings above for a discussion of consistency of Objective 1.1 with both the proposed SB 79 Phased Implementation and Low-Rise Ordinances.

Land Use Element

The Community Plans establish neighborhood-specific goals and implementation strategies to achieve the broad objectives laid out in the City's General Plan. Together, the 345 Community Plans make up the General Plan's Land Use Element, which plays an important role in bolstering housing and job opportunities, conserving open space and natural resources, and balancing different neighborhoods' needs. The Low-Rise Ordinance is consistent with the Land Use Element because it will not change the underlying zoning or land use of any parcels, but rather offers additional density and other relief from development standards as incentives in exchange for providing affordable units. The City has determined that the shortage of affordable housing is an ongoing crisis in Los Angeles, and the July 1st effectuation of SB 79 has enacted significant increases in maximum allowable density within SB 79 TOD zones. The increased intensity and density of proposed development from the Low-Rise Ordinance will be offset by the increase in affordable units. The ordinance conforms to the purpose of the Land Use Element by providing much needed housing near job centers and transit, and exceeding minimum capacity sufficient to enact a citywide phased implementation of SB 79 to ensure that the City has further time to plan and make decisions regarding land use considerations for specific geographies in future required SB 79 implementation. The SB 79 Phased Implementation Ordinance is consistent with the Land Use Element as it tailors the expansion of housing capacity to local land use goals. In particular it enables permanent exemptions from the provisions of SB 79 in certain industrial areas through a permanent exemption for areas meeting the criteria of industrial employment hubs as defined by the bill, which is consistent with the land use goals, policies, and objectives of the applicable Community Plans. The exemption of these areas will preserve eligible industrial land for job-generating industrial uses as envisioned and designated by the Community Plans. A full list of relevant goals, objectives, and policies, from the 14 Community Plans with sites in an industrial employment hub, that demonstrate how the

industrial employment hubs fulfill statutory requirements and local land use goals is provided beginning on page F-52.

C. Senate Bill 79 Discussion (California State Government Code Section 65912.155 – 65912.162)

Statutory requirements for Senate Bill 79 are delineated in Government Code Sections (GCS) 65912.155 - 65912.162. The law establishes minimum density standards for height, residential floor area ratio, and residential density for sites within 0.5 mile of a transit-oriented development stop creating a transit-oriented development zone (TOD zone) as defined by the statute, that permits residential, mixed, and commercial uses. The City estimates there are 145 TOD zones (139,450 sites) located wholly or in part within the City of LA boundaries. Consistent with GSC 65912.160(f), the Southern California Association of Governments (SCAG) as the metropolitan planning organization for the region is responsible for creating and maintaining an SB 79 eligibility map. At the time of the release of this report SCAG has not provided a ~~draft~~ or final TOD zone map. Parcels within these TOD zones that permit residential, mixed, or commercial uses and meet the eligibility requirements in GSC 65912.157 would be eligible for the zoning provisions of SB 79.

As permitted by the statute, the Phased Implementation Ordinance proposes to codify provisions allowing jurisdictions to permanently or temporarily exempt some of the eligible sites from SB 79 zoning allowances. Pursuant to GCS 65912.160(e), sites that qualify under this criteria would be permanently excluded from implementing the zoning provisions of SB 79. Consistent with GCS 65912.161(b)(1), the law also includes provisions to temporarily exempt qualifying sites from the otherwise effective date of July 1, 2026. The temporary exemption will continue until one year after the next state-mandated update to the housing element. Some of the temporary exemption criteria are applicable to individual sites, while other criteria are applicable to the entire TOD zone. The Phased Implementation Ordinance establishes mapping processes to authorize the Director of Planning to prepare maps indicating a site's eligibility for SB 79 and the permanent or temporary exemptions based on the criteria in the statute. Consistent with GCS 65912.160(c)(1) and 65912.161(b)(1), the sites eligible for permanent or temporary exemption will be indicated on a public facing map through the Zone Information and Map Access System (ZIMAS) on the Department's website. To review the maps identifying sites and TOD zones eligible for Phased Implementation, please refer to Exhibit 3, Maps 3A through 3M. To review the summary tables for the model results at a citywide, TOD zone, and individual site level, refer to Exhibit 4, Tables 1A through 1C.

The Phased Implementation Ordinance is the first step in establishing a framework for the phased implementation of SB 79, and intends, among other things, to ensure that the City's local implementation of SB 79 does not conflict with local land use and environmental concerns. The ordinance proposes to allow a temporary pause in the implementation of SB 79 consistent with the sites, TOD zone, and low resource criteria in GCS 65912.161(b), and proposes to codify exemptions from SB 79 for sites more than one-mile walking distance from a station or

within an industrial employment hub pursuant to GCS 69512.160(e). The Low-Rise Ordinance supports the phased local implementation approach, creating time to adopt a local transit-oriented alternative plan, pursuant to GCS 65912.161(a).

Sites Statutorily Exempt from SB 79 (California Government Code Section 65912.157(a))

Citywide, there are 139,450 parcels located within SB 79 TOD zones. Of these eligible sites, 3,976 or 2.93% are considered statutorily exempt from the provisions of the law, as they do not permit residential, mixed, or commercial uses (GCS 65912.157(a)). Sites which are zoned for Public Facilities and Open Space were not evaluated for local or SB 79 capacity as they do not permit residential or commercial uses as required by GCS 69512.157(a). There are instances throughout the City where sites may be zoned A1 or A2 and are assigned a general plan land use (GPLU) designation of Open Space. In general, sites zoned for A1 or A2 with an Open Space GPLU represent privately owned open spaces, such as cemeteries or golf courses. An example of such sites include the Forest Law Memorial Park adjacent to Griffith Park or the Van Nuys Golf Course located south of the Van Nuys Airport. Many of these sites are composed of multiple acres of land, of which, only a marginal portion may intersect with the half mile buffer of an eligible SB 79 TOD stop. Further, given the size of the parcels, a majority of the parcel may be located more than one mile walk from the eligible TOD stop. LAMC Sections 12.05.B “A1” Agriculture Zone, and LAMC 12.06.B “A2” Agriculture Zone state for lots designated as Public and Open Space on the land use map of the community plan, physical development in these areas should require action by the City Planning Commission pursuant to Sec. 13.B.2.3 (Class 3 Conditional Use Permit) and 13B.6.1 (Evaluation of Non-Compliance) of Chapter 1A of the LAMC. Open Space designations are intended, as stated in the Community Plans, which comprise the Land Use Element of the General Plan for the City, are designed to conform with the definition of Open Space Land in Article 10.5 of the State of California Government Code.¹ Article 10.5 of the California Government Code defines Open Space land as unimproved land for the purpose of preservation of natural resources and outdoor recreation, not for residential uses. While the A1 and A2 zones may allow a single family dwelling, when designated in tandem with the Open Space GPLU, the residential portion may be considered an ancillary use to the agricultural use, not a primary use. As a result, land zoned as A1 and A2 and designated with an Open Space GPLU have not been evaluated for local or SB 79 capacity.

As industrial zoned land in the City of LA permits commercial uses, the department has asked the California Department of Housing and Community Development to advise on their eligibility for SB 79, as eligibility is still uncertain, modeling evaluates capacity on industrial land unless the sites were identified as part of an industrial employment hub. Further, sites subject to the Rent Stabilization Ordinance (RSO) have also been included in the analysis for local and SB 79 capacity. GCS 65812.1157(h)(1) states a proposed development may not utilize the zoning provisions of SB 79 on sites with more than two units that would require the demolition of

¹ Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan, General Plan Land Use Map, Footnote 6
<https://planning.lacity.gov/odocument/4a114e79-e0d2-4add-abd9-b4f4219e4bd8/shrplanmap.pdf>

housing subject to the RSO. This has been interpreted as a project level exemption, with no application to the criteria outlined in GCS 65912.161(b)(1), and jurisdictions should include sites subject to RSO in the analysis for determining eligibility for temporary exemption. The following sections demonstrate the analysis performed to identify sites that comply with the permanent or temporary exclusion criteria consistent with state law.

Permanent Exclusions (California Government Code Section 65912.160(e))

Pursuant to GCS Section 65912.160(e)(1) and 65912.160(e)(2), a local jurisdiction is permitted to permanently exclude parcels through the adoption of an ordinance within a TOD zone if the sites meet one of the following criteria:

- Sites where no walking path of less than one mile from that location to the transit-oriented development stop (GCS 65912.160(e)(1)).
- Sites designated as industrial employment hubs in cities with at least 15 transit-oriented development stops. An industrial employment hub shall be a contiguous area of at least 250 acres designated in the jurisdiction's general plan on or before January 1, 2025, as an employment lands area; the parcels within it shall be primarily dedicated to industrial use as defined in paragraph (3) or subdivision (f) of Section 65912.121 and housing shall not be a permitted use on any of the sites so excluded (GCS 65912.160(e)(2)).

Exhibit 4, Table 1A summarizes the count of sites eligible for permanent exclusion from SB 79. Exhibit 3, Maps 3A-3B visualize the sites eligible for permanent exclusion from SB 79. The final count of sites eligible for permanent exclusion cannot be finalized because it is dependent on SCAG's final map of TOD Zones, which has not been published as of the release of this report. SCAG has confirmed that the final map's anticipated release will not occur until July 2, 2026 - after SB 79's July 1, 2026 effective date and the City's adoption of the Low-Rise and Phased Implementation Ordinances. As such, further parcel identification will be needed in the future to align with SCAG's final map, consistent with the Director of Planning's authority to update SB 79 eligibility maps (Section 3 of SB 79 Phased Implementation Ordinance; LAMC Section 12.22 A.38 (j)(7)(i)(c).)

One Mile Walking Path

SB 79 permits permanent exclusions for sites that do not have a walking path of less than one mile to the TOD stop (GCS 65912.160(e)(1)). The one-mile walkability distance is measured by analyzing the street network within TOD zones utilizing ArcGIS Network Analyst and LA County TIGER. Natural impediments to walkability that are within the one-mile buffer around TOD zones are excluded from the qualifying walkable street network, including highways, railroads, hillside areas, waterways and subdivision neighborhoods with no road connectivity. After these exclusions for impediments to walkability, the walking distance along the street network deemed walkable from the TOD stop to the site is calculated. Sites that have a mile or more distance

along the walkable street network are determined as eligible to be permanently excluded from SB 79. Based on the analysis described above, 341 sites, approximately 0.28% of eligible sites do not have a walking path of less than one mile to a TOD zone, and meet the criteria for this permanent exclusion. Exhibit 3, Map 3A visualizes the sites eligible for this permanent exclusion pursuant to GCS 65912.160(e)(1). Exhibit 4, Table 1A lists the sites eligible for this permanent exclusion.

Industrial Employment Hubs

SB 79 allows for the permanent exemption of areas identified as “industrial employment hubs” which meet the criteria specified in GCS 65912.160(e)(2). This provision specifies multiple criteria which the industrial employment hubs must meet. First, the exemption may only be utilized in cities with at least 15 transit oriented development stops. Second, the exempted “hub” must include “a contiguous area of at least 250 acres designated in the jurisdiction’s general plan on or before January 1, 2025, as an employment lands area”. Third, the parcels within it shall be primarily dedicated to industrial use as defined in paragraph (3) or subdivision (f) of Section 65912.121. Lastly, “housing shall not be a permitted use on any of the sites so excluded.” Further description of these requirements is provided in Table 3 below. Mapping analysis of industrial land of the city has identified six areas which meet the criteria for industrial employment hubs, including areas in Downtown/Southeast Los Angeles, Atwater/Cypress Park, Pacoima, Northridge, Chatsworth, and areas around LAX (for additional information on the industrial employment hubs in Los Angeles, please see Appendix 3 of this Staff Recommendation Report). For a detailed summary of Industrial Employment Hub Analysis see Appendix 3.

Table 3: Industrial Employment Hub Requirements per GCS 65912.160(e)(2)

<i>Requirement</i>	<i>Description</i>	<i>Methodology</i>
“A local government with at least 15 transit-oriented development stops designates the area as an industrial employment hub.”	Cities must have at least 15 TOD stops to designate areas as industrial employment hubs.	Conducted mapping to identify 145 TOD stops within the City.
“An industrial employment hub shall be a contiguous area of at least 250 acres designated in the jurisdiction’s general plan on or before January 1, 2025, as an employment lands area;”	Hubs must be a contiguous area of at least 250 acres of employment related land-uses.-	Conducted mapping analysis to assess contiguity and reviewed Framework and Land Use Elements as well as the Industrial Land Use Policy. Includes Industrial, and in limited instances,

		Commercial land uses intended for industrial employment growth.
“The parcels within it shall be primarily dedicated to industrial use as defined in paragraph (3) of subdivision (f) of Section 65912.121;”	Hubs must be primarily dedicated to industrial uses as defined by GCS 65912.121(f)(3) which defines “dedicated to industrial use” to mean any of the following: (1) the square footage is currently being used as an industrial use, (2) the most recently permitted use of the square footage is an industrial use, and the site has been occupied within the last three years, or (3) the site was designated for industrial use in the latest version of a local government’s general plan adopted before January 1, 2022, and residential uses are not principally permitted on the site.	Assessed zoning and land uses within areas identified as contiguous, including sites across a right-of-way and the LA River. Existing uses verified on some sites.
“...Housing shall not be a permitted use on any of the sites so excluded.”	Hubs cannot include sites which <u>principally</u> permit housing per the underlying zoning.	Assessed assigned industrial zoning within areas to identify <u>principally</u> permitted uses, including residential

To identify these six hubs, industrial land in the City was analyzed for compliance with each of the various components of GSC 65912.160(e)(2). In order to utilize the industrial employment hub exemption, cities first must have at least 15 TOD zones. The city estimates it has 145 TOD stops which meets and exceeds the requirement of the bill. The next criteria of the bill specifies that industrial employment areas must be at least 250 contiguous acres. Much of the city’s industrial land is clustered in areas such as downtown, adjacent to the LA River, and along railroad rights-of-way in the San Fernando Valley. Mapping analysis of the six hubs found that these areas exceed the 250 acre threshold and are also made up of contiguous sites as required by the bill (see below for a table with acreage for each industrial employment hub). While conducting the analysis of these areas, sites were considered to be contiguous if located across the right-of-way (including streets, freeways, and open space parcels containing the LA River), have a shared property line, or across a common corner. Based on staff analysis, parcels separated by residential, commercial, and open spaces such as parkland are *not* considered contiguous for purposes of meeting the 250 contiguous acre threshold of the bill.

Industrial Employment Hubs in the City of Los Angeles	
Name/Location	Size (in Acres)
LAX	3623
Van Nuys	2383
Downtown / Southeast Los Angeles	866 1758
Chatsworth	1282
Pacoima	664
Atwater / Cypress Park	312

The bill also requires that these sites be designated as “employment lands areas” by the general plan and shall be primarily dedicated to industrial use. The sites within the hubs are predominantly designated by the applicable Community Plan (which serves as the City’s Land Use Element) for industrial and commercial uses. The Framework Element, which provides foundational guidance for land use across the City, defines the purpose of industrial land uses to “support economic development and jobs generation” (page 3, Industrial Districts) and as intending to “preserve industrial lands for the retention and expansion of existing and attraction of new industrial uses that provide job opportunities for the City’s residents” (page 3-32, Definition).

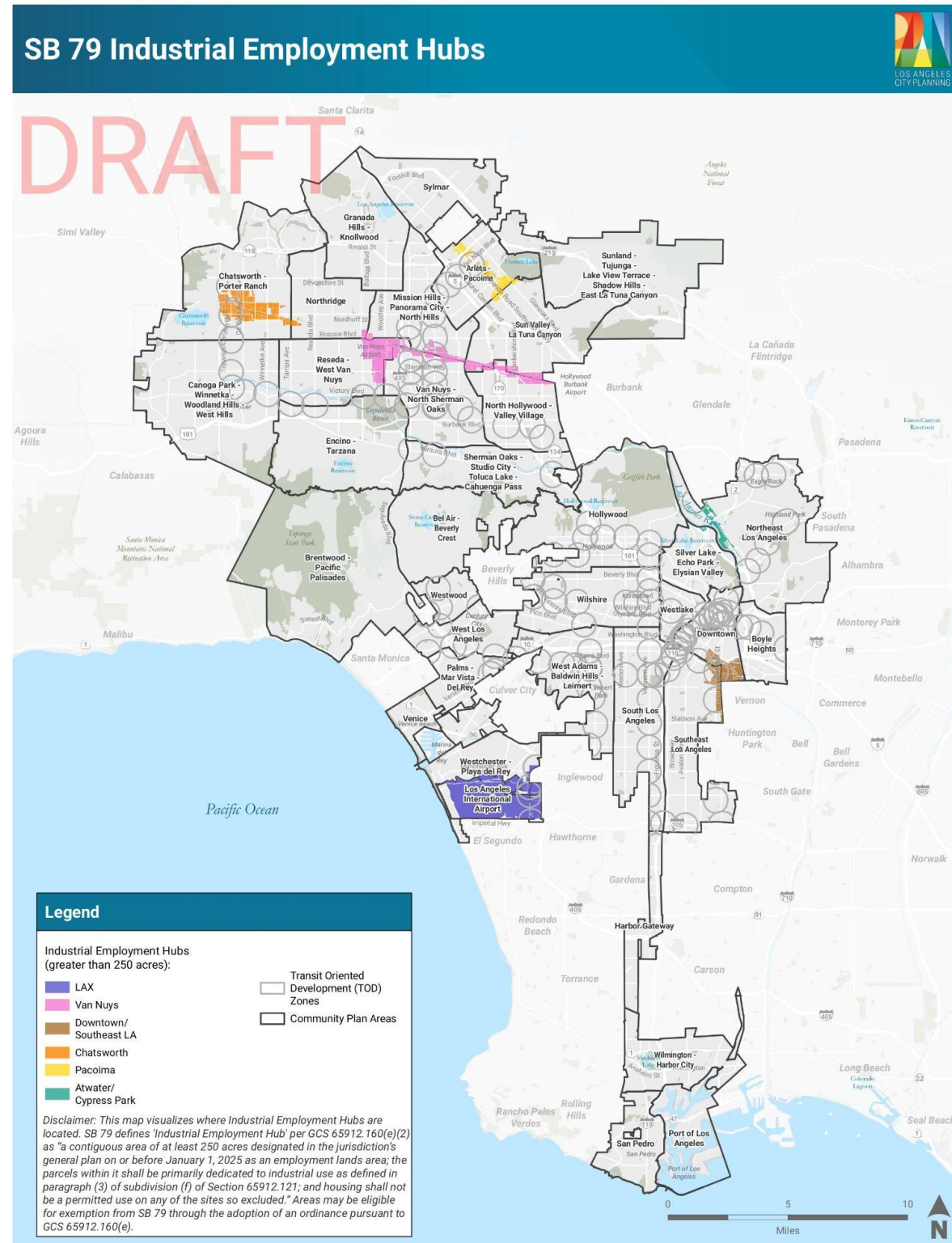
The Framework Element links the employment-generation purpose to industrial land use, and as such it can be found that industrial land within the City meets the criteria of employment lands areas of the bill. The Industrial Land Use Policy (ILUP) project² conducted by the Department also highlights the role of industrial land as an employment generating land use and the importance of retaining and encouraging industrial economic activity within existing industrial areas. In particular, the ILUP report highlights the strategic importance of downtown as a central point of connectivity for goods movement from the Ports of Long Beach and Los Angeles and designates areas of downtown as Employment Protection Districts³, where industrial zoning should be maintained. All sites within hubs were designated on or before January 1, 2025 by the applicable community plan as industrial land intended to be maintained for industrial uses and to support industrial jobs. This compliance includes industrial sites within the Downtown Community Plan, which is the most recently adopted Community Plan (Council File 22-0617),

² https://planning.lacity.gov/code_studies/landuseproj/Industrial_Files/Attachment%20B.pdf

³ https://planning.lacity.gov/odocument/7428f2e2-b9cb-41dd-94a3-a199fba77b97/downtown_results.pdf,
https://planning.lacity.gov/odocument/5b6e7294-516e-4559-903b-e78cd98eee78/alameda_results.pdf,
<https://planning.lacity.gov/odocument/5549a8cb-1391-4a15-8d55-33912ef99cca/southeastla.pdf>,

and the Boyle Heights Community Plan, which has adopted General Plan Land Use Designations (Council File 23-0861). The final effectuation of the zoning associated with the Downtown Community Plan was in February 2025, however the Plan's General Land Use designations were adopted via resolution by the City Council on May 3, 2023. The General Plan Land Uses of the Boyle Heights Community Plan were adopted via resolution by the City Council on September 25, 2024. Therefore, it can be determined that these industrial employment hubs comply with the January 1, 2025 designation date of the bill and qualify for exemption.

The jobs-generating function of industrial land uses are further supported by the goals, objectives, and policies of the Community Plans of the City's Land Use Element which designate industrial land uses across the City. With this in mind, a survey was conducted of 14 Community Plan documents and the LAX Plan associated with the areas of the City which intersect with one of the six proposed industrial employment hubs. The list of goals, objectives, and policies identified through analysis provide a unified policy vision for land designated for industrial uses by the Community Plans and which aligns with the priorities of the Framework Element described above. Across all 14 plan areas, the identified goals, objectives, and policies intend for industrial land to be utilized and preserved for both current and future employment opportunities. For this reason, the inclusion of parts of these community plan areas in the proposed industrial employment hubs is consistent with the statutory requirement that industrial employment hubs be designated as "employment lands areas" by a jurisdiction's general plan. Though the term "employment lands area" is not used explicitly, each plan clearly indicates that areas identified for industrial uses (some of which are included in the proposed industrial employment hubs) are intended to protect existing employment opportunities and promote job growth. Below is a list of relevant goals, policies, and objectives from each Community Plan and the LAX Plan that contain sites located in an industrial employment hub that illustrate how the plans contemplated the need to protect nodes of industrial activity for job growth. See Figure 1 below for a visual representation of the Community Plan Areas that intersect with the industrial employment hubs. The list of goals, policies, and objectives that follows are grouped by Community Plan and ordered based on the hub with which the Community Plan intersects.

Figure 1. Map of Industrial Employment Hubs and Community Plan Area Boundaries

Downtown/Southeast Los Angeles Industrial Employment Hub

Downtown Community Plan

Land Use (LU) Goal 8

An economy that is resilient to market changes and evolution.

LU 8.3: Foster long-term success with an ecosystem that accommodates both industrial and professional office sectors for future generations.

LU Goal 47

Distribution of land uses enhances investment opportunities in industrial areas, and supports the employment and entrepreneurial needs of the City and region.

LU 47.1: Facilitate the location of traditional industrial activity, in addition to clean technology, incubator businesses, and emerging industries in Production areas.

LU Goal 48

Vibrant centers of employment for a diversity of skills and industrial sector activities, including production, distribution, wholesale, and manufacturing. These areas accommodate shifting and new industry, maintaining efficient use of high-quality and flexible structures.

LU 48.1: Prioritize space for jobs by preserving existing industrial functions, allowing production sectors to cluster, and facilitating goods movement with access to freeways and transportation corridors.

LU 48.3: Encourage the provision of jobs for a range of skills and experience levels.

LU 48.5: Stabilize industrial businesses by limiting commercial establishments as accessory to heavy industrial and good movement activity.

LU 48.7: Support and reinforce the ecosystem of industry clusters while integrating new employment uses and economic activities.

Southeast Los Angeles Community Plan

Goal LU14

Sufficient land is conserved for a variety of industrial uses with maximum employment opportunities.

Policy LU14.1: Retain Industrial Designations for Industrial Uses. Retain industrial plan designations, such as for the Alameda Corridor and the Goodyear Tract, to provide for

existing and future industrial uses which contribute quality job opportunities for residents and which minimize environmental and visual impacts to the community.

Policy LU14.2: Protect Established Industrial Districts from Encroachment. Protect viable, established industrial districts from encroachment by nonindustrial uses, including retail, residential, live-work and schools.

Goal LU15

Technology-Based and Emerging Industries. Foster opportunities for attracting more technology-based and emerging industries. Industrial uses that are sensitive to the environment and human welfare and employ sustainable practices.

