



# DEPARTMENT OF CITY PLANNING RECOMMENDATION REPORT

**CITY PLANNING COMMISSION**

**DATE:** May 22, 2014  
**TIME:** After 8:30 a.m.\*  
**PLACE:** Van Nuys City Hall  
 Council Chamber 2<sup>nd</sup> Floor  
 14410 Sylvan Street  
 Van Nuys, CA 91401

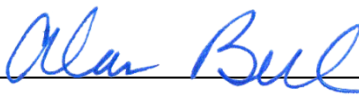
**PROJECT:** CPC-2014-1582-CA  
**COUNCIL FILES:** n/a  
**CEQA:** ENV-2014-1583-EAF  
**LOCATION:** Citywide  
**COUNCIL DISTRICT:** All  
**PLAN AREAS:** All

**SUMMARY:** The draft **re:code LA** Zoning Code Evaluation Report (Code Evaluation) outlines the direction and key provisions for the structure of a new citywide Zoning Code and recommends a comprehensive set of land use regulations to implement the City’s General Plan and other long range planning goals. In addition, the Code Evaluation will guide the development of a Downtown Code, and a new, first-of-its-kind web-based code.

**RECOMMENDED ACTIONS:**

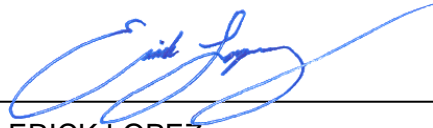
**Approve** the inclusion of four identified policy directions currently in the Code Evaluation;  
**Approve** the inclusion of 30 concepts that are not currently in the Code Evaluation;  
**Approve** the Code Evaluation with the recommended staff changes; and  
**Recommend** that City Council adopt the amended Code Evaluation.

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**ADVICE TO PUBLIC:** \*The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communication may be mailed to the Commission Secretariat, 200 North Main Street, Room 272, Los Angeles, CA 90012 (Phone No. 213/978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent a week prior to the Commission’s meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to these programs, services, and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request no later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at 213/978-1300.

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The official re:code LA project logo

## **Background**

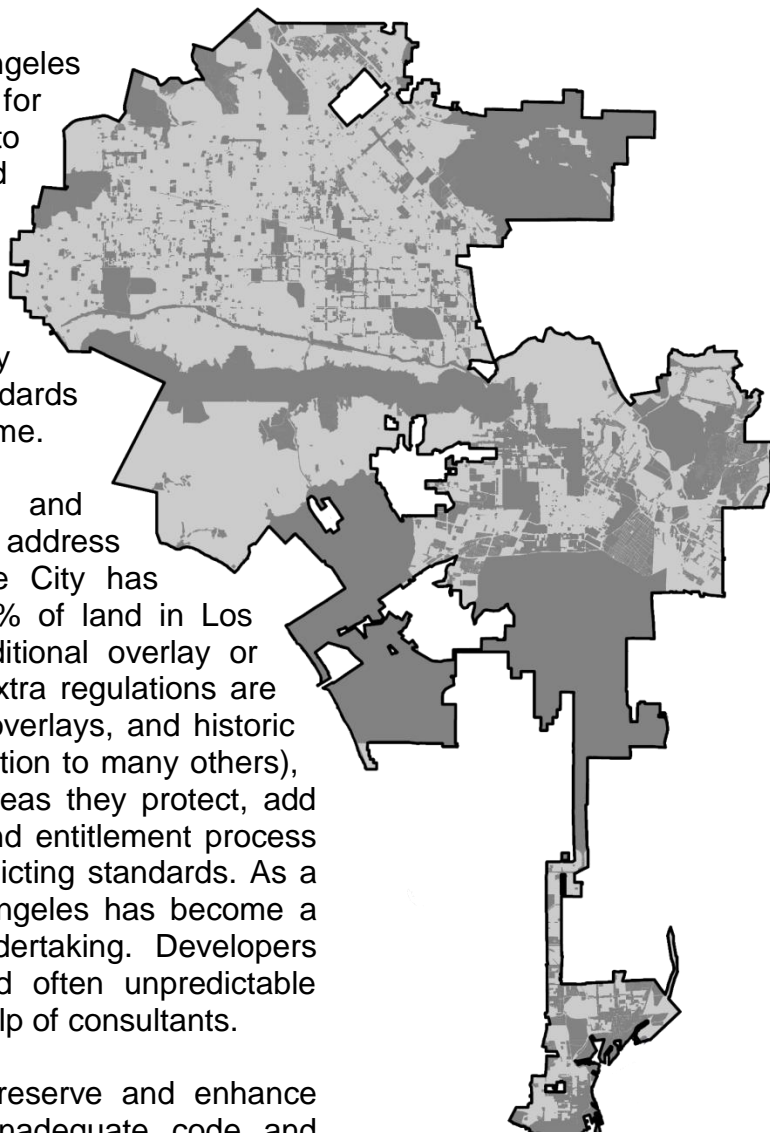
On June 19, 2012, the Los Angeles City Council approved funding for **re:code LA** - a five-year project to create a new, more streamlined Zoning Code for the City of Los Angeles. Given that the current Zoning Code was adopted in 1946, the document has continually been modified by planners working to make its standards more relevant to the issues of the time.

After decades of amendments and patches to the Zoning Code to address changing needs and policies, the City has reached the point where over 60% of land in Los Angeles is covered by some additional overlay or special regulation. Among these extra regulations are specific plans, community design overlays, and historic preservation overlay zones (in addition to many others), which, although valuable to the areas they protect, add complexity to the project review and entitlement process and increase the potential for conflicting standards. As a result, land development in Los Angeles has become a complex and time-consuming undertaking. Developers must go through an onerous and often unpredictable process that usually requires the help of consultants.

The City is attempting to both preserve and enhance itself, but is held back by an inadequate code and outdated community plans. **re:code LA** will address one of these obstacles by updating the Zoning Code. The new code will create zoning options that address community concerns and help improve the quality of life in the City.

With this new certainty, residents will know what they can expect to see developed in their communities and developers will better understand what the rules are.

The Zoning Code Evaluation Report (Code Evaluation), prepared by our lead consultant Code Studio, is the first milestone for this project and was developed with input from City departments, focused stakeholder groups, and the general public. It establishes the roadmap for the next four years of the project and touches upon the application of the new Zoning Code. However, the preferred method of implementation (i.e. how to go about rezoning the City into the new Code) needs to be discussed and determined by the City Planning Commission and City Council as **re:code LA** progresses.



*Over 60% of the City is covered by overlays or other types of special regulations.*

## Outreach

### Code Evaluation Development Listening Sessions & Research

Soon after **re:code LA**'s official launch, the project team hosted a series of Listening Sessions throughout the City. Over five evenings in early to mid-July of 2013, staff and consultants met with the public to introduce the project, answer questions, and gather initial feedback on what has and has not been working in the current Zoning Code. The Department also conducted five focus groups (oriented toward neighborhood groups, housing and development professionals, environmental interest groups, Downtown stakeholders, urban design experts and members of academia).

Each event began with a brief PowerPoint presentation summarizing the history of the Zoning Code and explaining why it needs to be updated. Stakeholders were then invited to express their thoughts and experiences with the team during town hall-style discussions. Staff and consultants responded to participant questions and concerns.

Altogether, the Department reached over 700 people and much of the feedback from these listening sessions was used to develop the Zoning Code Evaluation Report.



A word cloud of the most commonly used words in the Listening Session feedback.



Project staff presenting **re:code LA** at the Westside Listening Session in July 2013.

## Code Evaluation Review

### *Advisory Groups*

For purposes of providing a comprehensive assessment of the Code Evaluation, the Department organized in-person and virtual public forums, as well as three advisory groups: the Zoning Advisory Committee (ZAC), the Technical Advisory Committee (TAC), and the Internal Technical Advisory Committee (iTAC).

### Zoning Advisory Committee:

The ZAC consists of representatives from a cross-section of interests throughout the City including residents, developers, advocates, and scholars. A biographical list of the ZAC can be found on **recode.la**: <http://recode.la/learn-more/team>

### Technical Advisory Committee:

The TAC is comprised of representatives from City departments with an interest in or special knowledge of issues relating to the Zoning Code. The departments include Engineering, Sanitation, Building & Safety, Recreation and Parks, LADOT, Fire, LADWP, Cultural Affairs, and Housing & Community Investment.

### Internal Technical Advisory Committee:

The iTAC is the body of City Planning staff representing expertise in Community Plans, Downtown development, Historic Preservation, Subdivisions, Zoning Administration, and Policy.

## Outreach Period

### *Regional Forums*

An initial draft Code Evaluation was completed on January 17, 2014 and was reviewed by the iTAC, ZAC, and TAC prior to public release. The public draft was released on March 7, 2014 and the comment period concluded on May 2, 2014 after a series of regional forums.



**North San Fernando Valley Forum**  
Saturday, March 15



**Central Area Forum**  
Wednesday, March 19





**South Los Angeles Forum**  
Saturday, March 22



**East Los Angeles Forum**  
Saturday, March 29



**West Los Angeles Forum**  
Wednesday, April 2



**South San Fernando Valley Forum**  
Saturday, April 5



**Harbor Area Forum**  
Saturday, April 12



**Virtual Forum**  
Tuesday, April 15

### *Outreach Initiation – Getting the Word Out*

The Department announced the release of the draft Code Evaluation on the **recode.la** website, Facebook, and Twitter, and provided copies of the report to neighborhood councils, City Council offices, interested parties, professional organizations, and major media outlets. The ZAC dedicated two of its regular meetings to the subject and there were several Department staff meetings on the topic.

The project team contacted stakeholder groups using multiple interest lists, which included diverse groups such as the Korean Youth Center, Jewish Observer, LA Homba Hongwanji Buddhist Temple, Bethel Missionary Baptist Church, and area schools.

### *Public Forum Series*

Over the course of two months, feedback on the Code Evaluation was garnered at eight regional forums (including one Virtual Forum, an online webinar-style forum) in March and April with over 600 attendees. These forums combined the **re:code LA** initiative with two other Department initiatives – Mobility Plan 2035 and Plan for a Healthy Los Angeles.

## Youth in Planning

The seven regional forums included a new Department program, “Youth in Planning.” The purpose of this initiative is to educate young adults on planning and to elicit their feedback on planning proposals about their communities.

Activities included both self-guided exercises and staff/intern-facilitated educational discussions. Youth participants learned and shared information and ideas about land use and building design, as well as insights into issues and opportunities around residential, commercial, open space, public facilities and other areas of interest.

Most youth feedback mirrored information and perspectives also expressed by adults. This speaks to the value of hearing about planning issues that youth have the most experience with, and also presents an opportunity to gather more community input in general, especially in communities where adult turnout is a challenge. Adult attendees expressed a strong interest in the initiative and offered support in engaging youth in the future.



**YOUTH IN PLANNING** session at our East Forum

Middle- and high-school aged youth were invited to participate in the program through local schools and community organizations. With relationships now established with principals, teachers, and non-profit organizations, and the success of youth engagement, **re:code LA** plans to continue Youth in Planning as a part of ongoing community outreach efforts.

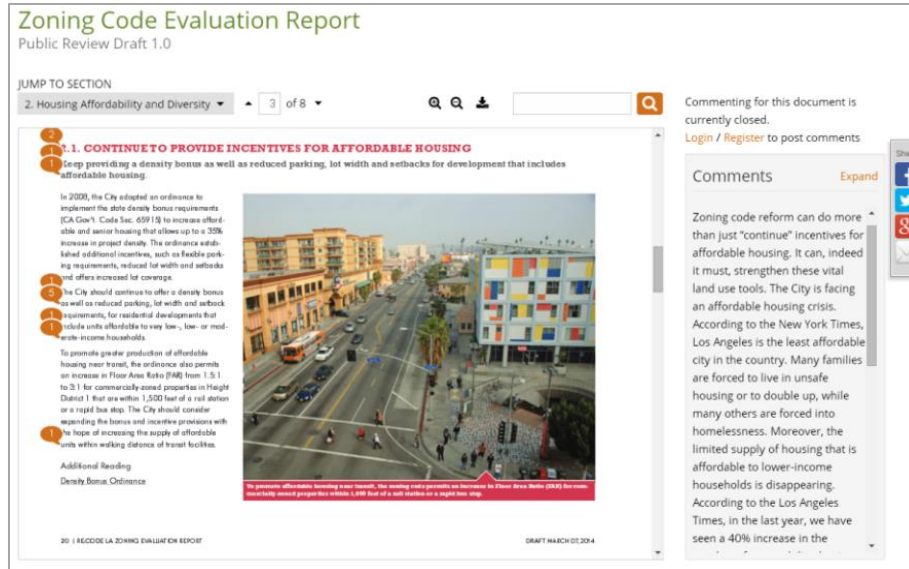
## Online Engagement

*recode.la*

In addition to traditional outreach efforts, the project website has offered a unique opportunity to engage the public. The following two website tools provide a continuing forum for feedback that engage users on their own time.

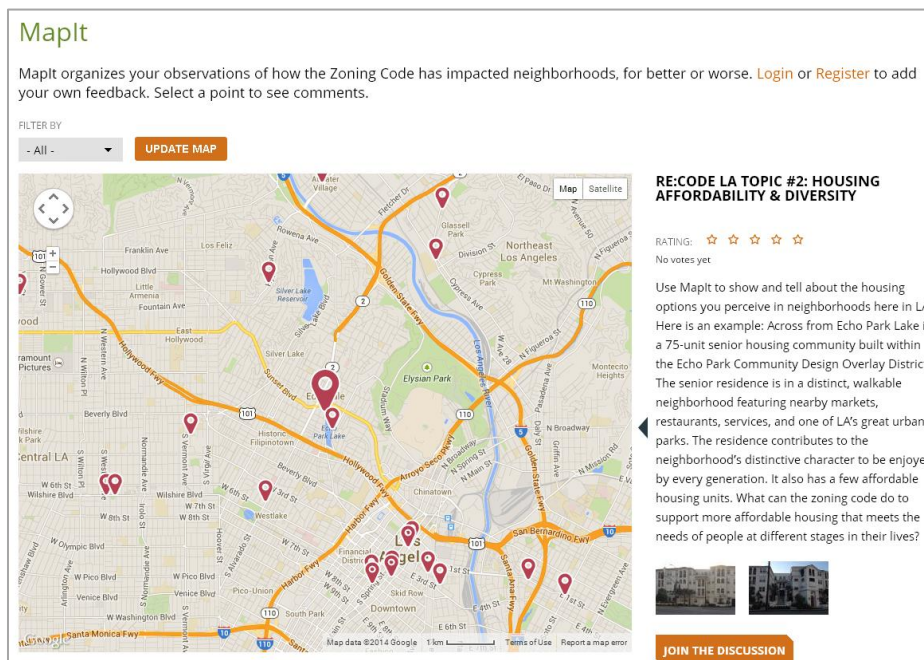
### MarkUp

This innovative feature enables users to comment directly onto the draft document and allows follow-up comments by other users, similar to newspaper websites. Commenters are then able to turn a comment into a productive discussion.



### MapIt

This additional innovative feature allows users to post and geo-tag a photo of a land use that they find significant for any planning-related reason, such as excellent design, poor site planning, or a connectivity challenge in a neighborhood. These posts can be added directly to the website from a cell phone. Other users can also comment on posts.





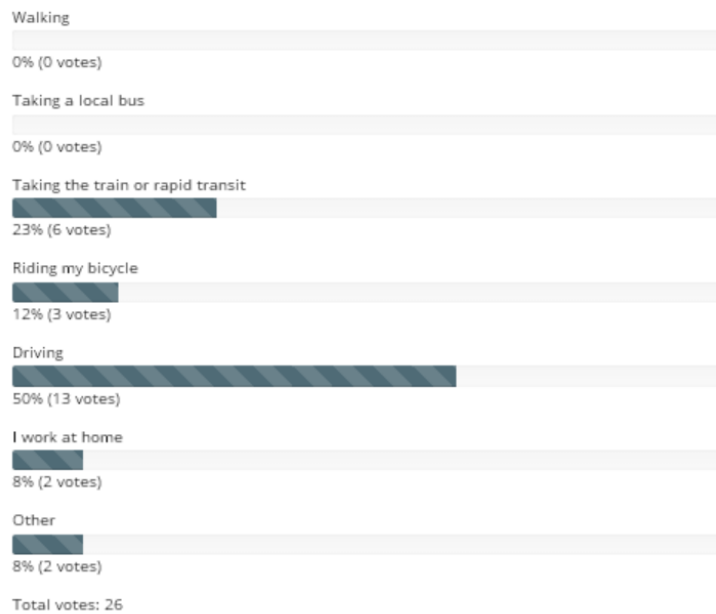
### Articles

The Department published two series of educational articles on **recode.la**: Zoning 101 and a series highlighting the Code Evaluation outreach efforts. The Zoning 101 series helps clarify what zoning is and how it affects life in Los Angeles. The second series of articles correlates with each chapter of the Code Evaluation. The series helped frame the discussion around the Evaluation Report in easy-to-understand terms.

### Polls

Lastly, the website has engaged the public by offering polls on a variety of topics concerning land-use and zoning that residents can easily relate to. Surveys regarding transit, Downtown amenities, and walkability are a playful tool to engage users and get them thinking about how planning impacts their day-to-day activities, and what changes they might envision for the betterment of their neighborhood.

#### What is the easiest way for you to get to work?



## Code Evaluation Summary and Recommended Changes

Although the project will address many outstanding zoning issues, certain sensitive land use topics such as billboards, community care facilities, and fracking will be addressed in separate initiatives independent of the **re:code LA** project.

The following table of contents identifies the issues that will be addressed:

### Evaluation Report Chapters

#### **Chapter 1 – Distinct Neighborhoods**

Preserve neighborhood character while promoting better urban design for multi-family residences.

#### **Chapter 5 – Jobs and Innovation**

Enhance the City's industrial zones.

#### **Chapter 2 – Housing Affordability & Diversity**

Modify existing housing regulations and expand housing types.

#### **Chapter 6 – A Strong Core**

Target new and updated zoning tools to enhance Downtown Los Angeles as a group of livable, job-rich, mixed-use neighborhoods.

#### **Chapter 3 – Centers and Corridors**

Improve design and landscape standards for the commercial corridors and expand zoning types.

#### **Chapter 7 – A Healthy City**

Increase healthy, environmentally friendly initiatives and access to open space.

#### **Chapter 4 – Transportation Choice**

Develop new parking standards and zoning around transit stations.

#### **Chapter 8 – Code Delivery**

Ensure a responsive, open and intuitive format and appearance for a new Zoning Code.

Among the many policy directions currently included in the Code Evaluation, four in particular have the potential to substantially depart from adopted City policies. Staff is seeking CPC confirmation on the policies highlighted below.

1. Expand the density bonuses and other incentives for affordable housing
2. Evaluate existing parking requirements and consider zones with unbundled parking and parking maximums
3. Modernize home occupation standards to explore the expansion of enterprise opportunities in residences
4. Expand geographic boundaries and sites eligible for Transfer of Floor Area Ratio (TFAR) regulations

## Recommended Changes to the Code Evaluation

Approximately 600 comments were received from the ZAC, the TAC, and the public. Comments are generally in agreement with the goals of the Code Evaluation and none objected to its overall direction. Certain categories of comments, while valuable, were not pertinent to amending the Code Evaluation. These categories include:

- Particular planning issues that are better addressed through community plan updates or other Department initiatives.
- Specific regulatory suggestions or ideas for the new Zoning Code rather than the Code Evaluation itself.
- Questions and suggestions that do not apply to the scope of **re:code LA**.

Staff is seeking CPC approval to include the 30 concepts below that are progressive, promote a flexible future for Los Angeles zoning, and expand upon existing themes.

Concept	Contributor	
1. Priorities for the City's future growth should include neighborhood preservation and conformity issues while encouraging green, multimodal, walkable community design and all the changes necessary to accommodate these goals.	ZAC	
2. Promote equity and guard against housing displacement.	ZAC, P	
3. Consider mandating standards for sustainability, not just removing barriers.	ZAC	
4. The Evaluation Report should examine ways to integrate equity and environmental justice into the new Zoning Code.	P	
5. Incentivize affordable housing by giving options beyond density bonus.	ZAC	
6. Include the possibility of providing density bonuses for green features.	ZAC	
7. Be proactive instead of reactive regarding the regulation of new undesirable uses.	ZAC	
8. Allow for technological advances and changing social priorities.	ZAC, TAC	
9. There are some goals/issues that have traditionally not been directly considered via zoning, but could benefit from it now. For example, zoning could be a tool for dealing with water use, drought, climate adaptation, etc.	ZAC	
10. Per the Housing Element, eliminate barriers to supportive and transitional housing and encourage a variety of housing types for all economic segments.	P	
11. Expand the Adaptive Reuse Ordinance citywide.	P	
12. Expand downtown incentives to other secondary cores.	P	
13. Modified commercial zones should make allowances for the needs of small businesses and other entrepreneurial activities (e.g., smaller parcels).	P	
14. Align the Zoning Code with the Building and Fire Codes to truly streamline development.	P	

Concept	Contributor	
15. Encourage diversity of residents and structures within neighborhoods.	ZAC	
16. Recognize the importance of innovative bus service for Transit Oriented Development (TOD), not just rail.	ZAC	
17. Emphasize that mixed use walkable areas also support sustainability and health goals.	ZAC	
18. Encourage preservation of historic assets, even when they are not designated or in a Historic Preservation Overlay Zone (HPOZ).	ZAC	
19. Design guidelines should streamline the development process—not make it more difficult to build based on aesthetics.	ZAC, P	
20. Coordinate with Metro to strategically preserve land and rights-of-way for future transit growth. Direct new development toward corridors in advance of future planned projects, allowing Metro to be a stronger competitor for federal grants.	P	
21. Evaluate how surrounding neighborhoods are impacted by new parking standards.	P	
22. Promote affordable housing by enhancing incentives along major transit corridors.	P	
23. Modify density requirements to provide for more flexible unit sizes.	P	
24. Clarify who decides what design standards are appropriate for each of the zones, and the role of the public in that process.	P	
25. Include designing for safety.	P	
26. Clarify how the project will implement existing Housing Element policies—particularly those geared towards affordability.	P	
27. Reference Metro’s First Mile/Last Mile report for TOD design that recommends features like mid-block paseos in long blocks, raised continental crosswalks, and clear, safe pathways to stations.	P	
28. Examine whether existing public improvements should be considered as contributing to HPOZs.	TAC	
29. Careful coordination with Department of Water and Power and Department of Building and Safety will ensure safety and adequate space for service infrastructure.	TAC	
30. Timely communication and coordination with the Bureau of Sanitation (BOS) will ensure integration and support plans from both departments.	TAC	
<u>Contributor Key</u> ZAC – Zoning Advisory Committee TAC – Technical Advisory Committee P – Public		



## **Rezoning Strategy**

At the end of the project, **re:code LA** will provide a wide variety of zoning tools and design standards for incorporation into the City's 35 Community Plans. On day one, the entire City will enjoy clear and simplified case processing procedures and updated citywide

development standards. However, a Community Plan Update is the primary tool to apply the new zones to properties. These Community Plan Updates include detailed studies of neighborhoods and public engagement that enable thoughtful rezoning.

Some Community Plan Updates could align with the new Code adoption in 2018/2019 and apply the new zones. However, one recurring concern is that it could be decades until all of the Community Plans are revised due to the Department's lengthy update process.

To address this important concern, the Department is preparing a more standardized and streamlined approach to future community plans so that they can be completed in a timelier manner. Coupled with additional Department resources, the City would thus be able to apply a modern, advanced code to the entire City in an expeditious manner that would enable Los Angeles to become a competitive economic development center as well as a more livable city.

It is also significant to note that **re:code LA** will help reduce community plan update timelines. A significant draw of resources in these efforts has been the need to draft individual implementation tools such as the Community Plan Implementation Overlay (CPIO), Community Design Overlay (CDO), Specific Plans, and Historic Preservation Overlay Zone (HPOZ) as a work-around to the current Zoning Code's regulatory shortcomings. The ability to link community plan policies with robust and standardized new zones will equate to time savings in community planning.

### **Key Strategies**

1. Streamline and standardize community plan updates.
2. Secure additional Department resources.

## Next Steps

Once the Code Evaluation is approved by CPC and City Council, the first deliverable will be the draft Downtown Development Code, projected to be completed in 2015. This document will complement the Department's Central City and Central City North Community Planning efforts by creating new zoning options specifically tailored to Downtown. The project team is exploring the opportunity to also align its efforts with the Boyle Heights Community Plan update that is underway and to develop regulations that can be applied on the ground in that community.

With regard to the new citywide Zoning Code, the **re:code LA** project team will begin developing an administrative draft for each section of the proposed Zoning Code. In addition to drafting the new Code itself, the project team will continue to develop a new, first-of-its-kind web-based Zoning Code system. This new web-code will provide an online and interactive experience to browse, search, and download the new Zoning Code.