Policy LU15.2: “Green” Industries. Encourage “green” industries that bolster the economic base and provide high-skill/high-wage job opportunities to locate in Southeast Los Angeles.

Policy LU16.7: Address Land Use Conflicts. Support the relocation of residential households within stable industrial districts to more appropriate locations and the relocation of intense industrial uses away from residential uses.

Westlake Community Plan⁴

Industrial Objective 1: To preserve designated industrial lands for industrial uses.

Industrial Objective 2: To conserve the existing industrial uses in order to contribute to the tax Base for the City and as a potential employment resource for community residents.

Industrial Objective 3: To encourage and provide opportunities for new industrial uses that generate intensive employment.

Industrial Policy 1: That the City encourage the use of public and private resources designed to stimulate industrial rehabilitation, intensification, and new development.

Industrial Policy 2: That the existing industrial areas be maintained and improved as a means of providing revenue to the City and employment opportunities for its residents.

Atwater/Cypress Park Industrial Employment Hub

Northeast Los Angeles Community Plan

⁴ The Westlake Community Plan describes the Plan’s industrial land as the following: “A narrow industrial corridor is located along Venice Boulevard east of Hoover Street and along the Harbor Freeway south of Olympic Boulevard. Existing industrial land use is 39 acres with approximately 743,600 square feet of existing industrial development.” A portion of the Downtown/Southeast Los Angeles Industrial Hub is located within the area described.

Goal 3

Sufficient land for the range of industrial uses necessary to provide maximum employment opportunities, especially for local residents; that are safe for the environment and work force; and have minimal adverse impact on adjacent uses and infrastructure resources.

Objective 3-2: To provide for existing and future industrial uses that contribute job opportunities for residents and minimize adverse environmental and visual impacts on the community.

Policy 3-2.1: Designate lands for the continuation of appropriate existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses that are compatible with nearby uses, provide employment opportunities, and have minimal impact on the environment.

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

Policy 3-3.1: Protect large rail yards and other large industrially-planned parcels located in predominantly industrial areas from development by other uses that do not support the industrial and economic base of the city and the community.

Silverlake-Echo Park-Elysian Valley Community Plan

Goal 3

Maintain a vital industrial base in the Community Plan area by providing for an adequate supply of industrial land and through policies that reduce conflicts between industrial and residential land uses.

Objective 3-1: Provide sufficient land for the expansion of low intensity industrial uses.

Policy 3-1.1: Designate lands for the continuation of existing industrial uses and development of high technology, light manufacturing and other clean industrial uses which provide employment opportunities.

Objective 3-3: Retain industrial plan designations to maintain the industrial employment base of the City.

Chatsworth Industrial Employment Hub

Chatsworth-Porter Ranch Community Plan

Objective 4: To promote economic well-being and public convenience through:

a. allocating and distributing commercial lands for retail, service, and other facilities in quantities and patterns based on Los Angeles City Planning Department accepted planning principles and standards.

b. designating lands for industrial development that can be used without detriment to adjacent uses of other types, and imposing such restrictions on the types and intensities of industrial uses as are necessary to this purpose.

Policies - Land Use - Industry:

The [Q]M1 Zone classification is permitted on those properties fronting on the following corridors: (1) the north and south sides of Nordhoff Street between De Soto Avenue and Topanga Canyon Boulevard; (2) the east side of Topanga Canyon Boulevard, from Nordhoff Street to the south side of Lassen Street; and (3) the south side of Lassen Street between Topanga Canyon Boulevard and De Soto Avenue. Such conditions of approval shall prohibit smoke stacks, metal plating, toxic and noxious industrial uses, and any new retail commercial uses within these zone classifications.

Industrial acreage shown on the Plan should be protected from intrusion by non-industrial uses, except those corridors described above on Nordhoff Street, Topanga Canyon Boulevard, and Lassen Street should allow uses similar to those permitted in the M1 and M2 Zones. In keeping with the low-density residential character of the Community, to the extent possible, the Plan proposes preservation of all existing MR zoned lands, and classification of all undeveloped industrial land in the MR1 and MR2 Zones.

Northridge Community Plan (Note this plan also overlaps with the Van Nuys Industrial Employment Hub and as such would be applicable in that hub area.)

Goal 3

Sufficient land for a variety of industrial uses with maximum employment opportunities for the community's workforce which are safe for the environment and which have minimal adverse impact on adjacent uses.

Objective 3-1: To provide for the retention of existing industrial uses and promote future industrial development which contribute to job opportunities and minimize environmental and visual impacts.

Policy 3-1.1: The City should utilize land use, zoning, and financial incentives to preserve the economic viability of Northridge's existing industries.

Objective 3-2: To encourage the conservation and strengthening of viable industrial development throughout the plan area.

Policy 3-2.1: Industrially planned parcels located in predominantly industrial areas should be protected from development by other uses which do not support the industrial economic base of the City and the community.

Van Nuys Industrial Employment Hub

Reseda-West Van Nuys Community Plan

Goal 3

Sufficient land for a variety of industrial uses with maximum employment opportunities which are safe for the environment and work force, and which have minimal adverse impact on adjacent uses.

Objective 3-1: To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.

Policy 3-1.1: Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.

Objective 3-2: To retain industrial plan designations to maintain the industrial employment base for the community residents and to increase it whenever possible.

Mission Hills-Panorama City-North Hills Community Plan

Goal 3

Provide sufficient land for a variety of industrial uses with maximum employment opportunities which are safe for the environment and the work force, and which have minimal adverse impact on adjacent residential uses.

Objective 3-1: To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.

Policy 3-1.1: Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.

Objective 3-2: To retain industrial plan designations to maintain the industrial employment base for the community residents and to increase it whenever possible.

Policy 3-2.1: Large industrially planned parcels located in predominantly industrial area should be protected from development by other uses which do not support the industrial base of the City and community.

North Hollywood-Valley Village Community Plan

Industrial Opportunity 2: Manufacturing uses that generate employment for the local work force.

Industrial Opportunity 3: Availability of sites planned for job producing uses that improve the economic and physical condition of the area.

Sun Valley-La Tuna Canyon Community Plan (Note this plan area also overlaps with the Pacoima Industrial Employment Hub and as such would be applicable in that hub area.)

Goal 3

Sufficient land for a variety of industrial uses with maximum employment opportunities for the community's work force for the environment and which have minimal adverse impact on adjacent uses.

Objective 3-1: To provide for the retention of existing industrial uses and promote future industrial development which contributes to job opportunities and minimizes environmental and visual impacts.

Pacoima Industrial Employment Hub

Arleta-Pacoima Community Plan

Industrial Opportunity 2: Manufacturing uses that generate employment for the local work force.

Industrial Opportunity 3: Availability of sites planned for job producing uses that improve the economic and physical condition of the area.

LAX Industrial Employment Hub

Westchester-Playa Del Rey Community Plan

Goal 3

Provide sufficient land for limited and light industrial uses with employment opportunities that are safe for the environment and workers, and which have minimal adverse impact on adjacent uses.

Objective 3-1: To provide locations for future industrial development and employment which are convenient to transportation facilities and compatible with surrounding land use.

Policy 3-1.1: Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.

Objective 3-2: To retain industrial lands for industrial use to maintain and expand the industrial employment base for the community residents.

Policy 3-2.1: Protect areas designated for Industry on the Plan map from unrelated commercial and other non-industrial uses, and upgrade such areas with high quality industrial development that is compatible with adjacent land use.

LAX Plan

Goal 1: Strengthen LAX's unique role within the regional airport network as the international gateway to the Southern California region.

Goal 3: Optimize LAX's critical role in supporting the economy as a major generator of economic activity.

1. Operate LAX in an efficient and competitive manner to benefit local, regional, and state economies.
2. Maximize, where feasible, the public benefits of airport development to adjacent land uses, such as direct economic benefits to local business districts (ie., Westchester Central Business District, Century Boulevard, EL Segundo, Inglewood, etc.)

Sites within the hubs must also comply with the bill's criteria that these areas be primarily dedicated to industrial use as defined in GCS 65912.121(f)(3), which specifies that "dedicated to industrial use" means any of the following (1) the square footage is currently used as an industrial use, (2) the most recently permitted use of the square footage is an industrial use, and the site has been occupied within the last three years, or (3) the site was designated for industrial use in the latest version of a general plan adopted before January 1, 2022, and residential uses are not principally permitted on the site. Industrial employment hubs are predominantly occupied by existing industrial uses and are predominantly located within industrial General Plan Land Use Designations. The Framework Element specifies that these industrial land use designations are to be preserved for industrial uses which in turn support industrial jobs (page 3-32, Definition). The Framework Element "sets a citywide context to guide the update of the community [plans]" (page 1, Introduction) and "many of the Element's policies will be implemented by the revision of the community plans and the Municipal Code" (page 2, Implementation of the General Plan Framework Element), and as a result, the Community Plans echo the intent to maintain industrial land for existing and new industrial uses. Therefore, the industrial land within the hubs can be found to align with the provisions of SB 79 requiring primary dedication to industrial uses.

The final criteria of industrial employment hubs prohibits the allowance of residential uses within the hubs. General Plan Land Use Designations are assigned by the Community Plans as informed by the Framework Element and are also accompanied by corresponding zone(s) which further regulate use and development of a site. Mapping analysis was conducted based on zone and included sites located in industrial zones, specifically including the MR1 (Restricted Industrial), M1 (Limited Industrial), MR2 (Restricted Light Industrial), M2 (Light Industrial), M3 (Heavy Industrial), I1 (Industrial 1), I2 (Industrial 2), LAX zones, and select PF (Public Facilities) zoned sites with known industrial uses (approximately three known sites). Residential uses are not permitted as a primary use within any of these zones. Rather, within the MR1, M1, and MR2 zones a residential accessory use is permitted for a guard or caretaker (including the guard's or caretaker's family) of an industrial development or of a permitted use that requires a 24-hour supervision, and is located on the same lot with the development or use. Hybrid industrial zones which permit residential uses were not included in the mapping analysis in compliance with the bill's provisions. A summary of industrial and hybrid industrial zones is provided in Table 4. below. It's important to note that in addition to the uses that zone classes principally permit, some zones allow uses conditionally through a discretionary process. In manufacturing zones, conditionally permitted residential uses include joint living and work quarters and adaptive reuse projects which are permitted in the MR1, M1, MR2, M2, and M3 zones through the approval of a CUP pursuant to LAMC Section 12.24 X.13 and 12.24 X.1(d), respectively. The Conditional Use Process is an exception to the allowed uses in each zone class, therefore conditionally permitted uses were not considered as part of determining which sites qualify for inclusion within the industrial employment hubs. More information on the analysis conducted on conditionally permitted uses in industrial zones can be found in Appendix 3 of this Staff Recommendation Report.

Based on the analysis described above, there are 2,377 sites, approximately 1.95% of eligible sites, that are considered industrial employment hubs, and meet the criteria for this permanent exclusion. Exhibit 3, Map 3B visualizes the sites eligible for this permanent exclusion pursuant to GCS 65912.160(e)(2).

Table 4: Industrial and Hybrid Industrial Zones Summary

Zone Class	Notes on <u>Principally</u> Permitted and Restricted Uses	Corresponding Land Uses	Permits Residential
CM (Commercial Manufacturing)	• C2 commercial uses permitted. • Residential uses <u>principally</u> permitted.	Commercial Manufacturing, Hybrid Industrial, Limited Industrial	Yes
MR1 (Restricted Industrial)	• Zone Purpose - LAMC 12.17.5 A.1: To protect industrial land for industrial use, and prohibit unrelated commercial and other non-industrial uses.	Limited Industrial	No

Zone Class	Notes on <u>Principally</u> Permitted and Restricted Uses	Corresponding Land Uses	Permits Residential
	- Zone Purpose - LAMC 12.17.5. A.3(a): To upgrade industrial development standards, to protect industrial investment against incompatible residential, commercial and industrial uses. - Residential uses limited to “guard or caretaker unit” only as an accessory building. Residential otherwise not <u>principally</u> permitted. - C2 commercial uses permitted as ancillary to primary industrial/manufacturing, or tech/media office use (this includes office and restaurant uses).		
M1 (Limited Industrial)	- Residential uses limited to “guard or caretaker unit” only as an accessory building. Residential otherwise not <u>principally</u> permitted. - Commercial uses permitted.	Limited Industrial	No
MR2 (Restricted Light Industrial)	- Zone Purpose - LAMC 12.18 A.1: To protect industrial land for industrial use, and prohibit unrelated commercial and other non-industrial uses. - Residential uses limited to “guard or caretaker unit” only as an accessory building. Residential otherwise not <u>principally</u> permitted. - Commercial uses permitted as ancillary to primary industrial/manufacturing use.	Light Industrial	No
M2 (Light Industrial)	- Prohibited Use - LAMC 12.19 A.1.5(b): Any building containing dwelling units or guest rooms. <u>Residential uses limited to “guard or caretaker unit” only as an accessory building. Residential otherwise not principally permitted.</u> - Commercial uses permitted.	Light Industrial	No
M3 (Heavy Industrial)	- Prohibited Use - LAMC 12.20 A.1.5(b): Any building containing dwelling units or guest rooms. - Commercial uses permitted.	Heavy Industrial	No
<u>LAX (Los Angeles International Airport Zone)</u>	<u>Residential uses prohibited.</u> <u>Commercial uses permitted.</u>	<u>Airport Airside.</u> <u>Airport Landside.</u> <u>Airport Landside Support, LAX Northside</u>	<u>No</u>
IX1 (Industrial-	Use Class Intent Sec. 5B.6.1.A: To accommodate a	Markets	Yes

Zone Class	Notes on <u>Principally</u> Permitted and Restricted Uses	Corresponding Land Uses	Permits Residential
Mixed Use District)	wide variety of employment, cultural, and recreational opportunities while supporting vulnerable residents with affordable housing and social services, and facilitate the efficient management of municipal resources. • Limited residential uses permitted. • Commercial uses permitted.		
IX2 (Industrial-Mixed Use District)	• Use Class Intent Sec. 5B.6.2.A: To accommodate light industrial uses, office space, and research & development activity. This district also allows a wide range of commercial uses as well as Joint Living & Work Quarters. • Limited residential uses permitted. • Commercial uses permitted.	Markets	Yes
IX3 (Industrial-Mixed Use District)	• Use Class Intent Sec. 5B.6.3.A: To promote a mix of uses that support creative production industries, accommodate a wide variety of employment, cultural and recreational opportunities, while supporting vulnerable residents with affordable housing and social services, and facilitate the efficient management of municipal resources. • Limited residential uses permitted. • Commercial uses permitted.	Markets, Hybrid	Yes
IX4 (Industrial-Mixed Use District)	• Use Class Intent Sec. 5B.6.4.A: Supports office and commercial uses, as well as research & development, wholesale, and light industrial uses. • Limited residential uses permitted. • Commercial uses permitted.	Hybrid	Yes
I1 (Industrial 1)	• Use Class Intent Sec. 5B.7.1.A: Allows heavy commercial uses, and light industrial uses as well as a limited amount of commercial activity. This District intends to support employment, goods movement, and warehousing. • Residential uses not permitted. • Heavy commercial⁵ uses permitted.	Production	No
I2 (Industrial 2)	• Use Class Intent Sec. 5B.7.2.A: Allows heavy commercial uses, light industrial uses, and heavy	Production	No

⁵ Heavy commercial uses include motor vehicle services, fueling station, motor vehicle sales and rental, indoor storage, and outdoor storage.

Zone Class	Notes on <u>Principally</u> Permitted and Restricted Uses	Corresponding Land Uses	Permits Residential
	industrial uses as well as a limited amount of commercial activity. This District is intended to support employment and accommodate the most intense industrial activities while minimizing potential disruptions to surrounding uses. • Residential uses not permitted. • Heavy commercial⁴ uses permitted.		

Temporary Exemptions (California Government Code Section 65912.161(b)(1))

Sites may be temporarily exempt from implementing provisions in California Government Code Section 65912.157 until one year after the jurisdiction adopts the next housing element, through a local ordinance that indicates sites that meet the temporary exemption criteria pursuant to Sections 65912.161(b)(1), and indicates on its public zoning map which sites or transit-oriented development zones are and are not covered by GSC 65912.157. SB 79 permits temporary exclusion from the bill's provisions at both the individual site level and at a TOD zone level.

The criteria for temporary exemption is described below:

- Sites permitting half of density and residential floor area ratio afforded in SB 79 (GCS 65912.161(b)(1)(A)).
- Sites in TOD zones meeting capacity, density and floor area minimums (GCS 65912.161(b)(1)(B)(i)).
- Sites in an area designated as low resource on the most recently adopted version of the opportunity area maps published by the California Tax Credit Allocation Committee (TCAC), within a jurisdiction that cumulatively allows for at least 50% of the Residential Capacity required by SB 79 (GCS 65912.161(b)(1)(B)(iii)).
- Sites in primarily low resource TOD zones permitting half of the total capacity and floor area afforded in SB 79 (GCS 65912.161(b)(1)(B)(iii)).
- Sites covered by a local transit-oriented development alternative plan (GCS 65912.161(b)(1)(C)).
- Sites within a very high fire hazard severity zone (GCS 65912.161(b)(1)(D)).
- Sites vulnerable to one-foot of sea level rise (GCS 65912.161(b)(1)(E)).
- Sites with a historic resource designated as of January 1, 2025, on a local register (GCS 65912.161(b)(1)(F)).

~~SB 79 permits temporary exclusion from the bill's provisions at both the individual site level and at a TOD zone level.~~

The temporary exemption criteria above is either dependent on a site or TOD zone's geographic location or local capacity in comparison to the capacity SB 79 permits. To calculate the City's local capacity within eligible TOD zones, the model accounts for a parcel's zoned capacity

before and after development bonuses, including incentive bonuses from the MIIP and two recently adopted and effective Community Plan Updates, the Downtown LA Community Plan and the Hollywood Community Plan.

The section of the statute providing instructions for temporary exemption criteria (GCS 65912.161(b)), which takes into account local capacity for qualification, does not specify the method of calculating local capacity. Approximately 81% of permit applications representing about 90% of units proposed in 2025 in multifamily (5+ unit) developments used a local housing bonus program⁶, therefore the inclusion of density and building volume granted through bonus programs is supported by development trends. The frequent use of housing incentive programs in Los Angeles is due to their careful design, which targets common zoning barriers, offers development bonuses in excess of state law (GSC. 65915), and provides alternative development standards to ensure the maximum densities can be achieved. Bonuses granted through these incentive programs change the zoning regulations on a site to increase the density and building volume permitted. Furthermore, the use of local bonus program capacity was found to be compliant by HCD for the purposes of meeting the City's Regional Housing Needs Assessment (RHNA) Rezoning and capacity obligations⁷.

The following section describes each temporary exemption criteria and summarizes the sites the City considers eligible for phased implementation of SB 79. Exhibit 4, Table 1A summarizes the number of sites eligible for temporary exemption at a citywide level, and Table 1B summarizes sites eligible for temporary exemption by TOD zone. Exhibit 3, Maps 3C through 3I visualize the sites and TOD zones eligible for temporary exemption. For a more detailed explanation of the analysis methodology, refer to Appendix 1. The final count of sites eligible for temporary exemption is dependent on SCAG's final map of TOD Zones, which has not been published as of the release of this report. SCAG has confirmed that the final map's anticipated release will not occur until July 2, 2026 - after SB 79's July 1, 2026 effective date and the City's adoption of the Low-Rise and Phased Implementation Ordinances. As such, further parcel identification will be needed in the future to align with SCAG's final map, consistent with the Director of Planning's authority to update SB 79 eligibility maps (Section 3 of SB 79 Phased Implementation Ordinance: LAMC Section 12.22 A.38 (j)(7)(i)(c).)

TOD Zone Level Temporary Exemption Criteria Assumptions

Government Code Sections 65912.161(b)(1)(B)(i) and 65912.161(b)(1)(B)(ii) permit temporary exemptions for sites within the entire TOD zone if they meet criteria as a primarily low resource TOD zone or provide sufficient density. If an individual site within the TOD zone does not meet the criteria for temporary exemption described in the section above, the site may still be eligible

⁶ 2025 Annual Progress Report (APR) on the Housing Element webpage
<https://planning.lacity.gov/plans-policies/housing-element>

⁷<https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/HAU/los-angeles-he-ta-11182024.pdf>

for temporary exemption if the entire TOD zone is determined it meets the requirements of the statute for TOD zone level exemption.

TOD Zones with Half of the Density and FAR permitted by SB 79 (GCS 65912.161(b)(1)(B)(i))

Pursuant to GCS 65912.161(b)(1)(B)(i), a TOD zone may be temporarily exempt from the zoning provisions of SB 79 when 33 percent of sites permit half the density and residential floor area specified in GCS 65912.157(a) and which include sites with densities that cumulatively allow for at least 75 percent of the aggregate density for the TOD zone under SB 79 development standards. Aggregate density is calculated by the summation of the Maximum Allowable Units for the entire TOD zone. The analysis found that 74 TOD zones are eligible for temporary exemption under this criteria. Exhibit 3, Map 3D visualizes the TOD zones that meet the requirements of GCS 65912.161(b)(1)(B)(i). Exhibit 4, Table 1B shows the TOD zones eligible for this criteria.

Primarily Low Resource TOD Zones (GCS 65912.161(b)(1)(B)(ii))

The criteria in GCS 65912.161(b)(1)(B)(ii) temporarily exempts TOD zones primarily comprised of low resource areas and which includes sites with densities that cumulatively allow for at least 40% of the aggregate density permitted by GCS Section 65912.157(a). Primarily low resource TOD zones were identified by using a plurality methodology, where the land area of each TCAC designation was summed per TOD zone. When Low Resource was the highest percentage of land area in the TOD zone, then it was considered a primarily low resource TOD zone. For the purposes of the analysis, High and Highest Resource land areas were combined as a single category. Areas designated as Insufficient Data, which are areas identified on the TCAC California Department of Housing and Community Development (HCD) Opportunity Maps where data reliability is too low to accurately determine opportunity resource level, have been removed as a TCAC category and from the calculation of land area. To determine when local capacity for the TOD zone meets 40 percent of the density provided by SB 79, the sum of Local Maximum Allowable Units per TOD zone is compared to 40% of the sum of Maximum Allowable Units permitted by SB 79. When Local Maximum Allowable Units per TOD zone is greater than or equal to 40 percent of SB 79 Maximum Allowable Units, and the TOD zone is identified as primarily low resource TOD zone, all sites located within the TOD zone are eligible for temporary exemption pursuant to GCS 65912.161(b)(1)(B)(ii). The analysis found that 80 TOD zones are eligible for temporary exemption under this criteria. Exhibit 3, Map 3E visualizes the TOD zones that meet the requirements of GCS 65912.161(b)(1)(B)(ii). Appendix 1, Table 9 shows the plurality method analysis for TCAC categories by TOD zone and identifies the TOD Zones that are considered primarily Low Resource.

Individual Site Level Temporary Exemption Criteria Assumptions

Low Resource Sites (GSC 65912.161(b)(1)(B)(iii))

This temporary exemption applies when a site meets the criteria as a Low Resource site as designated by TCAC HCD Opportunity Maps. When a site is located in a Low Resource

designation on the TCAC HCD Opportunity Maps, and the site permits at least 50 percent of the density and residential floor area of SB 79, the site is eligible for this temporary exemption. Based on analysis of existing zoned capacity, 75,704 sites, approximately 55.88% of eligible sites meet the criteria for this temporary exemption. Exhibit 3, Map 3F visualizes the sites eligible for this temporary exemption pursuant to GCS 65912.161(b)(1)(B)(iii). Exhibit 3, Map 3L visualizes the Low Resource sites and primarily Low Resource TOD zones eligible for temporary exemption.

Local Transit-Oriented Development Alternative Plan GSC 65912.161(b)(1)(C)

No sites eligible for SB 79 are currently relying on a local transit-oriented development alternative plan to meet the temporary exemption from SB 79 pursuant to GCS 65912.161(b)(1)(C).

Very High Fire Hazard Severity Zones GSC 65912.161(b)(1)(D)

Sites located within a Very High Fire Hazard Severity Zone, as determined by the Department of Forestry and Fire Protection are considered eligible for temporary exemption. The analysis found 12,910 sites, approximately 10.59% of sites eligible for SB 79 are located within a Very High Fire Hazard Zone and are eligible for temporary exemption. Exhibit 3, Map 3G visualizes the sites eligible for this temporary exemption pursuant to GCS 65912.161(b)(1)(D). Table 1B in Exhibit 4 shows the count of sites per TOD zone eligible for this temporary exemption.

Sites Vulnerable to One-Foot Sea Level Rise Areas GSC 65912.161(b)(1)(E)

Sites located within an area vulnerable to one-foot sea level rise, as determined by the National Oceanic and Atmospheric Administration, Ocean Protection Council, United States Geological Survey, the University of California, or a local government's coastal hazards vulnerability assessment are considered eligible for temporary exemption. The analysis found no sites are located within an area vulnerable to one-foot of sea level rise.

Sites Designated as a Local Historic Register GSC 65912.161(b)(1)(F)

Sites designated as a historic resource on a local register prior to January 1, 2025 are considered eligible for temporary exemption. For the City of LA, these are sites designated as local Historic Cultural Monuments (HCMs) and Historic Preservation Overlay Zones (HPOZs) before January 1, 2025. The analysis found 7,689 sites, approximately 6.31% of sites eligible for SB 79 are designated as an HCM or HPOZ and are eligible for temporary exemption. Exhibit 3, Map 3H visualizes the sites eligible for this temporary exemption pursuant to GCS 65912.161(b)(1)(F). Table 1B in Exhibit 4 shows the count of sites per TOD zone eligible for this temporary exemption.

Sites Meeting Half of the Density and FAR permitted by SB 79 (GCS 65912.161(b)(1)(A))

This temporary exemption applies to sites permitting the density and residential floor area of at least 50 percent of the development standards afforded by SB 79, Government Code Section 65912.157(a). This exemption would apply to any site with sufficient density and residential floor

area in any TOD zone. Analysis of existing zoning, inclusive of the local density bonus program known as the Mixed Income Incentive Program (MIIP), determined 46,526 sites or 34.34% of eligible sites allow for densities and residential floor area of at least 50 percent of the zoning provisions afforded by SB 79. Exhibit 3, Map 3I visualizes the individual sites eligible for this temporary exemption pursuant to GCS 65912.161(b)(1)(A). Exhibit 3, Map 3C visualizes sites and TOD zones eligible for this temporary exemption.

Amendments to the Mixed Income Incentive Program (MIIP) through the Low-Rise Ordinance (LAMC Sections 12.22 A.38(c)(10)(i) and 12.22 A.38(g)(3)(i)(a)), include provisions for sites to utilize half the amount of units and floor area otherwise permitted by SB 79 when sites are eligible for the provisions of the bill but do not meet the temporary exemption criteria pursuant to GCS 65912.161(b), or are not otherwise exempt pursuant to GCS 65912.155 through 65912.162. Furthermore, proposed amendments to the MIIP in the Low-Rise Ordinance offer one additional story in height (beyond the height allowed by Table 12.22 A.38(g)(3)(i)) to sites within 200 feet of a Tier 1 or Tier 2 TOD Station to ensure that height limitations do not preclude a project from achieving half of the units and floor area guaranteed under GCS 65912.157(a). Exhibit 3, Map 3K visualizes the sites eligible for at least one temporary exemption criteria without the adoption of the Low Rise Ordinance. ~~When factoring in this provision, the analysis found 17,562 additional sites would meet this temporary exemption criteria. To determine the number of sites that would require this provision, first, all sites, including residential zoned sites eligible for the Low-Rise Ordinance, are run through the model to determine eligibility for permanent or temporary exemption. Second, sites that are not eligible for an exemption are identified and given the Maximum Allowable Units and Maximum Allowable Residential Building Volume of Half of the capacity permitted by SB 79.~~ Exhibit 3, Map 3L visualizes the sites eligible for this temporary exemption with the MIIP provision pursuant to GCS 65912.161(b)(1)(A). When new TOD zones become eligible for SB 79, the Low-Rise Ordinance proposes to allow any site that does not meet the requirements of GCS 65912.160(e) or GCS 65912.160(b)(1) for permanent exclusion or temporary exemption is eligible for up to half the amount of units and floor area otherwise permitted in SB 79 (GCS 65912.157(a)). Exhibit 3, Map 3J visualizes sites that would be eligible for temporary exemption with the adoption of LAMC 12.22 A.38(c)(10)(i).

In summary, there are 2,718 sites that meet the requirements for permanent exclusion from SB 79. Exhibit 4, Table 1A (Citywide Summary of Sites and TOD Zones Eligible for Phased Implementation) summarizes the sites eligible for permanent exclusion at a citywide level. There are 135,474 sites and 145 TOD zones that meet the criteria for temporary exemption from SB 79. Effectively, 100% of the eligible sites and TOD zones within the City of LA are eligible for permanent or temporary exemption from the provisions of SB 79, until one year following the adoption of the seventh revision of the housing element. Exhibit 4, Table 1B (Summary of TOD Zones Eligible for Phased Implementation) summarizes the sites eligible for temporary exemption by TOD zone.

As the first step in establishing a framework for local implementation of SB 79, the adoption of the permanent and temporary exemptions through the Phased Implementation Ordinance, in tandem with revisions to MIIP through the Low-Rise Ordinance, would give the City additional time to plan for and consider local sensitive environmental areas through local transit-oriented alternative plans. Together, the SB 79 Phased Implementation and Low-Rise Ordinances implement Section 65912.161(b)(1), by demonstrating the City complies and is consistent with the criteria for temporary exclusion from the full implementation of SB 79.

D. State Housing Element Discussion (California State Government Code Section 65580 – 65589.11)

State Housing Element Law

Statutory requirements for the Housing Element and RHNA Re-zoning programs are delineated in California State Government Code Sections 65580 – 65589.11. The California Department of Housing and Community Development approved the City of Los Angeles 2021-2029 Housing Element on June 29, 2022 and the Rezoning Program on June 18, 2025. Pursuant to 65583(c)(1) and 65583.4(a), the Rezoning Program addressed the City's RHNA deficit by making sites with more than 255,433 units of capacity available and producing a Low Income Sites List where by-right development is guaranteed for projects built to a minimum density that provide at least 20% of units for lower income households. Housing Element Law also obligates the City to identify rezoning actions that affirmatively further fair housing as defined in CGS 8899.50 and to encourage the development of a variety of types of housing for all income levels (GCS 65583(c)(1)).

Low-Rise Ordinance

The Low-Rise Ordinance adds citywide capacity consistent with CGCS 65912.161(b), Housing Element Law, and the City's certified Housing Element. The ordinance does not amend the Housing Element Sites list, and expands incentives to all sites that would otherwise be ineligible for a pause in effectuation from Senate Bill 79, as well as to low density residential zones in Opportunity Station Areas. The Rezoning Program targeted 52% of rezoning efforts in Higher Opportunity Areas to meet the Housing Element Program 124 (Affirmatively Further Fair Housing) requirement that half of rezoning efforts are targeted to Higher Opportunity Areas. The Opportunity Station approach increases housing capacity in Higher Opportunity Areas, and is hereby consistent with goals and in excess of benchmarks in program 124. Additionally, the Low-Rise program incentivizes a missing middle typology which broadens the reach of income levels and family sizes that may benefit from the City's Rezoning Program incentives, consistent with the intent of State Housing Element law to create broad ranging opportunities for housing. The Low-Rise Ordinance is therefore consistent with Housing Element Law.

SB 79 Phased Implementation Ordinance

The SB 79 Phased Implementation Ordinance does not amend the Housing Elements Sites list or reduce the City's housing capacity. The purpose of the ordinance is to allow the City to begin phasing in the provisions of SB 79 through creating housing capacity consistent with its certified Housing Element. Therefore, the SB 79 Phased Implementation Ordinance is consistent with State Housing Element law.

E. State Density Bonus Law Discussion (California Government Code Sections 65915 - 65918)

The Low-Rise Ordinance amends the Citywide Housing Incentive Program (CHIP) (specifically the MIIP) a local implementation of State Density Bonus Law. State law stipulates local jurisdictions' ability to offer density bonus incentives in excess of state incentives and for projects ineligible for state incentives. California Government Code Section 65915(n) states: "If permitted by local Ordinance, nothing in this section shall be construed to prohibit a city, county, or city and county from granting a density bonus greater than what is described in this section for a development that meets the requirements of this section or from granting a proportionately lower density bonus than what is required by this section for developments that do not meet the requirements of this section." As detailed in the State Density Bonus Discussion of The Housing Element Rezoning Program staff report, the CHIP calibrates incentives so that local programs always match or offer greater bonuses and incentives to projects meeting the requirements of California Government Code Sections 65915 - 65918. All local incentives require affordability in excess of the set asides required under State Density Bonus. The Low-Rise Ordinance further expands access to housing by permitting projects ineligible for 65915 because the site's Maximum Allowable Residential Density is less than five units, but access to incentives through the local program is provided only if the project constructs at least five units.

The CHIP would remain in compliance with GCS 65915(n) with amendments from the Low-Rise Ordinance. One amendment replaces a footnote that previously required projects meet a State Density Bonus affordability threshold with an expanded program standard that affirms the program's requirement to meet or exceed State Density Bonus Law affordability requirements. Additionally, SB 79 has fundamentally altered the relationship between lower density zones and State Density Bonus through enabling the stacking of State Density Bonus with new transit-based development standards in single-family zones, low density zones, and sites zoned for commercial development within a half-mile of transit oriented development stops. By expanding the applicability of incentives to phase-in implementation of SB 79, the City is offering lower density sites substantial density bonus incentives that they would otherwise not be eligible for through a pause in SB 79 effectuation alone. The bonuses and set aside requirements are calibrated for low-rise development accordingly, consistent with 65915(n). Additionally, projects cannot make individualized incentive or waiver requests beyond relief built into the Low-Rise Incentive Area and must comply with performance standards that replace select zoning regulations, however they are guaranteed the building envelope offered by the program

regardless of other massing and layout standards that might otherwise apply. Though the Low-Rise Incentive Area does not allow project specific incentive requests, it offers a substantial density bonus that starts at 5 units in exchange for an affordability set aside that meets the requirements of state density bonus law. For example, a single-family zoned site which permits the construction of one home would be permitted to build up to 10 units through LR-1 incentives (equates to a ~1000% density bonus) and up to 16 units on a single family zoned site designated as LR-2 (equates to ~1,600% density bonus). The project would be required to provide 1 ~~Moderate Income~~ unit in LR-1 and 1 ~~Very Low Income~~, 1 ~~Low Income~~, or 2 ~~Moderate Income~~ units in LR-2, which equates to 100% or 200% of the site's maximum allowable residential density. In other instances, affordability would scale based on the project size should a project include the consolidation of multiple lots or invoke the LAMC 12.22 A.3(g)(3)(i)a to access half of the density permitted under GCS 65912.157(a). Furthermore, the proposed language in LAMC 12.22 A.38(j)(12) would ensure affordability standards in 65915 are met. Projects with a maximum allowable residential density of more than five units could elect to use LAMC 12.22 A.37 if incentive or waiver requests are desired for a project, in lieu of the incentives in LAMC 12.22 A.38. One hundred percent affordable projects as defined in State Density Bonus are also eligible for the low-rise incentives as specified in the rent schedule program standard. Therefore, the local CHIP program further supports the State Density Bonus framework by exceeding State Density Bonus in exchange for more affordable units or by offering smaller scale set incentives to sites otherwise not eligible for the state statute, pursuant to GCS 65915(n).

Summary of CEQA Findings and Justifications

Project Description (Phased Implementation Ordinance and Low-Rise Ordinance)

The Phased Implementation and Low-Rise Ordinances (the Project) together comprise the City's local implementation of Senate Bill 79 ("SB 79") (2025) or "The Abundant and Affordable Homes Near Transit Act", which was signed into law by Governor Gavin Newsom on October 10, 2025 and codified in Government Code Sections 65912.155 - 65912.162. The Phased Implementation Ordinance affirms citywide phased implementation of the bill's provisions consistent with GCS 65912.161(b), while the Low-Rise Ordinance facilitates the first phase of SB 79 implementation with the expansion of incentives targeting missing-middle building outcomes to just over a third of the City's potential TOD zones.

The SB 79 Phased Implementation Ordinance (Exhibit 1) will allow a temporary pause in the bill's effectuation citywide consistent with the sites, TOD zone, and low resource area criteria in GCS 65912.161(b); will codify exemptions from SB 79 for sites within industrial employment hubs and that are more than one-mile walking distance from a station pursuant to GCS 65912.160(e); and will establish mapping processes.

The Low-Rise Ordinance (Exhibit 2A) amends Los Angeles Municipal Code Section 12.22 A.38 and other related code sections to establish housing incentives to allow low-scale, multi-family housing development in low density zones within a half-mile area of Opportunity Stations.

Opportunity Station areas consist of majority Higher and Moderate Opportunity Areas as defined by the California Tax Credit Allocation Committee and are major transit stops (as defined in Public Resources Code Section 21064.3) served by heavy rail, light rail, commuter rail, bus rapid transit, and certain bus lines that operate in bus-only lanes. In addition to renaming the existing Corridor Transition Incentive Area the Low-Rise Incentive Area to better align the program's name with the program's intended building outcomes and geographic applicability, the Ordinance will also amend program incentives to improve project feasibility through revising base incentives, affordability requirements, multi-bedroom incentives, open space requirements, lot coverage limitations, roadway widening relief, and applicable performance standards. Furthermore, the Low-Rise Ordinance will guarantee any site not eligible for phased implementation half of the density and floor area permitted under SB 79; recommends a new Fire Restriction Area definition to exclude from eligibility sites in Hillside and Very High Fire Hazard Severity Zones; makes technical edits to eligibility criteria, mapping frequency, and program standards; and establishes new definitions. Note that amendments are subject to change based on guidance from other implementing agencies including the California Department of Housing and Community Development and the Southern California Association of Governments. The Project is inclusive of amendments recommended in Exhibit 2B to create more incentives for projects in Low-Rise Incentive Areas that provide deeper and/or more on-site affordable units should the City Council direct the Department to incorporate them into the Low-Rise Ordinance.

SB 79 Phased Implementation Ordinance Not Subject to CEQA

Pursuant to GCS 65912.160(c)(1 - 2), an ordinance to make zoning code consistent with the provisions of Government Code Sections 65912.155 - 65912.162 is determined not to be a project for the purposes of review under the California Environmental Quality Act (CEQA). The Phased Implementation Ordinance makes the City's zoning consistent with SB 79 because it phases in local implementation through meeting the technical requirements of 65912.161(b) and permanently exempts industrial employment hubs as well as sites that are more than one-mile walking distance from a station pursuant to GCS 65912.160(e). GCS 65912.161(b) allows a local jurisdiction to not apply GCS 65912.157 to areas that meet the rules specified in GCS 65912.161(b)(A-F) so long as an ordinance is adopted "in accordance with Section 65912.160". As such, the Phased Implementation Ordinance affirms compliance with GCS 65912.161(b) and meets the requirements of GCS Section 65912.160(c)(1), making the City's zoning code consistent with SB 79 through the effectuation of a phased implementation approach of the bill's provisions. For these reasons, the Phased Implementation Ordinance is not a project subject to CEQA per GCS 65912.160(c)(2) since it is proposed consistent with provisions of GCS 65912.160(c)(1) and GCS 65912.161(b)(1). Furthermore, the Phased Implementation Ordinance will not result in the expansion of any land uses or intensity of existing land uses, therefore it will not result in any impacts that necessitate further study or review.

Housing Element Statutory Exemption (Public Resources Code Section 21080.085) for Low-Rise Ordinance

On June 30, 2025, the State of California approved Senate Bill (SB 131), which amended CEQA to include a statutory exemption for rezoning that “implements the schedule of actions contained in an approved housing element” pursuant to Public Resources Code (PRC) Section 21080.085(a), except for those rezonings that allow for new oil or gas infrastructure or those that allow construction within natural and protected lands without specified mitigation measures (PRC Section 21080.085(b)). This amendment enables a statutory exemption for qualifying “rezonings”, such as the amendments proposed by the Low-Rise Ordinance, if a lead agency can demonstrate that the rezoning is compliant with PRC Section 21080.085.

Compliance with Public Resources Code Section 21080.085(a) (Housing Element Programs)

Consistent with PRC Section 21080.085(a), the Low-Rise Ordinance expands the incentives of the City of Los Angeles’ Housing Element Rezoning Program to sites within a half-mile of transit. The expansion of these incentives is proposed through code amendments that codify relief from a site’s underlying zoning rules, including but not limited to density, FAR, and height, in exchange for the provision of on-site affordable housing. Enabling a site to build a project type or size not previously allowed effectively results in a site level rezoning. This rezoning approach implements the schedule of actions in the City’s Housing Element, specifically those in the following Programs described below:

- Program 48 (Update to Density Bonus and Other Affordable Housing Incentive Programs): The Citywide Housing Incentive Program (CHIP) Ordinance adopted in 2025 effectuated a comprehensive local density bonus program through the codification of the State Density Bonus Program (12.22 A.37), the Mixed Income Incentive Program (12.22 A.38), and the Affordable Housing Incentive Program (12.22 A.39). The Low-Rise Ordinance builds on this effort by amending the MIIP to expand program eligibility, as well as bringing forward amendments to support project feasibility for the purpose of making the MIIP an advantageous housing approval pathway for mixed income projects in Opportunity Station Areas.
- Program 55 (Implement CEQA Streamlining Measures): Consistent with Program 55, the Low-Rise Ordinance implements CEQA streamlining measures by enabling by-right development opportunities for sites newly eligible for the Low-Rise Incentive Area in Opportunity Station Areas, therefore increasing the number of projects that have the ability to seek project approval without additional CEQA review. .
- Program 57 (Improvements to Development Processing): The Low-Rise Ordinance expands the number of sites eligible for a streamlined approval process. In particular, incentives available through the Low-Rise Ordinance necessitate only a ministerial, zoning review therefore potentially reducing the amount of time needed to obtain an approved building permit.

- Program 103 (Missing Middle): The Low-Rise Ordinance advances Program 103 through introducing flexible zoning standards and incentives to support opportunities for more ‘Missing Middle’ housing typologies, particularly in Higher Opportunity Areas. The Low-Rise Ordinance’s expansion of the Low-Rise Incentive Area to all sites within Opportunity Station Areas directly implements this goal, allowing for lower- scale, multi-unit housing in low-density, Moderate and Higher Opportunity areas of the City where this typology is not currently permitted. Further, the Low-Rise Incentive Area’s affordability requirements implement the value capture approach that Program 103 planned for, ensuring increases in density are tied to covenanted affordable housing that reduce barriers and create long-term housing opportunities for low-income residents.
- Program 121 (RHNA Re-Zoning): The Low-Rise Ordinance builds on the CHIP Ordinance (a key Housing Element Rezoning Program component) by expanding the applicability of one of the key CHIP incentive tools previously known as the Corridor Transition Incentive Area (proposed to be renamed the Low-Rise Incentive Area). In particular, consistent with Program 121 and the Rezoning Program strategies (described in further detail in Chapter 4 of the 2021-2029 Housing Element), the broadened applicability of Low-Rise Incentive Area incentives brings into fruition the “TOC Expansion in Higher Opportunity Areas” Rezoning Program strategy (discussed in Chapter 4 of the 2021-2029 Housing Element) within Opportunity Station Areas and fulfills objectives to apply flexible zoning tools to single-family and low density zones near transit in order to create opportunity for construction of missing middle typologies. Incentives are proposed to be expanded to more sites not subject to CHIP incentives or other local rezoning initiatives in Higher and Moderate Opportunity areas near transit.
- Program 124 (Affirmatively Furthering Fair Housing Program): The Low-Rise Ordinance Affirmatively Furthers Fair Housing by proposing rezoning in single-family and low-density zoned areas near transit that are predominantly Higher and Moderate Opportunity Areas, therefore advancing objectives contained in Program 124 to expand housing opportunities in areas of the city with access to key place-based opportunities including schools, jobs, transit infrastructure, and other amenities. Consistent with Program 124’s framework to Affirmatively Further Fair Housing, creating housing construction opportunities in single-family zoned areas in Higher Opportunity neighborhoods advances zoning regulations locally in a way that addresses exclusionary land use practices of the past.

Compliance with Public Resources Code Section 21080.085(b) (Oil or Gas Infrastructure and Natural and Protected Lands)

Specific rezoning categories ineligible for the Housing Element statutory exemption include rezoning to allow for the construction of distribution centers or oil and gas infrastructure (PRC 21080.085(b)(1)) as well as rezoning to allow for construction to occur within the boundaries of any natural and protected lands pursuant to PRC Section 21067.5 (PRC 21080.085(b)(2)).

Distribution Centers and Oil and Gas Infrastructure

Code amendments proposed as part of the Low-Rise Ordinance do not facilitate the construction of oil or gas infrastructure. In particular, amendments proposed as part of the Low-Rise Ordinance focus on increasing opportunities for housing construction citywide near certain transit stations in urbanized higher and moderate resource neighborhoods and do not propose any amendments to the code that would facilitate or create allowances for new distribution centers or oil and gas infrastructure consistent with PRC Section 21080.085(b)(1)(A)

Natural and Protected Lands

Code amendments proposed as part of the Low-Rise Ordinance would not facilitate construction within the boundaries of any natural or protected lands as defined in PRC Section 21067.5. The expanded incentives would apply in existing urbanized areas and would not apply in areas identified as “natural and protected lands” as defined in PRC Section 21067.5 inclusive of (a) through (p).

Criteria (a) through (h) of PRC Section 21067.5 include lands designated at the state and national level as parks, wilderness, or for wildlife. Since the Low-Rise Ordinance only extends incentives to residential zones, and cannot/does not amend any of these designations, the proposed rezoning does not occur in these areas.

Criteria (i) refers to Hazardous Waste Sites defined pursuant to GCS 65962.5 and contains an exception for if one of the listed agencies determines a site is suitable for a proposed use. This is consistent with Environmental Protection Measures (Hazardous Materials-1) that were adopted with CHIP and will be applicable to development on properties rezoned with the Low-Rise Ordinance.

At present, based on staff’s evaluation of available mapping tools including Los Angeles Zoning Information and Map Access System (ZIMAS), Los Angeles Geohub, and FEMA floodway mapping, it appears no sites eligible for the Low-Rise Ordinance meet criteria (j), (k), (m), or (p) which includes land in regulatory floodways as mapped by FEMA, land under conservation easement, lands within 300 feet of a wetland, Environmentally Sensitive Habitat Area in the Coastal Zone, or prime farmland as determined by the Department of Conservation. If new TOD Zones in the Coastal Zone are added, further CEQA findings will need to occur for sites in those areas.

Criteria (l) includes land on or within 300 feet of a wetland and (n) land identified as part of a conservation plan. The Low-Rise Ordinance does not rezone any wetland but some parcels may be within 300 feet of urbanized wetland areas like Lake Balboa, the Hansen Dam, or Echo Park. SB 131 allows portions of an otherwise exempt rezoning that are on Natural and Protected Land to be cleared with another CEQA clearance. Any parcels within 300 feet of a wetland or part of a conservation plan would have been analyzed for the RHNA buildout in the Housing Element EIR (see below). City Planning is not aware of any parcels to be rezoned with the Low-Rise Ordinance in conservation plans. If some do exist, which does not seem likely, the

Low-Rise Ordinance does not change zones or designations within lands identified in conservation plans, but if some parcels in urbanized areas that technically fall within the bounds of those plans are eligible for incentives those sites too would have been analyzed for the RHNA buildout of the Housing Element EIR.

Criteria (o) includes Very High Fire Hazard Severity Zones, except sites where fire hazard mitigation measures are adopted pursuant to existing State Fire Code standard or State Minimum Fire Safety regulations. Due to the fact that the City's code has incorporated these State codes and rezoning contained in the Low-Rise Ordinance would only occur on Very High Fire Hazard Severity Zone sites where these standards apply, the Low-Rise Ordinance remains consistent with the provisions contained in PRC 21080.085(b)(a)(B). Although not necessary for the exemption, it may be noted, the Low-Rise Ordinance maintains or revises eligibility criteria excluding certain sites that are in both Hillside Areas and Very High Fire Hazard Severity Zones (with more limited ingress and egress).