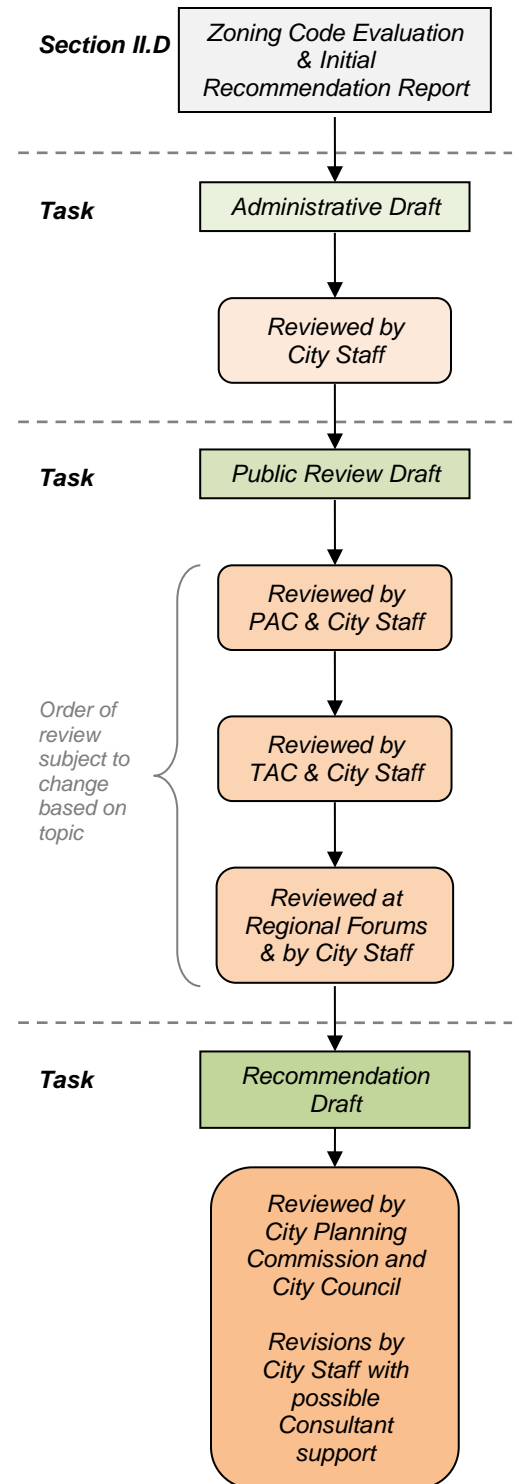
## **Project Timeline**

Per the adjacent project timeline, staff will continue seeking input after each draft module of the new Zoning Code is completed.

## Conclusion

The Code Evaluation covers a wide range of citywide and downtown-specific topics such as preserving neighborhood character, creating new zones for transit station areas, and enhancing urban design standards. It also identifies sections of the existing Zoning Code that are effective, ineffective, and/or confusing. With a clear and comprehensive zoning system, as well as a means to apply the new zones on the ground, decision-makers, developers and community members will be able to work together more effectively and efficiently to build a better Los Angeles.

## **Document Review & Evaluation**



**Appendix A – Zoning Advisory Committee MarkUp Comments**

Section	Section Page	Report Order	Report Text	Comment
0. Introduction	5	1	Over the next 57 years, LA's population more than doubled. During this period, entire neighborhoods have completely transformed both demographically and physically, the hubs of commerce and activity have shifted multiple times, and residents of Los Angeles of 1946 would scarcely recognize the current city.	At the same time, I think much about the city has remained the same. Some areas have experienced investment and undergone real physical change while others have seen a lot of planning effort with little development.
0. Introduction	5	2	development under the zoning code is now a challenging process, and routinely confuses developers and planners, as well as the general public.	I would add that it is an excessively expensive process as well, since navigating through the code has made developing in LA somewhat cost prohibitive. This has led to it being more political as well, since the vague and confusing language lends itself to selective interpretation.
0. Introduction	5	3	the City of Los Angeles is undertaking a 5-year, \$5 million project to completely rewrite the zoning code. There are numerous goals for project, including improved clarity, procedural streamlining, alignment with the City's plans, attracting investment and improving the quality of life for all Angelenos.	This report as well as other materials about the re:code project give mixed messages about the scope of the zoning code rewrite. It is unclear whether it is simplification of the existing code, a completely new code that will look nothing like our current code or a simplification of the existing code plus new zones implemented via community plan updates. More clarity up front on this issue would be helpful.
0. Introduction	5	4	the City of Los Angeles is undertaking a 5-year, \$5 million project to completely rewrite the zoning code. There are numerous goals for project, including improved clarity, procedural streamlining, alignment with the City's plans, attracting investment and improving the quality of life for all Angelenos.	I agree with Liz.
0. Introduction	5	5	the City of Los Angeles is undertaking a 5-year, \$5 million project to completely rewrite the zoning code. There are numerous goals for project, including improved clarity, procedural streamlining, alignment with the City's plans, attracting investment and improving the quality of life for all Angelenos.	I am much clearer on things after the presentation at our last meeting, but clarity when speaking to the public is critical. Being consistent about what you call the various products/outcomes would go a long way. Even in the presentation, the truly "new" code vs the old yet "consolidated" code, were confusing, because both were called "new."
0. Introduction	5	6	Let's zone like we mean it, in a transparent way. No more using industrial zones to build shopping centers, no more special zone change conditions on top of overlays on top of outdated base zones.	Let's figure out why we are zoning to inform what is in the code. As mentioned in the intro, the city an region have changed. The zoning code shouldn't include (or exclude) elements out of habit, just because those components have traditionally shown up in zoning documents. There may be goals related to land use and quality of life that are very important, but that are better tackled by other forms of formal or informal regulation rather than by zoning. (Ie, if an activity is potentially harmful, do you zone it away from people, or regulate the harm directly, or both?) Flip side is that there may be some important goals that have traditionally not been directly considered via zoning, but now can be (dealing with water use/ the drought/ climate adaptation, etc).
0. Introduction	5	7	Let's zone like we mean int, in a transparent way. No more using industrial zones to build shopping centers, no more special zone change conditions on top of overlays on top of outdated base zones.	I agree with Mark on this. I fear that we may be reaching to zoning to solve a myriad of issues through regulation - many of which may be better done through other mechanisms. For example, if there are problems with noise generated by certain types of businesses, enact a clear, enforceable noise ordinance - not a zoning scheme to designed to create an onerous process for those types of businesses.



Section	Section Page	Report Order	Report Text	Comment
0. Introduction	5	8	Let's streamline the review and CEQA processes to achieve the outcomes we want with less hassle. We need to ensure that small projects take a modest amount of effort, and big projects that match our plans can be reviewed and built before the market for their product has changed.	Good luck with this! CEQA reform has been talked about for the past 5 years. Most planners think that this is a state issue and it's been difficult to get significant changes from Sacramento. One thing the City can do, however, is provide for more Categorical Exemptions in the City's guidelines.
0. Introduction	5	9	Let's streamline the review and CEQA processes to achieve the outcomes we want with less hassle. We need to ensure that small projects take a modest amount of effort, and big projects that match our plans can be reviewed and built before the market for their product has changed.	Care must be taken to balance the interest of business and residents. CEQA provides an important environmental protection tool. We don't want to suggest we are trying to create a system that allows developers or the city to bypass state protections.
0. Introduction	5	10	Let's streamline the review and CEQA processes to achieve the outcomes we want with less hassle. We need to ensure that small projects take a modest amount of effort, and big projects that match our plans can be reviewed and built before the market for their product has changed.	I agree with Mark on this. I fear that we may be reaching to zoning to solve a myriad of issues through regulation - many of which may be better done through other mechanisms. For example, if there are problems with noise generated by certain types of businesses, enact a clear, enforceable noise ordinance - not a zoning scheme to designed to create an onerous process for those types of businesses.
0. Introduction	5	11	Let's upgrade our neighborhood protection.	Also need to allow evolution and not assume that the way we live today is the way that people will want to live in the future. The code should facilitate experiments & adaption without forcing people to change. At a discussion at occidental a few days ago mayor Garcetti said that we should be neither nostalgists nor utopians in thinking of the future form of LA, we should be organicists. I think this means we don't force rapid redevelopment and we don't freeze too much of the city in time. Zoning is about forcing people to structure their buiit environment in specific ways; we should use a light touch or at least ensure ways for people to innovate.
0. Introduction	5	12	Let's upgrade our neighborhood protection.	I agree with Mark. Zoning should be done in a manner that still permits technology advances and changes in social priorities and preferences to improve the quality of life of those living and doing business in LA. We're learning how to do things, smarter, cleaner and safer. Zoning needs to allow for these quality of life improvements to thrive where practical.
0. Introduction	5	13	Fixing the transition between zones of differing intensity, managing impacts created by specific uses, protecting our elegant historic resources, and ensuring a quality lifestyle in many different flavors, from rural to urban.	not only manage impacts but plan to avoid incompatible uses that are a risk to health and quality of life
0. Introduction	6	14	BASIS OF ANALYSIS	I would like to see the policy/regulation distinction made here. And acknowledgement that some standards issues, like parking requirements, will raise many policy questions
0. Introduction	6	15	This diagnostic report provides recommendations to address inadequacies inherent in the current zoning code.	Good luck with this! CEQA reform has been talked about for the past 5 years. Most planners think that this is a state issue and it's been difficult to get significant changes from Sacramento. One thing the City can do, however, is provide for more Categorical Exemptions in the City's guidelines.
0. Introduction	6	16	This diagnostic report provides recommendations to address inadequacies inherent in the current zoning code.	In my experience, exemptions are part of the problem. Better projects requiring less exemptions and complying with the new Code would be a good start.

Section	Section Page	Report Order	Report Text	Comment
0. Introduction	7	17	Finally, in November of last year, a “virtual listening session” was held. The virtual listening session was a webinar that allowed participants to log on remotely from any location to watch the listening session presentation, followed by an on-line question and answer session with the consultant team and City staff.	As a part of this process I think there needs to be clear recognition of where we are now in terms of built environment and where we want to end up in terms of physical development. Understanding the magnitude of this gap (some areas might be almost there while others have a long way to go) will help target efforts and ensure more positive outcomes.
0. Introduction	7	18	Common Themes. As expected, the initial public feedback reflects the broad range of needs and desires of LA residents. Many different concerns have been raised, but some things are common to all of LA. While the downtown loft dweller and the Sylmar family might have different visions for their respective neighborhoods, there are concerns that are shared by Angelenos, regardless of lifestyle.	I attended the public hearing held in the central area/ metro / downtown and the first three themes you list weren't among the most commonly expressed concerns at that hearing. The main themes I heard were: (1) zoning makes it hard to do anything innovative and (2) current zoning contributes to us being addicted to cars; and (3) we need housing to be more affordable
0. Introduction	8	19	The following pages offer a high-level view of how the job of creating a new zoning code can get done in LA. Of course, “the devil is in the details,” and substantial work must be occur during this project to see that these outcomes are achieved.	There is a typo here.
0. Introduction	8	20	The key concept here is to group similar rules together for ease of use, and reduce the duplication of material to a bare minimum.	seems like good idea
0. Introduction	8	21	STEP 2. Review and Incorporate External Material into the New Zoning Code Once a new outline as been determined, the next step would involve reformatting all of the existing material to be retained, moving it over to the new outline	What will the criteria for decision making be for the material to be retained?
0. Introduction	9	22	While this implies more zones will be found in the new zoning code, the use of the web-based code will allow users to pull only those requirements they need for their project	would it be possible to try to create a version of the code that decreases the number of zones, rather than increasing them, by consolidating zones and giving flexibility within broader zones, rather than creating more and more very- specific zones. It would be useful to compare an outline with many specific zones to one with fewer broader zones.
0. Introduction	9	23	STEP 4. Draft New Zones to Implement Future Planning No matter which type of zone is considered (residential, commercial, industrial), it appears that recent community plans cannot be implemented with the series of zones available today	example?
0. Introduction	9	24	As part of this project, whether any zone changes (map amendments) are made or not, a toolkit of new zones intended to offer solutions for implementing Community Plans is needed.	what is the anticipated time frame of the new code- if it is expected to provide the basic framework for decades to come, it would be nice to include zones in the toolkit designed to address issues likely to be significant - ie climate change, aging population
0. Introduction	9	25	The adoption of these plans provides an opportunity to put new zones to the test on the ground.	Priority should be given to update maps for the community plans that are under review at this time not only central LA where the typology is probably very unique compared to the rest of the city. The inference is that the city's economic development focus is limited to downtown.
0. Introduction	10	26	Outdoor site lighting	Can on-site amenities be added to this list? (eg publicly accessible plazas)

Section	Section Page	Report Order	Report Text	Comment
0. Introduction	10	27	STEP 6. Strategically Amend the Zoning Map Over the next 4 years, as the new zoning code is developed and implemented, a variety of parallel planning projects will offer the opportunity to change the zoning map and implement new zones.	If most of the city won't be undergoing planning in the next 5 years, new code should retain old zones and selectively change elements of these zones so that improved rules can immediately apply. No areas should be stuck with flawed rules for 20 years until all community plans updated.
0. Introduction	10	28	STEP 6. Strategically Amend the Zoning Map Over the next 4 years, as the new zoning code is developed and implemented, a variety of parallel planning projects will offer the opportunity to change the zoning map and implement new zones.	Agreed. I also think the document should make it more clear that we will basically have two systems working simultaneously for decades, potentially.
0. Introduction	10	29	Other Community Plans. Any other community plans completed during this project's timeline should be implemented with new zones and development standards from the new code as well.	Again, the inference here is that community planning efforts in other areas of the cities are less superior. If there is no difference between the ReCode effort here between downtown and non-downtown plans, why is the former being called out?
0. Introduction	10	30	No zone changes to Specific Plans are proposed to occur through re:code LA.	I'd suggest calling this out earlier in the document. This is a common misunderstanding of the effort that I've heard in the community.
0. Introduction	11	31	CODE REWRITE TOPICS The following pages of this report discuss individual topic areas in greater detail. It is the intent of these sections to help those unfamiliar with the regulations to understand where the new zoning code drafting might take the City.	might want to list or briefly summarize these topics here and reference how they fit together. when I read chapter 2 I thought it was backwards; some of the other chapters had more of what I was looking for but I had no perspective on how they the different topics fit together. maybe that relationship between core. corridors and suburbs will be in another section but it would be nice to have the structural overview in the intro.
0. Introduction	11	32	CODE REWRITE TOPICS The following pages of this report discuss individual topic areas in greater detail. It is the intent of these sections to help those unfamiliar with the regulations to understand where the new zoning code drafting might take the City.	I agree. Also, it might be nice to have a section that summarizes current/recent planning and community outreach efforts citywide. Given these, what kind of city do we agree we want to be?
0. Introduction	11	33	CODE REWRITE TOPICS The following pages of this report discuss individual topic areas in greater detail. It is the intent of these sections to help those unfamiliar with the regulations to understand where the new zoning code drafting might take the City.	It would nice somewhere in the document to give people an idea about how impactful similar changes have been in other cities, or even examples from Los Angeles itself. How quickly can our citizens expect to "see" results.
1. Distinct Neighborhoods	1	34	Provide a clearer, more prescriptive approach to promoting and preserving neighborhood character.	I think "prescriptive, yet flexible" would be more palatable to various constituencies.
1. Distinct Neighborhoods	1	35	How can the City effectively regulate land use in a comprehensive way, while accommodating each "city" in this "city of cities?" A one-size-fits-all approach to regulating development in LA will not work.	Acknowledging LA's diversity of physical form is important but I think the typical Los Angeles development pattern should be acknowledged as well: blocks created by wide commercial corridors transitioning to multifamily all of which protects single family development at the interior of the block. Understanding how the code rewrite might impact this pattern would help a greater number of citizens think through how the project will improve the city.
1. Distinct Neighborhoods	1	36	This project offers an opportunity to reduce the complexity of this system, while at the same time maintaining the useful nuances across this vast City of Los Angeles	Giving some examples here would be useful.
1. Distinct Neighborhoods	2	37	DISTINCT NEIGHBORHOODS	Points 1.1 through 1.6 are excellent. These priorities well summarize stakeholder concerns from all areas of the City with regard to residential character. In particular, transitions could--and should--be better. 'Useful nuances': great phrase.

Section	Section Page	Report Order	Report Text	Comment
1. Distinct Neighborhoods	2	38	1.1. Combine the Existing Residential Requirements into a New System: Translate existing residential zones plus overlays into unique zones.	The priorities suggested by this list are weird and out of date. It looks talking points from this defunct group <a href="http://archinect.com/news/gallery/42775035/2/editor-s-picks-256">http://archinect.com/news/gallery/42775035/2/editor-s-picks-256</a> , not goals for a great city in 2014 (aiming to shape itself for the future). If we are interested in promoting distinct neighborhoods through zoning, surely the most important issue is ensuring that there are a range of urban forms and living environments throughout the city. My top pick for a neighborhood type that needs to be encouraged and protected is the most successful urban form in history, but one that the LA zoning code has waged holy war against: the mixed-use, walkable, compact urban neighborhood where people live in 4-5 story buildings above businesses and don't need to own a car. Once we figure out ways to make sure that a wide array of these walkable neighborhoods are legal throughout the city, we can focus on equinekeeping districts and boarding houses. Not to say that these 'suburban defense league' type issues shouldn't be addressed, but to have them front and center in the report is off-putting. LA is facing a 500 year drought, the number of 95 plus degree days is expected to triple in many parts of the city by mid century, lots of low and moderate income people can't afford housing, so let's put put energy into stuff that matters.
1. Distinct Neighborhoods	2	39	1.2. Continue to Protect Historic Resources and Established Neighborhoods: Consider adding neighborhood conservation districts, improving base zoning standards.	allow preservation of significant buildings; do not preserve bad land use (by which I primarily mean areas where people cannot walk to daily amenities)
1. Distinct Neighborhoods	2	40	1.2. Continue to Protect Historic Resources and Established Neighborhoods: Consider adding neighborhood conservation districts, improving base zoning standards.	I agree with Mark. Los Angeles in the post WWII era became a sprawling city that has become unsustainable. With the goals of AB32 and SB375 to reduce greenhouse gases and encourage compact, multimodal, walkable community design, residents in many of the communities will have to consider the fact that changes have to take place to accommodate pedestrian oriented developments along with affordable housing, supportive housing, homeless services, etc in all the communities in Los Angeles. We need to look at the bigger picture and make the necessary changes - even for established neighborhoods.
1. Distinct Neighborhoods	2	41	1.3. Address Impacts within Single-Family Residential Neighborhoods: Unlicensed boarding houses and short-term rentals are perceived as threats to single-family neighborhoods.	There is a long and tragic history of exclusionary zoning that should be rooted out rather than continued. the goal for an updated zoning code should be inclusion and diversity within neighborhoods, not exclusivity of one type of resident or structure.
1. Distinct Neighborhoods	2	42	1.3. Address Impacts within Single-Family Residential Neighborhoods: Unlicensed boarding houses and short-term rentals are perceived as threats to single-family neighborhoods.	agree - however the issue is the overconcentration in a specific community and region. This housing is not equitably distributed throughout the city due to economic segregation.
1. Distinct Neighborhoods	2	43	1.3. Address Impacts within Single-Family Residential Neighborhoods: Unlicensed boarding houses and short-term rentals are perceived as threats to single-family neighborhoods.	eliminate the development of multi-unit housing in single family residential areas via downzoning to preserve the scale and character of the neighborhood.
1. Distinct Neighborhoods	2	44	1.5. Improve The Transition Between Corridors and Neighborhoods: Set standards for commercial and industrial development abutting residential areas	This is key. Multi-family has usually been used to make this transition but this step down is usually only one or two lots deep. Given the need for housing, there is a lot of pressure on the one or two multifamily zoned sites between commercial and single family. These areas of the city need to be expanded and open to both traditional and innovative low-rise multi-family housing typologies: house courts, small lot subdivisions, row housing, courtyard housing, fourflats, mini-houses, clustered housing, live/work, etc.



Section	Section Page	Report Order	Report Text	Comment
1. Distinct Neighborhoods	2	45	1.5. Improve The Transition Between Corridors and Neighborhoods: Set standards for commercial and industrial development abutting residential areas	I think this poses the challenge the wrong way. In an era of climate change, we need to ensure that as high a percentage of LA residents as possible live within walking distance of retail, employment and transit corridors. So the goal for a transition between residential neighborhoods commercial areas or corridors should be to change elements of the zoning code that mandate low residential densities adjacent to commerce and transit; or that make it challenging for residents to walk or bike to businesses/transit.
1. Distinct Neighborhoods	2	46	1.6. Retain the Rural Lifestyle: Provide for the long-term viability of equine keeping and other unique rural areas.	buffers should be considered similar to what is contemplated for industrial areas particularly if livestock are allowed.
1. Distinct Neighborhoods	3	47	1.1. COMBINE THE EXISTING RESIDENTIAL REQUIREMENTS INTO A NEW SYSTEM	The use of the word unique here gives the wrong impression, I think, implying something exclusive and one of a kind instead of just different. Perhaps specialized, comprehensive, articulate?
1. Distinct Neighborhoods	3	48	The intent of re:code LA is to simplify and clarify the existing zoning regulations	the intent of recoding is recoding, right? the priority is improving, then making the new version easy to understand.
1. Distinct Neighborhoods	3	49	This process would allow for a variety of new base zones that incorporate the full spectrum of overlays currently applied throughout the City.	I still don't understand what the new simpler zone would be. Are you suggesting creating something like a 'residential, suburban, low-height, no mansions zone'?
1. Distinct Neighborhoods	3	50	The City could apply these new base zones, pro-vided they encompass all of the overlays applied today, through a table adopted along with the zoning text that converts each zone combination to its new zone letter designation.	The process of "conversion" needs to be discussed in the code drafting steps section.
1. Distinct Neighborhoods	4	51	...then lot might be split to the zoned lot size of 9,000 square feet.	Please try to use examples that are relevant to the main challenges and opportunities facing a diverse, contemporary LA, not exurban, exclusionary zoning models.
1. Distinct Neighborhoods	4	52	The adoption of new zoning text as part of re:code LA will not make changes of this kind, although it will establish a set of new clear, context-sensitive zones to be applied when implementing Community Plans.	These types of problem should however be flagged so that they are eventually addressed and not ignored.
1. Distinct Neighborhoods	4	53	Where residential zones are also subject to Q (Qualified Classifications), T (Classifications) or D (Development Limitations) that have been applied by the City Council as part of a zone change, the conditions should be reviewed, and where appropriate, incorporated into the new base zones or general development standards.	Very important detail as some neighborhoods do not have specific plans, and the Q was used to control height and step backs.
1. Distinct Neighborhoods	4	54	Actual removal of the conditions applied during a previous zone change requires another zone change approved by the City Council.	I can't seem to locate the paragraph that talks about Q,T and D. In my hard copy, I believe after T in parenthesis is says (Classifications). The word should really be (Tentative).
1. Distinct Neighborhoods	5	55	1.2. CONTINUE TO PROTECT HISTORIC RESOURCES AND ESTABLISHED NEIGHBORHOODS	Los Angeles in the post WWII era became a sprawling city that has become unsustainable. With the goals of AB32 and SB375 to reduce greenhouse gases and encourage compact, multimodal, walkable community design, residents in many of the communities will have to consider the fact that changes have to take place to accommodate pedestrian oriented developments along with affordable housing, supportive housing, homeless services, etc in all the communities in Los Angeles. We need to look at the bigger picture and make the necessary changes - even for established neighborhoods.

Section	Section Page	Report Order	Report Text	Comment
1. Distinct Neighborhoods	5	56	Consider adding neighborhood conservation districts, improving base zoning standards.	Protecting established neighborhoods is a crowd pleaser, but neighborhoods don't and shouldn't stay frozen in time. The people in LA neighborhoods change quite quickly. I would like to see a little push back on this sentiment, recognizing that some neighborhoods should change for the sake of broader community interests.
1. Distinct Neighborhoods	5	57	The existing staff (and any anticipated future staff) would be unable to process permits for all neighborhoods using this labor-intensive model	what about survey the city did to identify HPOZ? Can community plan updates assist in this manner?
1. Distinct Neighborhoods	5	58	A new tool allowing neighborhoods to develop measurable standards (not guidelines) to match the base zoning to existing or desired character could be developed.	Setbacks are there for a reason: to provide air and light. Front and rear yards provide much needed rec space and outdoor living room...and space to grow food. Communal urban gardens are good but low density areas should KEEP their setbacks and yards—and residents should be encouraged to grow their own fresh produce and fruit. Best way to attack the food deserts issue IMO. Grow food instead of lawns
1. Distinct Neighborhoods	5	59	A new tool allowing neighborhoods to develop measurable standards (not guidelines) to match the base zoning to existing or desired character could be developed.	More important to me than tools to mandate conformity (the city shouldn't act like a homeowners association) are tools to allow evolution towards measurable goals like reduced vehicle miles traveled and energy and water usage per resident; population density adequate to support regular transit; increased mode share for active transportation; lower rents; wider diversity of housing types in each neighborhood, etc. So what are the pathways for accessory dwellings to added much more easily, for neighborhood serving retail to open in single family homes, for single family properties to become duplexes or cottage housing courts or small lot attached housing, for car parking spaces to be eliminated or replaced with bike parking, etc.
1. Distinct Neighborhoods	5	60	Prevailing setbacks (front, side, rear)	Setbacks are one of the main legacy elements of the zoning code that need to be rethought. What are they for? Are setbacks the best way to achieve these purposes? Are there competing goals (sustainability, affordability, flexibility etc) that are more important than standard setbacks. Here is a good quote from A Quincy Jones regarding setbacks: "Can anyone positively declare that the usual Southern California tract, with its uniform rows of houses set back the legally required twenty-five feet from the street, provides more satisfactory living, or is more aesthetically satisfactory, than the enclosed street facades and garden courts of mexican colonial towns designed for a similar climate?" > a quincy jones & frederick e emmons, builders homes for better living, 1957
1. Distinct Neighborhoods	5	61	Roof style (pitched, flat)	we need to move rapidly towards light colored, reflective roofs so roof stye should not mandate dark nor tile roofs.
1. Distinct Neighborhoods	5	62	Architectural elements (porches, dormers)	houses with lower ratios of surface area to volume are more energy efficient, so standards should not be allowed to mandate features like dormers that make buildings more difficult to insulate. (Not that more complicated structures cannot be made energy efficient, but government regulations should not make it harder to save energy).
1. Distinct Neighborhoods	5	63	The recent Survey LA work could serve as a foundation for these new overlays.	Perhaps we might want "different" zoning based on different communities. For example, all communities might have a C2 zone, but there could be different standards for the C2-CBD vs. C2-WLA vs. C2-Northridge
1. Distinct Neighborhoods	6	64	1.3. ADDRESS IMPACTS WITHIN SINGLE-FAMILY RESIDENTIAL NEIGHBORHOODS	This seems to be a discriminatory policy. Only allowing certain types of people to live together seems exclusionary. There has always been some race or group that the neighborhood felt inappropriate for their community or lifestyle. With so many different types of co-housing arrangements coming forward, the label 'Single-Family Residential' will become a misnomer. We need to build in flexibility within the Zoning Code to allow for different uses, people, and living arrangements. We can't keep going down this path of constantly creating prohibitive policies that are discriminatory into the Zoning Code. That's what we have now.