Conclusion

Based on the above, the project described in this report is statutorily exempt from Division 13 (commencing with Section 21000) of the PRC, any parcels excluded as in Natural or Protected Lands are cleared by the Housing Element EIR.

Housing Element Environmental Impact Report (EIR)

Impacts of the Project were analyzed under Housing Element EIR Number ENV-2020-6762 (SCH No. 2021010130) certified on November 29, 2021, and Addenda 1 and 2 (ENV-2020-6762-EIR-ADD1 and ENV-2020-6762-EIR-ADD2). Adoption of the Phased Implementation Ordinance phases in capacity created through SB 79 consistent with affirmatively furthering fair housing objectives and the overall goals of the 2021-2029 Housing Element. Adoption of the proposed Low-Rise Ordinance, which implements Program 121 (RHNA Re-zoning Program) of the 2021-2029 Housing Element and phases in compliance with the Abundant and Affordable Homes Near Transit Act pursuant to GCS 65912.161(b), will further increase residential capacity by incentivizing housing near transit consistently with goals, objectives, policies and programs in the Housing Element to facilitate construction of the 456,643 unit RHNA target for the 2021-2029 planning period (486,379 including a buffer recommended by the California Department of Housing and Community Development). The Housing Element EIR examined the build out of the RHNA and 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 had been approved but not built). The Housing Element EIR found that the environmental impacts of several of the issue areas were significant and unavoidable, with regard to:

- Air Quality (Exceedance of Criteria Pollutants—Construction and Operations)
- Biological Resources (Special Status Species, Sensitive Habitats, Wildlife Corridors)
- Cultural Resources (Historical Resources and Archaeological Resources)
- Geology and Soils (Paleontological Resources)
- Hazards and Hazardous Materials (Hazardous Materials Near Schools and Hazardous Materials Sites)
- Noise (Construction Noise, Operation Noise, and Construction Vibration)
- Public Services (Fire Protection, Police Protection, and School Facilities)
- Recreation (Deterioration of Recreational Facilities and Construction of Recreational Facilities)
- Transportation (Freeway Queuing)
- Tribal Cultural Resources (Construction: Ground Disturbance during Construction)
- Wildfire (Impair Emergency Response Plan, Exacerbate Wildfire Risks in State Responsibility Area or VHFHSZ, Require Infrastructure that may Exacerbate Fire Risk, Expose People or Structures to Significant Risks in State Responsibility Area or VHFHSZ, and Expose People or Structures to Significant Risks Involving Wildland Fires)

The Housing Element EIR also identified the following significant impacts that were anticipated to be reduced to less than significant with identified mitigation measures:

- Air Quality: Construction-related emissions of toxic air contaminants
- Hydrology: Impeding or Redirect Flood Flows
- Transportation: Circulation Plan Consistency, Hazardous Design, Emergency Access

As discussed above, the Project is within the scope of the the Housing Element EIR which fully analyzed the environmental impacts that could occur as a result of the implementation of the 2021-2029 Housing Element, including mixed-use development ranging in size and scale, neighborhood commercial mixed-use with smaller non-residential uses, and high-rise mixed-use with larger non-residential uses. Additionally, the Housing Element EIR analyzed impacts of multi-family developments in lower density zone classes including single-family. Overall, the Housing Element EIR acknowledged that the buildout of the RHNA would occur in a manner consistent with the latest building permit activity in areas of the City zoned for multi-family and commercial development, but could still be realized in any area of the city where zoning or land use permits residential units including commercial zones, some industrial zones, and lower density residential sites, including within the coastal zone and throughout the City where conservation easements may exist. The Housing Element EIR anticipated and fully analyzed that the construction and operation of these housing units would require action to streamline approvals, including making more projects subject to by-right or administrative review and eliminating discretion in the approval of affordable housing developments. The Project described is consistent with Housing Element programs and any impact associated with the proposed changes in the Phased Implementation and Low-Rise Ordinances were analyzed as part of the Housing Element EIR's analysis of the full RHNA buildout.

Additionally, the City does not find that there is a change to the project, change to circumstances, or new information that would necessitate the preparation of a subsequent EIR (PRC Section 21166 or CEQA Guidelines Section 15162(a)) given that the Phased Implementation Ordinance is phasing in the effectuation of SB 79. The City's assessment of SB 79 led to several reports to the City Council and subsequent direction by the City Council to implement the bill through the execution of a temporary pause of the bill's provisions and amendments to local incentive programs to phase in SB 79 capacity in a manner consistent with the 2021-2029 Housing Element. Furthermore, SB 79 will be paused beyond the plan horizon of the Housing Element. For this reason, there is no change to the project, change to circumstance, or new information requiring the preparation of a subsequent EIR.

Incorporation by Reference

The following documents associated with the Housing Element EIR were used in preparation of these findings, and incorporated herein by reference, consistent with Section 15150 of the CEQA Guidelines. The Housing Element EIR is available for review at the City of Los Angeles, Department of City Planning Records Management, 221 N. Figueroa Street, Room 1450 Los Angeles, and online at the following weblinks:

- Final EIR:
https://planning.lacity.gov/EIR/HEU_2021-2029_SEU/feir/files/Final%20EIR%20-%20October%202021.pdf
- EIR Administrative Record: [Los Angeles City Council File 21-1230 - https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=21-1230](https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=21-1230)
- Addendum 1 to the EIR:
[https://planning.lacity.gov/odocument/23bb4628-cd19-4859-9484-48284bbdcd96/Exhibit_C - Addendum to Environmental Impact Report \(ENV-2020-6762-EIR, SCH No. 2021010130\).pdf](https://planning.lacity.gov/odocument/23bb4628-cd19-4859-9484-48284bbdcd96/Exhibit_C_-_Addendum_to_Environmental_Impact_Report_(ENV-2020-6762-EIR,_SCH_No._2021010130).pdf)
- Addendum 2 to the EIR:
https://cityclerk.lacity.org/online/docs/2021/21-1230-S6_misc_6_11-13-24.pdf

Revised EXHIBIT 3:

SB 79 Map Inventory

CPC-2026-1798-MS, CPC-2026-1797-CA

June 17, 2026

This Exhibit contains a series of maps related to SB 79 interpretation, the Phased Implementation Ordinance, and the Low-Rise Ordinance.

Exhibit of Resources

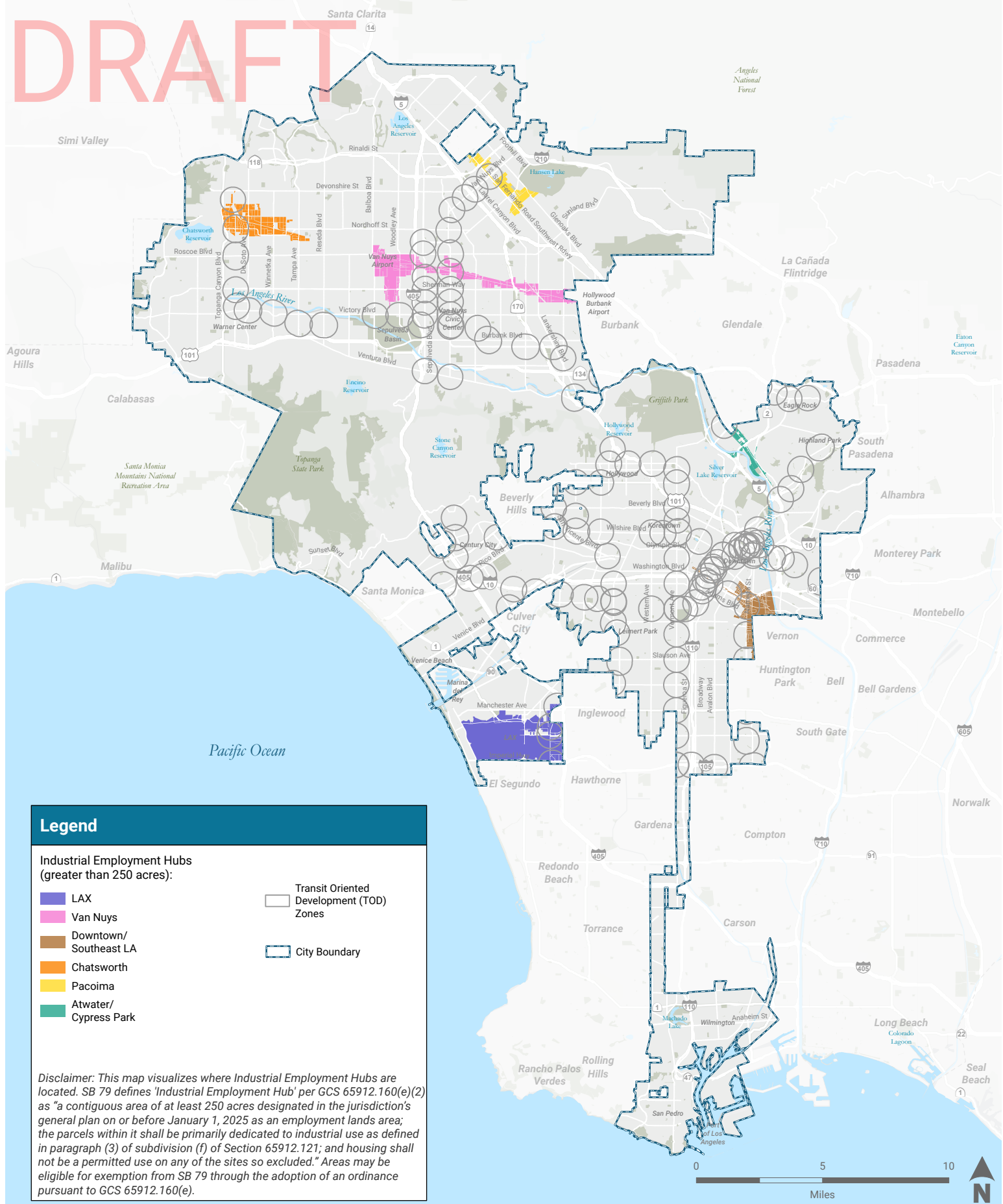
4. Industry Employment Hub Map

Map 4A: SB 79 Industrial Employment Hubs

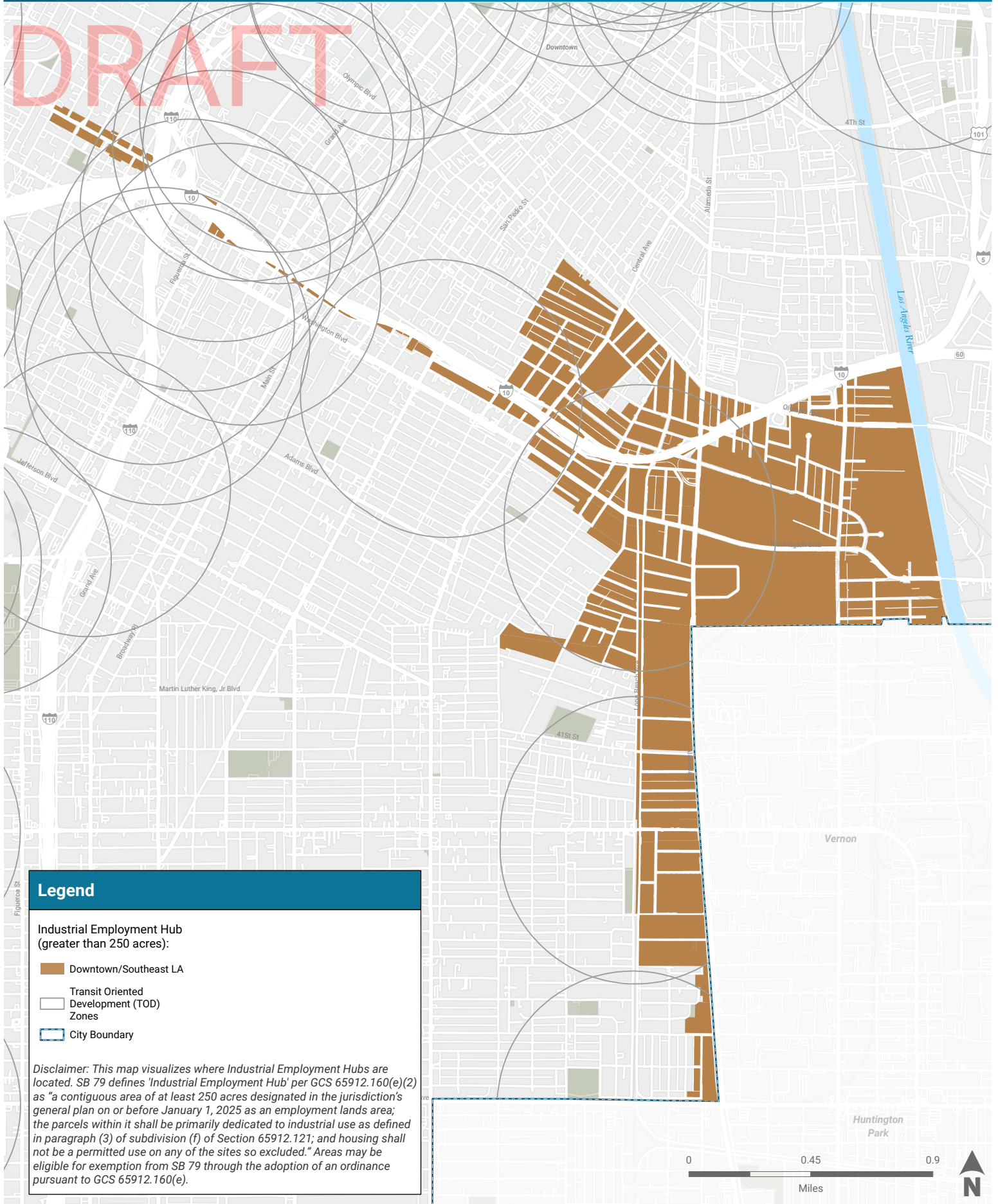
Map 4D: Downtown/Southeast LA SB 79 Industrial Employment Hub

SB 79 Industrial Employment Hubs

DRAFT



Downtown/Southeast LA SB 79 Industrial Employment Hub



Revised APPENDIX 1:

SB 79 Phased Implementation Model Methodology

CPC-2026-1798-MS

June 17, 2026

Appendix 1: SB 79 Phased Implementation Model Methodology

The “Abundant and Affordable Homes Near Transit Act”, signed into law as Senate Bill 79 (SB 79), pursuant to California Government Code Section 65912.155 through 65912.162, offers incentives which supersede local zoning and General Plan land use regulations to increase the supply of affordable and market rate housing within a half mile of certain specified TOD zones. These development incentives apply to any site within the TOD Zone that is zoned for residential, mixed, or commercial development (Government Code Section 65912.157(a)). SB 79 provides provisions for permanent or temporary exemptions from the development standards provided in SB 79 for sites and TOD zones that meet certain criteria, including those that already have a significant housing capacity, low resource areas as defined by the Opportunity Map tool created by the Department of Housing and Community Development and the Tax Credit Allocation Committee (TCAC), and sites with sensitive environmental considerations, as detailed in Section 65912.161(b). The Department of City Planning developed a model to understand the composition of sites within eligible TOD zones and determine if they meet the criteria for permanent exclusion or temporary exemption from SB 79. ~~The following section describes the assumptions that were developed to identify sites in compliance with the phased implementation criteria outlined in SB 79.~~

Background on Model Approach

The model was constructed in partnership with a contracted consultant firm, Psomas, and uses the ArcGIS geodatabase platform and Jupyter notebooks to analyze City-provided data on parcels eligible for SB 79 to determine a site's eligibility for permanent or temporary exemption for SB 79 pursuant to Government Code Sections 65912.160(e) and 65912.161(b)(1). The eligible parcels are run through the model, which consists of a set of logic commands and calculations written in Python script, to output the site's existing local zoned capacity, SB 79 permitted capacity, and eligibility for permanent or temporary exemption.

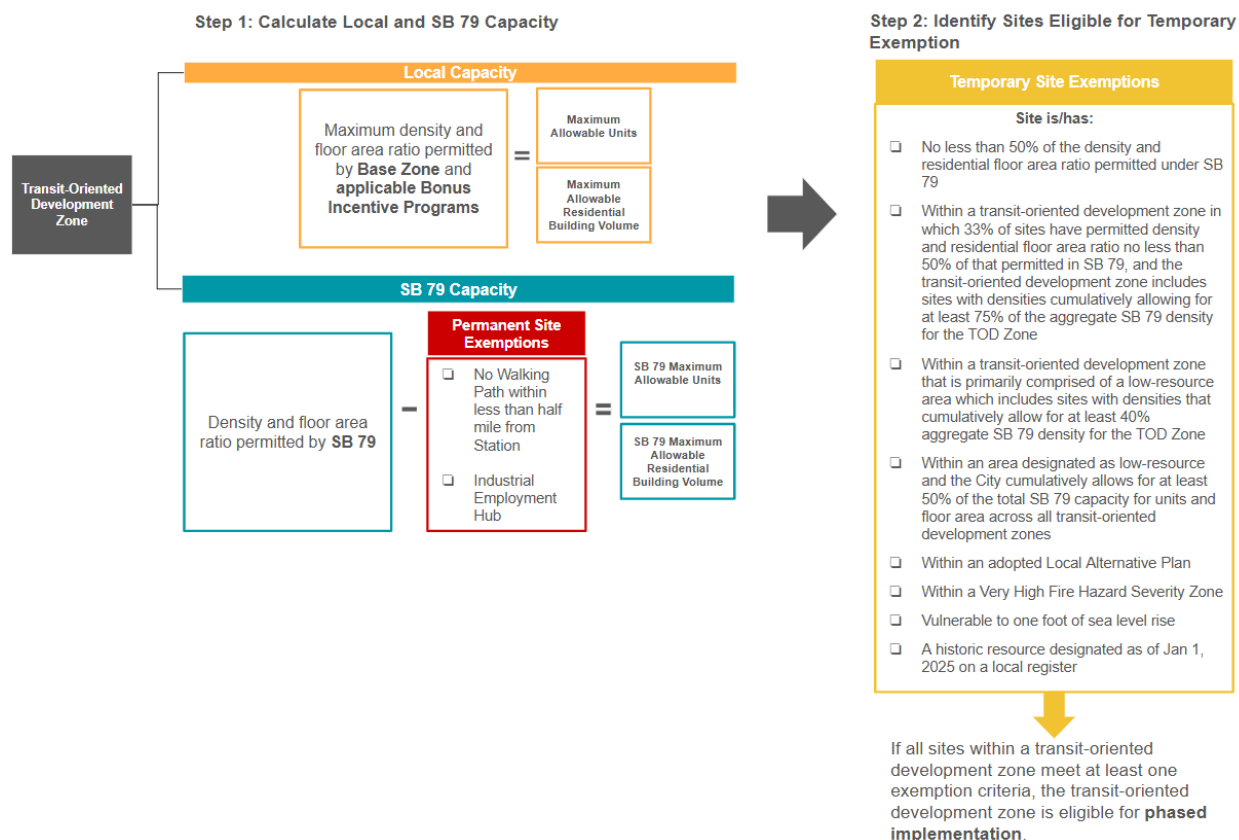
The Python-based approach was chosen over an Excel-based model with embedded formulas for efficiency, accuracy, and reliability due to the complexity and size of the dataset required to be analyzed for the City of Los Angeles. The City has over 100,000 parcels eligible for SB 79, each with varying development standards which require parcel specific model variation to account for limitations in allowed use, buildable area and density. Additionally, the City's zoning code is highly complex and variable, with multiple zones with varying densities and FAR, different rules for calculating FAR dependent on zone and use, and some areas of the City subject to a new zoning code with entirely different development regulations. Past attempts at using an excel-based model with embedded formulas for a data set of this size have resulted in frequent technical issues, including but not limited to requiring bifurcation of formulas into multiple variations of the dataset, save times over three hours, and loss of work from the model shutting down during computation. As such, for the Housing Element Rezoning CF 21-1230-S5 model CIVIS software was used to automate calculations. Based on positive experience using an automated model for the scale analysis required by the City, a new automated model was built for SB 79 analysis. The developed model has over 100 logic steps, further affirming the

need for automation. The bill requires calculations on a site, TOD Zone, and citywide level. Further complicating the City's analysis is the fact that a parcel can be located in multiple TOD zones which requires reconciliation and deduplication of data to result accurate data regarding the citywide number, and to produce the TOD zone-specific results. The model also enables geospatial analysis, which is key for the City to accurately analyze split-zoned sites and sites that are eligible for more than one SB 79 TOD zone with different tier designations. This model structure further enables flexibility for model replication and adjustment, as the City continues to receive guidance from state and regional agencies, including the Southern California Association of Governments and the California Department of Housing and Community Development. For these reasons, the City is distinct from other jurisdictions that have fewer sites eligible for SB 79, and therefore the same modeling methods used in other jurisdictions would not work for Los Angeles.

Model Overview

The following section describes the assumptions that were developed to determine whether sites eligible for the zoning provisions of SB 79 meet the criteria for permanent or temporary exemption. At a high level, the model is designed to calculate the City's local capacity and the capacity permitted by the development standards set forth by SB 79 (SB 79 capacity), and analyzes whether sites and TOD zones meet the criteria for permanent or temporary exemption as set forth in the bill. SB 79 requires capacity to be calculated by density, or the maximum number of units allowable on a site, and FAR, or the amount of area that may be developed with a building on a site.

The model considers the City's maximum buildout capacity, inclusive of local incentive programs such as the MIIP (LAMC Section 12.22 A.38) and recently updated Downtown LA Community Plan and Hollywood Community Plan. External factors such as market conditions or the realistic likelihood of new development occurring on each parcel are not required under SB 79 and were not incorporated in model logic. For clarity, a local TOD alternative plan, pursuant to GCS 65912.161(a) includes requirements for net gain capacity calculations when considering the application of local development standards. The maximum buildout capacity model is specific to the temporary exemption criteria pursuant to GCS 65912.161(b), as shown in the flowchart below.

Figure 1. Phased Implementation Model Flowchart

Local Capacity Assumptions

To calculate the City's local capacity within eligible TOD zones, the model accounts for a parcel's zoned capacity before and after development bonuses (base and bonus capacity), including incentive bonuses from the MIIP and two recently adopted and effective Community Plan Updates, the Downtown LA Community Plan and the Hollywood Community Plan. For the purposes of the model analysis, capacity in terms of density and floor area will be called Maximum Allowable Units; and Maximum Allowable Residential Building Volume; respectively in the following sections.

The section of the statute providing instructions for temporary exemption criteria (GCS 65912.161(b)), which takes into account local capacity for qualification, does not specify the method of calculating local capacity. Approximately 81% of permit applications representing about 90% of units proposed in 2025 in multifamily (5+ unit) developments used a local housing bonus program¹, therefore the inclusion of density and building volume granted through bonus programs is supported by development trends. The frequent use of housing incentive programs in Los Angeles is due to their careful design, which targets common zoning barriers, offers development bonuses in excess of state law (GSC. 65915), and provides alternative

¹ 2025 Annual Progress Report (APR) on the Housing Element webpage
<https://planning.lacity.gov/plans-policies/housing-element>

development standards to ensure the maximum densities can be achieved. Bonuses granted through these incentive programs change the zoning regulations on a site to increase the density and building volume permitted. Furthermore, the use of local bonus program capacity was found to be compliant by HCD for the purposes of meeting the City's Regional Housing Needs Assessment (RHNA) Rezoning and capacity obligations².

As described above, eligible sites exclude parcels that do not permit residential, mixed, or commercial uses. Sites zoned for Parking have been excluded from the SB 79 capacity calculation as they do not allow residential or commercial uses, but have been included in the analysis for local capacity as though they are eligible for bonus incentives through the MIIP.

For all parcels within eligible TOD zones, base and bonus capacity are calculated using assumptions at the BOE Parcel Identification Number (PIN) level. Density for residential, commercial, and industrial-mixed zoned parcels is divided by lot area to result in Maximum Allowable Units. For parcels where FAR is considered the limited factor, including when density is Unlimited, the Maximum Allowable Units is calculated by multiplying the FAR by PIN lot area and dividing by 1150³. In areas that require a certain amount of non-residential area per parcel, such as the Industrial-Mixed-3 (IX3) Use District⁴ in the Downtown LA Community Plan Area, then the Maximum Allowable Units is calculated as PIN lot area multiplied by FAR minus 1, divided by 1150. The NI(EC), HJ(EC), HR(EC), and MU(EC) zones in the Exposition Corridor Transit Neighborhood Plan Area (Expo TNP) include provisions that require a minimum percentage of lot area be designated for non-residential use. In the Revised Model Methodology, the base building volume is multiplied by the percentage permitted for residential uses to obtain the accurate base building volume that can be designated for residential uses.

MIIP has a project eligibility threshold of 5 total proposed units in order to utilize the incentive program, and the previous version of the phased implementation model methodology incorrectly excluded bonus units for sites with a base density of less than 5 units, instead of a total of 5 proposed units inclusive bonus units. The Revised Model Methodology included updates to ensure all parcels eligible for MIIP counted bonus capacity toward Maximum Allowable Units. Revisions were also made in the Revised Model Methodology to correctly capture bonus building volume capacity for sites in the Downtown LA Community Plan Area, where previously the model only accounted for base building volume.

Building volume assumptions for ~~residentially-zoned~~ parcels include adjustments to FAR to account for the calculation of Buildable Area ~~RFAR~~. ~~Residential floor area is calculated by multiplying the parcel's Buildable Area by the FAR.~~ Buildable Area is defined in LAMC Section 12.03; as all portions of a lot located within the proper zone for the proposed main building, excluding those portions of the lot which must be reserved for yard spaces, building line setback

²<https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/HAU/los-angeles-he-ta-11182024.pdf>

³ This figure is based on an average unit size assumption.

⁴ The Industrial-Mixed-3 (IX-3) Use District requires 1.0 FAR of a proposed development to be utilized for non-residential uses, pursuant to Sec. 5B.6.3 of Article 5 in Chapter 1A of the LAMC.

space, or which may only be used for accessory buildings or uses. This method of calculating Buildable Area is applicable to all zones that allow residential uses, with the exception of the C2, C4, and C5 zones and certain Specific Plans. There are 52 Specific Plans throughout the City and it was not feasible to verify the FAR calculation regulations of every plan. Furthermore, the current model is built to identify Buildable Area exceptions by zone class, and most Specific Plans contain zone classes utilized throughout the city that are not unique to the area. Therefore, the model employs the more conservative approach of applying Buildable Area in all specific plans. As yard space and building line setback may differ depending on the zone, the model used the following Residential Floor AreaR factor assumptions detailed in Table 1 below, to estimate residential floor area allowable FAR in zones subject to the Buildable Area definition. For zones considered Single Family Residential, a Residential Floor Area Ratio of 0.45 was applied. For sites within the Downtown Community Plan or eligible for CT incentive tiers, lot area is the same as Buildable Area, and not subject to LAMC Section 12.03.

Table 1: Residential Floor Area Factor Assumptions

APN Lot Size Range	Residential Floor Area Factor
Base Capacity	
Less than 3,000 sf	0.45
3,001 sf to 5,000 sf	0.55
5,001 sf to 10,000 sf	0.65
Greater than 10,001 sf	0.75
Bonus Capacity	
Less than 3,000 sf	0.5
3,001 sf to 5,000 sf	0.6
5,001 sf to 10,000 sf	0.7
Greater than 10,001 sf	0.8

As mentioned above, the local capacity calculation included the application of local bonus programs, either through the MIIP (LAMC 12.22 A.38 of Chapter 1) or Local Affordable Housing Incentive Program (Article 9, Sec. 9.3.2 of Chapter 1A) in the Downtown LA Community Plan Area. The model first calculates units and floor area using base zoning, and then applies the bonus density and FAR through the applicable local incentive programs to determine the Maximum Allowable Units and Maximum Allowable Residential Building Volume on the site. In cases where a site is eligible for more than one incentive program, a general hierarchy of MIIP incentive tiers, as shown in Table 2 below, establishes which incentive tier to apply. As there are sites where the CT incentive program will permit more units than the TOIA incentive program. The model includes an override rule for sites eligible for both the TOIA and CT Incentive Area,

denoted as T and CT incentive subareas in the table below. The model first will calculate the Maximum Allowable Units using the TOIA subarea incentives. If the Maximum Allowable Units permitted by the TOIA subarea is greater than 10 or 16 units, depending on the CT incentive subarea, the Maximum Allowable Units will reflect the TOIA value. Otherwise, the value is replaced with the greater CT incentive subarea value for Maximum Allowable Units. Logic was updated in the Revised Model Methodology to ensure that the CT tier's corresponding Maximum Allowable Residential Building Volume is also replaced in these cases. The Revised Model Methodology additionally includes updates to reflect new development standards and geographic eligibility for CT tiers as proposed through the Low-Rise Ordinance. This new field, called PIN_Incentive_Eligibility_Expansion, identified sites eligible for the development standards of the Low Rise Ordinance and applied the appropriate density and floor area ratio assumptions (the nomenclature maintains the CT tiers, but the equivalent Low Rise development standards were applied). Then, Maximum Allowable Units and Maximum Allowable Residential Building Volume were calculated for these sites. For sites that were still not eligible for a permanent or temporary exemption, the field LR_50 was added to the model, and as permitted by the Low Rise Ordinance LAMC Section 12.22 A.38(c)(10), these sites were permitted half of SB 79 density and floor area ratio to ensure every site in the City would be eligible for at least one permanent or temporary exemption. It is important to note that the model utilizes the development standards of the CT program as adopted in February 2025, and does not reflect the proposed updates to the program through the Low-Rise Ordinance.

Table 2: Hierarchy of MIIP Incentive Tiers

Incentive Tier	Rank
OC-3	1
T-3	2
OC-2	3
T-2	4
OC-1	5
T-1	6
CT-3	7
CT-2	8
CT-1	9

Transit Oriented Incentive Area (TOIA) tiers are The MHP assigneds differing density and FAR incentives based on the designated TCAC Opportunity Area, with greater incentives for sites in Higher Opportunity Areas. The Revised Model Methodology updatedmodel utilizes the TCAC Opportunity Area map from 2024 to 2026 to assign the bonus density and FAR for TOIA tiers, reflecting incoming map updates through the Low Rise Incentive Area Ordinance. These

amendments will enact MIIP eligibility map updates based on 2026 TCAC Opportunity Areas as well as new transit eligibility. Because TOIA eligibility is not dependent on TCAC Opportunity Areas, sites currently eligible for TOIA in the model will remain eligible regardless of the MIIP map update, and therefore may be assigned corresponding bonuses based on 2026 TCAC Opportunity Areas. In contrast, OC and CT grant eligibility based on TCAC Opportunity Area designation, and therefore require the map update for verification of continued eligibility for sites currently eligible under 2024 TCAC Opportunity Area designations. Since this updated MIIP map is not yet in effect, 2024 TCAC Opportunity Areas are used to determine current OC and CT tier eligibility, as the model is run in the future to align with SCAG's final TOD Zone map eligibility will be updated to reflect applicable TCAC Opportunity Areas.

The Boyle Heights and Harbor Gateway Community Plan Updates have been adopted by the City Council but are currently in the Form and Legality process with the City Attorney. The model utilizes a conservative approach and does not consider Transit Oriented Communities (TOC) incentives for these recently adopted Community Plans, as the TOC program is anticipated to sunset in 2026 and would not be available in the future on SB 79 eligible sites. The assumptions for these community plans utilize the existing zoned capacity available today and do not include assumptions regarding bonus capacity from the TOC program or the proposed New Zoning Code.

The MIIP assigns varying density bonus and FAR incentives based on whether a site is zoned for residential or commercial. The model is built to categorize each site based on the zone class, and classified every parcel into one of eight zone descriptors: Single Family Residential, Multiple Family Residential, Commercial, Parking, Industrial Mixed, Manufacturing, Public Facilities or Open Space, as shown in Table 3 below. The model uses the zone descriptors to apply the corresponding MIIP development incentives. For sites in the Single Family Residential zone descriptor category, the model assumes the Maximum Allowable Unit per parcel is one unit.

Table 3: Zone Descriptor Categories and Associated Zone Classes

Zone Descriptor	Associated Zone Classes
Single Family Residential	RA, RE, RE40, RE20, RE15, RE11, RE9, R1, R1H1, R1', R1R3, R1V1, R1V2, R1V3, RMP, RU, RZ2.5, RZ3, 'RZ4, RZ5, RG3, RG4, RS, RW1, A2, A2(PV), A2P
Multiple Family Residential	PVSP, RD6, RD5, RD4, RD3, RD2, RD1.5, R2, R3, R3(EC), R3(PV), R3(UV), R4, R4(UV), R5, RAS3, RAS3(UV), RAS4, RAS4(UV), RW2, RG1, RG2, RX1, RX2, RX3, RX4
Commercial	ADP, C1, C1(PV), C1.5, C2, C2(PV), C4, C4(OX), C5, CEC, CM(GM), CM(UV), CR, CR(PKM), CW, LASED, MU(EC), NMU(EC), PPS, UC(CA), UI(CA), USC-1A, USC-1B, USC-2, USC-3, UV(CA), CM, <u>NI(EC)</u> , HJ(EC), HR(EC), (WC)River, (WC)Downtown, (WC)Uptown, (WC)North Village, (WC)Topanga,

	(WC)Park, (WC)College, (WC)Commerce, DNSP, CCA, CX1, CX2, CX3, CX4, CX5, CX6, CX7, CX8, CX9, CX10
Parking	P, PB, R2P, R3P, R4P, R5P
Industrial Mixed	IX1, IX2, IX3, IX4, IX5, IX6, IX7, UV(CA), UI(CA), UC(CA)
Manufacturing	LAX, MR1, MR2, M, M(PV), M1, M2, M2(PV), M3, M(EG) , CCS, I1, I2, I3, I4, I5, I6, I7, I8
Public Facilities	PF, PF(UV), P1, P2, FWY, FRWY, Various
Open Space	OS1, OS, OS(PV), OS(UV), A1, A1(UV), A2, GW(CA) If the parcel is zoned A1 or A1(UV) and the General Plan Land Use is Single Family Residential, then it is assigned Single Family Residential.

After the corresponding incentive program density and FAR bonuses are applied, Maximum Allowable Units is calculated by either multiplying the units allowed by the base zoning by the bonus density percent, or when density is Unlimited, then the PIN lot area is multiplied by the bonus FAR and divided by 1150. When the parcel is not eligible for a bonus incentive program, Maximum Allowable Units is equivalent to the units allowed by the base zoning. Maximum Allowable Residential Building Volume is calculated by multiplying the PIN lot area by the bonus FAR, if applicable, and multiplying by the Residential Floor Area Factor for bonus capacity (refer to Table 1 for bonus RFAR factors). When the parcel is not eligible for a bonus incentive program, Maximum Allowable Residential Building Volume is equivalent to the building volume allowed by the base zoning.

SB 79 Capacity Assumptions

To calculate the development capacity permitted by the development standard provisions of SB 79, the model considered the following assumptions shown on the table, pursuant to Government Code Section 65912.157(a). The development assumptions were applied to each parcel at the LA BOE PIN level, and summed to the LA County APN level after the initial capacity calculations were completed. For example, Maximum Allowable Units is calculated by PIN lot area divided by density, and Maximum Allowable Residential Building Volume is calculated by PIN lot area multiplied by FAR, these values are then summed to the APN level. The law includes additional development standards for any site that is immediately adjacent to a TOD stop, pursuant to GCS 65912.157(e). As it is challenging to identify all sites adjacent to TOD stops, the model assumes any site within 200 feet of a TOD stop would be eligible for the additional development standards, as reflected in the Table 4 below.

Table 4: SB 79 Development Assumptions (GCS Section 65912.157(a))

TOD Zone Tier and Distance	Density per Acre	Density (per square foot of lot area)	FAR
Tier 1 200 feet	160	272	4.5
Tier 1 ¼ mile	120	363	3.5
Tier 1 ½ mile	100	435.6	3.0
Tier 2 200 feet	140	311	4.0
Tier 2 ¼ mile	100	435.6	3.0
Tier 2 ½ mile	80	544.5	2.5

SB 79 Statutorily Exempt Assumptions

According to the statute, a housing development project is an allowed use on any site zoned for residential, mixed, or commercial development within a TOD zone (GCS 65912.157(a)). SB 79 permits housing as a use in zones that allow commercial, even if residential uses are prohibited. As a result, the model assumes sites zoned for public facilities, parking, and open space are statutorily exempt from the provisions of SB 79, and no capacity is assigned to these zones. However, industrial zoned land in the City of LA permits commercial uses. The City has reached out to HCD and is awaiting guidance on this issue. To be conservative, pending future guidance, the model calculates SB 79 capacity on industrial zoned land, including MR1, MR2, M1, M2, and M3 zones, unless identified as part of an industrial employment hub. The model does not calculate capacity on industrial zoned land as part of the local capacity model as no residential uses are currently permitted.

GCS 65912.157(h)(1) states a proposed development may not utilize the zoning provisions of SB 79 on sites with more than two units that would require the demolition of housing subject to the RSO. This has been interpreted as a project level exemption due to the demolition provision, rather than a site level criteria that can qualify for a statutory exemption. Therefore, the model includes sites subject to the RSO in the capacity analysis for determining eligibility for temporary exemption. Including sites with RSO units acknowledges that projects on sites with more than two units would be permitted to utilize SB 79 zoning provisions provided they do not result in the demolition of RSO units that have been occupied in the last seven years.

Consistent with the criteria described above, sites zoned for Public Facilities or Open Space do not allow residential or commercial uses and were not evaluated for capacity as a part of this model. The zone class GW(CA) in the Cornfield-Arroyo Seco Specific Plan was erroneously omitted from the list of open space zone classes assigned a statutory exemption. This error was

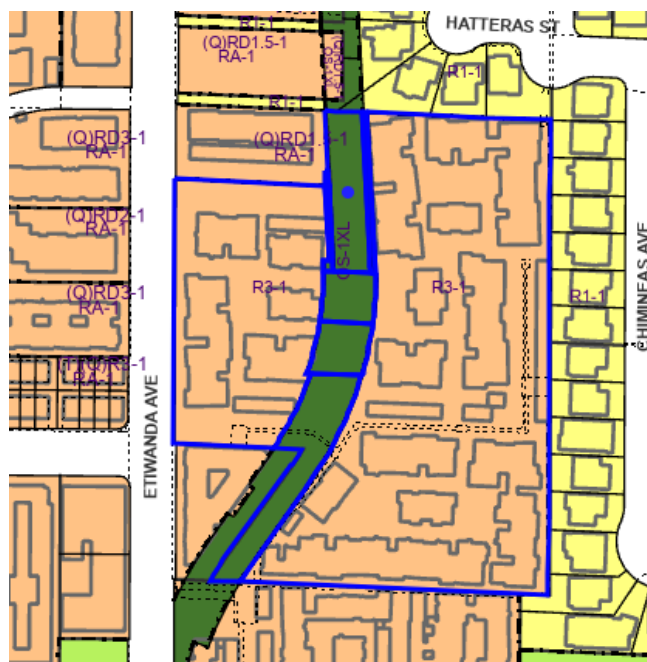
corrected in the Revised Model Methodology and any parcels zoned GW(CA) are now identified as statutorily exempt from SB 79. The Revised Model Methodology also removed the LAX zone class from the statutorily exempt field, as it was found the LAX zone class permits commercial uses and is eligible for SB 79.

~~However, t~~There are many sites in the City with split zones, where one site may include multiple zones. The following paragraph describes the method for isolating the exempt zones from sites with split zones to ensure they are not evaluated for capacity by the model.

~~GCS 65912.157(h)(1) states a proposed development may not utilize the zoning provisions of SB 79 on sites with more than two units that would require the demolition of housing subject to the RSO. This has been interpreted as a project level exemption due to the demolition provision, rather than a site level criteria that can qualify for a statutory exemption. Therefore, the model includes sites subject to the RSO in the capacity analysis for determining eligibility for temporary exemption. Including sites with RSO units acknowledges that projects on sites with more than two units would be permitted to utilize SB 79 zoning provisions provided they do not result in the demolition of RSO units that have been occupied in the last seven years.~~

The City of LA uses two types of parcel identification geometries: BOE PINs and LA County Assessor Parcel Numbers (APNs). They are two disparate systems for tracking land area, and in general, BOE PINs are more granular than LA County Assessor APNs. Using the BOE PIN geometry allowed the model to address split zones (instances where one APN may have multiple zones), and allowed for accuracy when calculating capacity on sites where there may be a portion of the site not eligible for capacity. In the example below, the sites located on the eastern side of Etiwanda Avenue and Collins Street in the Encino-Tarzana Community Plan Area are identified in the LA County Assessor system as APN 2157009033. This APN includes two zones, R3-1 and OS-1XL, where the site intersects the LA River channel. In order for the analysis to calculate capacity only on the portions of the site zoned for R3-1, the site utilized the BOE PIN land base to isolate the OS-1XL parcels and assign 0 value for capacity, while calculating capacity at the local and SB 79 level on the R3-1 portions of the site. For the purpose of this analysis, local capacity and SB 79 capacity are calculated at the BOE PIN level and then summed to the APN level when determining whether a site meets the temporary exemption criteria.

Figure 2. Split Zone Site Located on the eastern side of Etiwanda Avenue in Encino-Tarzana



ZIMAS, 2026

Permanent Exclusions

As mentioned above, SB 79 includes permanent exclusions for sites where no walking path of less than one-mile exist and for industrial employment hubs. The following analysis describes the process for determining whether a site meets the permanent exclusion criteria. If the site meets the criteria, it is ascribed a “yes” value, if it does not meet the criteria, it is ascribed a “no” value. When the value is “yes”, the model considers the site permanently excluded from the zoning provisions of SB 79, and does not calculate SB 79 capacity for the site. When the value is “no”, the model considers the site eligible for the zoning provisions of SB 79 and calculates capacity on the site.

No Walking Path of Less than One-Mile

SB 79 permits permanent exclusions for sites that do not have a walking path of less than one mile to the TOD station (GCS 65912.160(e)(1)). The one-mile walkability distance is measured by analyzing the street network within TOD zones utilizing ArcGIS Network Analyst and LA County TIGER. Natural impediments to walkability that are within the one-mile buffer around TOD zones are excluded from the qualifying walkable street network, including highways, railroads, hillside areas, waterways and subdivision neighborhoods with no road connectivity. After these exclusions for impediments to walkability, the walking distance along the street network deemed walkable from the TOD Station to the site is calculated. Sites that have a mile or more distance along the walkable street network are determined as eligible to be permanently excluded from SB 79.

Industrial Employment Hub

SB 79 defines an industrial employment hub as “a contiguous area of at least 250 acres designated in the jurisdiction’s general plan on or before January 1, 2025, as an employment lands area” (GSC 65912.160(e)(2)). The bill further specifies that these areas must be primarily dedicated to industrial use and that housing cannot be a prohibited use on any of the sites excluded. Mapping analysis identified sites meeting the criteria of the bill located in MR1, M1, MR2, M2, M3, I1, I2, and LAX zones, and select PF zoned sites with known industrial uses. Hybrid industrial zones were not included due to the allowance of residential uses in these types of zones. To meet the contiguous acreage criteria, sites were considered to be contiguous if located across a right-of-way (including streets, freeways, and open space containing the LA River), have a shared property line, or across a common corner. Industrial parcels that are separated by residential, commercial, or open space uses were not considered contiguous, and do not count as industrial employment hubs.

Mapping analysis of the industrial areas of the city identified six areas summarized in the table below which meet the criteria of industrial employment hubs, and therefore are permanently excluded from SB 79 eligibility. For additional information about industrial land in the City and the six industrial employment hubs, please refer to Appendix 3 of this report. The analysis also identified other areas of contiguous industrial land across the city that did not meet the 250 acre threshold, and as such, these areas are not exempt from the bill and are included in the modeling analysis.

Table 5: Summary of Industrial Employment Hubs

Name/Location	Acreage	Number of Sites¹
LAX	3623	297
Van Nuys	2383	1733
Downtown / Southeast LA	1758	3077
Chatsworth	1282	1023
Pacoima	664	442
Atwater / Cypress Park	312	413

¹ The number of sites included here are inclusive of sites outside of a SB 79 TOD zone.

Table 6 below summarizes the sites eligible for permanent exclusion from the zoning provisions of SB 79 pursuant to GCS 65912.160(e)(1) and (2).

Table 6: Summary of Sites Eligible for Permanent Exclusion from SB 79⁵

⁵ The final count of sites eligible for permanent exclusion cannot be finalized because it is dependent on SCAG’s final map of TOD Zones, which has not been published as of the release of this Appendix 1 and all corresponding Planning Reports. SCAG has confirmed that the final map’s anticipated release will not occur until July 2, 2026 - after

SB 79 Statutory Exemption	Count of Sites
No Walking Path of Less than One-Mile	341
Industrial Employment Hub	2,377

Temporary Exemptions

Pursuant to GCS 65912.161(b), sites, low resource areas, and TOD zone stations may be eligible for temporary exemption if they meet one of the criteria described below. The analysis performed for each temporary exemption criteria corresponds to a subsection of GCS 65912.161(b) as shown in Table 7, below.

SB 79's July 1, 2026 effective date and the City's adoption of the Low-Rise and Phased Implementation Ordinances. As such, further parcel identification will be needed in the future to align with SCAG's final map, consistent with the Director of Planning's authority to update SB 79 eligibility maps (Section 3 of SB 79 Phased Implementation Ordinance; LAMC Section 12.22 A.38 (j)(7)(i)(c).)

Table 7: Phased Implementation Criteria

Government Code Statute	Temporary Exemption Criteria	Level of Analysis
65912.161(b)(1)(A)	A site which permits density and RFAR at no less than 50% of the standards specified under subdivision (a) of Section 65912.157.	Individual Site
65912.161(b)(1)(B)(i)	A site in a TOD zone in which at least 33% of sites in the relevant TOD zone have permitted density and RFAR no less than 50% of the standards specified under subdivision (a) of Section 65912.157 and which includes sites with densities that cumulatively allow for at least 75% of the aggregate density for the TOD zone specified under subdivision (a) of Section 65912.157.	TOD zone
65912.161(b)(1)(B)(ii)	A site in a TOD zone that is primarily composed of a low-resource area which includes sites with densities that cumulatively allow for at least 40% of the aggregate density for the TOD zone specified under subdivision (a) of Section 65912.157.	TOD zone
65912.161(b)(1)(B)(iii)	A site in an area designated as low resource on the most recently adopted version of the opportunity area maps published by the TCAC/HCD, and within a jurisdiction that cumulatively allows for at least 50% of the total capacity for units and floor area as specified under subdivision (a) of Section 65912.157.	Individual Site
65912.161(b)(1)(C)	A site that is covered by a local TOD alternative plan adopted by a local government	Individual Site
65912.161(b)(1)(D)	Sites within a VHFHSZ as determined by the Department of Forestry and Fire Protection pursuant to Section 5118, or within the state responsibility area, as defined in Section 4102 of the Public Resources Code.	Individual Site
65912.161(b)(1)(E)	Sites vulnerable to one foot of sea level rise (SLR), as determined by the National Oceanic and Atmospheric Administration, the Ocean Protection Council, the United States Geological Survey, the University of California, or a local government's coastal hazards vulnerability assessment.	Individual Site
65912.161(b)(1)(F)	Sites with a historic resource designated as of January 1, 2025, on a local register.	Individual Site

Assessment of the City's Temporary Exemption Eligibility based on Station Area Characteristics

After existing baseline capacity and SB 79 capacity are established, the existing baseline capacity in terms of Maximum Allowable Units (density) and Maximum Allowable Residential Building Volume are compared to SB 79 capacity and evaluated by the requirements of GCS 65912.161(b)(1) to determine if the site is eligible for temporary exemption. The section below describes the assumptions and analysis performed to determine if a site is eligible for temporary exemption.