Section	Section Page	Report Order	Report Text	Comment
1. Distinct Neighborhoods	6	65	Unregulated group living arrangements, short-term rentals, eldercare facilities, and State licensed community care facilities are perceived as threats to single-family neighborhoods.	HPOZ tends to be associated with a limited number of income levels although many of the historical communities within the urban core are now home to largely communities of color. How do you assist low-income communities establish these protections? How do we make this equitable and not a process of gentrification?
1. Distinct Neighborhoods	6	66	During the listening sessions held at the beginning of this project, many community members complained of unacceptable impacts from both permitted and non-permitted uses in single-family residential neighborhoods.	Clear and reasonable land use regulations, including definitions and performance standards [noise, traffic, parking, operating hours, and the like], are necessary for good governance, civil society, buffering of uses between zone classifications, proper code enforcement, neighborhood stability, public health, and public safety.
1. Distinct Neighborhoods	6	67	Most of the complaints centered on the proliferation of short-term rentals and unregulated group living arrangements, many of which house more residents than the typical single-family home.	Many people like the idea of renting out their house or even a room to help with their family finances. Perhaps the solution is to develop standards and criteria to mitigate real or perceived problems. For example, frequency of rental, number of occupants. Maybe these uses should only be allowed with a CUP, but the application fee must be reasonable.
1. Distinct Neighborhoods	6	68	In any case, the City's current definition of "family" allows virtually any group of people, regardless of number, to share a residence in a single-family neighborhood.	I believe that there was a court case about 15 years ago in Santa Barbara about how a "family" is defined.
1. Distinct Neighborhoods	6	69	In any case, the City's current definition of "family" allows virtually any group of people, regardless of number, to share a residence in a single-family neighborhood.	Student housing needs to be addressed here too. I live next door to not 3 but 8 Oxy Students, and it has ruined my life.
1. Distinct Neighborhoods	6	70	Unless the Ad Hoc Committee on Community Care Facilities working on this issue adopts alternate provisions, the current definition will be carried over to the new zoning code.	Where do you address the concern for the development of multiunit properties in single family residential areas.
1. Distinct Neighborhoods	6	71	Unless the Ad Hoc Committee on Community Care Facilities working on this issue adopts alternate provisions, the current definition will be carried over to the new zoning code.	Can we include density restrictions to prevent over concentration in any given neighborhood
1. Distinct Neighborhoods	7	72	1.4. ENHANCE MULTI-FAMILY DESIGN STANDARDS	The title should include Mixed-Use Housing
1. Distinct Neighborhoods	7	73	Ensure multi-family project quality, apply Baseline Mansionization and Hillside standards.	Since this is the section on neighborhood and strengthening community, I think this section could focus more on how multi-family can contribute to neighborhood character and vitality. Focusing on how to make multi-family look pretty and not be too big makes it sound like we don't want multi-family in our neighborhoods.
1. Distinct Neighborhoods	7	74	The re:code LA project provides an excellent opportunity to revise the multi-family design standards applied today in both multi-family and mixed use zones.	One caution - the Zoning Code needs to correspond to the Building Code when it comes to height, projections, number of stories, etc. I've seen many arbitrary numbers get baked into the zoning code. For example, a 30' height limit will allow 3 stories at low ceiling heights and no parapet. The ground floor cannot be raised for stoops or for ground floor retail without losing a story. If there is any grade change, Zoning height is measured from the lowest point of the site. Why can't zoning height be measured like the building code height - from the average height of the site? Also, can we build in some flexibility here so if you have stoop units or ground floor retail, the height can be raised or something similar.
1. Distinct Neighborhoods	7	75	During the preparation of the recent Baseline Mansionization and Baseline Hillside regulations, many communities asked the City to also include multi-family projects as part of the system.	limiting residential density in some hillside areas makes sense but we need to increase population density in flat areas to levels that support more regular transit service.

Section	Section Page	Report Order	Report Text	Comment
1. Distinct Neighborhoods	7	76	With a working knowledge of the impact of these two ordinances on other residential projects, it is time to apply the concepts of these two ordinances to multi-family development.	To all multi-family projects? Or just to certain ones (e.g., over 50 units)?
1. Distinct Neighborhoods	7	77	With a working knowledge of the impact of these two ordinances on other residential projects, it is time to apply the concepts of these two ordinances to multi-family development.	The standards should apply to all projects. The city only reviews projects that are 50 units or more for Site Plan Review. If the project is below the threshold, Plan Check is the only process that controls what gets designed and built. For projects of 4 units or smaller, an architect's stamp is not required meaning anybody can design and build a 4-plex with an engineer's stamp. We need standards to cover all types of buildings.
1. Distinct Neighborhoods	7	78	With a working knowledge of the impact of these two ordinances on other residential projects, it is time to apply the concepts of these two ordinances to multi-family development.	Agreed!
1. Distinct Neighborhoods	8	79	Set standards for commercial and industrial development abutting residential areas.	transitions should allow for increased residential density within walking distance of corridors; make it easier for people to walk to the commercial sites (perhaps by requiring easements in the middle of long blocks to allow walk/ bike paths to the commercial corridor)
1. Distinct Neighborhoods	8	80	Set standards for commercial and industrial development abutting residential areas.	I agree. This section is really talking about buffering/mitigating adjacencies, not using the new code to create actual transitions and elongate and make more elegant the differences in use, density, height, etc.
1. Distinct Neighborhoods	8	81	Set standards for commercial and industrial development abutting residential areas.	I agree also. Many of the larger developments along the corridor I work on has multiple zones - C with R typically. And often times, the C zone allows less FAR and density than the R3,4,5 zones abutting it. This does not make. There should be a standard on transition regardless of the location.
1. Distinct Neighborhoods	8	82	One of the most frequent issues discussed in recent Community Plans is the transition between residential areas and adjacent commercial or industrial areas.	Reflects what I heard and read in the listening session notes.
1. Distinct Neighborhoods	8	83	Uses. In some cases, specific uses should be located away from residential areas.	examples?
1. Distinct Neighborhoods	8	84	Distance separation from residential and limited hours of operation can be applied to specific, impact-generating uses.	Consider performance based criteria to ensure compatibility. Noise, odors, hours of operation.
1. Distinct Neighborhoods	8	85	Site Design. Location of dumpsters and other site elements can also affect adjacent residential areas.	Does the City's recommendation to place new residential development 500-1000 ft from freeways fit here?
1. Distinct Neighborhoods	8	86	One that is especially problematic is the application of the Parking Zone (P) to portions of a site in order to restrict the development footprint.	An easy solution is to use the rezone process to change the P zone to something else, like 'partial open space' space zone or something, and allow open space, car parking, bike parking, some buildings
1. Distinct Neighborhoods	8	87	...the Parking Zone should be replaced by reverting that area to the surrounding zone on the property.	Missing last paragraph in this electronic version, but I could not agree more about obsolete Parking Zones.
1. Distinct Neighborhoods	8	88	This will allow flexibility to redevelop the project in the future, and to reinvest in the current site improvements.	Consider performance based criteria to ensure compatibility. Noise, odors, hours of operation.
1. Distinct Neighborhoods	9	89	When new development "comes to the nuisance" by building next to rural neighbors, it should not force adjacent existing rural structures to become nonconforming.	This statement applies to all (residential) zones not just rural districts. For instance, the Code correctly wants to separate schools from adult entertainment, but when the adult entertainment is there for many years and then the school moves in, the adult entertainment business suddenly becomes nonconforming because separation isn't maintained. Not that I'm a fan of adult entertainment, but it does seem to be unfair. I think there is a similar issue with hospitals and schools.



Section	Section Page	Report Order	Report Text	Comment
2. Housing Choice	1	90	2. HOUSING AFFORDABILITY AND DIVERSITY	Housing affordability is an issue I've been studying for a while. There are many factors that make housing here much more expensive than most other parts of the country. I was in Atlanta and visited a brand new high-rise apartment tower. For a 1800sf 2br unit, the rent was \$2650 = \$1.47 per sf. For a similar apartment in DTLA, the price is about \$6300 = \$3.50 per sf. So why is that? Land cost, tougher regulations, higher exactions, higher fees, higher construction costs, seismic zones, longer entitlement process, too much red tape and uncertainties. etc. How can we produce housing in a more efficient way so we don't have to rely on subsidy to produce housing that is within range of the residents? We can't rely on robbing Peter to pay Paul as a main vehicle to provide affordable housing. Subsidy means everyone has to pay more in the end = higher housing costs.
2. Housing Choice	1	91	Expand housing options to provide for a more complete range of people and incomes.	This section should also address existing housing under the Rent Stabilization Ordinance, which often has below market rents and no subsidy--a vital inventory the City should strive to protect since the cost of subsidizing new construction is exorbitant.
2. Housing Choice	1	92	A median-income household in Los Angeles County can afford only 24% of the homes currently for sale.	and probably one of the most segregated. I think it's worth referencing the history of housing segregation and covenants.
2. Housing Choice	1	93	The lack of affordable housing near jobs and shopping leads to long commutes that contribute to increased traffic	and air pollution, stress, climate change, physical inactivity and disease, etc.
2. Housing Choice	1	94	Zoning regulations are often seen as a barrier to housing choice and affordability.	then why does chapter 2 discuss preserving / strengthening these exclusionary rules?
2. Housing Choice	2	95	This bungalow court located near the intersection of Harvard and Martin Luther King is an example of just one of the unique housing options in LA.	zoning (parking requirements) and fire codes essentially outlawed courtyard housing in LA (see polyzoides, courtyard housing in los angeles); it would be nice to re-legalize it.
2. Housing Choice	2	96	2. HOUSING AFFORDABILITY AND DIVERSITY	I was surprised that only one of these sections discussed parking. Parking is such a huge form-driver for housing, it should be addressed in each of these sections.
2. Housing Choice	2	97	2.1. Continue to Provide Incentives for Affordable Housing: Keep providing a density bonus as well as reduced parking, lot width and setbacks for development that includes affordable housing.	as long as these bonuses are not excuses to keep base density low and base parking requirements high, both of which hurt the environment and also undercut affordability.
2. Housing Choice	2	98	2.1. Continue to Provide Incentives for Affordable Housing: Keep providing a density bonus as well as reduced parking, lot width and setbacks for development that includes affordable housing.	I agree. Finding ways to calibrate the code to market fluctuations would be ideal, so that incentives produce the affordable units we want but don't discourage developers from applying them.
2. Housing Choice	2	99	2.2. Provide a More Prescriptive Set of Housing Options: The zoning code should contain prescriptive standards for a more comprehensive menu of housing typologies.	As we think about incorporating various housing types into the code, it would also be good to think about how to use the code to encourage the revitalization of existing types, house courts, like you show on this page, four flats, dingbats, courtyard housing, six-packs, etc. One of the great unintended consequences of the SLS is that it could be used to convert existing projects, especially house courts. As usual, this will come down to parking and passageway requirements.
2. Housing Choice	2	100	2.2. Provide a More Prescriptive Set of Housing Options: The zoning code should contain prescriptive standards for a more comprehensive menu of housing typologies.	Also, many of these historic types are located on sites where the underlying zone far exceeds the density of the existing development. We see more of this historic fabric retained in neighborhoods undergoing less development. Using the code to encourage the preservation of these historic assets, even when they are not specifically designated or in an HPOZ zone would benefit communities and neighborhoods. Also, then these buildings could be used as models for newly built versions of the type
2. Housing Choice	2	101	2.3. Improve Regulations for Second Units: New regulations for second units must be developed and incorporated into the zoning code	There is a period missing here.

Section	Section Page	Report Order	Report Text	Comment
2. Housing Choice	3	102	To promote greater production of affordable housing near transit, the ordinance also permits an increase in Floor Area Ratio (FAR) from 1.5:1 to 3:1 for commercially-zoned properties in Height District 1 that are within 1,500 feet of a rail station or a rapid bus stop.	I agree! Especially about getting rid of density requirements.
2. Housing Choice	3	103	To promote greater production of affordable housing near transit, the ordinance also permits an increase in Floor Area Ratio (FAR) from 1.5:1 to 3:1 for commercially-zoned properties in Height District 1 that are within 1,500 feet of a rail station or a rapid bus stop.	The Chinatown Arroyo Seco Specific Plan proposed higher density when affordability was included. However, to incentivize the inclusion of affordable units the base density MUST be lower than 3:1, more like 1.5:1 to incentivize the developer to opt for the higher density. Starting with a base FAR of 3:1, the developer won't have any incentive to request higher density because there are diminishing returns with higher construction costs when you go above 5 stories. If in lieu fees are imposed they must be substantial (6 figures/unit) because that is what it costs local jurisdictions to subsidize an affordable unit. Also, if affordability is provided off-site, it can't be in Pacoima when the development is downtown. Low-income people are the heaviest transit users, and locating their housing at a distance (say more than .25 miles) from transit defeats the promise of improved mobility for all with TODs.
2. Housing Choice	3	104	To promote greater production of affordable housing near transit, the ordinance also permits an increase in Floor Area Ratio (FAR) from 1.5:1 to 3:1 for commercially-zoned properties in Height District 1 that are within 1,500 feet of a rail station or a rapid bus stop.	How about getting rid of the density limitations while retaining FAR? Density and FAR are 2 different things. We don't have to regulate them together.
2. Housing Choice	3	105	To promote greater production of affordable housing near transit, the ordinance also permits an increase in Floor Area Ratio (FAR) from 1.5:1 to 3:1 for commercially-zoned properties in Height District 1 that are within 1,500 feet of a rail station or a rapid bus stop.	Yes! Great policy.
2. Housing Choice	4	106	A more prescriptive approach would set different lot dimensional standards for each building type permitted within the same zone.	It's important the design standards for TODs be customized to the setting with standards to avoid massive buildings overshadowing single family residential housing. Given that these projects often lead to gentrification of communities - I am curious if there is data to show many residents in housing in proximity actually use the public transit system or are we just increasing density in communities under the pretense of supporting public transit. We also need incentives to support homeownership
2. Housing Choice	4	107	Another benefit of this approach is that specified building types could be restricted to certain neighborhoods depending on existing character and context, or planned future character.	Should always think about encouraging diversity in addition to, or instead of, discouraging it. I like how the portland toolkit shows options for sensitively fitting multiple units in r-1 zones. We definitely need to allow this kind of diversity in most r-1 zones in LA.
2. Housing Choice	4	108	Another benefit of this approach is that specified building types could be restricted to certain neighborhoods depending on existing character and context, or planned future character.	It will become increasingly important to update the residential zoning to avoid the development of multi-unit housing in predominately single family dwelling areas.
2. Housing Choice	4	109	Image: Tuscaloosa recently adopted zoning that includes prescriptive standards for a variety of new housing types.	I wonder how this can start to shape 'per dwelling unit' requirements such as trees, parking, open space, bicycles, etc. Many of the current developments such as podium and high-rise construction should be included. Currently in LA, most of mixed-use buildings are 7 stories or less and 20+ stories. When formulating the menu options, construction types (building code) should be studied to understand how they correlate with zoning requirements.

Section	Section Page	Report Order	Report Text	Comment
2. Housing Choice	4	110	Image: Tuscaloosa recently adopted zoning that includes prescriptive standards for a variety of new housing types.	I agree with Simon. Also, these types should be linked to parking strategies. Off-site parking opportunities should also be explored.
2. Housing Choice	4	111	Image: Tuscaloosa recently adopted zoning that includes prescriptive standards for a variety of new housing types.	We should also be encouraging more low-rise multi-family housing types compatible for predominantly single family neighborhoods.
2. Housing Choice	5	112	2.3. IMPROVE REGULATIONS FOR SECOND UNITS	Look before we leap: how are neighboring small cities regulating ADUs?
2. Housing Choice	5	113	By promoting second units, LA could ease the rental housing deficit, maximize limited land resources and assist low and moderate-income homeowners with supplemental rental income	very important goal
2. Housing Choice	5	114	By promoting second units, LA could ease the rental housing deficit, maximize limited land resources and assist low and moderate-income homeowners with supplemental rental income	ADU's also make housing more flexible at various life stages.
2. Housing Choice	5	115	Consequently, second units must meet the state-adopted rules	There is a period missing here.
2. Housing Choice	5	116	This has made it difficult to build second units on existing lots.	Should talk about parking requirements here!
2. Housing Choice	5	117	Second units must meet setback, lot coverage, passageway and height requirements that are really intended for principal units.	get rid of 10' passageway requirement
2. Housing Choice	5	118	As part of re:code LA, new regulations for second units must be developed and incorporated into the zoning code.	Agreed. We need standards but should not make it difficult to get the second unit approved and built.
2. Housing Choice	5	119	As part of re:code LA, new regulations for second units must be developed and incorporated into the zoning code.	The project seems to vacillate between simply consolidating existing codes and policies and then define policy where there are gaps. You indicate you are willing to take this on but defer in other policy fronts. There needs to be a clear set of criteria to determine what area
2. Housing Choice	6	120	Revise the Small Lot Subdivision ordinance to require a higher level of design and improved compatibility with neighboring properties.	small lot subdivisions should be allowed in most r-1 zones, they are a less wasteful use of land and can provide more diversity of housing options.
2. Housing Choice	6	121	Revise the Small Lot Subdivision ordinance to require a higher level of design and improved compatibility with neighboring properties.	I agree, but only if we can more tightly control bulk and parking strategies.
2. Housing Choice	6	122	Although small lot developments do not increase allowable density, they are often built on properties that might not otherwise get used for multi-family purposes.	This is, for the most part, untrue. Small Lot subdivisions (SLS) are more often than not an option to attached condo projects.
2. Housing Choice	6	123	In many instances, the base zoning does not match the development pattern on the ground; neighbors are surprised to see a single-family house replaced with four or five small-lot homes.	Remember that this only happens in multi-family zones (not in single-family zones). So the only way a SLS can replace a single-family home is where the SFD is under-utilizing the zoning.
2. Housing Choice	6	124	he best solution for this issue is to replace the base zone with a better match for the underlying development pattern (typically after an updated Community Plan).	or, if a small lot subdivision is successful, it means there is demand for small lot single family houses in that area, and the zoning should be changed to allow more diverse land uses. General rules should be: near transit and/or within walking distance of businesses, should not allow downzoning
2. Housing Choice	6	125	Tailoring parking to reflect the availability of transit options will help promote small lot development in targeted areas.	It can be prescriptive.

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2. Housing Choice	7	126	Downtown or near transit and might not be able to afford a conventional one-bedroom apartment.	Putting micro-units in the right location will be key. A quality lifestyle in a small unit is dependent upon city investment in transit, parks, streetscape and other city services.
2. Housing Choice	7	127	Since density is no longer a factor regulating development in the Downtown zones, there should be no restriction on micro-units Downtown.	The Downtown Housing Incentive Area has no limit on the number of dwelling units permitted (i.e., no cap on density). However, it is my understanding that the Building Code requires that each unit must be at least 220 s.f.
2. Housing Choice	7	128	Since density is no longer a factor regulating development in the Downtown zones, there should be no restriction on micro-units Downtown.	I think density should be eliminated. FAR should be used to control intensity. if the market demands 2000 sf units, the development can have less units, less parking, and lower construction cost. if the market demands 300 sf units, more parking, and high construction cost but also more net income. Traffic study and EIR will be done to study the impacts and as long as those are mitigated, I don't see why there has to be a limit on number of units. 400 or 200 sf of lot area per unit is arbitrary and should be removed.
2. Housing Choice	7	129	Since density is no longer a factor regulating development in the Downtown zones, there should be no restriction on micro-units Downtown.	I think parking requirements should be rethought as well. Unit size and type are no longer a reliable indicator of the actual number of people occupying a unit, since single person households and roommate households are on the rise.
2. Housing Choice	7	130	In areas where density regulations apply, such as near transit, micro-units could help to provide a more affordable housing option if bedrooms or some other measure of density applied (rather than dwelling units per acre) so that micro-units were on equal footing with larger apartments.	But let's not forget that there is still likely to be a demand for parking.
2. Housing Choice	7	131	Another micro-unit model worth considering is the tiny house.	reducing the minimum lot size in residential zones would also help. I believe that "In short supply," the report of the 1999 los angeles housing crisis task force, called for this step in certain areas.
2. Housing Choice	7	132	Tiny houses are very small single-family detached units that are small enough to easily fit in a residential backyard as a second unit.	But parking will still be a concern.
2. Housing Choice	8	133	Modify density restrictions for cohousing projects in preferred zones that implement mitigating measures.	good ideas. In addition to intentional living models, german baugruppen (multi-family housing collaboratively built by multiple owners) should be looked at to see if it has applicability in LA and if there any zoning barriers.
2. Housing Choice	8	134	Modify density restrictions for cohousing projects in preferred zones that implement mitigating measures.	I agree. Also, creating more flexible housing that can be occupied differently at various life stages would be ideal.
2. Housing Choice	8	135	Cohousing is a type of collaborative living arrangement where residents actively participate in the design and operation of everyday living.	How is this different than multi-unit housing other than there a single family homes? Where is this appropriate in a very densely populated city? Is this even feasible given the necessary lot size?
3. Centers and Corridors	1	136	The creation of a vibrant and sustainable community requires a variety of uses—commercial, civic/institutional and office uses—all within walkable proximity of a diverse array of types of residential units.	this is a good explanation
3. Centers and Corridors	1	137	A commuter in the LA region spends approximately 61 hours delayed in traffic annually.	Congestion is annoying but it is a skewed measurement of the efficiency of mobility systems. Travel times and Vehicle Miles traveled are better indicators <a href="http://www.planetizen.com/node/67172">http://www.planetizen.com/node/67172</a>
3. Centers and Corridors	1	138	If LA is serious about its commitment to sustain-ability, then the zoning code must provide options to get people out of their cars and into alternative forms of transportation such as on foot, on a bike or catching a train or bus.	I think this is probably the single most important goal for 21st century zoning