TOD Zone Level Temporary Exemption Criteria Assumptions

Primarily Low Resource TOD Zones

Government Code Section 65912.161(b)(1)(ii) permits temporary exemptions for sites within the entire TOD zone if they meet criteria as a primarily low resource TOD zone. The City utilized a plurality methodology to identify TOD zones that meet the temporary exemption criteria as a primarily low resource TOD zone. This methodology was decided on after input from HCD clarified that the term “primarily” in the SB 79 bill text (GCS 65912.161(b)(1)(B)(ii)) describes a “plurality” rather than a “majority.” The area in square feet of each TCAC designation (High & Highest Resource, Moderate Resource, and Low Resource) was calculated for every TOD zone and divided by the total area of the TOD zone to result in a percentage of land area per TCAC designation. Census tracts designated as Insufficient Data (which are areas identified on the CTCAC Opportunity Maps where data reliability is too low to accurately determine opportunity resource levels), have been removed as a category and from the total land area of the TOD zone.

A TOD Zone in which Low Resource Areas constitute a plurality of the land is illustrated with the Vermont/Sunset TOD Zone below (which is 38% Low Opportunity Area, 27% Moderate Opportunity Area, and 35% Higher Opportunity Area). Note that because Moderate and Higher Opportunity Areas make up a majority (over 50%) of the TOD Zone, this would be considered an “Opportunity Station” in the Low-Rise Ordinance even though under SB 79 it is considered a primarily low resource station. In this way, the City is exceeding the requirements of SB 79 to rezone beyond what is required.

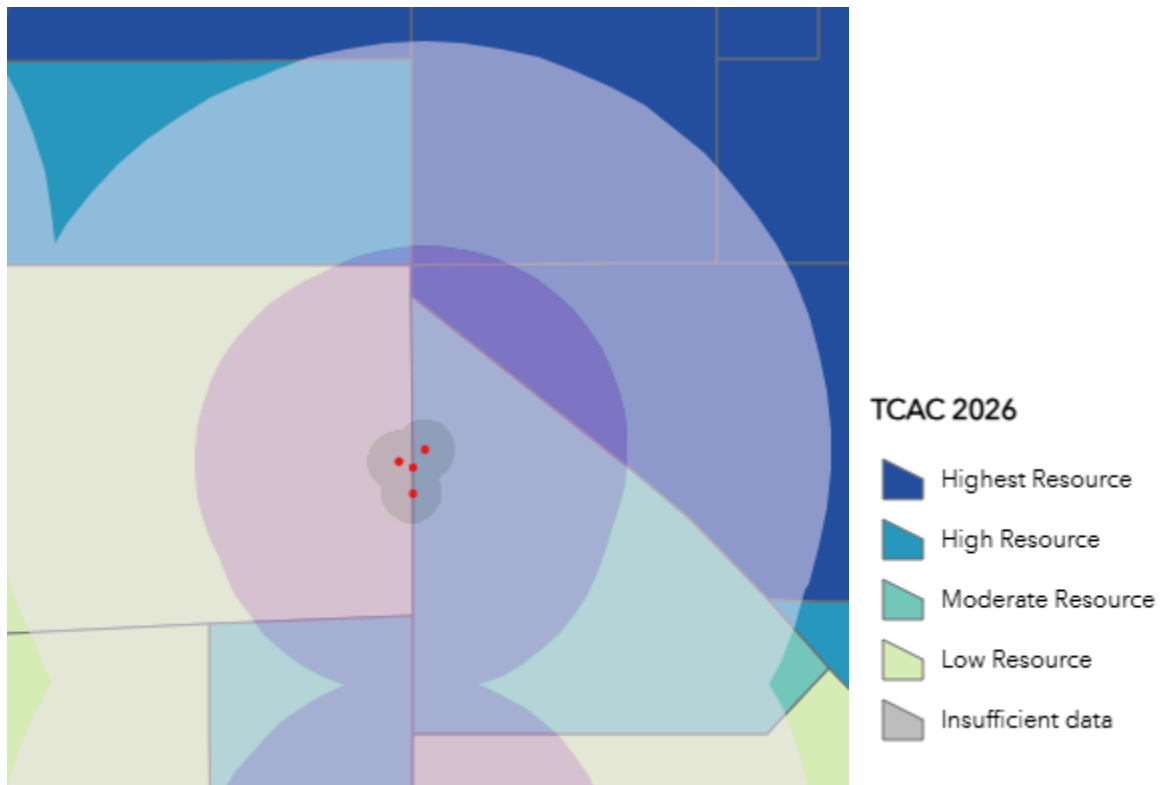
Figure 3. Vermont/Sunset TOD Zone with Low Resource Plurality

Table 9 at the end of this Appendix 1 shows the breakdown of TCAC categories by TOD zone and identifies the TOD Zones that are considered primarily Low Resource. Sites that permit at least 40 percent of the Maximum Allowable Units and Maximum Allowable Residential Building Volume provided by SB 79 are identified. When the TOD zone is considered a primarily Low Resource TOD zone and all sites permit at least 40% of the density and FAR standards of SB 79, then the entire TOD zone is eligible for temporary exemption.

TOD Zones Permitting Half of the Density and Floor Area of SB 79

An entire TOD zone may be temporarily exempt from the provisions of SB 79 when at least 33 percent of sites in the TOD zone permit at least 50 percent of the density and RFAR of the standards of SB 79, and at least 75 percent of the aggregate density standards provided by SB 79. To determine TOD Zones eligible for this temporary exemption, first, sites that meet at least 50 percent of SB 79 provisions are identified, and a count of sites meeting this criteria is calculated by TOD zone area. To determine whether 33 percent of sites in a TOD zone permits at least 50 percent of SB 79 development standards, the count of sites meeting 50 percent of SB 79 in both is divided by the count of sites eligible for SB 79 in the TOD zone. If the result is greater than or equal to 33 percent, the TOD zone meets the first part of this criteria. Next, the

model calculates 75 percent of the capacity permitted by SB 79 within the TOD zone, and compares it to the local Maximum Allowable Units and local Maximum Allowable Residential Building Volume for the TOD zone permitted by existing zoned capacity. If the local capacity for the TOD zone is greater than or equal to 75 percent of the capacity permitted by SB 79 in the TOD zone then the TOD zone is considered eligible for temporary exemption under GCS 65912.161(b)(1)(B)(i).

Individual Site Level Temporary Exemption Criteria Assumptions

Sites Meeting 50% of Density and FAR permitted by SB 79 (GCS 65912.161(b)(1)(A))

To identify sites eligible for temporary exemption because the local zoning permits at least 50 percent of the density and FAR afforded by SB 79, the model calculates whether local density in units per acre and local FAR are greater than or equal to 50 percent of SB 79 density and floor area, if both are true, then the site is eligible for temporary exemption under this criteria. If one or none are true, then the site is not eligible for temporary exemption under this criteria.

Low Resource Site GSC 65912.161(b)(1)(B)(ii)

To identify sites eligible for this temporary exemption, as a Low Resource site as designated by the California TCAC, the model determines first whether the parcel is in a Low Resource area. Then, the model evaluates if the local Maximum Allowable Units and local Maximum Allowable Residential Building Volume is greater than or equal to 50 percent of the SB 79 Maximum Allowable Units and SB 79 Maximum Allowable Residential Building Volume, respectively. If both local Maximum Allowable Units and Maximum Allowable Residential Building Volume are greater than or equal to half of SB 79 density and floor area, then the model inputs a “Yes” value, and the site is eligible for temporary exemption.

Local Transit-Oriented Development Alternative Plan GSC 65912.161(b)(1)(C)

No sites are currently relying on a local TOD alternative plan to meet the temporary exemption from SB 79 provisions criteria.

Very High Fire Hazard Severity Zones GSC 65912.161(b)(1)(D)

Sites located within a VHFHSZ, as determined by the Department of Forestry and Fire Protection are considered eligible for temporary exemption. The model identifies sites located in a VHFHSZ and considers these sites eligible for temporary exemption from SB 79 and indicates so with a “Yes” value, for temporary exemption. Sites were identified at the PIN level.

Sites Vulnerable to One-Foot Sea Level Rise Areas GSC 65912.161(b)(1)(E)

Sites located within an area vulnerable to one-foot sea level rise, as determined by the National Oceanic and Atmospheric Administration, Ocean Protection Council, United States Geological Survey, the University of California, or a local government’s coastal hazards vulnerability assessment are considered eligible for temporary exemption. The model identifies sites located in an area vulnerable to one-foot of sea level rise and considers these sites eligible for temporary exemption from SB 79 and indicates so with a “Yes” value, for temporary exemption. Sites were identified at the PIN level.

Sites Designated as a Local Historic Register GSC 65912.161(b)(1)(F)

Sites designated as a historic resource on a local register prior to January 1, 2025 are considered eligible for temporary exemption. For the City of LA, these are sites designated as local HCMs and HPOZs before January 1, 2025. The model identifies sites designated as a HCM or HPOZ before January 1, 2025, and considers these sites eligible for temporary exemption from SB 79 and indicates so with a “Yes” value, for temporary exemption. Sites were identified at the PIN level.

Sites Eligible for Any Temporary Exemption Criteria

Pursuant to GCS 65912.161(b)(1), a site may be eligible for at least one of the temporary exemption criteria. Table 8 below summarizes the sites and TOD zones that meet each temporary criteria. Some sites may be counted as eligible for more than one temporary exemption criteria.

Table 8: Sites Eligible for Temporary Exemption⁶

Temporary Exemption Criteria	Count of Eligible Sites or TOD zones	Percent of Eligible Sites or TOD zones
Sites permitting half of density and residential floor area ratio afforded in SB 79 (GCS 65912.161(b)(1)(A))	Existing Zoned Capacity: 46,526 parcels Inclusive of Low-Rise Ordinance Amendments: 17,562 parcels	Existing Zoned Capacity: 34.34% of sites Inclusive of Low-Rise Ordinance Amendments: 12.59% of sites
Sites in TOD zones meeting capacity, density and floor area minimums (GCS 65912.161(b)(1)(B)(i))	74 TOD zones	51% of TOD zones
Sites in an area designated as low resource on the most recently adopted version of the opportunity area maps published by the TCAC, within a jurisdiction that cumulatively allows for at least 50% of the Residential Capacity required by SB 79 (GCS 65912.161(b)(1)(B)(ii))	75,704 parcels	55.88% of sites
Sites in primarily low resource TOD zones permitting half of the total capacity and floor area afforded in SB 79 (GCS 65912.161(b)(1)(B)(iii))	80 TOD zones	55.1% of TOD zones
Sites covered by a local TOD alternative plan. (GCS 65912.161(b)(1)(C))	0 parcels	0% of sites
Sites within a VHFHSZ (GCS 65912.161(b)(1)(D))	12,910 parcels	10.59% of sites
Sites vulnerable to one-foot of sea level rise (GCS 65912.161(b)(1)(E))	0 parcels	0% of sites
Sites with a historic resource designated as of January 1, 2025, on a local register (GCS 65912.161(b)(1)(F))	7,689 parcels	6.31% of sites
Sites eligible for at least one temporary exemption criteria	135,474 parcels	100% of sites

⁶ The final count of sites eligible for temporary exemption is dependent on SCAG's final map of TOD Zones, which has not been published as of the release of this Appendix 1 and all corresponding Planning Reports reports. SCAG has confirmed that the final map's anticipated release will not occur until July 2, 2026 - after SB 79's July 1, 2026 effective date and the City's adoption of the Low-Rise and Phased Implementation Ordinances. As such, further parcel identification will be needed in the future to align with SCAG's final map, consistent with the Director of Planning's the authority to update SB 79 eligibility maps (Section 3 of SB 79 Phased Implementation Ordinance: LAMC Section 12.22 A.38 (j)(7)(i)(c).)

Model Example

The section that follows provides an example of the model process for determining eligibility for phased implementation. The example below first considers site-level information to determine eligibility for phased implementation, then analyzes eligibility of the site's TOD Zone for phased implementation.

Site Analysis

Site Information	
Zone	RD 1.5-1
Lot Area	8,951.9 sq ft
Base Density (Lot Area/ Minimum Lot Area per DU)	8,951.9/ 1500 (rounded up) = 6 units
Base FAR	3:1
Applicable Incentive Program	TOIA T-2, Low Resource
Bonus Density	6 * 110% (rounded up) = 7 units
Bonus FAR	3 * 40% increase = 4.2 bonus FAR
Qualifying TOD Station	ESFV-Van Nuys/Vanowen, within 1/4 mile
Eligible SB 79 TOD Tier	Tier 2
Density permitted by TOD tier	436 sq ft of lot area per DU ⁷
FAR permitted by TOD tier	3.0:1
Step 1: Calculate Local and SB 79 Capacity	
Local Capacity	
(Base Density+ Bonus Density)= Site's Maximum Allowable Units	(6+7) =13 units
Lot Area* (Base FAR+ Bonus FAR)*Applicable RFAR Assumption = Site's Maximum Allowable Residential Building Volume	8,951.9*(3 +1.2)*(.7) =26,318 sq ft
SB 79 Capacity	

⁷ SB 79 grants density as DU per acre. Sites within 1/4 mile of a Tier 2 TOD Stop receive 100DU per acre, which is equivalent to 436 sq ft of lot area per DU.

(Lot Area/ Tier Density) Site's Maximum Allowable Units	8,951.9/ 436(rounded up) = 21 units
(Lot Area* Tier FAR)= Site's Maximum Allowable Residential Building Volume	8,951.9*3 =26,855 sq ft
Step 2: Determine Site's Eligibility for Temporary Exemption	
<i>If the site qualifies for <u>at least one</u> temporary exemption criteria below, the site is eligible for phased implementation.</i>	
Site Specific Temporary Exemption Criteria	
Site is/ has:	Does Example Site Qualify?
☒ Half capacity of SB 79	Yes. Both the site's local Maximum Allowable Residential Building Volume and the local Maximum Allowable Units exceed the threshold for half capacity allowed by SB 79.
☒ Low Resource site & the City has half of SB 79 capacity	Yes. This site is designated as Low Resource and the City as whole exceeds the 50% threshold in both density and building volume permitted by SB 79.
☐ Within a Local Alternative Plan	No. As of the release of this staff report, the City has not adopted a Local Alternative Plan.
☐ Within VHFHSZ	No. This site is not within the VHFHSZ.
☐ Within one-foot of sea level rise	No. This site is not located in an area vulnerable to one-foot of sea level rise.
☐ Local historic resource designated as of Jan 1, 2025	No. This site does not contain a local historic resource designated as of Jan. 1, 2025.

As outlined in the table above, the example site meets site-level criteria to qualify for temporary exemption. However, additional temporary exemption criteria that consider eligibility for exemption at the TOD zone level can be analyzed.

TOD Zone Analysis

TOD Zone Information	
TOD Station	ESFV-Van Nuys/Vanowen
Step 1: Calculate Local and SB 79 Capacity	
Local Capacity	
Calculate local capacity for each site within the TOD Zone ⁸ , then sum for all sites:	
TOD Zone Maximum Allowable Units	36,295 units
TOD Zone Maximum Residential Building Volume	39,333,581 sq ft
SB 79 Capacity	
Calculate SB 79 capacity for each site within the TOD Zone ⁴ , excluding any sites meeting criteria for permanent exemption :	
☐ No Walking Path within less than ½ mile from Station (0 sites for this TOD Station) ☐ Industrial Employment Hub (0 sites for this TOD Station)	
Then sum for all SB 79 eligible sites:	
TOD Zone Maximum Allowable Units	35,847 units
TOD Zone Maximum Allowable Residential Building Volume	46,201,924 sq ft
Step 2: Determine TOD Zone's Eligibility for Temporary Exemption	
If the TOD Zone qualifies for <u>at least one</u> temporary exemption criteria below, the entire TOD Zone is eligible for phased implementation.	
TOD Zone- Specific Temporary Exemption Criteria	
TOD Zone is:	Does Example TOD Zone Qualify?
☒ Within a TOD Zone of which a third of sites have half SB 79 capacity and the TOD zone cumulatively has 75% of SB 79 density	Yes. At least one-third of sites within the ESFV-Van Nuys/Vanowen TOD Zone have at least half SB 79 capacity. Additionally, the TOD Zone cumulatively allows 36,295 units within local capacity, which exceeds the 75% threshold of units permitted by SB 79 (35,847 units).
☒ Within TOD zone that is primarily Low Resource and cumulatively has 40% SB 79 density	Yes. Although the example site is designated as Moderate Resource, the ESFV-Van Nuys/Vanowen TOD Zone is primarily designated as Low Resource since it is the designation that makes up the highest percentage of area within the TOD Zone. Additionally, the TOD Zone cumulatively allows 36,295 units within local capacity, which exceeds the 40% threshold of units permitted by SB 79 (35,847 units).

⁸ The model assumes sites zoned for public facilities, parking, and open space are statutorily exempt from the provisions of SB 79, and no capacity is assigned to these zones.

Since the site's TOD Zone qualifies for temporary exemption, the site also achieves eligibility for temporary exemption.

Table 9: Primarily Low Resource TOD Zones by Analysis

TOD Zone Name	High & Highest Resource	Moderate Resource	Low Resource	Primarily Low Resource TOD Zone	Permits 40% of SB 79 Density and FAR
A/RED/PUR/Metrolink-Union Station	29%	38%	33%	No	No
A-Chinatown	39%	56%	5%	No	No
A-Heritage Square	0%	41%	59%	Yes	Yes
A-Highland Park	23%	54%	23%	No	No
A-Lincoln/Cypress	3%	1%	96%	Yes	Yes
A-Little Tokyo/Arts District	7%	41%	52%	Yes	Yes
A-Southwest Museum	48%	39%	12%	No	No
BLU/EXP/RED/PUR-7th St/Metro Center	0%	43%	57%	Yes	Yes
BLU/EXP-Pico	0%	42%	58%	Yes	Yes
BLU/GRN-Willowbrook/Rosa Parks	0%	0%	100%	Yes	Yes
BLU-103rd St/Watts Towers	0%	0%	100%	Yes	Yes
BLU-Firestone	0%	0%	100%	Yes	Yes
BLU-Grand/LATTC	0%	4%	96%	Yes	Yes
BLU-San Pedro St	0%	0%	100%	Yes	Yes
BLU-Slauson	0%	0%	100%	Yes	Yes
BLU-Vernon	0%	0%	100%	Yes	Yes
BLU-Washington	31%	0%	69%	Yes	Yes
E-Indiana	0%	0%	100%	Yes	No
E-Mariachi Plaza	0%	4%	96%	Yes	Yes
E-Pico/Aliso	0%	23%	77%	Yes	Yes
ESFV/SP-Van Nuys	0%	0%	100%	Yes	Yes
ESFV/SP-Van Nuys/Oxnard (Orange)	30%	2%	68%	Yes	Yes
ESFV-Van Nuys/Arleta	0%	7%	93%	Yes	No
ESFV-Van Nuys/Laurel Canyon	0%	0%	100%	Yes	No
ESFV-Van Nuys/Nordhoff	0%	2%	98%	Yes	Yes
ESFV-Van Nuys/Roscoe	0%	0%	100%	Yes	Yes
ESFV-Van Nuys/San Fernando	0%	0%	100%	Yes	No
ESFV-Van Nuys/Sherman	0%	0%	100%	Yes	Yes
ESFV-Van Nuys/Vanowen	0%	11%	89%	Yes	Yes
ESFV-Van Nuys/Victory	1%	17%	82%	Yes	Yes
ESFV-Van Nuys/Woodman	0%	10%	90%	Yes	No
E-Soto	0%	6%	94%	Yes	Yes
EXP/SP-Expo/Sepulveda	100%	0%	0%	No	No
EXP-Culver City	87%	13%	0%	No	No
EXP-Expo Park/USC	0%	0%	100%	Yes	Yes
EXP-Expo/Bundy	100%	0%	0%	No	No
EXP-Expo/Crenshaw	0%	43%	57%	Yes	Yes
EXP-Expo/La Brea	0%	10%	90%	Yes	Yes
EXP-Expo/Vermont	0%	0%	100%	Yes	Yes
EXP-Expo/Western	0%	0%	100%	Yes	No
EXP-Farmdale	0%	20%	80%	Yes	Yes
EXP-Jefferson/USC	0%	0%	100%	Yes	Yes
EXP-La Cienega/Jefferson	26%	13%	61%	Yes	Yes
EXP-LATTC/Ortho Institute	0%	4%	96%	Yes	Yes
EXP-Palms	100%	0%	0%	No	No
EXP-Westwood/Rancho Park	100%	0%	0%	No	No
GRN/K Line-Aviation/96th St	72%	0%	28%	No	No
GRN/K Line-Aviation/Century	99%	0%	1%	No	No
GRN-Avalon	0%	0%	100%	Yes	Yes
GRN-Aviation/LAX	95%	0%	5%	No	No
GRN-Harbor Freeway	0%	0%	100%	Yes	Yes
GRN-Vermont/Athens	0%	0%	100%	Yes	No
K Line-Crenshaw/Adams	0%	0%	100%	Yes	Yes
K Line-Crenshaw/Exposition	0%	45%	55%	Yes	Yes
K Line-Crenshaw/MLK	0%	36%	64%	Yes	Yes
K Line-Crenshaw/Slauson	0%	6%	94%	Yes	Yes
K Line-Crenshaw/Vernon	0%	38%	62%	Yes	Yes
K Line-Fairfax/3rd	100%	0%	0%	No	No
K Line-Florence/Hindry	55%	0%	45%	No	No
K Line-Florence/West	0%	23%	77%	Yes	Yes
K Line-Highland/Odin	91%	8%	1%	No	No
K Line-LaCienega/Beverly	100%	0%	0%	No	No
K Line-SantaMonica/Fairfax	100%	0%	0%	No	No
K Line-SantaMonica/LaBrea	100%	0%	0%	No	No
K Line-SantaMonica/Palm	100%	0%	0%	No	No
K Line-SanVicente/Pico	81%	16%	3%	No	No
Metro 234 - Parthenia Street	0%	0%	100%	Yes	Yes
Metro 234 - Roscoe Boulevard	0%	0%	100%	Yes	Yes
Metro 234 - Saticoy Street	0%	0%	100%	Yes	Yes
Metro 234 - Sherman Way	0%	0%	100%	Yes	Yes
Metro 234 - Vanowen Street	0%	11%	89%	Yes	Yes
Metro 234 - Victory Boulevard	9%	15%	76%	Yes	Yes
Metro 234 - Ventura Boulevard	100%	0%	0%	No	No
Metro 33 - Venice Boulevard	100%	0%	0%	No	No
Metro 70 - N Spring Street	35%	9%	56%	Yes	Yes
Metro 78 - N Spring Street	17%	13%	70%	Yes	Yes