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3. Centers and Corridors	1	139	Mixed use comes in many forms-it may be in the form of a corner store in the neighborhood, a co-working space for people who sometimes tele-commute during the week, a compact area with a variety of uses, or a vertically mixed use building with restaurants or retail on the ground floor and residential or offices above.	I can't "see" the text, but there is a reference to corner store in the neighborhood. This is a great idea and long overdue. But, once again, this is more of a planning policy issue not a zoning Code implementation tool.
3. Centers and Corridors	2	140	3. CENTERS AND CORRIDORS	How can zoning help community plans to limit the overconcentration of undesirable uses in a neighborhood? How can it encourage and enforce broad access to desirable, daily necessities especially in the commercial realm--healthy food, exercise facilities, etc.?
3. Centers and Corridors	3	141	New commercial zones must be developed that address the variety of character that exists today, but are flexible enough to grow with the needs of the City over time.	any examples of what these new zones would be like?
3. Centers and Corridors	3	142	Rather than a set of "one-size fits all" zones with a variety of overlays and conditions, new base zones must address the existing and future needs of all commercial areas in the City.	The word "all" bothers me because I just don't see how this is possible.
3. Centers and Corridors	4	143	3.2. REQUIRE ENHANCED WALKABILITY AND FORM STANDARDS	There should be standards for sidewalk design and materials. Every project in Downtown has its own design for the sidewalk, making it very difficult to get a sense of place. In Glendale, they decided to go with "Glendale Grey" as a standard siting that it would be better to have a mundane but coordinated street scape than a fancy quilt. With so many projects under construction, there has to be a better standard for sidewalks.
3. Centers and Corridors	4	144	Allowing a broad range of uses must be balanced with the appropriate level of design regulation.	nice description
3. Centers and Corridors	4	145	With proper controls on form, a greater mix of uses can become natural and comfortable.	cornfields arroyo seco specific plan is a good example of mixed use zoning with some form elements.
3. Centers and Corridors	4	146	Use is not ignored, but can be more loosely regulated using broader parameters with better ability to respond to market economics, while also managing socially or environmentally undesirable uses.	Form based codes are great if they are flexible and used generally for massing and siting. I've seen some codes with too much prescriptive elements that made sensible design difficult. Here's an example: <a href="http://www.huntingtonbeachca.gov/files/users/planning/SP14_Beach_Edinger_050510.pdf">http://www.huntingtonbeachca.gov/files/users/planning/SP14_Beach_Edinger_050510.pdf</a> I worked on the first project after this was adapted by HB City Council. When we started to uncover some of the flaws within it, and the planners did not understand the nuances baked in it that made it too inflexible, the planning director could not go back to Council to amend it since she sold it as the greatest thing since sliced bread. We need to make sure the standards are good enough to create boundaries without hindering creativity and innovation.
3. Centers and Corridors	4	147	In short, a more form-driven approach to zoning is an effective way to translate desired outcomes into the zoning that will help implement future planning efforts and improve the overall quality of commercial development.	I would also like to see some performance-based criteria.
3. Centers and Corridors	5	148	The Mini-Shopping Centers and Commercial Corner Development rules should be replaced with citywide standards that apply to all commercial development.	good idea and interesting history



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3. Centers and Corridors	6	149	3.4. PROVIDE ENHANCED STANDARDS FOR LANDSCAPING	there should be another section dealing with open space and tree requirements. The open space requirements are essentially the same in Downtown as the Valley. Greater Downtown Incentive Area made some modifications but the requirements are still difficult to meet for higher density projects. Central City West Specific Plan has open space requirements that are even more difficult to meet. Most projects in DT and City West ask for reductions in both open space and trees required. Re: Trees - High-rises in DT are required to provide 1 tree per 4 units. For a 300 unit high-rise on a half acre site (21,780 sf), you need to provide 75 trees and 30,000 sf+ of open space. For a 300 unit project in City West, 300 trees are required (1 tree per unit) and about 45,000 sf of open space is required. For urban infill sites, these are impossible requirements. We need to rethink open space in urban environments.
3. Centers and Corridors	6	150	3.4. PROVIDE ENHANCED STANDARDS FOR LANDSCAPING	I agree with this as mentioned in my separate comment elsewhere on this page. We can't continue using 1 size fits all.
3. Centers and Corridors	6	151	3.4. PROVIDE ENHANCED STANDARDS FOR LANDSCAPING	I agree that there needs to be another section dealing with open space--both the zone itself and how we include it within developments.
3. Centers and Corridors	6	152	To help ensure functional and attractive commercial areas that serve as positive assets to the residential communities they border, the commercial zones (and to a certain extent the multi-family and industrial zones) should include enhanced standards for landscaping.	not just assets to adjacent residential areas but, where mixed use is allowed, commercial zones ARE residences
3. Centers and Corridors	6	153	The current landscaping requirements are confusing because they are not found in the zoning code and don't include the Landscaping Ordinance/Guidelines, a supplemental document which contains the majority of the requirements for landscaping.	Just want to emphasize the need for landscaping requirements to take into account the urban context. Downtown projects can't comply with the same standards that are used for more suburban models. There's a need here to recognize that we cannot continue using a one size fits all approach.
3. Centers and Corridors	6	154	Neither the zoning code nor guidelines address water-efficient landscaping approaches appropriate in LA's climate.	possible link with city's low impact development standards? <a href="http://www.lastormwater.org/green-la/low-impact-development/lid-documents/">http://www.lastormwater.org/green-la/low-impact-development/lid-documents/</a>
3. Centers and Corridors	6	155	Neither the zoning code nor guidelines address water-efficient landscaping approaches appropriate in LA's climate.	Great link with LID, but I think in some situations, LID requirements are not flexible enough for folks that don't have a ton of unused lot area. For those who are adding additional floor area onto an existing structure, options are limited to comply with LID....and therefore many opt to tear down the structure and re-build entirely.
3. Centers and Corridors	6	156	Neither the zoning code nor guidelines address water-efficient landscaping approaches appropriate in LA's climate.	Maybe a solution would be to allow people to use PROW to comply with LID...maybe in the parkway.
3. Centers and Corridors	6	157	For landscaped areas to be sustainable in the long-term, they should provide a wide variety of species which are, ideally, well-adapted to the local climate.	We should also consider edible landscaping in appropriate areas as an efficient use of water. Growing fruits and vegetables locally as droughts and climate change endanger healthy food affordability is key to the City's long-term interests in diversity. Using water to grow food should not be ruled out just because it uses more water than drought-tolerant native species, especially since we flush hundreds of thousands of gallons of fresh water to sea.
3. Centers and Corridors	6	158	At minimum, buffers should apply when higher intensity residential or commercial uses abut established single-family residential neighborhoods.	repeating what I wrote about buffers not blocking needed mid block passages between residential/commercial areas

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3. Centers and Corridors	7	159	In addition, signs have First Amendment (free speech) federal protections that can make drafting and enforcing sign regulations a difficult task, although the City can establish the "time place and manner" in which signs occur.	Comma is missing after the word "time."
3. Centers and Corridors	8	160	One example of a Sign District is the Hollywood Signage Supplemental Use District. This augments the general sign regulations with specific sign types such as architectural ledge signs, open panel roof signs, pillar signs, and skyline logo/icon signs.	We should clearly indicate when private space is publicly-accessible especially in dense communities where park area is limited. San Francisco requires developers to do this.
3. Centers and Corridors	9	161	It is important to establish a common vocabulary when discussing how design is regulated.	Perhaps provide a list of suggested guidelines (not mandated ones). And then require that a developer must meet, say, 8 out of 10 (his choice).
3. Centers and Corridors	9	162	It is important to establish a common vocabulary when discussing how design is regulated.	Sound approach. Developers need to have flexibility and a menu of options meets that need.
3. Centers and Corridors	9	163	Design guidelines are a more discretionary tool for determining the attributes of a proposed development.	Whose discretion?
3. Centers and Corridors	9	164	Design guidelines allow balancing of various design principles in the guidelines and consideration of the intent of a requirement when judging whether the guidelines have been met.	Who gets to decide?
3. Centers and Corridors	9	165	While many communities apply advisory guidelines (the applicant must listen to comments, but is not required to act on them), LA should strive for more effectiveness in the new zoning code.	Currently, there is a lot of discussion about whether guidelines are mandatory or permissive...whether the guidelines are standards or (golly) guidelines.
3. Centers and Corridors	9	166	Design guidelines should be incorporated in the zoning code by reference.	I'm skeptical of processes that would make it more difficult or slower to build stuff in LA, especially if related to aesthetics or style
3. Centers and Corridors	9	167	Design guidelines should be incorporated in the zoning code by reference.	Just wanted to repeat the comment I made the other night at the ZAC meeting. Please consider adopting reasonable design standards for various project types, incorporating them into the zoning code, then making more projects by right if they "follow the rules". In addition to this, the City will need more streamlined modification processes for projects that don't strictly comply with the standards, but seek only minor variations. That way, more intensive, higher-level design review can be focused on projects that propose designs that deviate greatly.
3. Centers and Corridors	9	168	The framework for design review (the powers and roles of decision-makers, and how decisions are appealed) should be defined in the zoning code, along with basic criteria that serve as the foundation for the guidelines.	There needs to be a clear mechanism for exceptions or variances from the design standards.
3. Centers and Corridors	10	169	Design guidelines should control only those elements of design that don't affect the basic entitlement, but relate to the quality of the urban design, architecture and landscape architecture.	Yes!
3. Centers and Corridors	10	170	Design review processes should never be forced to use "compatibility" or similarly undefined concepts to eliminate specific uses, or modify key elements of the entitlement such as total floor area.	Yes!

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3. Centers and Corridors	10	171	A hierarchy of design review based on the location of standards in Citywide Guidelines, Community Plans, Specific Plans, and zone-specific guidelines.	I would like to suggest that if we want downtown to be truly iconic, the City should think about creating an Architectural Review Board for downtown.
4. A Way Out of Gridlock	1	172	4. A WAY OUT OF GRIDLOCK	Subtitle is great, but title provides a false promise that better zoning will reduce traffic congestion. The trend is toward more density, more intense uses, and reduced roadway capacity. This will worsen traffic congestion, because mode changing is swamped by these other factors. LA residents know traffic is getting worse. I suggest reframing toward multimodalism, more transportation choices, etc.
4. A Way Out of Gridlock	1	173	4. A WAY OUT OF GRIDLOCK	Or providing more options to avoid traffic.
4. A Way Out of Gridlock	1	174	4. A WAY OUT OF GRIDLOCK	I agree with Richard. With alternative modes of transportation and pedestrian oriented design sharing the Public Right of Way, traffic will get worse. In Downtown, the bike lanes, road diets, and street car will make vehicular traffic worse. As traffic gets worse, more people will opt to use other modes of getting around. The title should reflect this change. Something like "expanding transportation options"
4. A Way Out of Gridlock	3	175	4.1. RETHINK ZONING AROUND TRANSIT STATIONS	This section emphasizes rail too much. Most folks don't live near a rail line, even with the expansion. 5% of the region's jobs are in downtown LA, 95% elsewhere. Please recognize the role of innovative bus service as a valid TOD target - bus corridors with bus priority lanes are vital. Also, gentification undoes transit ridership gains in many TODs, affordable housing requirements should be addressed.
4. A Way Out of Gridlock	3	176	4.1. RETHINK ZONING AROUND TRANSIT STATIONS	Agreed
4. A Way Out of Gridlock	3	177	4.1. RETHINK ZONING AROUND TRANSIT STATIONS	This is a relevant report to consider. Consider TOD's impact if zero-car households are lost: <a href="http://nuweb9.neu.edu/dukakiscenter/wp-content/uploads/TRN_Equity_final.pdf">http://nuweb9.neu.edu/dukakiscenter/wp-content/uploads/TRN_Equity_final.pdf</a>
4. A Way Out of Gridlock	3	178	The following projects are scheduled to be completed within the next 10 years: Orange Line Extension	orange line extension is complete
4. A Way Out of Gridlock	4	179	Subway and light rail densities should be greater than bus-rapid transit corridors, which should, in turn, be greater than conventional bus routes.	densities tied to mode, encouragement of mixed use, walkability all sound good
4. A Way Out of Gridlock	4	180	In LA, the floor area allocation system drives density, and parking impacts the ability to produce floor area.	eliminated, reduced or modified
4. A Way Out of Gridlock	4	181	Zoning for station areas must feature walkability, paying special attention to the interface between buildings and the street	How can we encourage transit oriented parks, transit oriented grocery stores, etc
4. A Way Out of Gridlock	5	182	4.2. PREPARE A COMPREHENSIVE SET OF STREET AND BLOCK STANDARDS	Excessive street width requirements in residential neighborhoods are defacto parking requirements.
4. A Way Out of Gridlock	5	183	New street and block standards that enhance the link between transportation and land use must be included in the zoning code.	Post WWII Los Angeles planning is based on a half mile grid with commercial on the outside with residential filling in the middle. This inherently creates a conflict when commercial corridors get jam packed with cars and creates the biggest neighborhood issue - traffic. If we continue to concentrate all the high intensity developments along the corridor without having a plan for the entire block, the resistance to developments will get worse and worse to the point of no development. We need to address this fundamental flaw in our original planning concept and figure out a bold way to create centers in each neighborhood. This may take entire blocks to be rezoned and up zoned.
4. A Way Out of Gridlock	5	184	Currently, LA regulates 1street design outside of the zoning code, through separate policies and manuals.	Planning should take the lead on streetscape planning...and BPW should be left to only issue permits in the same way that DBS issues permits. Obviously, coordination between departments is key since the Bureaus do much of the maintenance but clearer roles and responsibilities must be established.

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4. A Way Out of Gridlock	5	185	To enhance the link between transportation and land use, these new street standards must be included in the zoning code.	I'm sitting on the fence. Clearly, the street standards need to be adopted and put in the LAMC. I don't know that they need to be in the Zoning Code. They can be in the Mobility Element or in the BoE design standards. But I do agree that they should be in one place!
4. A Way Out of Gridlock	6	186	Image: Digital graphic design tools provide the opportunity to illustrate street cross-sections in a realistic way.	I think this image is doing you a disservice. Looks unfinished and doesn't show a situation compatible with LA.
4. A Way Out of Gridlock	6	187	Different parts of the City demand different levels of connectivity, and this should be addressed in the zoning code.	Given the fact that much of the City has already been developed (certainly the non-hillside areas), is this really an issue? I would hate to spend a lot of time on something that is really not that important in light of how built out the City already is.
4. A Way Out of Gridlock	6	188	Additional Reading	BTW, will the Subdivision Code be part of our effort? This is Sec. 17.00 of the Code. I assume not.
4. A Way Out of Gridlock	7	189	Required parking can be a significant development constraint, and the new zoning code provides the opportunity to 2study and comprehensively fix the requirements.	Required parking is another zoning legacy of a long ago era when planners wanted to encourage driving. Revising the zoning code in 2014 in a state with a mandate to reduce greenhouse gases by 90 percent by 2050, it seems to me that the choice should be between no requirements and mandatory maximums.
4. A Way Out of Gridlock	7	190	Required parking can be a significant development constraint, and the new zoning code provides the opportunity to 2study and comprehensively fix the requirements.	I strongly agree this is direction we should head.
4. A Way Out of Gridlock	7	191	Transportation experts have varying opinions on transportation, traffic congestion and parking.	I have not met the traffic expert who thinks parking requirements should be raised.
4. A Way Out of Gridlock	7	192	What is true, however, is that the availability of parking influences an individual's choice to drive, walk, bike or take public transit.	Precision would be added if we recognize different parking requirement problems: 1) when requirements exceed utilization at a \$0 price (pure land waste) and 2) when requirements exceed demand at a market price (lower prices and encouraging driving). #1 is common in the suburban portions of LA and #2 is common in urban areas. Both assume that zoning should be in the business of setting parking supply rather than the market.
4. A Way Out of Gridlock	7	193	For roughly 50 years, zoning codes across the country have included minimum requirements as a means of mitigating the impact of parking demand on public streets.	84 years in los angeles
4. A Way Out of Gridlock	7	194	Limiting options for development on smaller lots or awkwardly-shaped sites;	I'm not sure that I agree that this is a big problem. People walk and cycle when they are in close proximity. They are not turned off by an over-abundance of parking.
4. A Way Out of Gridlock	7	195	Limiting options for development on smaller lots or awkwardly-shaped sites;	Sure, but variances can be justified based on unusual (physical) circumstances.
4. A Way Out of Gridlock	7	196	Eroding pedestrian environments by increasing the proliferation of land devoted to the automobile, creating large swathes of inhospitable surface parking lots;	This seems to be a stretch
4. A Way Out of Gridlock	7	197	Eroding pedestrian environments by increasing the proliferation of land devoted to the automobile, creating large swathes of inhospitable surface parking lots;	This should be avoided through design (e.g., landscaping)
4. A Way Out of Gridlock	7	198	First, the Cornfield Arroyo Seco Specific Plan (CASP) that was recently approved includes no minimum parking requirements.	insert "is"
4. A Way Out of Gridlock	7	199	The CASP approach is not an approach that could be applied citywide,	why not?

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4. A Way Out of Gridlock	7	200	If a building's use changes, even if the new use has a higher parking ratio, the parking requirements stay the same;	I would be curious to know how many Districts have been created. It seems to me that a lot of DCP effort went into this enabling legislation, but it has not been used much (at all?).
4. A Way Out of Gridlock	7	201	If a building's use changes, even if the new use has a higher parking ratio, the parking requirements stay the same;	Is this really feasible? The impacts could be very great.
4. A Way Out of Gridlock	7	202	Buildings can move parking off-site, if it is located within 1,500 feet;	1500' distance should be re-examined. If you walk around 1 block in Downtown, you would have traveled about 2100'. it's typical for people to walk 1 mile (5280') or more in an urban setting. In suburban settings where you are the only person walking in the sidewalk under a blazing sun, a 5 minute walk can seem like an eternity. Also, depending on the type of transit and the type of neighborhood it serves, the distance should be increased. For example, a metro station in K-Town, Hollywood, or Downtown can serve pedestrians much further than 1 mile. For developments around the stations that serve more of the park and ride crowd need to consider the uses that may serve people who are driving home from the station such as groceries, dry cleaning, drug stores, and other neighborhood retail so they don't have to make additional stops along the way home, adding to more traffic congestion and air pollution. We may need to put more long term public parking in these areas but reduce residential parking for the immediate area. The current 1500' distance is a one size fits all and needs to be revised and tailored to the specific community it serves.
4. A Way Out of Gridlock	7	203	Maximum parking limits can be established (each use within a district has a set maximum number of spaces), but parking above the maximum if the development meets certain provisions;	the following is a citywide issue and not just associated with an MPR District: That is, parking also has a "market" demand component that can't be ignored. Pro formas for certain businesses rely on meeting their patron parking demands.
4. A Way Out of Gridlock	8	204	Shared parking and on-street parking should be allowed as flexible ways to meet parking requirements.	Most planners believe that on-street parking is not meant to satisfy off-street (Code) parking.
4. A Way Out of Gridlock	8	205	In Downtown and transit station areas, parking should be "unbundled" from rental or for sale prices, allowing new tenants to pay only for the parking they feel is needed	Good!
4. A Way Out of Gridlock	8	206	The application of maximum parking requirements near transit stations should be studied.	But we need to consider having projects provide extra parking spaces on their sites for transit patrons (serving as park and ride private facilities). this is especially true where transit stations did not plan enough parking in their kiss-and-ride lots.
4. A Way Out of Gridlock	8	207	The application of maximum parking requirements near transit stations should be studied.	That's not the job of zoning or private development. Transit agencies and the market should respond.
4. A Way Out of Gridlock	8	208	The current regulations recognize that it may be difficult to meet the parking provisions, and therefore allow staff some discretion to reduce parking requirements in certain settings.	This is a parking maximum comment. Maximums are an example of excess regulatory zeal. The cost of parking is an effective disincentive to excess supply. If a developer is foolish enough to want to build too much, then other regulations should address the impact of excessive parking, such as trips generated, driveway cuts, streetwall impacts, etc. In other words regulate the unwanted effects of too much parking on built form
4. A Way Out of Gridlock	8	209	Bike parking is another important topic. In 2011, the City approved the updated Los Angeles Bicycle Master Plan which documents the plans, methods, and goals of the City to improve its bicycle infrastructure.	The problem we're experiencing is that there is a huge number of required bike parking spaces for very large projects. This is particularly the case for downtown projects with no cap on residential density. I think the Code should re-think the standard and perhaps have a sliding scale. For instance (and I'm not saying that these are the correct figures) perhaps 1 bike space for the first 100 units, then 0.8 space for the next 50 units, and then 0.7 space for the next 50, etc.

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4. A Way Out of Gridlock	8	210	Additional Reading	Other zoning matters that affect trip generation: allowing mixed uses increases walking trips, design standards that bring buildings to the street improve transit feasibility, increased density makes rail systems more cost effective by adding ridership, zoning for rail and bus staging and maintenance facilities, requirements for mandatory transit pass purchase for multifamily residential development, shared car parking requirements, etc. Perhaps add a section that explains these connections.
5. Jobs and Innovation	1	211	Retain jobs and attract industry to strengthen Los Angeles as a global center for employment and innovation.	IMO, this is the most important section in the evaluation.
5. Jobs and Innovation	1	212	The Mayor's office and Planning Department have been working to protect industrial land since 12003, including studying the issue (Los Angeles' Industrial Land: Sustaining a Dynamic City Econ-omy, 2007), and issuing new staff direction in 2008.	Be careful. In this section, a lot of the write-up falls into the category of planning policy issues and not zoning practices.
5. Jobs and Innovation	1	213	Correction. Land use conversion has already taken place, need correct zoning for existing uses.	For industrial areas in downtown, this policy has to be changed. In the Arts District where it clearly is converting to a residential mixed use neighborhood similar to SoHo or Meat Packing District in NY, the policy to preserve the M zones are in direct conflict with reality. Each development has to go through GPA and Zone Change and has created spot zoning in the area. Similarly, Fashion District, City East, and Warehouse District should turn into a mixed use district to grow Downtown's jobs/housing balance to a sustainable ratio of 5:1 or greater. There are currently 5 million+ day time population vs 52,400 residents = 10:1. To increase this to 5:1, we need 100,000 residents and approximately 28,000 more housing units. There are 5000 units under construction and 8,000 or so in design. If all these are built, we would be half way to 5:1. To get to 3:1, we need 72,000 additional units which equate to about 360 buildings with 200 units each. The Housing Element calls for 80,000 additional units city wide. Downtown can put a big dent in this number but affordability will be an issue since higher land prices + higher construction price = higher consumer price.
5. Jobs and Innovation	3	214	In order to achieve true industrial protection, a more restricted use list must be applied to those properties with existing industrial uses intended to be protected.	I see and partly support the job-protection purpose of single use industrial zones, but also want most areas of city, whatever the primary use, to have some mixed use. Why not limit single-use industrial zones to the 'heaviest' categories of industry and have mixed use industrial zones that require that a certain percentage of every property be used for industrial purposes?
5. Jobs and Innovation	3	215	While industrial uses are acceptable neighbors for other industrial uses, in many cases a use at the edge of an area with industrial zoning requires landscaping or screening to protect adjacent non-industrial development from dust, noise, glare and other impacts of the industrial use.	Ultimately we need to transition industries to clean technologies, closed loop manufacturing, green chemistry etc because the buffers will never be enough in a dense city, and some historic industrial areas are located in places where we want more people to go (ie near the LA river). Most manufacturing of the future needs to be able to fit in with other uses, because we can only imperfectly wall it off from the rest of human activities.
5. Jobs and Innovation	4	216	True heavy industrial uses that may cause health hazards or otherwise make poor neighbors due to their impacts should be placed in industrial sanctuary zones.	some industrial areas border residential areas (often lower income) that also abut freeways. Existing spatial separation (or better landscaping buffers) doesn't protect residents from cumulative impacts of pollution from multiple sources. Look to the clean up green up initiative being developed by the city for suggestions on protecting vulnerable populations and areas. Also, many smaller businesses, auto-body shops etc, also pose health risks, so the issue isn't limited to large scale facilities.
5. Jobs and Innovation	4	217	True heavy industrial uses that may cause health hazards or otherwise make poor neighbors due to their impacts should be placed in industrial sanctuary zones.	Absolutely, recycling centers, auto-body shops, natural resource extraction facilities all can have significant health impacts.
5. Jobs and Innovation	6	218	5.4. ENHANCE THE JOBS HOUSING BALANCE	Or Bring Housing to Jobs.



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5. Jobs and Innovation	6	219	Increase the number of jobs in close proximity to housing.	all good ideas
5. Jobs and Innovation	6	220	Live/Work. In many communities, live/work units (in which a single owner has space physically configured for both commercial and residential use) have become a popular incubator of small businesses.	Live/work has been an issue. Some unscrupulous developers/builders claim that their projects are live/work, but they really are not. The owners need to record a covenant promising that they will only rent to tenants who have City business licenses.
5. Jobs and Innovation	6	221	Business Incubator, Coworking. A business incubator or coworking space is typically a facility that provides support for growing businesses, including shared space, accounting and human resources support, along with business planning help.	Good
6. A Strong Core	1	222	Retool Downtown regulations to create a dense, livable pattern of development that supports a vibrant daytime and nighttime economy.	most of this sounds good. Ideally similar rules would apply in all of the city's 'centers,' even if most have not yet developed as intensive land use.
6. A Strong Core	1	223	This includes a range of housing options; grocery stores and other neighborhood-serving commercial services; quality public schools; public open spaces and recreational facilities; and access to frequent transit.	YES! Downtown needs more schools to attract and retain more families.
6. A Strong Core	1	224	Downtown has many of these attributes listed above, however, it is missing some key ingredients.	Don't forget about Smart and Final, Target has groceries, Urban Radish, Grand Central and many smaller neighborhood markets.
6. A Strong Core	1	225	For residents with elementary schoolage children, choices within Downtown include the Para Los Niños charter school at Seventh and Alameda, Ninth Street Elementary at Towne and 9th, and the Metro Center charter school at 15th and Grand.	LAUSD spent \$54m for 9th Street elementary. The new facility is great but the school is in the middle of the industrial part of DT and just at the edge of Skid Row. Metro Charter Elementary School is located in South Park and is a walkable school for the new families emerging in DT. School choice is an issue but our research shows that people are willing to stay in DT if there was quality school options.
6. A Strong Core	1	226	As the population of Downtown grows, the need for active recreation space is increasing.	How do you define active? There are many active open spaces in DT but not your typical grassy field. I will agree that there has to be more spaces where children can ride their bikes and dogs can run. Grand Hope Park is a great family park but does not allow dogs or kids on bikes, scooters, or anything else with wheels. But in an urban setting, hard scape plazas such as California Plaza provide a different type of open spaces. Also, don't forget about the Grand Park. Elysian Park is a great option and closer to DT than Corn Fields. it's about a mile from Financial District. There should be a shuttle to and from DT to Elysian Park.
6. A Strong Core	1	227	Apart from the State Historic Park adjacent to Chinatown, there are no other good public outdoor options for places to actively exercise.	YES! Downtown needs more parks.
6. A Strong Core	1	228	The issues raised above are primarily planning-related, and can only really be addressed as a part of a comprehensive effort for Downtown and the surrounding neighborhoods. Zoning will only play a limited role.	are any of these uses excluded from parts of downtown by zoning?

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6. A Strong Core	1	229	However, if the City would like to actively promote grocery stores, public schools and active outdoor recreation space Downtown, then these elements could be part of a public benefits package the developers provide in exchange for an increase in floor area.	Agreed on exchange of incentives for funding schools, open space, etc. but remember that higher the cost of production = higher the cost to the consumer. TFAR currently allows higher FAR for a community benefits payment. On sites where FAR has been down zoned such as south of Pico near the Convention Center, a developer has to pay for anything over 3 FAR (downzoned from 6 FAR in the 80's). This means even for a 7 story low-rise podium project, developers have to payout TFAR, increasing the cost of housing production = higher price for the consumer. We need to go back to the original FAR for downtown and lift all the 'D' limitations first.
6. A Strong Core	4	230	Allow for retrofitting of uses other than residential and hotel, expand the concept citywide.	this would have added benefit of potentially increasing seismic upgrades of older concrete buildings in the city
6. A Strong Core	4	231	The City should expand the ARO so that it applies to retrofits for office and other non-res-idential uses.	agree
6. A Strong Core	4	232	The minimum size of 450 square feet should be reconsidered in light of the discussion of micro-units and their relationship with affordable housing (see page 24).	But the Building Code has a minimum size. I believe it is 220 s.f.
6. A Strong Core	4	233	The average minimum size should be deleted all together.	yes
6. A Strong Core	5	234	6.3 RETHINK THE TRANSFER OF FLOOR AREA (TFAR)	Currently, if the TFAR request is over 50,000 sf, the project is subject to CPC, PLUM, Council, and Mayor's approval. Many projects are filing for 49,999 sf of TFAR to stay away from longer approval process. If the 50,000 sf limit can be changed, it would help to create higher intensity developments. Currently, no matter how big or small the site is, the limit for TFAR is the same at 50,000 sf before it becomes a time consuming process = added cost + uncertainty. If I had a 50,000sf site, the extra FAR before longer entitlement = 1 additional FAR or 7 FAR total If I had a 10,000sf site, the extra FAR before longer entitlement = 5 additional FAR or 11 FAR total If we can set the TFAR threshold based on a more logical system before requiring CPC, PLUM, Council, and Mayor approval, we can see more high-rises pushing higher FAR. One idea is to set the threshold based on a multiplier of the site area. For example: If we set the threshold at 1.5X the base FAR, a 50,000 sf site with 6 base FAR would be allowed 150,000 sf of additional FAR or 9 FAR total before the longer entitlement.
6. A Strong Core	5	235	Conversely, developers who want to exceed the base FAR can buy floor area, or TFARs, and achieve a maximum FAR of 13:1 (or even greater with other incentives).	LA Charter limits FAR to 13:1. You can't exceed 13:1 with incentives. There are some creative ways around this limit but not through incentives.
6. A Strong Core	5	236	Up until now, the TFAR program has been relatively successful.	Please consider how the TFAR process adds to entitlement timelines, and how that timeline could be shortened by tweeking the approval process. The process itself if often a barrier to entry for projects. We see many projects that max out the 6:1 ratio, but to exceed it by 50,000 or more heavy investment of time and money is required, so we see few projects in the middle. One way to solve this is to rescale the approval threshold (currently 50,000) to be a ratio of the lot size.

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6. A Strong Core	6	237	6.4. FIX THE GREATER DOWNTOWN HOUSING INCENTIVE ORDINANCE	Yes! Make it easier for developers to provide affordable housing by giving options for on-site, off-site, and in-lieu payments. Since the inception, only one or two projects have used the affordable housing incentives creative by the ordinance. I have tried to use it on a project but it was so restrictive, the client gave up and decided not to include affordable housing and opted to pay the TFAR instead. The planners writing these ordinances are too heavy on stick at times and not flexible enough on the carrots. It should care less about making sure the affordable units stay on site and allow other options so affordable housing can be produced in the general vicinity. Also, if High-rise development is a community benefit in itself and is what the city wants in downtown, allow the modified FAR definition to be used by high-rise developments. The goal of this ordinance should be to produce more housing, including affordable housing, supportive housing, and helping reduce the cost of producing housing so the consumer price would be lowered.
6. A Strong Core	6	238	Since its inception, the Greater Downtown Housing Incentive Ordinance has not been well used. The number of affordable units constructed Downtown has not lived up to expectations.	I disagree. The GDHIO has been used very well. Yes, it may not have had a significant impact in terms of producing affordable units, but it has provided a great incentive to downtown development.
7. A Healthy City	1	239	Improve the community's health through greener, more resilient development.	anticipated impacts of climate change should also guide land use rules, including zoning. Higher residential densities should be allowed in cooler, coastal areas which are not expected to experience as extreme dangerous temperatures in the future.
7. A Healthy City	1	240	For many years, Los Angeles was as well known for its smog-laden skies as for its other, more positive attributes.	Harvard School of Health had a study that showed for people living within half mile of a freeway had 250% more chance of getting a respiratory problem. Our major corridors are similar to freeways in terms of volume and congestion so logically anyone living within half mile of a major corridor would be subject to this. And given that our blocks are designed in half mile grids, essentially everyone in the city is within half mile of a major corridor. Aside from changing our entire planning grid or everyone driving electric cars, LA will continue to have air quality issues. The city has already started taking steps to deal with this through the Freeway Adjacent Advisory Notice for Sensitive Uses. I think we can go further and make sure indoor air quality in schools, work places, and homes are addressed.
7. A Healthy City	2	241	7. A HEALTHY CITY	There is a long history of zoning code and enforcement not being applied in certain neighborhoods. How can we ensure that this works gets applied equitably?
7. A Healthy City	2	242	7. A HEALTHY CITY	Also how are we promoting equity and guarding against displacement of both LA's old and new generations of residents? We risk efforts to curb greenhouse emissions if the poor are forced to move to suburbs.
7. A Healthy City	2	243	7.1. Implement the Plan for a Healthy Los Angeles: Support Plan for a Healthy Los Angeles policies that envision making the healthy choice the easiest choice throughout the City.	Process Questions: I assume more recommendations were not made in this section as not to duplicate the work of the Health Element. However, since the Health Element is currently development do we miss inserting opportunities into this project that may be missed with the Health Element? What is the process for coordinating both planning efforts' overall impact on support healthy choices in all of LA's neighborhoods?
7. A Healthy City	2	244	7.4. Remove Barriers to Green Solutions: Remove barriers to new green approaches to energy production, stormwater management, landscaping and local food production.	In addition to the approaches here, I would add innovative approaches to recreation, art, and community building spaces.
7. A Healthy City	5	245	Another idea is to use CEQA exemptions to accelerate implementation of new Community Plans and the zoning code. Imagine a neighborhood with a broadly-endorsed Community Plan and new zoning code.	YES! The City has not been fully utilizing the CEQA exemptions to implement portions of already-approved community plans. We need to streamline (or eliminate) CEQA for more projects that follow the rules.

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7. A Healthy City	5	246	San Francisco has successfully reviewed dozens of projects under a locally calibrated Community Plan Exemption (CEQA Guidelines Sec. 15183).	good idea if it makes it possible to approve high quality infill more quickly
7. A Healthy City	5	247	In general, projects of the same type should have the same conditions of approval.	YES! There is currently great variation between conditions of approval between projects. This makes it more difficult for departments to interpret them when applicants are ready to pull permits. This, in turn, creates unnecessary confusion and delay.
7. A Healthy City	5	248	Where the peculiar circumstances of a project result in significant environmental effects despite the uniform standards, the City then applies feasible mitigation measures.	DCP has a list of standard mitigation measures. Generally speaking, it has served everyone well.
7. A Healthy City	5	249	Without offering an opinion on the merits of CEQA litigation, opportunities for CEQA challenges should be clarified to maximize fairness and accountability.	Somewhere in the LAMC (Zoning Code?), the City should outline/codify the deadlines for environmental review.
7. A Healthy City	6	250	7.4. REMOVE BARRIERS TO GREEN SOLUTIONS	The greenest solution for buildings is a walkable location. The sustainability/ health section of this report should stress what is referenced in the corridors/ center section- that mixed, use walkable areas with residences in close proximity to amenities and adequate density to support local retail is in itself a sustainability and health priority.
7. A Healthy City	6	251	7.4. REMOVE BARRIERS TO GREEN SOLUTIONS	also, eliminating parking requirements removes a barrier to greener city
7. A Healthy City	6	252	Remove barriers to new green approaches to energy production, stormwater management, landscaping and local food production.	this is great and I support removing barriers to more sustainable living. But why for sustainability are we just removing barriers when for less important goals like aesthetics, exclusionary zoning, subsidizing driving, does the code mandate standards? Why are there mandatory parking requirements rather than mandatory rainwater tanks/ cisterns as in some Australian municipalities; why aren't all buildings required to generate at least 10 percent of their power from on site renewables, etc?
7. A Healthy City	6	253	Stormwater facilities that focus on treating each drop where it falls, such as rain gardens, bioswales, green roofs, downspout cisterns, permeable surfaces, and streets and parking lots that incorporate stormwater management facilities.	I like the idea of density bonuses for these types of green features, especially if that density could be transferred through city or area wide trading
7. A Healthy City	6	254	Local animal production options such as raising chickens, rabbits or goats in appropriate locations.	Can we remove barrier to the interim and innovative of underutilized/vacant properties? Some public and private parcels have been vacant for decades and the codes limits the potential for these sites to be used for community benefiting interim-uses without a relatively costly zone-change/variance process. Can these spaces be used for pop-up events? For urban farming ventures? Solar farms, etc?
7. A Healthy City	6	255	In some cases, new green ideas bring impacts of their own, and in these instances, new development standards should be added to the code to address any significant impacts.	The current tree requirement (1 tree for every 4 units) is a real burden on downtown projects because such projects typically have a large number of units and, yet, those project cover most of the site, leaving little area for tree planting. Many variance have been approved as a result. When variances become the norm, it's time to change the Code.
8. Code Delivery	3	256	The City should clarify when public input is what form.	ideally there is public input primarily at the planning and standards phase, then if someone is building something in a good place and to good standards approval would be easy and quick to allow green growth for sustainability, affordability and economic development.
8. Code Delivery	5	257	The system will also allow users to start in ZIMAS, the City's property mapping system, with a specific property, and then link back to the zoning code.	what happened to idea of a more dynamic zimas that would display 3-d models of what is allowed on a parcel based on zoning?
8. Code Delivery	5	258	Finally, a series of Frequently Asked Questions will serve as a layman's user guide to the zoning code.	FAQs rae fine, but some can be very long. We need to limit the number of FAQs. Most people get impatient wading through a long list hoping to find an answer to their particular question.

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8. Code Delivery	6	259	The new web-based zoning code system will allow for the insertion of notes into the zoning code's pages so that as formal interpretations occur, they can be annotated and available to all users of the zoning code.	It might be nice to have a margin icon that indicates that previous Code language can be found by clicking on the icon.
9. Summary of Recommendations	1	260	9. SUMMARY OF RECOMMENDATIONS	The report structure does a nice job of staying out of the weeds and not losing the audience. Its exciting to think of how many technical reforms could have such benefits. For the wonks, though, perhaps an appendix (or separate technical report) that inventories and organizes all the specific problems that were identified in your work would be useful. Critics might say that you didn't do an evaluation - which would involve defining evaluation criteria and assessing all the code elements. I'm OK with that, since it would be a vast undertaking, but calling this an evaluation is technically a bit of a stretch. More like Zoning Code Issues and Opportunities?
9. Summary of Recommendations	2	261	Apply new base zones for centers and corridors	anything important that is going to be applied in future through community plan updates should be temporarily applied through revision of equivalent existing zones.

**Appendix B – Public MarkUp Comments**

Section	Section Page	Report Order	Report Text	Comment
0. Introduction		0 001	PUBLIC REVIEW Draft March 07, 2014	<p>While the draft offers a solid framework for revamping the City's zoning code, we recommend expanding the scope of the framework to address the potential to improve: a) compatibility of land uses in communities with a proportionately high level of industrial use; b) access and connectivity between residents and vital community resources, like clinics, parks, and public facilities, through new street and sidewalk standards; and c) environmental sustainability and conservation through the design of streets and thoroughfares.</p> <p>Our recommendations do not offer a radical departure from the existing draft framework, but are meant to represent communities in Los Angeles, like San Pedro and Wilmington, that face disproportionately high Port and Port-related land uses.</p>
0. Introduction		0 002	A New Zoning Code for a 21st Century Los Angeles	<p>The power to restrict the use of land is the most potent power possessed by local governments. This zoning power encompasses much more than establishing building specifications—it touches all aspects of how land may be used. It enables local governments to influence the socio-economic and racial composition of a community by prescribing the nature and mix of an area's housing stock. It also enables localities to shape a community's character and economy by dictating the kinds of businesses that are allowed and the types of goods and services that may be sold.</p> <p>Historically, local governments have used this considerable power to exclude people of color or low socio-economic status. More recently, some innovative cities have begun to use their zoning codes to counter such historical discrimination by using the built environment to promote socio-economic and racial equity and by directing valuable land use rights and benefits to the city residents who need them most. Even the American Planning Association describes the purpose of the planning process as “to improve the welfare of people and their communities by creating more convenient, equitable, healthful, efficient, and attractive places for present and future generations.”</p>



Section	Section Page	Report Order	Report Text	Comment
0. Introduction	0 002	A New Zoning Code for a 21st Century Los Angeles		<p>The recently published Health Atlas for the City of Los Angeles demonstrates just how vastly the daily experiences and the consequent outcomes differ from neighborhood to neighborhood. As just one of many possible examples, residents of Brentwood and Pacific Palisades have access to nearly five hundred times the amount of park acres as do citizens of Southeast Los Angeles. Even more drastic is the finding that residents of Southeast Los Angeles communities have life expectancies 12 years shorter than residents of those wealthier neighborhoods.</p> <p>This is not just a story of geographic or socio-economic disparity. It is also a story of a Los Angeles in which women and men of color face a very different life experience than whites. Consider the health and parkland statistics above in light of the fact that 83% of Brentwood residents are white as compared with 1% in Southeast Los Angeles. In our view, derived from 85 years on the front lines of Los Angeles poverty, these outcomes represent a history of racial discrimination and disempowerment that has calcified into an entrenched structural racism that persists despite the widespread rhetoric of equality.</p>
0. Introduction	0 002	A New Zoning Code for a 21st Century Los Angeles		<p>The loss of Los Angeles's most potent tool for addressing these stark realities has amplified this already grave challenge. The mandated dismantling of the city's Community Redevelopment Agency (CRA/LA) has deprived low-income neighborhoods, especially low-income neighborhoods of color, of a crucial source of funding for affordable housing and has resulted in the elimination of important tools—such as local and disadvantaged hiring, small business loans, and job training programs—to help local residents access economic opportunities. The CRA/LA's demise has also increased uncertainty for developers, who cannot predict what policies or standards will apply to new projects. In this post-redevelopment landscape, the revisions to the zoning code represent a new, exciting, and timely opportunity to address the risk of community destabilization by implementing policies in line with the above-referenced CRA/LA policies that promoted equitable development as a comprehensive set of meaningful zoning tools to ensure that new growth and investment will benefit rather than harm existing residents.</p>

Section	Section Page	Report Order	Report Text	Comment
0. Introduction		0 002	A New Zoning Code for a 21st Century Los Angeles	<p>You might think that the zoning code is no place for such innovative policies. But local governments throughout the country are using their zoning power to shape a more just and equal economy. City departments in San Francisco, Oakland, and Richmond have secured regional funds to help them use their planning processes to increase equity and address displacement. Cities like Marysville, Washington have incorporated living wage provisions into their zoning code. In addition, consider the myriad ordinances throughout California that have relied on the zoning code to regulate big box stores. In fact, there is plenty of precedent in Los Angeles for zone based regulations that go beyond the design of buildings. In fact, the current Los Angeles zoning code goes so far as to require adult film actors to wear condoms while filming!</p> <p>The zoning code revision underway now thus presents a vital opportunity to institute equitable development principles that promote community economic revitalization and the protection of the most vulnerable members of our community. Below are our specific recommendations, organized around the relevant chapters of the draft Zoning Code Evaluation Report.</p>
0. Introduction		0 003	To create livable communities, encourage sustainable development and foster economic vitality, we need a modern and user-friendly zoning code – we need to re:code LA.	<p>The Harbor Community Benefit Foundation (HCBF) appreciates the opportunity to submit these public comments to the Draft document entitled, "Zoning Code Evaluation Report" as part of re:code LA.</p> <p>HCBF is an independent non-profit organization formed in 2011. Its mission is to assess, protect, and improve the health, quality of life, aesthetics, and physical environment of the harbor communities of San Pedro and Wilmington, which have been impacted by the Port of Los Angeles. We accomplish this through grantmaking, independent research, and community engagement. Our primary source of funding is the "Port Community Mitigation Trust Fund (PCMTF)," established by the Port of Los Angeles in response to growing expansion.</p> <p>We appreciate the vision and scope of the draft zoning document. It is refreshing to see a renewed focus on how zoning codes in Los Angeles could be retooled to create more sustainable, healthier neighborhoods. We also appreciate the reference and connection to the Plan for a Healthy Los Angeles (7.1 Implement the Plan for a Healthy Los Angeles), to which we have submitted public comments separately.</p>
0. Introduction		3 004	In July 2013, five public "listening sessions" were held at various across LA. The purpose of the "listening sessions" was to introduce the project, and most importantly to hear comments and input about zoning-related issues.	"listening sessions were held at various across LA." Should have "locations" In between "various" and "across"

Section	Section Page	Report Order	Report Text	Comment
0. Introduction		5 005	TYPICAL ZONING OUTLINE	Be sure to add wireless telecommunications regulations as a separate chapter in the zoning code. Also remove all detailed submittal requirements from the regulations and put them in an administrative manual so they are easy to find.
0. Introduction		5 006	Administration Review bodies, procedures, nonconformities, enforcement	Provide a section with clear, understandable thresholds (unit count or square footage) of when certain environmental reviews are triggered (traffic studies, EIR, etc.)
0. Introduction		6 007	The result of this set of steps will be: »» A new zoning code for Downtown and the rest of the City;	More density! Fewer parking minimums!
0. Introduction		7 008	1. Distinct Neighborhoods Recommendations to help promote and preserve neighborhood character.	Taking our 4,600 resident Melrose Hill Neighborhood as an example, one of our worst problems is the current explosion we are seeing in front yard "quality-of-life" zoning violations. These include ugly illegal front yard pave overs, tall illegal front yard over height fences, illegal open storage in residential front yards and illegal parking in residential front yards. Currently there is only rare super-selective enforcement.  Similarly, we are seeing grass parkways paved over in concrete, missing street trees not being replaced and abandoned curb cuts not returned to curbs. grass and trees. Again, in the case of the paved residential parkways, there is only rare super selective enforcement.  We hope the new zoning code will address these issues.
0. Introduction		7 009	3. Centers and Corridors Recommendations to help enhance commercial corridors and centers.	3.3. Suggest that there may be 3 important sub-elements to corridors needing special attention and provisions: 1. Commerical corners: have lots of special burdens, complications and opportunities to address. 2. Roadway/Sidewalk/Building Front/Building Back/Alley/Residential Interface Transect: A challenging, too-often-dysfunctional typology in many older parts of the City, particularly where commercial frontage depths are shallow and alley maintenance is unprovided for. Innovation Incentives for More Vital Ground Level Frontages. Successful pedestrianization depends upon humanizing the ground level building frontages, too often bunkered against growing traffic. Need to move beyond an over-dependence of retail-as-we-have known it.
0. Introduction		7 010	4. Transportation Choices Recommendations to help improve mobility choices across the City.	4.1: Consider requirements and incentives to promote active, on-going organizational support, such as "Transportation Management Organizations" ("TMO's"), to help oversee and support the needs of the additional access and circulation infrastructure around transit facilities and significant corridors.
0. Introduction		7 011	4. Transportation Choices Recommendations to help improve mobility choices across the City.	4.1: Another important reference that should be cited is "Developing and Implementing the City of Los Angeles' Transit Corridors Strategy: Coordinating Action Towards a Transit-Oriented Metropolis" [Mayor's Office Draft of 6-20-12]

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0. Introduction	7	012	4. Transportation Choices Recommendations to help improve mobility choices across the City.	<p>4.3: Strongly re-affirm that all properites carry a fundamental obligation to contribute an appropriate "level-of-effort/resources" for their local accessibility. If a parking requirement is reduced, then it should be recognized that appropriate and commensurate alternative contributions should be made to insure on-going and equitable local accessibility.</p> <p>The new code should try to recognize that urban site accessibility is comprised of a mix of modes (not just private auto parking alone), and, in some instances, may not be reasonably satisfied by one-time capital facility improvements, but will increasingly require on-going contributions to support programatic and O&amp;M costs.</p> <p>The provisions for "in lieu fees" [in lieu of parking] are fundamental and essential but need to be much more robust and more realistically calibrated to the actual, long-term needs for local access. The City needs to establish professional, specialized institutional capacity to oversee the administration of local in lieu accessibility accounts.</p>
1. Distinct Neighborhoods	9	013	1.2. Continue to Protect Historic Resources and Established Neighborhoods: Consider adding neighborhood conservation districts, improving base zoning standards.	Consider down-zoning in historic residential neighborhoods where higher density, a greater need for street parking and increased traffic will adversely impact single family home and low density multi family buildings.
1. Distinct Neighborhoods	9	014	1.2. Continue to Protect Historic Resources and Established Neighborhoods: Consider adding neighborhood conservation districts, improving base zoning standards.	Tighten and enforce existing rules and regs also address individual and commercial businesses using R-1 dwellings as place of business
1. Distinct Neighborhoods	9	015	1.3. Address Impacts within Single-Family Residential Neighborhoods: Unlicensed boarding houses and short-term rentals are perceived as threats to single-family neighborhoods.	Unlicensed boarding houses and short-term rentals are an outcome of the high costs of renting in LA - costs which are partly driven by the fact that much of the city is zoned R1. Our current zoning & review process already acknowledges the impacts of development on single-family neighborhoods, the place where it comes up short is assessing the impacts of not allowing new construction in R1 neighborhoods on the rest of the city.