Table 9: Primarily Low Resource TOD Zones by Analysis

TOD Zone Name	High & Highest Resource	Moderate Resource	Low Resource	Primarily Low Resource TOD Zone	Permits 40% of SB 79 Density and FAR
Metro 81 - Olympic Boulevard	0%	51%	49%	No	No
Metro 81 - Pico Boulevard	0%	34%	66%	Yes	Yes
Metro 81 - Venice Boulevard	0%	19%	81%	Yes	Yes
Metro 81 - W 12th Street	0%	43%	57%	Yes	Yes
Metro 81 - W 23rd Street	0%	13%	87%	Yes	Yes
Metro 81 - W Washington Boulevard	0%	11%	89%	Yes	Yes
Metro 910 - N Spring Street	14%	14%	72%	Yes	Yes
Metro 910 - S Figueroa Street	0%	40%	60%	Yes	Yes
Metro 910 - W Aliso Street	23%	18%	60%	Yes	Yes
Metro 910/70 - N Spring Street	13%	15%	72%	Yes	Yes
Metrolink - Glendale	69%	31%	0%	No	No
NOHO to Pasadena BRT-Colorado Boulevard	100%	0%	0%	No	No
NOHO to Pasadena BRT-E Broadway	80%	20%	0%	No	No
NOHO to Pasadena BRT-Eagle Rock Boulevard	100%	0%	0%	No	No
NOHO to Pasadena BRT-Hesby Street	75%	25%	0%	No	No
NOHO to Pasadena BRT-Townsend Avenue	100%	0%	0%	No	No
NOHO to Pasadena BRT-W Alameda Avenue	100%	0%	0%	No	No
NOHO to Pasadena BRT-W Riverside Drive	100%	0%	0%	No	No
Orange Line - Balboa	56%	20%	24%	No	No
Orange Line - Canoga	0%	16%	84%	Yes	Yes
Orange Line - Chatsworth	100%	0%	0%	No	No
Orange Line - De Soto	0%	47%	53%	Yes	Yes
Orange Line - Laurel Canyon	100%	0%	0%	No	No
Orange Line - Nordhoff	40%	14%	46%	Yes	Yes
Orange Line - Pierce College	19%	47%	34%	No	No
Orange Line - Reseda	57%	26%	17%	No	No
Orange Line - Roscoe	0%	0%	100%	Yes	Yes
Orange Line - Sepulveda	62%	1%	37%	No	No
Orange Line - Sherman Way	0%	0%	100%	Yes	Yes
Orange Line - Tampa	52%	47%	1%	No	No
Orange Line - Valley College	52%	48%	0%	No	No
Orange Line - Van Nuys	29%	2%	70%	Yes	Yes
Orange Line - Woodley	54%	0%	46%	No	No
Orange Line - Woodman	32%	45%	24%	No	No
PURex/K Line-Wilshire/Fairfax	100%	0%	0%	No	No
PURex/SP-Westwood UCLA	86%	14%	0%	No	No
PURex-Century City	100%	0%	0%	No	No
PURex-Westwood/VA Hospital	85%	15%	0%	No	No
PURex-Wilshire/La Brea	100%	0%	0%	No	No
PURex-Wilshire/La Cienega	100%	0%	0%	No	No
PUR-Wilshire/Normandie	0%	35%	65%	Yes	Yes
PUR-Wilshire/Western	8%	72%	20%	No	No
RC-1st/Central	7%	37%	56%	Yes	Yes
RC-2nd/Broadway	3%	20%	77%	Yes	Yes
RC-2nd/Hope	0%	42%	58%	Yes	Yes
RED/CRN-Hollywood/Highland	58%	23%	19%	No	No
RED/Orange Line-North Hollywood	49%	37%	13%	No	No
RED/PUR/Vermont BRT-Wilshire/Vermont	0%	43%	57%	Yes	Yes
RED/PUR-Civic Center/Grand Park	11%	19%	71%	Yes	Yes
RED/PUR-Pershing Square	0%	30%	70%	Yes	Yes
RED/PUR-Westlake/MacArthur Park	0%	1%	99%	Yes	Yes
RED/Vermont BRT-Vermont/Santa Monica	11%	23%	65%	Yes	Yes
RED/Vermont BRT-Vermont/Sunset	34%	29%	37%	Yes	Yes
RED-Hollywood/Vine	7%	50%	43%	No	No
RED-Hollywood/Western	19%	18%	63%	Yes	Yes
RED-Universal City/Studio City	100%	0%	0%	No	No
RED-Vermont/Beverly	2%	82%	15%	No	No
SP-Santa Monica	100%	0%	0%	No	No
SP-UCLA Ackerman Union	66%	34%	0%	No	No
SP-Ventura/Van Nuys	100%	0%	0%	No	No
Vermont BRT - Athens	0%	0%	100%	Yes	No
Vermont BRT - Century Blvd	0%	0%	100%	Yes	Yes
Vermont BRT - Florence Ave	0%	0%	100%	Yes	Yes
Vermont BRT - Pico Blvd	0%	0%	100%	Yes	Yes
Vermont BRT - Slauson Ave	0%	0%	100%	Yes	Yes
Vermont BRT - Vernon Ave	0%	0%	100%	Yes	Yes
Vermont BRT - W 3rd St	0%	61%	39%	No	No
Vermont BRT - W Adams Blvd	0%	12%	88%	Yes	Yes
Vermont BRT - W Manchester Ave	0%	0%	100%	Yes	Yes

Revised APPENDIX 3:

Impacts of Senate Bill (SB) 79 on Industrial Areas of Los Angeles

CPC-2026-1798-MS

June 17, 2026

APPENDIX 3: IMPACTS OF SENATE BILL (SB) 79 ON INDUSTRIAL AREAS OF LOS ANGELES

I. Introduction

This appendix provides a summary and analysis of Senate Bill (SB) 79's potential impacts to industrial areas of Los Angeles within or near Transit Oriented Development (TOD) zones¹ as well as an overview of industrial areas that are eligible for exemption due to meeting the criteria for "industrial employment hubs". SB 79 (Government Code Section (GCS) 65912.155-162) intends to facilitate housing near transit and enables TOD housing developments on "any site zoned for residential, mixed, or commercial uses" that are located within a quarter mile or half mile of an eligible TOD stop. The bill does not explicitly prohibit eligibility in industrial zones, but cities may permanently exempt by ordinance sites meeting the criteria for industrial employment hubs (~~GCS~~GCS 65912.160(e)(2)).

II. Analysis

Industrial Land in Los Angeles

The Framework Element and Community Plans establish the City's goal to preserve industrial land for industrial uses, to attract new industries, and to address conflicts associated with allowing residential adjacent to industrial uses. Policy 3.14.4 of the Framework Element, which guides the City's long term growth and informs the City's Community Plans and zoning ordinances, expresses this policy intent and states "Limit the introduction of new commercial and other non-industrial uses in existing commercial manufacturing zones to uses which support the primary industrial function of the location in which they are located." Across Community Plans that comprise the City's Land Use Element that apply to areas with higher concentrations of industrial zoned sites, policy goals cite the intention to protect industrial land for the purpose of maintaining industrial uses, preserving industrial jobs, and promoting economic viability.^{2,3,4}

The role of industrial land as an employment generating use and the importance of retaining and encouraging industrial economic activity was also highlighted by the Industrial Land Use Policy (ILUP) project⁵ conducted by the Department. The ILUP assessed industrial land use and related policies in the City, highlighted the importance of industrial land to the local economy, and made recommendations related to retaining and encouraging industrial uses. In particular,

¹ TOD zone refers to the half-mile radius of eligible sites around an eligible TOD stop.

² Downtown Community Plan Policy LU 48.1: Prioritize space for jobs by preserving existing industrial functions, allowing production sectors to cluster, and facilitating goods movement with access to freeways and transportation corridors.

³ Southeast Los Angeles Community Plan Goal LU 14: Sufficient land is conserved for a variety of industrial uses with maximum employment opportunities.

⁴ Van Nuys-North Sherman Oaks Community Plan Goal 3: Sufficient land for a variety of industrial uses with maximum employment opportunities for the community's workforce which are safe for the environment and which have minimal adverse impact on adjacent residential uses.

⁵ https://planning.lacity.gov/code_studies/landuseproj/Industrial_Files/Attachment%20B.pdf

the ILUP report highlights the strategic importance of downtown as a central point of connectivity for goods movement from the Ports of Long Beach and Los Angeles and designates areas of downtown as Employment Protection Districts⁶, where industrial zoning should be maintained. The ILUP gives staff direction on the protection of industrial land from the intrusion of other uses which is memorialized in a memorandum⁷ that specifically recommends that project “applications in industrial zones outside of the ILUP Project Study Areas should be handled in the same manner as those in Employment Protection Districts” (page 7).

The Community Plans also address the allowance of complementary uses and new, emerging technology in industrial zones as a way to adapt to changing industrial land use needs. At the same time, these plans acknowledge the incompatibility of residential and industrial uses and call to limit the negative impacts of industrial uses on adjacent residential uses through land use policy. Though impacts of this incompatibility result from existing industrial uses, negative health impacts may also persist in residential areas within close proximity to sites formerly occupied with industrial uses. Reporting⁸ on a recent study conducted on and around a former battery plant in southeast Los Angeles County found that despite remediation efforts, many homes still had high lead levels exceeding safety thresholds recommended by the California Environmental Protection Agency. More recent General Plan documents, including the draft Health and Environmental Justice Element, proposed updated Boyle Heights Community Plan, and adopted Southeast Los Angeles Community Plan, address the history of environmental justice in communities and the resulting impacts of the long-standing conflict between residential and industrial uses through policies intended to minimize future harm.^{9,10,11} One such example of this is the Southeast Los Angeles Community Plan Implementation Overlay industrial subareas, which were developed to protect residential and other sensitive uses and in certain areas, adjacent to residential, place limitations on allowed uses and require additional development standards.

SB 79 Applicability to Industrial Areas in Los Angeles

As mentioned, SB 79 does not explicitly exclude industrial zones from eligibility and instead stipulates that SB 79 may apply on any site zoned for residential, mixed use, or commercial uses (GCS 65912.157(a)). The City's industrial zones permit commercial uses either primarily or as ancillary accompanying uses. As such, the Department has sought guidance from the

⁶ https://planning.lacity.gov/odocument/7428f2e2-b9cb-41dd-94a3-a199fba77b97/downtown_results.pdf, https://planning.lacity.gov/odocument/5b6e7294-516e-4559-903b-e78cd98eee78/alameda_results.pdf, <https://planning.lacity.gov/odocument/5549a8cb-1391-4a15-8d55-33912ef99cca/southeastla.pdf>;

⁷ <https://planning.lacity.gov/odocument/60b134a0-97c0-4c25-aad8-b158a6476e28/staffdirections.pdf>

⁸ <https://laist.com/news/climate-environment/la-county-exide-cleanup-lead-uc-irvine-study>

⁹ Draft Health and Environmental Justice Element Policy 3.3.4 Land Use Conflicts: Reduce or limit conflicts between heavy commercial, industrial uses and other potentially noxious uses or activities, and sensitive receptors and uses by requiring compliance with environmental protection measures that focus on preventing adverse impacts or significant health and safety risks.

¹⁰ Boyle Heights Community Plan LU Goal 23: Industrial land uses are sited and designed in a manner that prioritizes the health and safety of local residents.

¹¹ Southeast Los Angeles Community Plan Policy LU16.4 Minimize Incompatibilities. Minimize residential-industrial land use incompatibilities and prohibit noxious industrial uses adjacent to residential.

California Department of Housing and Community Development (HCD) as to whether industrial sites which permit commercial uses are eligible for SB 79 incentives. As the city may be unable to prohibit SB 79 broadly across industrial zoned sites, establishing the industrial employment hub exemption areas is essential for health and job growth goals.

Industrial Employment Hubs

SB 79 allows cities to permanently exempt “industrial employment hubs” (GSC 65912.160(e)(2)) from eligibility through the adoption of an ordinance. Table 1 below provides a breakdown of the criteria industrial employment hubs must meet and describes the City’s methods to assess compliance with each. The analysis conducted is based on mapping analysis of the City’s industrial land as well as policy analysis of the City’s General Plan elements which speak to the intent and regulation of industrial land.

Table 1. Industrial Employment Hub Requirements per GCS 65912.160(e)(2)

<i>Requirement</i>	<i>Description</i>	<i>Methodology</i>
“A local government with at least 15 transit-oriented development stops designates the area as an industrial employment hub.”	Cities must have at least 15 TOD stops to designate areas as industrial employment hubs.	Conducted mapping to identify 145 TOD stops within the City.
“An industrial employment hub shall be a contiguous area of at least 250 acres designated in the jurisdiction’s general plan on or before January 1, 2025, as an employment lands area;”	Hubs must be a contiguous area of at least 250 acres of employment related land-uses.-	Conducted mapping analysis to assess contiguity and reviewed Framework and Land Use Elements as well as the Industrial Land Use Policy. Includes Industrial, and in limited instances, Commercial land uses intended for industrial employment growth.
“The parcels within it shall be primarily dedicated to industrial use as defined in paragraph (3) of subdivision (f) of Section 65912.121;”	Hubs must be primarily dedicated to industrial uses as defined by GCS 65912.121(f)(3) which defines “dedicated to industrial use” to mean any of the following: (1) the square footage is currently being used as an industrial use, (2) the most recently permitted	Assessed zoning and land uses within areas identified as contiguous, including sites across a right-of-way and the LA River. Existing uses verified on some sites.

	use of the square footage is an industrial use, and the site has been occupied within the last three years, or (3) the sites was designated for industrial use in the latest version of a local government's general plan adopted before January 1, 2022, and residential uses are not principally permitted on the site.	
"...Housing shall not be a permitted use on any of the sites so excluded."	Hubs cannot include sites which <u>principally</u> permit housing per the underlying zoning.	Assessed industrial zoning within areas to identify <u>principally</u> permitted uses, including residential

The bill requires industrial hubs to be designated as "employment lands areas", and in order to determine how the City's industrial land is aligned with this designation, the Framework Element¹² and Land Use Element (comprising 34 Community Plans) ~~was~~ reviewed for applicable goals and policies. The Framework Element provides policy direction to guide land use citywide and across General Plan Elements, including the Land Use Element which is made up of ~~34~~ 345 Community Plans. The Community Plans then assign specific locations land use designations and corresponding zones tailored to the community plan area. In analyzing the Framework Element, the employment producing nature of the City's industrial land is repeatedly stated. The Framework Element establishes various land use categories, including industrial districts which are designated by the Community Plans for the purpose of "[supporting] economic development and jobs generation" (page 3). The Framework Element goes on to define industrial land uses as intending to "preserve industrial lands for the retention and expansion of existing and attraction of new industrial uses that provide job opportunities for the City's residents" (page 3-32). This definition is further supported by Goal 3J that states "Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability," and Objective 3.14 to "provide land and supporting services for the retention of existing and attraction of new industries." These goals and objectives of the Framework Element acknowledge the role of industrial land in maintaining existing industrial uses and jobs, but also emphasize the use of this land for the expansion of new industries and job growth. The Framework Element underscores industrial land use as a valuable source of employment opportunities which are to be supported and grown when possible, and as such, it can be determined that industrial land within the City meets the criteria of employment lands areas.

To further assess how the industrial employment hubs meet the intent of the "employment lands area" term, a survey of 14 Community Plan documents and the LAX Plan was conducted for the Community Plan Areas that intersect with the proposed industrial employment hubs (discussed later in this analysis). The survey identified goals, objectives, and policies in each Community

¹² https://planning.lacity.gov/odocument/513c3139-81df-4c82-9787-78f677da1561/Framework_Element.pdf

Plan document which lay out a unified policy vision for land designated for industrial uses by the Community Plans. Across all 14 plan areas, the identified goals, objectives, and policies intend for industrial land to be utilized and preserved for both current and future employment opportunities in alignment with the priorities of the Framework Element discussed above. For a full list of relevant Community Plan policies, refer to the Land Use Element Findings and SB 79 Discussion Findings of this Staff Recommendation Report.

Industrial employment hubs must also be primarily dedicated to industrial use as defined in GCS 65912.121(f)(3). Mapping analysis was based on zoning and General Plan Land Use Designations within the industrial areas identified as 250 contiguous acres. The City's Community Plans assign land use designations geographically, and each land use has corresponding zone(s) which further regulate the use and development of sites. Figure 1 below from the Framework Element provides a description of the typical uses and characteristics for different industrial land use designation. As shown, these industrial land use categories are intended primarily for industrial uses. Commercial uses may be used within these categories as an ancillary use to the main industrial uses, but maintaining industrial use is the focus of these designations. The Downtown Community Plan applies the City's new Zoning Code (Chapter 1A) and introduces a new industrial land use designation, Production. The Production land use category intends to "preserve and sustain industrial activity while serving as a regional jobs base," and its "uses include heavy industrial and evolving and innovative industries, such as light assembly and manufacturing, clean technology, incubators, and research and development facilities" (page 15, Downtown Community Plan)

Figure 1. Excerpt of Table 3-1 Land Use Standards and Typical Development Characteristics

<i>Industrial</i>	
Industrial-Light	● Industrial uses with potential for a low level of adverse impacts on surrounding land uses ● Increased range of commercial uses that <i>support</i> industrial uses (through zoning amendments) ● Possible consideration for other uses where parcels will not support viable industrial uses (determined by community plan)
Industrial-Heavy	● Industrial uses ● Possible consideration for other uses where parcels will not support viable industrial uses (determined by community plan)
Industrial-Transit	● Industrial uses with higher levels of employment that would benefit from proximity to public transit ● Increased range of commercial uses that <i>support</i> industrial uses (through zoning amendments)

With regard to the requirement that housing shall not be a permitted use within industrial employment hubs, only industrial parcels which do not principally permit residential uses are eligible for the industrial employment hub exemption. To understand which zones meet this criteria, the Department analyzed industrial zones and use permissions and found that all industrial zones except for CM and other hybrid industrial zones meet the use limitations of the

requirements and no commercial zones meet the use limitations. A breakdown of industrial zones and their principally permitted uses is included in Table 2 below. It's important to note that in addition to the uses that zone classes principally permit, some zones allow uses conditionally. This is an exception to the allowed uses in each zone class, therefore conditionally permitted uses were not considered as part of determining which sites qualify for inclusion within the industrial employment hubs.

Table 2. Industrial and Hybrid Industrial Zones Summary

Zone Class	Notes on <u>Principally</u> Permitted and Restricted Uses	Corresponding Land Uses	Permits Residential
CM (Commercial Manufacturing) ¹²	• C2 commercial uses permitted. • Residential uses <u>principally</u> permitted.	Commercial Manufacturing, Hybrid Industrial, Limited Industrial	Yes
MR1 (Restricted Industrial)	• Zone Purpose - LAMC <u>Los Angeles Municipal Code (LAMC)</u> 12.17.5 A.1: To protect industrial land for industrial use, and prohibit unrelated commercial and other non-industrial uses. • Zone Purpose - LAMC 12.17.5. A.3(a): To upgrade industrial development standards, to protect industrial investment against incompatible residential, commercial and industrial uses. • Residential uses limited to “guard or caretaker unit” only as an accessory building. Residential otherwise not <u>principally</u> permitted. • C2 commercial uses permitted as ancillary to primary industrial/manufacturing, or tech/media office use (this includes office and restaurant uses).	Limited Industrial	No
M1 (Limited Industrial) ¹³	• Residential uses limited to “guard or caretaker unit” only as an accessory building. Residential otherwise not <u>principally</u> permitted. • Commercial uses permitted.	Limited Industrial	No
MR2 (Restricted Light Industrial)	• Zone Purpose - LAMC 12.18 A.1: To protect industrial land for industrial use, and prohibit unrelated commercial and other non-industrial uses. • Residential uses limited to “guard or caretaker unit” only as an accessory building. Residential otherwise not <u>principally</u> permitted. • Commercial uses permitted as ancillary to primary industrial/manufacturing use.	Light Industrial	No
M2 (Light Industrial) ¹²	• Prohibited Use - LAMC 12.19 A.1.5(b): Any building containing dwelling units or guest rooms. • Residential uses limited to “guard or caretaker unit” only as an accessory building. Residential otherwise not <u>principally</u> permitted.	Light Industrial	No

¹³ Note that this zone does not have a Zone Purpose subsection in the LAMC.

Zone Class	Notes on <u>Principally</u> Permitted and Restricted Uses	Corresponding Land Uses	Permits Residential
	Commercial uses permitted.		
M3 (Heavy Industrial) ¹²	- Prohibited Use - LAMC 12.20 A.1.5(b): Any building containing dwelling units or guest rooms. - Commercial uses permitted.	Heavy Industrial	No
<u>LAX (Los Angeles International Airport Zone)</u>	<u>Residential uses prohibited.</u> <u>Commercial uses permitted.</u>	<u>Airport Airside, Airport Landside, Airport Landside Support, LAX Northside</u>	<u>No</u>
IX1 (Industrial-Mixed Use District)	- Use Class Intent Sec. 5B.6.1.A: To accommodate a wide variety of employment, cultural, and recreational opportunities while supporting vulnerable residents with affordable housing and social services, and facilitate the efficient management of municipal resources. - Limited residential uses permitted. - Commercial uses permitted.	Markets	Yes
IX2 (Industrial-Mixed Use District)	- Use Class Intent Sec. 5B.6.2.A: To accommodate light industrial uses, office space, and research & development activity. This district also allows a wide range of commercial uses as well as Joint Living & Work Quarters. - Limited residential uses permitted. - Commercial uses permitted.	Markets	Yes
IX3 (Industrial-Mixed Use District)	- Use Class Intent Sec. 5B.6.3.A: To promote a mix of uses that support creative production industries, accommodate a wide variety of employment, cultural and recreational opportunities, while supporting vulnerable residents with affordable housing and social services, and facilitate the efficient management of municipal resources. - Limited residential uses permitted. - Commercial uses permitted.	Markets, Hybrid	Yes
IX4 (Industrial-Mixed Use District)	- Use Class Intent Sec. 5B.6.4.A: Supports office and commercial uses, as well as research & development, wholesale, and light industrial uses. - Limited residential uses permitted. - Commercial uses permitted.	Hybrid	Yes
I1 (Industrial 1)	- Use Class Intent Sec. 5B.7.1.A: Allows heavy commercial uses, and light industrial uses as well as a limited amount of commercial activity. This District intends to support employment, goods movement, and warehousing. - Residential uses not permitted. - Heavy commercial¹⁴ uses permitted.	Production	No

¹⁴ Heavy commercial uses include motor vehicle services, fueling station, motor vehicle sales and rental, indoor storage, and outdoor storage.

Zone Class	Notes on <u>Principally Permitted and Restricted Uses</u>	Corresponding Land Uses	Permits Residential
I2 (Industrial 2)	• Use Class Intent Sec. 5B.7.2.A: Allows heavy commercial uses, light industrial uses, and heavy industrial uses as well as a limited amount of commercial activity. This District is intended to support employment and accommodate the most intense industrial activities while minimizing potential disruptions to surrounding uses. • Residential uses not permitted. • Heavy commercial ¹³ uses permitted.	Production	No

As discussed above, as the Department does not consider a conditionally permitted use to be a principally permitted use per GCS 65912.169(e)(2) and 65912.121(f)(3), the analysis focused on assessing principally permitted uses rather than conditionally permitted uses as part of analysis to determine whether a site would meet the criteria associated with the industrial employment hub exemption. LAMC Section 12.24 enables specific site exceptions to the uses allowed within each zone class including allowing certain types of uses that can meet certain conditions through a Conditional Use Permit (CUP) process.

The only conditionally permitted residential uses in the City's industrial zones are joint living and work quarters and adaptive reuse projects which are permitted in the MR1, M1, MR2, M2, and M3 zones through the approval of a CUP pursuant to LAMC Section 12.24 X.13 and 12.24 X.1(d), respectively. Approval of these CUPs necessitates making findings that ensure the viability of industrial uses. A CUP for joint living and work quarters must make the finding "that the proposed joint living and work quarters will not displace viable industrial uses and will not substantially lessen the likelihood that the property will be available in the future for industrial uses" (LAMC Section 12.24 X.13(a)(2)), and adaptive reuse projects in industrial zones must make the finding that a project "will not displace viable industrial uses" (LAMC Section 12.24 X.1(d)(4)). Based on an analysis of existing uses on industrially zoned sites within the identified industrial employment hubs, more than 70% of sites are currently improved with industrial uses. This data presents a potential challenge to proposed projects in an industrial employment hub to make this finding and avoid displacing industrial uses consistent with the zoning code and city policy. The required findings are intended to preserve industrial land for industrial uses, which as a result support industrial jobs, and the allowance of these quarters for artists and artisans are intended to grant projects a limited amount of flexibility for project feasibility. Therefore due to the separate requirements described above, joint living and working quarters and adaptive reuse projects are not considered housing as a principally permitted use in industrial zones. Further, a City Planning staff recommendation report¹⁵ associated with an ordinance amending the Joint Living and Work Quarters definition in 2010 (Ordinance 181.133, CF 09-1845) uplifts that "it is the explicit policy of the General Plan reiterated in all Community Plans and in a 2008 Joint Directive to staff from the Director Planning and Chief Executive Officer of the Redevelopment Agency to preserve industrial land for jobs and business activities that need to be located on such sites"(page 11). The report goes on to underscore that in most cases

¹⁵ https://cityclerk.lacity.org/online/docs/2009/09-1845_rpt_cpc_7-23-09.pdf

“industrial land should therefore not be subject to such conversion”(page 11). This further demonstrates that conversions to residential from industrial uses should be viewed as an exception within the LAMC’s regulatory framework and must meet a high benchmark to even be considered for conditional approval.