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1. Distinct Neighborhoods		9 016	1.3. Address Impacts within Single-Family Residential Neighborhoods: Unlicensed boarding houses and short-term rentals are perceived as threats to single-family neighborhoods.	<p>While houses in residential areas shouldn't be hotels in disguise (although perhaps there might be a case for exceptions if people paid a significant mitigation fee to be spent within the neighborhood), there needs to be some flexibility for people who need housing for, say, two weeks between when their old lease ends and their new lease begins but who can't afford expensive hotels and want to avoid seedy motels and SROs.</p> <p>A good way to deal with this might be to say that it's OK to have a short lease/sublet where it's casual and not a regular business, but to increase penalties for unlicensed boarding houses that are actually businesses. Airbnb and similar commercial operators impose serious spillover costs on neighbors that need to be regulated (either through prohibitions or mitigation fees); people saying "Hey, I'm traveling for two weeks - anyone need a place to stay?" are not the problem.</p>
1. Distinct Neighborhoods		9 017	1.4. Enhance Multi-Family Design Standards: Ensure multi-family project quality, apply Baseline Mansionization and Hillside standards.	Hillside standards for multi-family should allow for an option to measure height from an average grade plane rather than stepping with existing topography. This places more of the mass lower on the site and reduces the amount of stepping, which creates waterproofing difficulties and adds to construction cost.
1. Distinct Neighborhoods		9 018	1.5. Improve The Transition Between Corridors and Neighborhoods: Set standards for commercial and industrial development abutting residential areas.	In many neighborhoods the transition could be improved by facilitating mixed use development on the arterial roads around the neighborhood. A great example would be Venice Blvd, which is currently a barrier to pedestrian activity between Palms and Culver City. With more residential and mixed use development, it would be a much nicer boulevard that would improve the surrounding neighborhoods.
1. Distinct Neighborhoods		9 019	1.5. Improve The Transition Between Corridors and Neighborhoods: Set standards for commercial and industrial development abutting residential areas.	Four to Five story R-3 or Commercial should not be directly adjacent to one or two story R-1 There must be a height transition zone between Corridors and residential neighborhoods to maintain view shed and sun shed
1. Distinct Neighborhoods		9 019	1.5. Improve The Transition Between Corridors and Neighborhoods: Set standards for commercial and industrial development abutting residential areas.	<p>The "transition" must include increased setbacks by new development with mandatory "screening" with the use of dense, fast growing trees and shrubs which must be maintained by the owners of the new development, and subject to monetary sanctions.</p> <p>Consideration must also be given to the possibility of down zoning or imposing height restrictions on the final 30 to 50 feet of new development which is contemplated to be built adjacent to residential buildings (be they one, two, three or four story multi residential buildings).</p>

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1. Distinct Neighborhoods	9	020	1.5. Improve The Transition Between Corridors and Neighborhoods: Set standards for commercial and industrial development abutting residential areas.	Set standards that allow for dense, mixed use projects along corridors and gradually step back in density and buildable envelope as you move away from the most intense and dense uses. In this gradated areas, allow for less and less intense ground floor uses that promote walkability as you move away from the busy corridor and into neighborhoods. Also step massing envelopes and unit densities in these 'step-down' zones.
1. Distinct Neighborhoods	11	021	Actual removal of the conditions applied during a previous zone change requires another zone change approved by the City Council.	Is the City Council able to overturn Proposition U (1986)?
1. Distinct Neighborhoods	12	022	Currently, the City is no longer accepting new HPOZ applications that require new review boards, based on their ability to manage the current review process.	The City must recognize that its historic single family residential neighborhoods are its pillars of history. The City has, in many instances, failed to preserve its historic buildings by allowing them to be destroyed by hodge-podge architecture. The City must renew its efforts in allowing new HPOZ applications to be processed and must commit its economic resources to hiring additional staff to accomplish this. Once an historic structure is destroyed, it can never be replaced.
1. Distinct Neighborhoods	12	023	Regrettably, re:code LA does not have the resources to conduct a citywide assessment of neighborhoods and conduct zone changes for all of the neighborhoods at once.	Although the City may not be able to conduct a citywide assessment of all historic neighborhoods and conduct zone changes for all of the neighborhoods at once, the City must not throw up its hands and nix the idea altogether. The City must immediately instigate a review process whereby historic neighborhoods which have not as yet achieved HPOZ status are reviewed separately and assessed separately. It should be the function of each City Councilmember to reach consensus on how to "prioritize" the numerous historic neighborhoods which could qualify for historic protection.
1. Distinct Neighborhoods	12	024	Regrettably, re:code LA does not have the resources to conduct a citywide assessment of neighborhoods and conduct zone changes for all of the neighborhoods at once.	This is vital as Los Angeles is quickly becoming the city for the wealthy while middle class and lower are forced into apartments and long commutes. Sections of the San Fernando Valley remain the last areas of suburbanhood which is quickly becoming fodder for developers who's only interest is to turn a quick buck. There's no accountability to the neighborhoods, and very little homeowners can do to preserve their most important investment - their home and property.
1. Distinct Neighborhoods	12	024	A new tool allowing neighborhoods to develop measurable standards (not guidelines) to match the base zoning to existing or desired character could be developed.	Moderate single family neighborhoods need to be preserved. Measurable standards that cannot be wiped away by variances are a step in the right direction.
1. Distinct Neighborhoods	12	025	A new tool allowing neighborhoods to develop measurable standards (not guidelines) to match the base zoning to existing or desired character could be developed.	I agree with this comment as well. Matching existing character does not necessarily mean literally following height, density or ornament of the surrounding properties. Comparability can be done tastefully without mimicking.

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1. Distinct Neighborhoods	12	025	A new tool allowing neighborhoods to develop measurable standards (not guidelines) to match the base zoning to existing or desired character could be developed.	"Desired character" should not excuse strangling the housing supply. It is imperative that the city allow enough development to house its citizens, while maintaining neighborhood character to the extent consistent with broader housing goals.
1. Distinct Neighborhoods	12	025	A new tool allowing neighborhoods to develop measurable standards (not guidelines) to match the base zoning to existing or desired character could be developed.	I second this comment. A neighborhood's "desired character" under our current development process almost always determined by the handful of people who have the most motivation to show up - i.e. those who perceive new development to be a threat.
1. Distinct Neighborhoods	12	026	A new tool allowing neighborhoods to develop measurable standards (not guidelines) to match the base zoning to existing or desired character could be developed.	In "established neighborhoods" which have a combination of single family homes, two story apartment buildings, and three story condominiums, each neighborhood should be empowered to determine whether setback & height limits should be re-defined so that no new construction or remodeling of existing structures exceed the "prevailing" height & setbacks, whether that prevailing height be one story, two stories, or three stories. And, after such determination is made, each residential structure shall have whatever Q condition imposed which reflects this determination. Without this, the "established" neighborhood will become a crazy quilt of out-of-character mini-mansions. Applications for this "neighborhood re-determination" shall be processed by City Planning, in the same manner that CP processes applications by developers.
1. Distinct Neighborhoods	12	027	A new tool allowing neighborhoods to develop measurable standards (not guidelines) to match the base zoning to existing or desired character could be developed.	In many established neighborhoods the "desired character" is low density single family homes and low density multi family structures. In order to ensure that these established neighborhoods achieve and maintain this "desired" character the City must open avenues to allow DOWN ZONING and other methods to protect the survival of these established neighborhoods.
1. Distinct Neighborhoods	12	028	In many communities, this tool is described as neighborhood conservation, and applied as an overlay.	All existing HPOZ neighborhoods shall continue to operate under their current preservation plans and none of the protections already given to these neighborhoods shall be loosened, waived, or made less restrictive.
1. Distinct Neighborhoods	12	029	Others worth considering include: »» Prevailing setbacks (front, side, rear) »» Building height (principal, accessory) »» Building size (principal, accessory) »» Roof style (pitched, flat, reflective property) »» Architectural elements (porches, dormers)	On the other hand, in historic neighborhoods and established neighborhoods, neighborhood conservation plans and overlays should increase floor area to more accurately recognize the historic and established nature of the neighborhood, which honors less density, and more landscaping space in front/back/side yards.
1. Distinct Neighborhoods	12	030	In most neighborhood conservation regulations, the standards must be based on existing characteristics of the neighborhood, ensuring that the end result is compatible infill.	Developers seeking to build on "infill" in all historic areas shall not be protected "by rights" and shall not be permitted to build new construction which is not compatible with the historic fabric of the neighborhood.



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1. Distinct Neighborhoods	13	031	During the listening sessions held at the beginning of this project, many community members complained of unacceptable impacts from both permitted and non-permitted uses in single-family residential neighborhoods.	I am very concerned that this will develop into an assault on our rights to live in homes as needed for small groups to age in place, start careers or go through recovery. Why should a family by birth be allowed to have 10 kids on a block but a group of seniors can't come together to stay in their community safely and cost effectively? Why should our kids be forced to commute across the city because they can't afford to rent by themselves in the community that they grew up in? And when our kids need to recover from addiction problems, don't we want them in a community that they can establish roots in? Like any residence, nuisance abatement regulations need to be in place and used effectively. Please look forward rather than looking back! Our culture is changing and we need to keep up.
1. Distinct Neighborhoods	13	031	During the listening sessions held at the beginning of this project, many community members complained of unacceptable impacts from both permitted and non-permitted uses in single-family residential neighborhoods.	Not only that, but there's a real risk that developers will sue the city and win big judgments if the city starts trying to define who can live together. It's not hard to imagine 20 or 30 years ago the city saying same-sex partners couldn't live together because they wouldn't be considered a family. Other unconventional relationships, which may be protected by the Unruh Act or other civil rights laws, might be treated the same today. Whatever our moral views, the Zoning Code shouldn't be used to legislate morality - it should focus on avoiding spillover costs and similar legitimate goals.
1. Distinct Neighborhoods	13	031	During the listening sessions held at the beginning of this project, many community members complained of unacceptable impacts from both permitted and non-permitted uses in single-family residential neighborhoods.	And on the same note, the Federal Court of Appeals that covers California has held cities liable for manipulating zoning laws to keep out group homes for seniors and people with disabilities (which, under the latest amendments, may include certain addictions) for reasons that stemmed from hostility to their presence in the neighborhood rather than for legitimate status-neutral reasons.
1. Distinct Neighborhoods	13	031	During the listening sessions held at the beginning of this project, many community members complained of unacceptable impacts from both permitted and non-permitted uses in single-family residential neighborhoods.	The language may need to be revised, but the practice of group homes for profit is one that needs to be regulated. For every law abiding group home, there are others who do not care for the welfare and quality of life for their residents, and neighbors. Eldercare home when well run are fine. Cram-them-in homes need to go.
1. Distinct Neighborhoods	13	031	During the listening sessions held at the beginning of this project, many community members complained of unacceptable impacts from both permitted and non-permitted uses in single-family residential neighborhoods.	I agree, but this is an area where the drafters need to be very careful how they phrase the rules. They should be engaging with disability rights groups, for example, to ensure that language meant to target bad actors does not inadvertently become exclusion of people with disabilities.
1. Distinct Neighborhoods	13	031	During the listening sessions held at the beginning of this project, many community members complained of unacceptable impacts from both permitted and non-permitted uses in single-family residential neighborhoods.	I agree with this comment. The zoning code should not make moral judgments about what living arrangements are or are not acceptable.

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1. Distinct Neighborhoods	13	032	During the listening sessions held at the beginning of this project, many community members complained of unacceptable impacts from both permitted and non-permitted uses in single-family residential neighborhoods.	<p>I also think that the economic conditions of L.A. have contributed to the need of homeowners to rent out rooms as a means to keep their homes from foreclosure or just to survive. I would hope that Los Angeles would not restrict homeowners who are merely providing a place to live and utilizing their empty rooms to generate additional income i.e. "roommates", "housemates" or house rental vs a hotel-like situation.</p> <p>The quality of life, noise, and parking issues are a concern to most of us, but they are the direct result of the building codes and the resulting high density structures that came from those codes. Regulation of the quality of building and parking will result in a reduction of the above mentioned problems, not acting against homeowners who are renting to others.</p>
1. Distinct Neighborhoods	13	032	During the listening sessions held at the beginning of this project, many community members complained of unacceptable impacts from both permitted and non-permitted uses in single-family residential neighborhoods.	It may be worth considering a "trigger mechanism," so that certain limits on occupancy, etc., are automatically varied unless sufficient housing is available. Homeowner opposition to new, denser developments in their neighborhoods has been accused of contributing to the extreme housing shortage. It would be great if the system could be designed to account both for local opposition and the need for housing - a system in which homeowners would have the incentive to push for more development *somewhere* lest they lose the ability to block development in their own neighborhoods could preserve SFR neighborhoods while creating a powerful constituency to advocate for a solution to the housing shortage.
1. Distinct Neighborhoods	13	033	During the listening sessions held at the beginning of this project, many community members complained of unacceptable impacts from both permitted and non-permitted uses in single-family residential neighborhoods.	Volume of occupancy in R-1 should be regulated both for traditional "family" and non-traditional "family" without having to get into a long and unwinnable definition of what constitutes a "family" just use Occupant and include non-human animals in interior -exterior.
1. Distinct Neighborhoods	13	034	During the listening sessions held at the beginning of this project, many community members complained of unacceptable impacts from both permitted and non-permitted uses in single-family residential neighborhoods.	Accessory dwelling units in single-family zones should be allowed as-of-right.
1. Distinct Neighborhoods	13	035	Most of the complaints centered on the proliferation of short-term rentals and unregulated group living arrangements, many of which house more residents than the typical single-family home.	There are many examples of business owners creating group living arrangements and bending/breaking the rules. There should be a limit of the number of these home businesses as one owner will come in and buy five homes, cram as many people - I can only assume rehab centers are very profitable. They have also been known to bend the rules by trying to convert existing single homes into "townhouses" in order to accommodate larger numbers. This needs to stop.

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1. Distinct Neighborhoods	13	035	Most of the complaints centered on the proliferation of short-term rentals and unregulated group living arrangements, many of which house more residents than the typical single-family home.	Any attempts to recode for commercialization of a single family neighborhood must include the effects of parking and traffic, especially the impact of employee and visitor traffic and parking on the neighborhood. Vendor promises of shuttle services are unrealistic.
1. Distinct Neighborhoods	13	035	Most of the complaints centered on the proliferation of short-term rentals and unregulated group living arrangements, many of which house more residents than the typical single-family home.	Disagree with last sentence. It is possible to enforce shuttle promises e.g., by requiring performance bond.
1. Distinct Neighborhoods	13	036	Most of the complaints centered on the proliferation of short-term rentals and unregulated group living arrangements, many of which house more residents than the typical single-family home.	If single-family houses are housing more than the "typical" number of residents, it is because the cost of living is high, and again, this is partly due to the fact that no new units can be built in R1 areas.
1. Distinct Neighborhoods	13	036	Most of the complaints centered on the proliferation of short-term rentals and unregulated group living arrangements, many of which house more residents than the typical single-family home.	Agree.
1. Distinct Neighborhoods	13	037	Short-term rental of single-family homes can also create impacts in single-family neighborhoods. Based on the City's Transient Occupancy Residential Structure ordinance, leasing units for fewer than 30 days is prohibited in single-family zones.	As I briefly noted above, the thing that really imposes spillover costs is short term leases *as a regular business.* The house that holds 8 different people every night, who come and go, who have no stake in the neighborhood, who only care about their absentee landlord who visits once every few months - these are the people who are harming their neighbors. Not the homeowner who very occasionally lets someone who needs a place to stay for a couple weeks while they wait for their new place to be ready use the spare bedroom for a fee. I realize that the former is more likely to draw enforcement action than the latter, but drawing the line avoids throwing the baby out with the bathwater. Flexibility and efficient resource use is good. (Additionally, there should be serious consideration of the possibility of using substantial mitigation fees instead of outright bans, again to leave open some flexibility.)
1. Distinct Neighborhoods	13	037	Short-term rental of single-family homes can also create impacts in single-family neighborhoods. Based on the City's Transient Occupancy Residential Structure ordinance, leasing units for fewer than 30 days is prohibited in single-family zones.	Short term rentals do not belong in R-1 neighborhoods. If the city wants to make a new zoning for STR, then go ahead and make the process transparent and legal. Right now it's flying under the radar, hotels lose out, taxes are not paid, the fabric of the neighborhood as far as people being invested is frayed. If people need extra income and have an extra room, then take in a permanent tenant.
1. Distinct Neighborhoods	13	037	Short-term rental of single-family homes can also create impacts in single-family neighborhoods. Based on the City's Transient Occupancy Residential Structure ordinance, leasing units for fewer than 30 days is prohibited in single-family zones.	I think your comments don't really apply to occasional rentals, but only to people who do this as a business. Allowing people to rent out their homes while they're on vacation is not a problem; allowing people to buy homes and then run hotels might be.

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1. Distinct Neighborhoods	13	038	In response to these concerns, the City will be issuing additional guidance with regard to urban design and buffering criteria for eldercare facilities when locating in single-family neighborhoods.	Zoning code reform should eliminate barriers to supportive and transitional housing and should not restrict the City's ability to site a variety of types of housing for all economic segments of society. See Housing Element Policy 1.1.3 ("Facilitate new construction and preservation of a range of different housing types that address the particular needs of the city's households") and Policy 4.1.6 ("Provide housing facilities and supportive services for the homeless and special needs populations throughout the City, and reduce zoning and other regulatory barriers to their placement and operation in appropriate locations.")
1. Distinct Neighborhoods	13	039	1.3. ADDRESS IMPACTS WITHIN SINGLE-FAMILY RESIDENTIAL NEIGHBORHOODS	As currently written, this section will get the city sued. The federal courts have ruled that the ADA and Fair Housing Amendments Act prevent cities from designing rules to exclude individuals with disabilities (which includes individuals with mental illnesses) from their communities. An Orange County city recently had to pay huge damages after designing zoning rules to exclude group care facilities. Rules must be inclusionary, adopting restrictions in a manner that minimizes impacts on people with disabilities, and cannot be pretexts for exclusion of 'undesirables.'
1. Distinct Neighborhoods	13	040	While many other California cities use the conditional use process to regulate the larger community care facilities, LA does not provide a clear mechanism for these facilities to locate anywhere in the City.	See previous notes on the possibility that using zoning as a tool for excluding people with disabilities (including addictions) will lead to serious risk of liability for the City under the FHAA.
1. Distinct Neighborhoods	13	041	This all-encompassing term includes a myriad of non-traditional living situations where residents might not be related to each other and who might have been selected to live in the residence by a third party.	The Zoning Code should not attempt to define "family." If people are willing to live together in an otherwise legal fashion, they should be allowed to do so. Disruptive behavior should be dealt with by the LAMC's disorderly conduct provisions and the CA Penal Code, not zoning law. There is a risk that any zoning definition will have adverse effects on racial groups with a tradition of extended-family living, as well as sexual minorities and poor people just looking for an affordable way to stay off the streets.
1. Distinct Neighborhoods	13	041	This all-encompassing term includes a myriad of non-traditional living situations where residents might not be related to each other and who might have been selected to live in the residence by a third party.	I agree with this comment. Zoning has no place in defining family.
1. Distinct Neighborhoods	14	042	The re:code LA project provides an excellent opportunity to revise the multi-family design standards applied today in both multi-family and mixed use zones.	Yes, this is important. Also please look at the various other planning overlays in the city and abolish where possible. For example, the Westwood community plan has elements which contradict the Residential Citywide Guidelines. Make sure that no two are ever in effect at once or you'll recreate the overlay zone mess we currently have.

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1. Distinct Neighborhoods	14	043	The re:code LA project provides an excellent opportunity to revise the multi-family design standards applied today in both multi-family and mixed use zones.	If the zoning code is to provide design standards for multi-family housing, it is imperative that they be rule based. Any conforming project should be automatically approved; there should be no place for arbitrary requirements to be made on a project by project basis. If we are going to have any chance of slowing or stopping the increase in the cost of living in LA, we need to have much more construction of low-rise and mid-rise multi-family units. That increase in construction will only happen if there is adequate land zoned for it and developers feel certain that projects will be allowed to be approved and constructed without the imposition of arbitrary costs or delays.
1. Distinct Neighborhoods	14	044	1.4. ENHANCE MULTI-FAMILY DESIGN STANDARDS	Multi-family design standards should be simple, not impose significant additional costs, and rule-based rather than discretionary. Low-rise and mid-rise multi-family projects are vital to solving the housing shortage, and the Zoning Code should incentivize investment in these types of projects by reducing costs and uncertainty.
1. Distinct Neighborhoods	15	045	Typical transition tools are focused on various anticipated impacts, including:	Yes the height transition between R-3 or Commercial must be more rigorous so that 4-5 story or more is not built directly adjacent to 1-2 story R-1 No exceptions for whatever density bonus privileges. Height transition must be the primary decision between adjacent zoning. View shed and sun shed impact is extremely important.
1. Distinct Neighborhoods	15	045	Typical transition tools are focused on various anticipated impacts, including:	This might be better addressed through mitigation fees than absolute regulatory requirements. The developer would have to "buy" the right to interfere with sunlight, at a price set by a neutral assessment (to overcome co-ordination problems and prevent holdout homeowners from holding the development hostage to extract a payoff greater than the actual value they place on the light). The overshadowed owner's lost amenity value is something that can be compensated in money, and allowing this semi-market mechanism in could result in benefits for both developers and neighboring homeowners - far more socially beneficial than an all-or-nothing fight.
1. Distinct Neighborhoods	15	045	Typical transition tools are focused on various anticipated impacts, including:	Yes, currently a restaurant was granted a variance to expand their kitchen to the edge of the alley behind my house. In effect zero setback. The smells and noise atrocious. With possible up-zoning that restaurant building could go as high as 5 stories, but hopefully with a much larger setback with no variances allowed.  The towering of buildings over R-1 properties is of great concern to me. I worked very hard to buy my house and enjoy my backyard. Now it could all be overshadowed by a big building.

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1. Distinct Neighborhoods	15	045	Typical transition tools are focused on various anticipated impacts, including:	I think the way to deal with that is to make the developer pay for overshadowing you. In some places - major commercial corridors and high-demand areas - tall buildings make sense but bad planning left single family homes too close. Stopping building altogether is a bad idea; some kind of system with an independent assessment of the value of light rights that the developer must then purchase is better.
1. Distinct Neighborhoods	15	045	Typical transition tools are focused on various anticipated impacts, including:	Apartment buildings and single family houses can coexist without issue in many neighborhoods, for example in Palms. I agree with the comment by josephusmyer.
1. Distinct Neighborhoods	15	046	Height. The City's current height transition provisions are lost in the Exceptions portion of the zoning code.	All maximum height restrictions on commercial structures which abut residential areas must be reviewed so as to allow neighborhoods the opportunity to request lower heights on new commercial construction which abuts the residential structures in the neighborhood.
1. Distinct Neighborhoods	15	047	Height. The City's current height transition provisions are lost in the Exceptions portion of the zoning code.	To address existing height disparities, adjacent low-density lots should be up-zoned to deal with the transition, rather than down-zoning commercial corridors or requiring setbacks/stepbacks. Corridors defined by mixed-use multi-family buildings should then "step down" to less-intense multi-family projects with active ground floors before stepping down to townhouse/rowhouse projects before stepping down to single family.
1. Distinct Neighborhoods	15	048	Glare and Noise. Where a commercial or industrial area abuts a residential zone, it is common to provide for a screening wall and landscaping to reduce the impact of glare, noise, dust and other common externalities.	Where new commercial development seeks a place abutting a residential area (be it single family dwellings or two, three or four story multi family residential dwellings), the final 20 to 50 feet of the new development must be stepped down in height so that it does not exceed the height of the adjacent residential buildings. Further, fast growing and dense landscaping material (trees, shrubs) must be made a mandatory part of the landscaping plan of the new development to screen the intrusive nature of the new construction. The landscaping must be maintained throughout the existence of the new construction and penalties must be imposed for failure to maintain the landscaping.
1. Distinct Neighborhoods	15	049	Glare and Noise. Where a commercial or industrial area abuts a residential zone, it is common to provide for a screening wall and landscaping to reduce the impact of glare, noise, dust and other common externalities.	While generally this makes sense, very small neighborhood stores should be allowed to locate on major residential streets. You shouldn't have to walk to the nearest arterial to buy bread and milk.
1. Distinct Neighborhoods	15	050	Uses. In some cases, specific uses (such as outdoor animal care or drive-through facilities) should be located away from residential areas. Distance separation from residential or limits on hours of outdoor activity can be applied to specific, impact-generating uses.	Use restrictions in residential areas should not interfere with non-disruptive home businesses and entrepreneurs. A person using a keyboard is consistent with residential character, as is a small home bakery or hand-crafting products (without loud power tools). The garage phase is critical to entrepreneurship; usually, you can't immediately afford to rent a separate space. Zoning should aim at nuisances; it shouldn't make it impossible for small businesses to get off the ground.

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1. Distinct Neighborhoods	15	050	Uses. In some cases, specific uses (such as outdoor animal care or drive-through facilities) should be located away from residential areas. Distance separation from residential or limits on hours of outdoor activity can be applied to specific, impact-generating uses.	I agree with this comment. Zoning should regulate public nuisances, not stifle economic growth and small business.
1. Distinct Neighborhoods	15	051	Site Design. Location of dumpsters and other site elements can also affect adjacent residential areas. Standards that minimize these impacts should apply to all development.	Yes, dumpster location, and hours of trucks emptying those dumpsters is something that needs to be consistent. Do you know what it's like when the bottle collector comes at 5:50 AM to pick up several loads of glass bottles cascading into the truck. This happens right behind my house.
1. Distinct Neighborhoods	15	052	Assuming that new techniques to manage the transition of these zones are adopted and generally applied to transitions, the Parking Zone should be replaced by reverting that area to the surrounding zone on the property.	It's not just new techniques for transitions. The City needs to make sure that polluting industries are using the best available control technology and have all required permits (not exemptions, think Exide). The City also needs to make sure that polluting industries are not moving into already overburdened communities and compounding to existing problems.
1. Distinct Neighborhoods	16	053	When new development "comes to the nuisance" by building next to neighbors, it should not force adjacent existing structures or development to become nonconforming.	Zoning rules should be changed so that those who want to keep animals are allowed to do so, so long as it does not cause a public nuisance. However, trying to preserve a rural lifestyle in a neighborhood where there is no market for it will be a losing strategy in the long run, and prevent people from putting the land to other productive use.
1. Distinct Neighborhoods	16	053	When new development "comes to the nuisance" by building next to neighbors, it should not force adjacent existing structures or development to become nonconforming.	Generally agree, but part of the point of a zoning code is to codify what a public nuisance is.

Section	Section Page	Report Order	Report Text	Comment
2. Housing Choice	18	054	Great neighborhoods are the building blocks of great communities.	<p>The zoning code revision presents a critical opportunity to craft an action plan for attacking the unprecedented affordable housing crisis gripping Los Angeles. On April 23, 2014, Council Member Cedillo led the City Council in adopting a resolution naming that day as Renters' Day in recognition of the vital role renters play in our local economy and to highlight the need to protect renters. More than 300 renters gathered at City Hall from South LA, Boyle Heights, Downtown, the Valley and the Westside to celebrate Renters' Day and to call on the City to create enforceable policies to preserve and expand affordable housing. The situation is dire and the need for effective policy is urgent. The crisis facing Los Angeles renters has been well documented by the City, independent research and in the media.</p> <p>We support the goals of recommendation 2.1 (Continue to Provide Incentives for Affordable Housing) but it does not go far enough to meet the scope of the current housing affordability crisis. Policies should be put in place to preserve existing housing options affordable to lower-income Angelenos. There are 638,000 RSO units in the city of Los Angeles (Housing Element, 1-62), compared to 68,908 "affordable" subsidized units (Housing Element, Appendix A). Whether or not this stock is legally considered to be "affordable housing" it is in fact the largest source of housing affordable to low income tenants, particularly seniors, tenants with disabilities, low wage workers, and persons on fixed incomes.</p>
2. Housing Choice	18	054	Great neighborhoods are the building blocks of great communities.	<p>We will never build enough publically subsidized units for this population, and therefore the role of RSO units is extremely important in the housing landscape of low income renters. Unfortunately both the Zoning Code Evaluation Report and the Housing Element lack any policies to preserve RSO units. In fact, we criticized the Housing Element for its failure to include such policies. If existing RSO units are demolished in order to increase density, they will no longer have RSO protections due to vacancy decontrol. Renters will be subject to the whims of the landlords, and the market. Thus, while more units will be built, they will be less affordable to low income renters. Re:code LA should include policies to preserve existing affordable housing, including RSO units.</p>



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2. Housing Choice	18	054	Great neighborhoods are the building blocks of great communities.	<p>Moreover, census data shows that persons of color are more likely to rely heavily on transit than whites, even while controlling for income. Blacks are almost six times more likely as whites to travel by public transit, while Latinos are three times more likely than whites to do so. The importance of promoting equal housing opportunities adjacent to public transit for all groups protected by state and federal fair housing laws—including categories such as race and gender, as well as disabilities, families with children, sexual orientation, and source of income discrimination—is particularly salient in light of the growing number of studies showing displacement of protected groups along TOD.</p> <p>In light of this dire situation, we propose that you include an innovative, first-of-its kind, net gain affordable housing policy in the new zoning code that protects housing options for Extremely Low-Income, Very Low-Income, and Low-Income residents. The goal of such a policy would be to create a net gain of units affordable at each of the referenced income levels around each transit stop. Because of the scale of affordable units lost, this policy will require both preservation of existing units and the creation of new units, which must work in tandem to ensure that future growth and investment in these neighborhoods is inclusive and accountable to those most in need.</p>

Section	Section Page	Report Order	Report Text	Comment
2. Housing Choice	18	054	Great neighborhoods are the building blocks of great communities.	<p>Specific Recommendations</p> <ul style="list-style-type: none"> <li>â€¢ Preservation                             <ul style="list-style-type: none"> <li>o Include Net Gain policy in all areas within a half-mile radius of rail stations and rapid bus stops</li> <li>o Include condominium conversion limitation policies (e.g. 100 unit per 12-month period with moratorium triggers)</li> <li>o Establish robust data collection policies for affordable housing and rental prices</li> <li>o Implement tracking process to trigger strict limits on market-rate development in the case of loss of affordable units or insufficient affordable housing development</li> </ul> </li> <li>â€¢ Production: any expanded incentive program to create affordable housing around transit should:                             <ul style="list-style-type: none"> <li>o Include significant enhanced density bonus for affordable housing (must incentivize only Extremely Low-, Very Low-, and Low-Income units who are most likely to use transit)</li> <li>o Be adopted within a half-mile radius of rail stations and rapid bus stops</li> </ul> </li> <li>â€¢ Ensure that any zoning code changes that impact shared housing options do not result disparate impacts on the basis of race and disability, especially by causing displacement or promoting fair housing violations.</li> </ul>
2. Housing Choice	18	054	Great neighborhoods are the building blocks of great communities.	<p>Furthermore, increasing density near transit without programs to require or incentivize the preservation and production of affordable housing will not promote greater production of affordable housing, nor will it lead to the desired increase in public transit usage. Recent studies have shown that persons who are low income are more likely to utilize transit infrastructure more consistently than higher-income households. Studies have also shown that preserving and building truly affordable homes near transit for low-income and very-low-income residents will maximize the benefit of investment in TOD to reduce vehicle miles traveled (VMT) as well as greenhouse gas emission (GHG). Any plan for increased TOD must include a plan to create and preserve housing for low-income households along corridors where transit infrastructure is being or has been built.</p>

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2. Housing Choice	18	054	Great neighborhoods are the building blocks of great communities.	Demand for housing along transit-rich corridors is expected to rise exponentially in the coming decades. In the Los Angeles region alone, it is forecasted that by 2030 over 1.7 million households or about 22 percent of the region will want to live near transit. This increased demand will undoubtedly have a detrimental impact on low-income households by driving up rental pricing. The pressures of gentrification in some transit-rich sectors with TOD plans has already driven many low-income families out of their neighborhoods and into areas that are further from their jobs, schools, and social networks, not to mention public transit. When low-income households are displaced by the creation of new TOD, it undermines efforts to reduce VMT and GHG by making transit inaccessible to the individuals who are likely to have a higher rate of transit utilization and more likely to reduce individual automobile use.
2. Housing Choice	18	055	The 2013-2021 Housing Element specifically calls for a City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy, sanitary and affordable to people of all income levels, ethnicities and ages, and suitable for their various needs.	Housing preservation policies are crucial to protect the existing stock of affordable housing, including rent-stabilized units. The next report from this project should identify ways in which the City can preserve RSO housing.
2. Housing Choice	18	056	2. HOUSING AFFORDABILITY AND DIVERSITY	The most important thing the Zoning Code can do to increase affordability is to increase the number of units built. There's a huge demand to live in LA; if there's a very low supply of places to live, prices and rents will skyrocket. Gradually transitioning areas near arterials to multifamily, increasing by-right heights by a story or two, and generally moving to a vision where as many units as possible get built will stabilize rents and allow the city to meet further demand - and in a green way that minimizes the need for people to have crazy commutes from the Inland Empire just so they can afford to live somewhere.
2. Housing Choice	18	056	2. HOUSING AFFORDABILITY AND DIVERSITY	Also, it may be worth reading this proposal. I don't necessarily think it's perfect, but it's worth a read. <a href="http://letsbola.wordpress.com/2013/12/20/a-modest-zoning-proposal/">http://letsbola.wordpress.com/2013/12/20/a-modest-zoning-proposal/</a>

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2. Housing Choice	18	057	Expand housing options to provide for a more complete range of people and incomes.	<p>Expanding housing supply is one of the most critical issues facing LA today. If the city is to provide accessible opportunity for all of its residents, as well as the many people around the world who would like to be a part of the city, the zoning code must provide a clear way for new housing to get built.</p> <p>Redevelopment Agencies, even if they return in some form, are not currently capable of building housing on a large enough scale.</p> <p>The best way to achieve affordability would be to do it the same way that LA did it in the past - a large amount of low-rise and mid-rise multi-family construction. This could be implemented with rules that would gradually increase the intensity of development permitted. This would distribute development throughout the city, helping ensure that no neighborhood is unduly burdened by gentrification or overwhelmed by development. The zoning code must be updated so that these types of projects are viable.</p>
2. Housing Choice	18	058	Expand housing options to provide for a more complete range of people and incomes.	Zoning code reform should include additional preservation and production measures including benefit fees, regulation of conversions and demolitions, transfer of floor area ratio, and other land use mechanisms.
2. Housing Choice	19	059	2. HOUSING AFFORDABILITY AND DIVERSITY	Yes as long as height and setback do not impact adjacent R-1 enjoyment of view shed and sun shed.
2. Housing Choice	19	059	2. HOUSING AFFORDABILITY AND DIVERSITY	Partially disagree. Views and sun are commodities; a developer should be able to purchase them (possibly at a fixed scale to avoid hostage-taking behavior by holdouts)
2. Housing Choice	19	060	2.1. Continue to Provide Incentives for Affordable Housing: Keep providing a density bonus as well as reduced parking, lot width and setbacks for development that includes affordable housing.	Missing here: affordable construction standards. The zoning code must be up to date with engineering standards - if developers have to use steel when wood-frame is structurally sound, it creates needless and wasteful expenses that exacerbate housing shortages. I suggest that these types of standards be revised continually by an apolitical engineering advisory board, rather than being stuck in a rarely-changed code.

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2. Housing Choice	19	061	2.1. Continue to Provide Incentives for Affordable Housing: Keep providing a density bonus as well as reduced parking, lot width and setbacks for development that includes affordable housing.	<p>To promote housing diversity, the zoning code reform should facilitate a variety of housing types. In addition to the this list of programs, the code should also address the following:</p> <ul style="list-style-type: none"> <li>- Pursuant to Housing Element Program 4, "explore barriers to the development of Limited Equity Housing Cooperatives (LEHCs) in the Zoning Code and housing funding processes. Explore greater ways for the City to promote LEHCs, which offer ownership opportunities to low and moderate income households while retaining the units as affordable after they move on."</li> <li>- Pursuant to Housing Element Program 132, "Identify and adopt changes to the Zoning Code to facilitate by-right siting of a greater variety of shelter, transitional and permanent supportive housing facilities throughout the City."</li> <li>- Pursuant to Housing Element Program 133, "Facilitate siting of housing and services for all persons, including those with special needs. Eliminate Zoning Code provisions that restrict locations of public health and treatment programs, including day treatment facilities and residential based treatment programs, in order to comply with federal and state fair housing laws.")</li> </ul>
2. Housing Choice	19	062	2.1. Continue to Provide Incentives for Affordable Housing: Keep providing a density bonus as well as reduced parking, lot width and setbacks for development that includes affordable housing.	Don't undermine the incentives for affordable housing
2. Housing Choice	19	062	2.1. Continue to Provide Incentives for Affordable Housing: Keep providing a density bonus as well as reduced parking, lot width and setbacks for development that includes affordable housing.	Agree, but increased housing supply generally is an important way of controlling housing cost inflation.
2. Housing Choice	19	063	2.2. Provide a More Prescriptive Set of Housing Options: The zoning code should contain prescriptive standards for a more comprehensive menu of housing typologies.	Reduced parking, lot widths and setbacks should to a variety of projects that "give something back" to the community, not just projects with low-income housing. Projects that meet higher levels of sustainable design should be entitled to similar bonuses.
2. Housing Choice	19	064	2.2. Provide a More Prescriptive Set of Housing Options: The zoning code should contain prescriptive standards for a more comprehensive menu of housing typologies.	Occupancy limits must be regulated strongly for both traditional and non-traditional "families" including non-human animals.
2. Housing Choice	19	065	2.3. Improve Regulations for Second Units: New regulations for second units must be developed and incorporated into the zoning code.	Clarify and regulate and enforce the difference between accessory living "quarters" and accessory living "dwelling"
2. Housing Choice	19	065	2.3. Improve Regulations for Second Units: New regulations for second units must be developed and incorporated into the zoning code.	<p>Yes, new regulations for second units.</p> <p>Every other house in this neighborhood has some kind of garage conversion, and those renters int he garage are parking an additional 1 or 2 cars on the street. It's getting crowded here. The residents of the garage are putting their trash in the cans of the people across the street.</p>

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2. Housing Choice	19	066	2.4. Enhance the Design of Small Lot Subdivisions. Revise the Small Lot Subdivision ordinance to require a higher level of design and improved compatibility with neighboring properties.	As with any 3-5 story height the small lot subdivision in R-3 or Commercial often encroaches upon view and sun of an adjacent 1-2 story R-1 home. Make the height and setback transition more rigorous and enforceable.
2. Housing Choice	19	066	2.4. Enhance the Design of Small Lot Subdivisions. Revise the Small Lot Subdivision ordinance to require a higher level of design and improved compatibility with neighboring properties.	Yes, agree on that. Small-lot development has some downsides. Those tiny lots have to be built up vertically and the impact on an adjacent property can be negative in regards to light/air/noise.
2. Housing Choice	19	067	2.5. Remove Barriers to Micro-Housing: In areas with higher land values, such as near transit, micro-units help to provide an affordable housing option.	As long as there is a more rigorous height and setback transition between R-3 or Commercial and adjacent R-1
2. Housing Choice	19	068	2.5. Remove Barriers to Micro-Housing: In areas with higher land values, such as near transit, micro-units help to provide an affordable housing option.	This includes reduced or eliminated parking requirements where served by adequate transit and density standards.
2. Housing Choice	19	069	2.6. Improve Options for Shared Housing Communities: Modify density restrictions for cohousing projects in specific zones.	As long as it does not impact and erode the quality of life and the enjoyment of the R-1 zone - Lessen, do not increase the density restrictions in R-1
2. Housing Choice	19	070	2.6. Improve Options for Shared Housing Communities: Modify density restrictions for cohousing projects in specific zones.	There are many comments on this page about the impact of development on R-1 zones, so it must be repeated that the inability to construct new housing in R-1 areas has a major impact on affordability in the rest of the city.
2. Housing Choice	20	071	2.1. CONTINUE TO PROVIDE INCENTIVES FOR AFFORDABLE HOUSING	Expand incentives for affordable housing and enforce regulations that discourage displacement.
2. Housing Choice	20	071	2.1. CONTINUE TO PROVIDE INCENTIVES FOR AFFORDABLE HOUSING	Agree, but this shouldn't be at the cost of reducing overall development. Increased housing supply means increased affordability.

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2. Housing Choice	20	072	Keep providing a density bonus as well as reduced parking, lot width and setbacks for development that includes affordable housing.	<p>Zoning code reform can do more than just "continue" incentives for affordable housing. It can, indeed it must, strengthen these vital land use tools. The City is facing an affordable housing crisis. According to the New York Times, Los Angeles is the least affordable city in the country. Many families are forced to live in unsafe housing or to double up, while many others are forced into homelessness. Moreover, the limited supply of housing that is affordable to lower-income households is disappearing. According to the Los Angeles Times, in the last year, we have seen a 40% increase in the number of rent stabilized units removed from the rental market.</p> <p>Despite these dire circumstances, funding for affordable housing in Los Angeles has been cut by over 75% since 2008. This makes land use tools that encourage affordable housing all the more crucial. Since the City adopted a density bonus ordinance in 2008, private developers have used it to build over 368 affordable homes in a depressed housing market. During this time, 108 affordable homes have been built using a parking incentive. It would take a public subsidy of \$32.1 million to build that many affordable homes.</p> <p>Land use and zoning tools like the density bonus are major producers of affordable homes, and should be strengthened.</p>
2. Housing Choice	20	073	Keep providing a density bonus as well as reduced parking, lot width and setbacks for development that includes affordable housing.	Land use policies and zoning incentives should not encourage the displacement of residents and/or destruction of affordable housing. The City should strengthen the density bonus ordinance and ensure it is only utilized in cases where there is a net gain of affordable homes.
2. Housing Choice	20	074	The City should continue to offer a density bonus as well as reduced parking, lot width and setback requirements, for residential developments that include units affordable to very low-, low- or moderate-income households.	If the density bonus is to be most effective, the city must take care not to undermine the incentives by granting zone changes and other density increases separate from this program. See Housing Element Programs 73 and 101
2. Housing Choice	20	075	The City should continue to offer a density bonus as well as reduced parking, lot width and setback requirements, for residential developments that include units affordable to very low-, low- or moderate-income households.	I totally disagree - transit in Los Angeles will never keep up or exceed the need for vehicles and parking and eliminating or lessening parking requirements only gives developers more profit per square foot and pushes vehicle parking into adjacent lower density neighborhoods impacting the quality of life in those zones. TOD is just a code/buzz word for higher density more profit equaling hellish gridlock.
2. Housing Choice	20	075	The City should continue to offer a density bonus as well as reduced parking, lot width and setback requirements, for residential developments that include units affordable to very low-, low- or moderate-income households.	I agree. Parking requirements often force developers to build more expensive concrete construction, which makes low-margin affordable projects nonviable. Street parking should be priced and controlled by parking districts. Some guy named Donald Shoup wrote a book about it, maybe you've heard of him ;)

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2. Housing Choice	20	075	The City should continue to offer a density bonus as well as reduced parking, lot width and setback requirements, for residential developments that include units affordable to very low-, low- or moderate-income households.	The density bonus is a giveaway to the developer. Even in the low-income senior housing built on Pico, those residents have cars and park them on the street with their handicapped placards because there was no parking built for them. This is magical thinking that seniors, or low income people don't own cars. Do not reduce parking requirements for developers.
2. Housing Choice	20	075	The City should continue to offer a density bonus as well as reduced parking, lot width and setback requirements, for residential developments that include units affordable to very low-, low- or moderate-income households.	Reducing or eliminating parking requirements for market-rate housing (in addition to affordable units) would improve overall housing affordability, provide consumers with additional housing product options, and generally support the city's strategy for encouraging walkable, transit-oriented development.
2. Housing Choice	20	075	The City should continue to offer a density bonus as well as reduced parking, lot width and setback requirements, for residential developments that include units affordable to very low-, low- or moderate-income households.	A lot of density bonus stuff is state law, so the Zoning Commission has limited power over it. But in general, a big problem is that reduced parking requirements will result in spillover onto the street unless the street parking is priced at a market rate. Otherwise, there's a huge externality: because providing parking is expensive, developers will only provide as much as tenants want - but those tenants are receiving subsidized on-street parking from the City, so they don't demand the free market amount from developers. They burden the public instead.
2. Housing Choice	20	076	The City should continue to offer a density bonus as well as reduced parking, lot width and setback requirements, for residential developments that include units affordable to very low-, low- or moderate-income households.	The Zoning Code should encourage most retail to have at least one floor of housing above it, even outside major corridors. It's a good way to increase the housing stock, reduces congestion, and encourages more efficient use of parking spaces outside business hours. Single-story buildings are a waste of space.
2. Housing Choice	20	077	The City should continue to offer a density bonus as well as reduced parking, lot width and setback requirements, for residential developments that include units affordable to very low-, low- or moderate-income households.	In addition, the City should create a program to allow owners of affordable housing to sell their unused Floor Area Ratio or air rights to other developers if they agree to preserve the affordability of the units for a set number of years beyond the expiration or termination date. Such a program could effectively create an additional subsidy to facilitate preservation deals. See Housing Element Program 54 (â€œoe, examine strategies toâ€¦ facilitate the use of density bonus at Transit Stops/Major Employment Centers, â€¦ and transfer unused density bonus rights.â€¦)
2. Housing Choice	20	078	The City should consider expanding the bonus and incentive provisions with the hope of increasing the supply of affordable units within walking distance of transit facilities.	In transit corridors, where development pressures are strong and the need for affordable housing especially great, the City should adopt a citywide policy that would include an enhanced incentive program that applies to all transit districts.
2. Housing Choice	21	079	The zoning code should contain prescriptive standards for a more comprehensive menu of housing typologies.	It is important that any standards make it clear what is permitted, and do not allow discretionary interference with projects that conform. In addition, the standards should not be written so tightly that very few projects are able to conform without variances.



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2. Housing Choice	21	079	The zoning code should contain prescriptive standards for a more comprehensive menu of housing typologies.	Agree.
2. Housing Choice	21	080	The current zoning code does a poor job of differentiating between the variety of residential building types that could be built in a given zone.	Missing from this list is fencing standards. Badly designed fences can be an eyesore that deters walking and makes neighborhoods appear unwelcoming. Chain-link fences are particularly common and ugly. Particularly in residential areas but also in commercial/institutional settings, the Zoning Code should encourage more attractive fencing, or encourage developers to shield unattractive fences with plants or similar. Security can be achieved without sacrificing design.
2. Housing Choice	21	081	For example, RD1.5 allows one- and two-family dwellings, apartment houses and multiple dwellings, all of which currently have the same dimensional standards.	There is currently a complete decoupling of density and FAR/envelope in lower density zones (RD up to R-3). This leads to the construction of units with average unit sizes that are too large and lead to fewer options for single renters (who are becoming increasingly prevalent). Either density and FAR should be better linked to provide for unit sizes that meet current and future demand or density should be done away with entirely.
2. Housing Choice	21	082	A more prescriptive approach would set different lot dimensional standards for each building type permitted within the same zone.	Who decides? Neighborhood councils who know nothing about architecture or planning? City planners who will have the budget and time to do this for 2080?
2. Housing Choice	21	082	A more prescriptive approach would set different lot dimensional standards for each building type permitted within the same zone.	I agree no "prescriptive" Planning is not medicine - it is rule based - stricter enforcement is required not looser interpretation.
2. Housing Choice	21	082	A more prescriptive approach would set different lot dimensional standards for each building type permitted within the same zone.	I think you may misunderstand. Prescriptive means making things rule-based, rather than having blunt standards that inevitably require variances and other discretionary decisions that raise costs, deter investment, and privilege the politically connected.
2. Housing Choice	21	083	Concerns about the prescriptive nature of the regulations can often be addressed by providing an option for discretionary design review for buildings that do not fit the standards.	Concerns about prescriptive are valid here and shouldn't be taken lightly. First off, if people want prescriptive they have a whole county to the south to move to. Second, calling for a discretionary design review board adds a rather large layer of bureaucracy on top of an already complex system of approvals. Please oh please don't make any more of our system subject to "whim" rather than code.
2. Housing Choice	21	084	Concerns about the prescriptive nature of the regulations can often be addressed by providing an option for discretionary design review for buildings that do not fit the standards.	Giving planners the ability to approve small variances where deemed appropriate (10% of a setback or facade length, etc.) would provide flexibility without requiring an additional layer of design review.
2. Housing Choice	22	085	New regulations for second units must be developed and incorporated into the zoning code.	Very important and I'm glad to see re:code taking this on.
2. Housing Choice	22	086	New regulations for second units must be developed and incorporated into the zoning code.	So R-1 is now defacto R-2 thus increasing density without mitigation? Tighten and address the impact on R-1 Define "Accessory Living Quarters" and "Accessory Dwelling Unit" Clarify and enforce the difference.

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2. Housing Choice	22	087	Also, due to the general nature of the State requirements, no compatibility requirements exist and units as large as 1,200 square feet have been built in settings where they are out of scale and character with the neighborhood. As part of re:code LA, new regulations for second units must be developed and incorporated into the zoning code.	This should include a focus on alleviating constraints to developing second units that are affordable to low, very low and extremely low income households.  In addition to removing barriers to new second units, the City should create a program to effectively legalize and rehabilitate illegal existing second units in exchange for affordability covenants on those units.
2. Housing Choice	22	088	Also, due to the general nature of the State requirements, no compatibility requirements exist and units as large as 1,200 square feet have been built in settings where they are out of scale and character with the neighborhood. As part of re:code LA, new regulations for second units must be developed and incorporated into the zoning code.	ADUs are an important component of affordability and the zoning code should encourage their development. Setbacks and parking requirements will need to be flexible for this to work.  It should be noted that in addition to providing an additional unit of housing supply to a city that sorely needs it, ADUs also put home ownership within reach for a greater number of people, since the rental income from an ADU can help pay the mortgage.
2. Housing Choice	22	089	Also, due to the general nature of the State requirements, no compatibility requirements exist and units as large as 1,200 square feet have been built in settings where they are out of scale and character with the neighborhood. As part of re:code LA, new regulations for second units must be developed and incorporated into the zoning code.	The new proposed ADU regs need to eliminate the passageway requirement (10 ft clearance to the sky from front property line to accessory unit. Also parking requirements need to be reviewed to loosened for ADUs.
2. Housing Choice	22	090	Second units (accessory apartments, in-law suites or granny flats as they are also known) are an important source of affordable housing.	Appendix I of the Housing Element states that 187 second units were built from 2006 to 2011, but none were known to be affordable. The Housing Element concluded that the affordability component [was] not effective. (I-21) For second units to be an important source of affordable housing, they should be specifically targeted to increase opportunities for low, very low and extremely low-income households.
2. Housing Choice	22	091	Consequently, second units must meet the state-adopted rules. This has made it difficult to build second units on existing lots. Second units must meet setback, lot coverage, passageway and height requirements that are really intended for principal units.	Actually, the state rules are looser than the initial LA design standards and are therefore easier to build to. Zoning-

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2. Housing Choice	23	092	Revise the Small Lot Subdivision ordinance to require a higher level of design and improved compatibility with neighboring properties.	One problem is that the current code is too internally contradictory: are "space, light, [and] air" things that Neighbor owns and which Developer must purchase, or are they things that Developer owns and Neighbor must suffer the loss of unless willing to pay Developer to change her plans? Assigning the property right to someone, rather than a morass of discretion and bureaucracy, will allow the certainty necessary for this sort of trading. That might not work in Downtown, where the trading would involve too many parties and create coordination problems, but in more suburban areas, a property-rights-based approach isn't so unrealistic when only 3 or 4 neighboring landowners are affected.
2. Housing Choice	23	092	Revise the Small Lot Subdivision ordinance to require a higher level of design and improved compatibility with neighboring properties.	The neighbors were surprised because the projects don't need to inform neighbors about what they are planning. Look at the picture how the new 3 small-lot homes tower over and dwarf the neighboring 2-story building.  I can see that there are two mind-sets here: (1) Those who like their space, light, air. (2) Those who look to fill every cranny with a building, a person, and celebrate this concept.
2. Housing Choice	23	093	In many instances, the base zoning does not match the development pattern on the ground; neighbors are surprised to see a single-family house replaced with four or five small-lot homes.	Definitely - the lack of height transition is a nightmare for adjacent single story.
2. Housing Choice	24	094	For many Angelenos, the oversized house with its unmanageable mortgage has lost its appeal.	As long as it does not impact negatively adjacent zones - Do not remove parking requirements as every one is not capable of bicycling or walking to transit - Yes the car culture must change but we live in a vast collection of suburbs over 100 miles wide - the vehicle is here to stay based on our geography - accommodate it.
2. Housing Choice	24	095	This shift has led the way for a rise in popularity of very small self-contained homes called micro-units.	I fully support allowing smaller apartment units. The zoning code should not dictate to people how much space they need to live or how much lot coverage they need under them.  While it is true that micro units might appeal to young, single professionals, historically, these types of units have helped a much more vulnerable set of people - the low income and the homeless. So micro units could also provide a way for low income people to secure quality, stable housing, and for the homeless to be able to secure their own housing that will help them achieve independence.
2. Housing Choice	24	095	This shift has led the way for a rise in popularity of very small self-contained homes called micro-units.	Agree.