Mapping Methodology

After identifying eligible land use types and zones that fit the industrial employment hub criteria the Department began mapping areas meeting the eligibility criteria beginning with qualifying zone classes. Mapping includes sites located in the MR1, M1, MR2, M2, M3, I1, I2, and LAX zones, and select PF zoned sites with known industrial uses (approximately three sites). Residential uses in the MR1, M1, MR2, and M2 zones, residential uses are only permitted as an accessory use for a guard or caretaker unit (including the guard’s or caretaker’s family) for an industrial development or of a permitted use that requires 24-hour supervision, and is located on the same lot with the development or use. Analysis excludes sites located in the CM, IX, or industrial zones of the Exposition Corridor Transit Neighborhood Plan (Expo TNP). The CM (Commercial Manufacturing) zone is a hybrid industrial zone and IX (Industrial-Mixed Use) is a hybrid industrial use district in Chapter 1A of the LAMC, both of which allow residential, commercial, and industrial uses. Several other hybrid industrial zones were established in the Expo TNP, including “NI(EC)” New Industry Zone, “HJ(EC)” Hybrid Industrial: Jobs Emphasis Zone, and “HR(EC)” Hybrid Industrial: Residential Emphasis Zone. Each of these zones permits a tailored mix of uses including residential uses. Due to the allowance of residential uses in these hybrid industrial zones, sites in these zones do not meet the criteria for industrial employment hubs and therefore were not included in the analysis.

The City’s complex zoning has resulted in a limited number of sites with split zoning designations including industrial and hybrid industrial zones. Specifically, within the industrial employment hubs, there are eight split zoned sites partially zoned CM. Seven of the eight sites are located outside of a TOD zone, and one site is located within a TOD zone. The CM zone portion of these sites was counted toward the total acreage of each industrial employment hub, however each hub meets the 250 acre threshold prior to the inclusion of these sites. For the site located within a TOD zone, the CM zone portion was not excluded from capacity analysis within the industrial employment hub, and thus the capacity model accounts for the potential development capacity of this area under SB 79 and local zoning rules. As stated, even if removed, each of the City of Los Angeles’ industrial employment hubs would remain consistent with statutory requirements. Below is a list of each split zoned site and its associated industrial employment hub:

- Located outside of a TOD zone:
 - APN: 2414023012 (Van Nuys)
 - APN: 5442002910 (Atwater)
 - PIN: 150B213 268
 - PIN: 148-5A215 339
 - PIN: 147A215 1051
 - APN: 2748005053 (Chatsworth)

- APN: 2748005056 (Chatsworth)
- APN: 2748005057 (Chatsworth)
- Located within a TOD Zone:
 - APN: 2222037006 (Van Nuys)

Following the determination of which zones to include as hubs, industrial areas were assessed for contiguity. Sites were considered to be contiguous if located across the right-of-way (including streets, freeways, and open space for the LA River), having a shared property line, or across a common corner. Based on staff analysis, parcels separated by residential, commercial, and open space uses are *not* considered contiguous for purposes of meeting the 250 contiguous acre threshold. Sites not meeting the contiguity or industrial land use criteria were not included in the acreage analysis. Additionally, only industrial sites located within the City were included within the mapped industrial employment hubs.

Analysis indicates that the city has six areas which meet the criteria of the industrial employment hubs, which are located in Downtown/Southeast Los Angeles, Pacoima, Van Nuys, Atwater/Cypress Park, and Los Angeles International Airport (LAX) (see Findings for additional information on the sites¹⁶ that qualify for permanent exemption pursuant to GCS 65912.160(e) as a result of designation as an industrial employment hub). The Downtown/Southeast Los Angeles hub has been revised to remove sites in the Boyle Heights Community Plan based on the GPLUs adopted by the City Council in 2024 as part of the update of the Community Plan. While the final zoning for the Community Plan has not yet been adopted, the GPLUs have been finalized and were analyzed to revise the hub boundaries. The updated Boyle Heights Community Plan designates sites previously included within the hub as Light Industrial and Hybrid Industrial. Due to the allowance of limited residential uses in these designations, these sites have been removed from the hub. For additional information on the city's industrial employment hubs, please see Table 3 and Map 1 below. As discussed above, based on an assessment of the City's industrial land use policies and the bill's requirement for designation as an "employment lands area", the identified hubs are intended to function as areas for industrial job growth in alignment with the bill's provisions. These areas have industrial General Plan Land Use Designations, and their industrial land use is supported by accompanying policies of the applicable Framework Element and Community Plans which address the City's policy priority to support industrial jobs, maintain industrial land, and protect incompatible residential uses from negative impacts of industrial uses. The various elements of the General Plan make clear that these lands provide valuable employment opportunities that are critical to the region's economic activity and serve as employment land areas.

¹⁶ The final count of sites eligible for permanent exclusion cannot be finalized because it is dependent on SCAG's final map of TOD Zones, which has not been published as of the release of this report. SCAG has confirmed that the final map's anticipated release will not occur until July 2, 2026 - after SB 79's July 1, 2026 effective date and the City's adoption of the Low-Rise and Phased Implementation Ordinances. As such, further parcel identification will be needed in the future to align with SCAG's final map, consistent with the Director of Planning the authority to update SB 79 eligibility maps (Section 3 of SB 79 Phased Implementation Ordinance: 12.22 A.38 (j)(7)(i)(c)).

Table 3. Industrial Employment Hubs

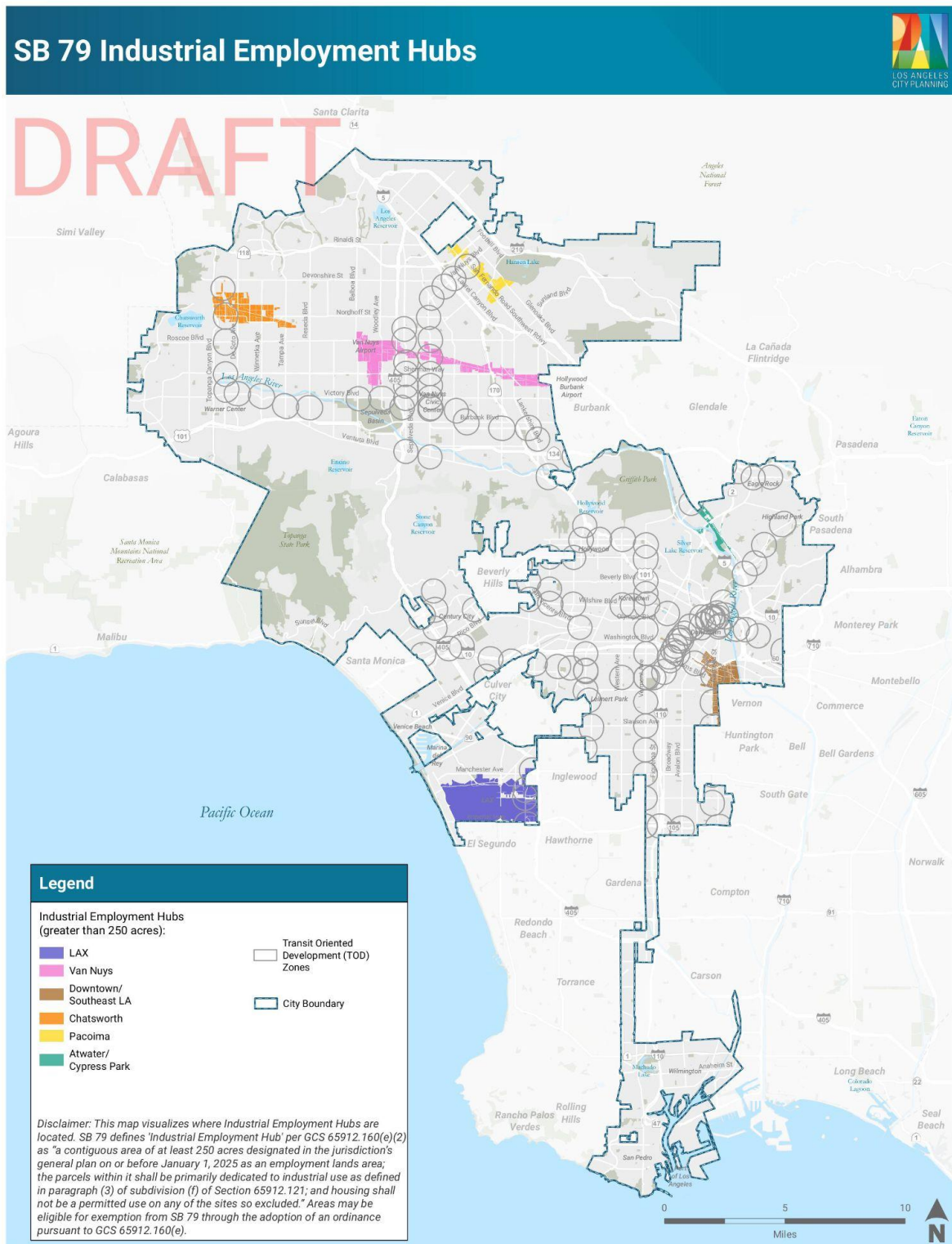
Name/Location	Acreage	Zones¹⁷	General Plan Land Uses¹⁸
LAX	3623	LAX, MR1, M1, M2, PF	Airport Airside, Airport Landside, Airport Landside Support, General Commercial, LAX Airport Northside, Light Industrial, Light Manufacturing, Limited Industrial, Limited Manufacturing, Public Facilities, Public Facilities - Freeways, Regional Commercial
Van Nuys	2383	MR1, M1, MR2, M2	Commercial Manufacturing, General Commercial, Light Industrial, Light Manufacturing, Limited Industrial, Limited Manufacturing, Low Medium II Residential, Low Residential, Medium Residential, Open Space, Parking Buffer, Public Facilities - Freeways, Regional Commercial
Downtown / Southeast Los Angeles	866 4758	CM ¹⁹ , MR1, M1, MR2, M2, M3, I1, I2	Heavy Industrial, Heavy Manufacturing, Highway Oriented and Limited Commercial, Hybrid Industrial, Light Industrial, Light Manufacturing, Limited Industrial, Limited Manufacturing, <u>Low Medium Residential</u> , Open Space, Production, Public Facilities, Public Facilities - Freeways
Chatsworth	1282	CM ¹⁶ , MR1, M1, MR2, M2	Commercial Manufacturing, Community Commercial, Highway Oriented Commercial, Light Manufacturing, Limited Manufacturing, Public Facilities
Pacoima	664	MR1, M1, MR2, M2, M3, PF	Heavy Manufacturing, Light Industrial, Light Manufacturing, Limited Industrial, Limited Manufacturing, Low Residential, Open Space, Public Facilities
Atwater / Cypress Park	312	MR1, M1, M2, M3	Commercial Manufacturing, Heavy Manufacturing, Light Industrial, Limited Industrial, Limited Manufacturing, Low Medium I Residential, Low Medium II Residential, Low Residential, Open Space, Public Facilities, Public Facilities - Freeways

¹⁷ This column shows simplified zone classes and is not indicative of the complete zone and height district.

¹⁸ Note that the industrial employment hubs include a limited number of sites in industrial zones with multiple General Plan Land Use Designations, including non-industrial designations. For the purpose of this analysis, hubs with these sites still meet the criteria for employment lands areas and are still considered to be primarily for industrial use consistent with GCS 65912.121(f)(3) as described in Table 1 of this appendix.

¹⁹ Note that the industrial employment hubs include a limited number of sites with split zoning, including sites in the CM zone. Sites that are wholly located within the CM zone are not included in the hubs.

Map 1. Industrial Employment Hubs and Other Industrial Areas (Revised)



The city has other sizable industrial areas which were identified in the mapping analysis, but do not meet the criteria to be exempted as industrial employment hubs. In some instances, the industrial areas are too small in area and do not meet the 250 acre threshold. In other instances, industrial areas have a commercially zoned or open space parcel that interrupts industrial zones, thus making the area not contiguous. Additional information about these industrial areas which do not qualify can be found in Table 4 below. Due to these sites not meeting the criteria of industrial employment hubs, they may be considered eligible for SB 79. At the time of this report, further guidance from HCD is pending on the applicability of SB 79 on sites in industrial zones. Pending this guidance, the City's capacity modeling accounts for the potential capacity of these sites. If these sites are eligible, the Department recommends incorporating processes to ensure environmental review and remediation for any site proceeding under SB 79 authority, including but not limited to establishing Discretionary processes and/or expanding environmental protection measures.

Table 4. Industrial Areas Which Do Not Qualify as Industrial Employment Hubs

Name/Location	Acreage	Reason for Exclusion
Atwater North	234	Does not meet acreage threshold. Industrial zones interrupted by non-industrial uses.
Canoga Park	183	Does not meet acreage threshold. Industrial zones interrupted by non-industrial uses.
South Central	163	Does not meet acreage threshold.
Van Nuys Civic Center	115	Does not meet acreage threshold. Industrial zones interrupted by non-industrial uses.
Hollywood	116	Does not meet acreage threshold.
West LA	79	Does not meet acreage threshold.
Lanzit	52	Does not meet acreage threshold.
Temple / Beverly	24	Does not meet acreage threshold.
Reseda	22	Does not meet acreage threshold. Industrial zones interrupted by non-industrial uses.

III. Conclusion

The City's policy approach to industrial land and housing intends to preserve industrial land for industrial uses and jobs and aims to reduce negative impacts of industrial uses on nearby residential uses, which can include adverse health effects. While industrial land is not broadly exempt from SB 79, the six areas of the City identified as meeting the criteria of industrial employment hubs are eligible for exemption from SB 79 through the proposed Phased Implementation Ordinance and in alignment with the City's policy goals. Capacity modeling to determine compliance with SB 79 excludes land within these industrial employment hubs, but

remaining industrial sites that are unable to be exempted are accounted for in the Department's modelling of SB 79 capacity. These other industrial sites in the City will remain eligible for the bill unless amended or additional guidance from HCD becomes available.

June 3, 2026 Communications from the Department of City Planning to the Community, Economic, and Human Development Committee of the Southern California Associations of Governments

CPC-2026-1798-MSD

June 17, 2026

CITY OF LOS ANGELES

CALIFORNIA



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June 3, 2026

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CITY OF LOS ANGELES PUBLIC COMMENTS ON SENATE BILL 79 (SB 79) MAPPING AND METHODOLOGY

On behalf of the City of Los Angeles (the City), we would like to thank the Southern California Association of Governments (SCAG) for the opportunity to provide comments on SCAG's SB 79 implementation. The following comments are from Los Angeles City Planning regarding the recently released "Draft SB 79 Mapping Approach and Methodology" document, dated May 22, 2026, and draft "Senate Bill 79: Transit Oriented Development Map" published on June 1, 2026. With almost 150 potential Transit Oriented Development (TOD) Zones in the City of Los Angeles, our jurisdiction is uniquely impacted by the identification and classification of Tier 1 and Tier 2 TOD stops. The City of Los Angeles is currently advancing an approach to local implementation of SB 79 that generally includes the proposed SB 79 Phased Implementation and Low-Rise Ordinances, which at its core rely exclusively on mapping that is consistent with statutory requirements, taking into account unique regional planning considerations. With this in mind, we appreciate the opportunity to offer technical feedback to ensure that the final regional map and its associated methodology supports jurisdictions in their ability to implement this transformative bill consistent with the legislative intent and policies set forth in SB 79.

SB 79 Mapping Approach and Methodology

1. **Future Transit Oriented Development (TOD) Stops.** Though the proposed methodology clarifies that the SB 79 map will be revised on an annual basis, the document does not clearly indicate how stops will be added to the map, except in the case of a county that is newly designated an "urban transit county". Los Angeles City Planning maintains an interpretation, as detailed in Table 1 below, that Tier 2 TOD qualify as a TOD Stop once the stop becomes operational, whereas Tier 1 stops are eligible either at the selection of a preferred alternative or when in operation.

Table 1: Senate Bill 79 Transit Eligibility for Planned and Operational Service

RTP Status	Stop Status (Tier 1 and Tier 2)			
	Operational/ Existing	Planned in RTP, without a Preferred Alternative selected and not in RTIP	Planned with a Preferred Alternative selected	Planned in RTIP
If project is in the RTP before 1/1/26 (i.e., it is in the current RTP)	✓	-	✓	✓
If project is NOT in the RTP before 1/1/26 (i.e., it is not in the current RTP)	✓	-	✓* *only if stop qualifies as Tier 1 TOD stop	✓* *only if stop qualifies as Tier 1 TOD stop

2. **Transit Hub Methodology.** To simplify mapping for purposes of making calculations associated with Phased Implementation (Government Code Section 65912.161(b)) and future TOD Alternative Plans (Government Code Section 65912.161(a)), it is recommended that TOD stops served by intersecting transit lines are consolidated and counted as one TOD stop. If the transit lines are of differing TOD tiers (e.g., an intersection of Tier 1 heavy rail and Tier 2 light rail), the higher applicable tier should be applied. In these instances, the outermost boundaries of the overlapping TOD zones would determine the TOD zone perimeter for the purpose of identifying eligible parcels within the TOD zone. In instances where stations do not share entrances, but stations are located at the same intersection or approximate location, for example stations with an at grade bus stop and subterranean heavy rail; stations should be combined to one TOD zone. For a list of stations that were combined into a single station hub, see Appendix 1 attached below.
3. **Pedestrian Access Points.** Los Angeles City Planning recommends updating the methodology associated with identifying pedestrian access points to maintain consistency with statutory requirements, which state that distances shall be measured “to a pedestrian access point for the transit-oriented development stop” (Government Code Section 65912.157(b)). Specifically, it is recommended that the methodology qualifies points for station portals or station entrances, rather than points for platform locations, as pedestrian access points for the purpose of establishing TOD Zones

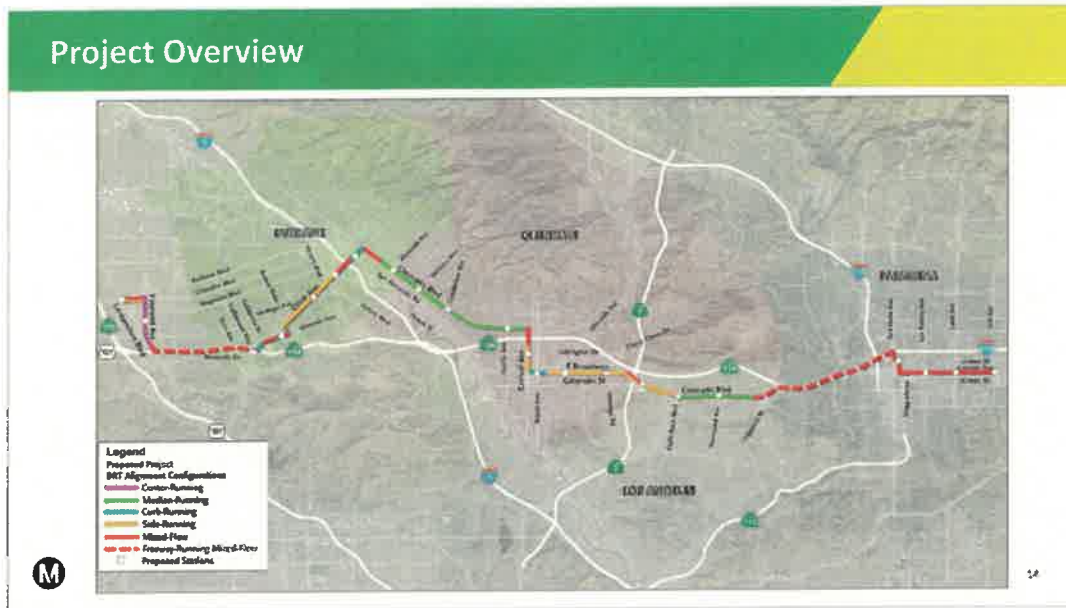
4. **Bus Service.** The methodology should further clarify that the full-time dedicated bus-only lane must exist between two stops. Stations with a portion of a bus-only lane between it and the next station that requires shared traffic to get to the next station are not eligible under SB 79. For example, the J (Silver) Line bus has separate rights-of-way at its stations, however between stations it shares the Express Lanes with other vehicles and therefore does not have a full-time dedicated bus lane.
5. **Map Disclaimer Language.** SCAG's map is the authority on qualifying TOD stops and TOD zones consistent with the Government Code Section 65912.160.(f). While it is appropriate for the disclaimer language on the splash screen of the map adopted by the SCAG Regional Council, to facilitate and encourage coordination with local agencies regarding the facts and conditions of specific sites, site conditions, and applicable local laws, given the need for a centralized database, City Planning recommends that verification of transit service, transit project plans, and current transit service levels not be referred to local agencies and remain a SCAG function.

Comments on TOD Stop Locations

1. **Sepulveda Boulevard/Saticoy Street.** The Metro 234 bus stop on Sepulveda Blvd at Saticoy St was not included in the draft SCAG SB 79 map. Metro 234 meets frequency, bus only lane, and major transit stop requirements and should therefore be included in the draft map. Specifically, the LADOT DASH Panorama City/Van Nuys¹ intersects the Metro 234 with 20-minute frequencies compliant with Major Transit Stop definitions.
2. **Olive/Riverside Station.** The NoHo to Pasadena BRT includes segments between stations of shared freeway lanes and rights of way. The Olive/Riverside (WB) station requires shared rights of ways to travel to neighboring stations in both its eastbound and westbound segments, including the use of the 134 freeway. As shared rights of ways are required for travel, the station is ineligible under the statute.

¹ <https://cdn.ladottransit.com/pdf/dash/pcvn.pdf>

Image 1: North Hollywood to Pasadena Bus Rapid Transit Alignment Configurations



Source, Metro Los Angeles, Slide 14, 07.10.2025 Community Meeting - NoHo to Pas (1)²

Conclusion

The City of Los Angeles appreciates this opportunity to provide input on SB 79 implementation. Should there be any questions regarding the comments provided in this letter, please contact Blair Smith at City Planning at blair.smith@lacity.org.

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning

VPB:AV:jm:bs:tt:cb

Enclosures: Station Hubs of Intersecting Lines

² [https://www.dropbox.com/scl/fo/3tlwsvsfogwi83gxbp3lj/AOaPeeG-h1UKaZfd_Avvp-Y/Previous%20Meetings/7-10-25%20Community%20Meeting/07.10.2025%20Community%20Meeting%20-%20NoHo%20to%20Pas%20\(1\).pdf?rlkey=ohch4ad06e5nin5r4kbcqlihi&e=2&st=tiw1lfzf&dl=0](https://www.dropbox.com/scl/fo/3tlwsvsfogwi83gxbp3lj/AOaPeeG-h1UKaZfd_Avvp-Y/Previous%20Meetings/7-10-25%20Community%20Meeting/07.10.2025%20Community%20Meeting%20-%20NoHo%20to%20Pas%20(1).pdf?rlkey=ohch4ad06e5nin5r4kbcqlihi&e=2&st=tiw1lfzf&dl=0)

Station Hubs of Intersecting Lines:

- A/B/D/Metrolink-Union Station
- A/E/B/D-7th St/Metro Center
- B/G-North Hollywood
- B/Vermont BRT-Vermont/Santa Monica
- B/Vermont BRT-Vermont/Sunset
- A/C-Willowbrook/Rosa Parks
- B/D/Vermont BRT-Wilshire/Vermont
- E/SP-Expo/Sepulveda
- D/SP-Westwood UCLA
- D/K-Wilshire/La Brea
- B/K-Hollywood/Highland
- B/D-Civic Center/Grand Park
- B/D-Pershing Square
- B/D-Westlake/MacArthur Park
- C/K-Aviation/96th St
- C/K-Aviation/Century
- ESFV/SP-Van Nuys
- D/K-Wilshire/Fairfax
- ESFV/SP-Van Nuys/Oxnard (Orange)