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2. Housing Choice	24	096	This is problematic in a regulatory system like that in Los Angeles, where there are very few limitations on the number of people who can live in a conventional house or apartment.	The city should inventory direct and indirect regulatory barriers to small unit development, and remove regulations that are regressive based on unit size. Indirect density restrictions -- like parking requirements or fixed open space requirements -- may thwart the development of small units more than direct density restrictions.
2. Housing Choice	24	096	This is problematic in a regulatory system like that in Los Angeles, where there are very few limitations on the number of people who can live in a conventional house or apartment.	I agree with this comment.
2. Housing Choice	24	097	Should the City regulate whether there are 4 people living in one 1,200 square foot apartment versus 4 people each living in a 300-square foot micro-unit in the same building? The impact on aesthetics, City services and existing infrastructure would be the same.	Impacts on City services and infrastructure would definitely change. Police, fire, ambulance, libraries, parks, recreational facilities, trash, sewer, water, parking. the people living as young singles just might decide one day to have children, then what?
2. Housing Choice	24	097	Should the City regulate whether there are 4 people living in one 1,200 square foot apartment versus 4 people each living in a 300-square foot micro-unit in the same building? The impact on aesthetics, City services and existing infrastructure would be the same.	Then they move - one of the benefits of a rental-based housing market. 4/1200 and 1/300 are equivalent, and when the person in the 300 gets married and has a couple of kids, she moves out and they find a 4/1200.
2. Housing Choice	24	098	In areas with higher land values, such as near transit, micro-units help to provide an affordable housing option.	This is an important and forward-thinking addition to the city's zoning code.
2. Housing Choice	24	099	In areas with higher land values, such as near transit, micro-units help to provide an affordable housing option.	Agreed with comment above
2. Housing Choice	25	100	Modify density restrictions for cohousing projects in specific zones.	Which zones are you talking about? R-1 is already under assault by a vast array of participants. Do more to protect and enforce the R-1 zone.
2. Housing Choice	25	101	The City should reduce or eliminate density restrictions for cohousing projects in preferred zones that implement similar mitigating measures.	This is a great area for leadership from the city.
2. Housing Choice	25	102	Cohousing is a type of collaborative living arrangement where residents actively participate in the design and operation of everyday living.	Sounds like a Kibbutz in Israel. or a prison situation.

Section	Section Page	Report Order	Report Text	Comment
2. Housing Choice	25	102	Cohousing is a type of collaborative living arrangement where residents actively participate in the design and operation of everyday living.	Like a Kibbutz. Not so much like a prison! I don't think that Kibbutz-style living will catch on, but neither should it be suppressed. Not quite sure why the Commission thought it necessary to devote a whole page to this, but I think the point is this: where communities pick arrangements unlike the typical ones around which the Zoning Code is designed, the Zoning Code should take account of their idiosyncrasies. Personally, I'd recommend that the Commission look harder to see whether the proposals in this section can be generalized - otherwise, we'll eventually end up with either inflexibility or a growth of complexity as new types of community demand similar accommodations.
3. Centers and Corridors	26	103	Rethink commercial corridors and centers to focus on providing accessible and healthy environments to live, work, play, learn and thrive in.	Make the height transition to adjacent zones more gradual as to not impact negatively the enjoyment of both zones.
3. Centers and Corridors	26	104	One way to do this is to rethink the built environment and change the rules that result in auto-dominated, single-use areas into rules that promote and encourage walkable, mixed use places.	Yes. In particular, the Zoning Code drafting process should assess the impacts certain policies have on safety for all modes of transportation. The "Target Zero" approach, in which the explicit goal is elimination of pedestrian and cyclist deaths (and the same principle should go for drivers too), is a good one. While the Zoning Code is not the primary tool in eliminating traffic deaths, it has a role to play. For example, driveway design can help minimize the risk of drivers crashing into pedestrians, cyclists, or other cars as they exit/enter the driveway. Do exits from a store's parking area force cyclists and pedestrians to weave between cars to reach the streets, or do they have separate pedestrian/bike exits? To the extent that the Zoning Code affects street design, it should encourage safe streets for all users. And parking area design can also have a key role in safety.
3. Centers and Corridors	28	105	New commercial zones must be developed that address the variety of character that exists today, but are flexible enough to grow with the needs of the City over time.	New standards for commercial development should include provisions to enhance and protect opportunities for community serving small businesses and social enterprises, including the creation of smaller parcel designations that are appropriate and beneficial to small businesses, and the creation of incentives for long-term leases for small businesses.
3. Centers and Corridors	28	106	Rather than a set of "one-size fits all" zones with a variety of overlays and conditions, new base zones must address the existing and future needs of all commercial areas in the City.	The City needs to include local hire and living wage requirements for commercial developments. In order to meet our environmental goals, we need to minimize VMTs esp in work commuting. In addition, we need to increase the economic vitality of the workforce in the city.

Section	Section Page	Report Order	Report Text	Comment
3. Centers and Corridors	29	107	In order to create a mixed use, pedestrian-friendly environment with a balance of mobility options, the typical approach to zoning must be reconsidered.	Residential uses in a C zone should be allowed to follow commercial setbacks (i.e.0' side yards) at residential floors. This will help create strong street walls while still allowing for buildings above the ground floor to be massed for residential use - similar to the great 1920's and 30's brick apartment buildings around LA. Building code requirements for openings and setbacks from the property line dictate setbacks where appropriate.
3. Centers and Corridors	29	108	Design is regulated using basic elements of good urban form as the mechanism to help ensure a certain quality of place is achieved.	Designing for safety is also a factor that should be separately acknowledged.
3. Centers and Corridors	29	109	More specifically, this approach regulates elements that directly affect the way a building and street function, to encourage pedestrian activity and a mixing of uses.	We encourage explicitly stating the importance of enhanced form standards to address resident and community *access* to vital resources, like clinics, parks, and public facilities. The Harbor region is an example of heavy industrial and Port land uses, lower volumes of community resources, and increased obstacles for residents to navigate their neighborhood. Consider how form standards can improve connectivity across a neighborhood to improve resource access is extremely important for public health.
3. Centers and Corridors	30	110	Originally inspired by the loss of corner gas stations, hundreds of mini-malls popped up at busy intersections across the City.	This is an interesting history. While some people may not like the mini-shopping centers today, it seems unlikely they'd prefer gas stations. The approach to commercial corners can be improved, but it must be done in a way that ensures commercial development remains viable.
3. Centers and Corridors	31	111	Improve the citywide landscaping standards to respond to LA's climate and provide standards for transitions.	All owners of property where landscaping has been mandated to create a buffer between the new construction and a residential area must be made to comply with maintaining the mandated landscaping by the City's use of all available legal tools necessary for the City to ensure strict compliance, including, but not limited to monetary sanctions, fines, citations for code violations, and ultimately, criminal penalties.
3. Centers and Corridors	31	112	At minimum, buffers should apply when higher intensity residential or commercial uses abut established single-family residential neighborhoods.	We recommend issuing a guidebook of sorts for use by public agencies, foundations, and community organizations that outlines best practices and recommendations (from a city zoning standpoint) for landscaping or beautifying streets and corridors.  The guidebook should not only consider recommendations from the perspective of landscape architecture, urban design, or engineering, but also consider how design can mitigate the impacts of industrial uses, such as particulate matter, pollution, diesel exhaust, and excessive noise.  A guidebook would ensure that community stakeholders, when implementing one-off landscape or beautification projects, align their objectives with city regulation to further its effectiveness and longevity.

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3. Centers and Corridors	32	113	Ensure that signs reinforce community character, while serving their business and communication objectives.	I support allowing certain types/styles/sizes of signage by-right as part of the entitlement approval process.
3. Centers and Corridors	33	114	The City should tie sign standards to the character and form of development.	Consistent with the First Amendment, the sign regulations should expressly emphasize that they do not intend to distinguish based upon substantive content, and that they should be interpreted where possible to mitigate disproportionate burdens on any particular message. Additionally, to foster free debate on political issues and to avoid First Amendment lawsuits, the sign rules should contain an express exemption for non-commercial political advocacy from most regulation, other than to deal with extremely disruptive political signs on content neutral grounds (e.g., no flashing lights or other hazards)..
3. Centers and Corridors	34	115	The future applicability of all design guidelines should be clarified. It is not currently clear which projects are subject to review using the design guidelines.	It is important that applicability of guidelines be clarified, and that the guidelines are not applied in a capricious manner.
3. Centers and Corridors	35	116	Design guidelines should control only those elements of design that don't affect the basic entitlement, but relate to the quality of the urban design, architecture and landscape architecture.	If a claimed "entitlement" is incompatible with the design guidelines (whether in an HPOZ or a Specific Plan), then the guidelines of the HPOZ or Specific Plan shall prevail.
3. Centers and Corridors	35	117	Design review processes should never be forced to use "compatibility" or similarly undefined concepts to eliminate specific uses, or modify key elements of the entitlement such as total floor area.	"By rights" entitlements shall be curtailed by all guidelines, regulations, standards, and provisions established in preservation plans and specific plans. Therefore, height limits, density, setbacks, design, scale, massing, and other such "entitlements" give way to the specific mandates in preservation plans and specific plans. To allow otherwise, would defeat the purpose of the preservation plan and specific plan.
3. Centers and Corridors	35	118	Therefore, the clarity with which guidelines are written, illustrated and administered is very important.	In all design review processes, the public shall be given the opportunity to provide community input during all public hearings. None of the public hearings to which the public was previously invited to participate shall be eliminated.
3. Centers and Corridors	35	119	Varying levels of design review, and an effective set of appeal and interpretation provisions.	Subjective aspects of design review (by a planner, a board or other entity) shouldn't be used to reduce or prevent what is otherwise allowed by right - i.e. the design review process can inform how a building is massed on a site, but can't take away allowable floor area.

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4. Transportation Choice	36	120	4. TRANSPORTATION CHOICE	<p>Recommendations 4.1 (Rethink zoning around transit stations) and 4.3 (Rightsize the code’s approach to parking) are laudable goals. However, for the goals of increased transit utilization and reduced VMTs to be achieved, affordable housing preservation and creation policies in any new TOD zones is critical. (See previous section.)</p> <p>It is well-established that the impacts of transit investment and expansion reverberate beyond individual parcels and affect broader neighborhoods and corridors. The zoning code could be an important and innovative tool for mitigating the potentially destabilizing impacts of transit expansion and effectively linking its benefits to existing communities, thereby ensuring that the public value produced by our public investment flows to the residents that it was intended to benefit.</p>
4. Transportation Choice	36	120	4. TRANSPORTATION CHOICE	<p>But equitable housing policies and upzoning around transit simply cannot achieve this objective unless the scope of its application is more closely aligned with the scope of the impacts of transit development. We therefore urge the City to maximize the potential of TOD by expanding its application to ½ mile radius around rail and rapid bus stations, thus covering most walkable areas. This TOD District Area expansion must be coupled with the housing policies suggested above in order to prevent harmful unintended consequences for” and fully realize the benefits to” low-income residents.</p> <p>Specific Recommendations:</p> <ul style="list-style-type: none"> <li>• Expand focus in TOD areas beyond increased density to include the housing and economic development policies described herein</li> <li>• Create zones around transit stops with radii of a ½ mile of rail stations and rapid bus stations</li> </ul>



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4. Transportation Choice	38	121	A transit-oriented development, or TOD, is typically a higher intensity development located within walking distance of a public transit stop.	Zoning code reform should ensure that higher intensity development like TOD does not negatively impact existing affordable housing near transit. Zoning code reform should prevent incentives to demolish or otherwise eliminate subsidized and rent stabilized units. See Housing Element Program 27 (‘‘Complete a study that identifies strategies to discourage the demolition and condo conversion of viable, stable affordable rental housing and/or rental housing that is subject to the Rent Stabilization Ordinance, particularly near rail transit stations.’’), Housing Element Policy 1.2.2 (‘‘Encourage and incentivize the preservation of affordable housing, including non-subsidized affordable units, to ensure that demolitions and conversions do not result in the net loss of the City’s stock of decent, safe, healthy or affordable housing’’), and Housing Element Policy 1.2.8 (‘‘Preserve the existing stock of affordable housing near transit stations and transit corridors. Encourage one-to-one replacement of demolished units.’’) This may be done through TFAR and/or targeting higher intensity development away from existing affordable housing in order to eliminate the incentive to demolish or otherwise eliminate subsidized and rent stabilized units.
4. Transportation Choice	38	122	Walking distance for transit is generally defined as a 5 to 10 minute walk or ¼- to ½-mile in distance.	Some studies have indicated that transit has impacts beyond a half-mile away. TOD standards should be research-based, rather than based on arbitrary round numbers.
4. Transportation Choice	38	122	Walking distance for transit is generally defined as a 5 to 10 minute walk or ¼- to ½-mile in distance.	I agree with this comment. The University of California Transportation Center studied this issue last year and found that the number of transit trips generated by residences and employment holds up remarkably well beyond 1/2 mile.  <a href="http://www.uctc.net/access/42/access42_halfmiletods.shtml">http://www.uctc.net/access/42/access42_halfmiletods.shtml</a>  In addition, people will walk (or bike) further to access higher quality transit.  If we want to take advantage of our investments in transit, we should look at our most successful transit lines - the Blue Line, Expo Line, and Red Line - and note that there is fairly high uniform density in the neighborhoods around the lines, even beyond 1/2 mile from the stations.

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4. Transportation Choice	38	123	It is also a more sustainable development pattern, and can create a higher quality of life for residents.	Increasing density alone is insufficient to achieve this goal. Without policies to ensure the development of homes affordable to core transit riders and most workers, those who regularly use transit will be priced out in favor of higher income residents who own more cars and are less likely to use transit. (See <a href="http://iris.lib.neu.edu/cgi/viewcontent.cgi?article=1003&amp;context=dukakis_pubs">http://iris.lib.neu.edu/cgi/viewcontent.cgi?article=1003&amp;context=dukakis_pubs</a> Numerous other studies have confirmed that transit development results in higher housing costs for properties located near transit.) Without a plan for ensuring affordable homes near transit, taxpayers may be burdened with the costs of providing infrastructure to meet the needs of working families force out of metro areas. Thus, TOD land use policies that increase the building envelope should not be enacted without appropriate safeguards, including replacement, relocation and no net loss policies. See Housing Element Policy 2.5.1 (Target housing resources, policies and incentives to include affordable housing in residential development, particularly in mixed use development, Transit Oriented Districts and designated Centers.)
4. Transportation Choice	38	124	4.1. RETHINK ZONING AROUND TRANSIT STATIONS	Be aware and restrict impact of height and density to adjacent R-1 zones.
4. Transportation Choice	38	124	4.1. RETHINK ZONING AROUND TRANSIT STATIONS	Yes. It should not be allowed for tall buildings to be build directly adjacent to R-1 properties. There needs to be a wide enough buffer, and stepped building, and setbacks.
4. Transportation Choice	38	124	4.1. RETHINK ZONING AROUND TRANSIT STATIONS	Does this problem actually exist for TOD? Most rail stations aren't that close to R-1.
4. Transportation Choice	38	124	4.1. RETHINK ZONING AROUND TRANSIT STATIONS	If rail stations are close to R-1, consideration should be given to upzoning those areas. It does not make sense to construct expensive transit improvements if the area around the station is forever restricted to R-1 density.
4. Transportation Choice	38	124	4.1. RETHINK ZONING AROUND TRANSIT STATIONS	Scratch my previous comment. There are still significant R1 areas near existing or proposed stations on almost every current or proposed line. Everywhere within a half-mile should be upzoned at least slightly, with anywhere within about a quarter mile upzoned significantly to promote investment in transit-adjacent areas.
4. Transportation Choice	38	125	The new zoning code should contain tools to successfully implement transit-neighborhood planning efforts.	Polices that increase development activity near transit should be linked with land-use tools that produce and preserve affordable housing, protect local small businesses, increase opportunities for low-income entrepreneurs, and support employment opportunities for local residents.
4. Transportation Choice	38	125	The new zoning code should contain tools to successfully implement transit-neighborhood planning efforts.	In addition to neighborhood planning efforts, the City should adopt a citywide equitable TOD policy, to establish baseline standards to protect existing communities, preserve and produce affordable housing and foster economic opportunities for low-income residents

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4. Transportation Choice	38	126	The LA region is poised to make a significant investment in public transit, as evidenced by Measure R and the 30/10 Initiative.	<p>This investment has the potential to bring much needed resources and opportunities to neighborhoods in Los Angeles. However, without proper tools in place, it also has the potential to force community members from their homes and jobs. Numerous reports have documented the increased housing costs and corresponding displacement pressures that beset neighborhoods in the wake of transit investment and transit oriented development. In this context, Los Angeles needs zoning tools that will deliver opportunity, not destabilization.</p> <p>The increased value from this public investment - including the zoning and land use policies that enhance property values - should be used to fund public programs such as affordable housing. Critical value capture tools must be implemented, to the extent possible, before property values rise as a result of the public investment in transit.</p>
4. Transportation Choice	38	127	The LA region is poised to make a significant investment in public transit, as evidenced by Measure R and the 30/10 Initiative.	The Zoning Code should encourage developments to leave open the possibility of further transit growth - there should be a coordination process with Metro to ensure that development occurs in a manner that does not impair the usefulness of rights of way. Where wide, light-rail-suitable medians are in private hands, development should be limited to preserve the possibility of transit growth. Similarly, the Code should allow increases in corridor density in advance of future planned projects to enable Metro to better compete for federal grants.
4. Transportation Choice	38	127	The LA region is poised to make a significant investment in public transit, as evidenced by Measure R and the 30/10 Initiative.	One additional thought: where a development is projected to add to congestion significantly, the Code might adopt transportation mitigation fees, to be invested in neighborhood-serving transportation investment that might include revamping streets to more efficiently serve the added traffic or neighborhood transit to reduce the number of cars on the road - say, supporting rail capital projects in the affected neighborhood or subsidizing bus operations.
4. Transportation Choice	38	128	The LA region is poised to make a significant investment in public transit. A number of rail and bus line improvements are scheduled to be completed in the next 10 years.	The Zoning Code may also be a good place for the City to lay out its long-term transit vision. Stating that the City's future priorities include, say, a northward extension of the Crenshaw line to Wilshire and thence up San Vicente to WeHo and terminating at Hollywood, or a Vermont Subway, or a Venice Blvd Streetcar, or extending the Sepulveda Pass corridor down to LAX - these things could help the City plan for its transportation future.
4. Transportation Choice	39	129	In LA, the floor area allocation system drives density, and parking impacts the ability to produce floor area.	Eliminating parking requirements in areas with ample transit options helps reduce the delivery cost per unit and makes more units affordable. But eliminating/reducing parking and increasing unit density should be coupled with robust on-site open space requirements.

Section	Section Page	Report Order	Report Text	Comment
4. Transportation Choice	39	130	In LA, the floor area allocation system drives density, and parking impacts the ability to produce floor area.	Increases in building envelope (including parking reductions) should be linked with policies to preserve existing affordable housing to avoid unintended consequences. Such increases should be prohibited in cases where the land use allows destruction or conversion of existing affordable housing units (including rent-stabilized units), unless the developer replaces the affordable units on a one-for-one basis.
4. Transportation Choice	39	131	Zoning for station areas must feature walkability, paying special attention to the interface between buildings and the street.	The Zoning Code should also deal with station design issues. In many transit-rich cities, subway stations are closely integrated with commercial uses - in-station malls, having station exits as the bottom floor of a building rather than otherwise-empty plazas, etc. The Code should strongly encourage retail and food amenities within or immediately adjacent to stations.  Also, retail/food concessions in stations should have no parking requirements.
4. Transportation Choice	39	132	Maximum building lengths should be considered in station areas on major corridors, with pedestrian connections to break down the scale and encourage multiple pedestrian routes.	The same scale-reducing effect could be achieved in a less burdensome way by using design to break up a single long building. If a whole block is technically one building, it doesn't matter so much if the design breaks it up - for example, by changing design elements every few hundred feet.
4. Transportation Choice	39	132	Maximum building lengths should be considered in station areas on major corridors, with pedestrian connections to break down the scale and encourage multiple pedestrian routes.	In order to allow for light and air flow, it would be better to break up the building. This also allows for more flexibility to landscape.
4. Transportation Choice	39	132	Maximum building lengths should be considered in station areas on major corridors, with pedestrian connections to break down the scale and encourage multiple pedestrian routes.	Good point. My mistake.
4. Transportation Choice	39	133	Both the Downtown Design Guide and the Warner Center Specific Plan propose solutions to break up existing large blocks.	Breaking up existing large blocks is a good idea and should be encouraged.
4. Transportation Choice	40	134	New street and block standards that enhance the link between transportation and land use must be included in the zoning code.	Strongly disagree. Design principles should seek to foster *efficient* use of vehicle lanes, which may not always mean keeping all lanes. A number of cities' experiments with pedestrianizing certain small areas and rerouting traffic has led to increased profits at local businesses - the classic example is Times Square in NY, but there are plenty of examples in more car-oriented cities too. Vehicles matter, but so do other road users, and efficiency doesn't always mean keeping as many vehicle lanes as possible everywhere. Too many lanes can turn quiet residential areas or bustling retail destinations into noisy, gridlocked arterials. Sensitivity to context is key.
4. Transportation Choice	40	134	New street and block standards that enhance the link between transportation and land use must be included in the zoning code.	Yes enhance the pedestrian and bicycle links to transit but do not remove vehicle lanes. Transit will never eliminate the growth of vehicles and their usage in a growing city which is actually a collection of suburbs spread over a vast area.

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4. Transportation Choice	40	135	The City should be commended for its continued commitment to complete streets; however, the standards in place today pay little attention to creating streets that accommodate a variety of transportation choices.	Work w/ DOT & BOE to develop street standards that match highway dedication requirements. If a widening is planned, encourage waiting to realign curbs until the entire block is widened (if it ever comes to it). Wider sidewalks and planting strips are better than odd curb indentations.
4. Transportation Choice	40	136	There is little about the current rules that advocates for complete streets.	Street tree rules should be carefully designed to avoid tree types that damage sidewalks. Where trees are provided by developers, the developer should remain liable for any harm the tree's roots do to the public right of way.
4. Transportation Choice	40	136	There is little about the current rules that advocates for complete streets.	I would add: merchants who illegally cut street trees should be fined. The city needs to do a better job of managing the trees it has, and those planned in the future.
4. Transportation Choice	41	137	However, a more appropriate block in a walkable, mixed use setting in LA would be between 500 and 700 feet in length. (It is no accident that places originally designed for pedestrian movement, such as Downtown LA, have blocks in this range.	Steamline the process for adding curb bulbs at corners and mid-block connections for new construction.
4. Transportation Choice	41	138	As the block face distance shortens, the permeability (and therefore efficiency) of the street network increases.	Fencing design, particularly where it faces the street, also plays an important role in the attractiveness of a street to pedestrians and cyclists. Excessive fencing makes a neighborhood feel less open and more oppressive, particularly where it is ugly bare metal chain-link fencing. High fencing also exacerbates the "dead area" effect of parking lots. High, street-facing fences should be disfavored; where necessary for security reasons, there should be some requirement to mitigate the effect, either by using more attractive fence designs or by shielding the fence with plants. There should also be more prescriptive fence design regulation, generally favoring non-metal (wood, stone, brick, hedgerow) fences, especially in residential areas.
4. Transportation Choice	42	139	Required parking can be a significant development constraint, and the new zoning code provides the opportunity to study and comprehensively fix the requirements.	Never eliminate parking requirements. We can not regulate behavior. Some people cannot or will not ever walk or bike.
4. Transportation Choice	42	140	Required parking can be a significant development constraint, and the new zoning code provides the opportunity to study and comprehensively fix the requirements.	chrispm misunderstands the proposal. Allowing a more free-market approach to parking is about putting parking in appropriate places, not forcing people to walk or bike.

Section	Section Page	Report Order	Report Text	Comment
4. Transportation Choice	42	141	Eroding pedestrian environments by increasing the proliferation of land devoted to the automobile, creating large swathes of inhospitable surface parking lots; and	To avoid inhospitable and ugly surface parking lots, a CUP should be required (and grants disfavored); additionally, an environmental remediation fee should apply as a mitigation measure, to be invested in the local community.  Regulations should also require esthetic standards from all parking lots, surface or not, to ensure that they are well-integrated with the community they serve. For example, in dense areas and commercial corridors, part of the ground floor should always be commercial (small shops, cafes, etc.) or similar. In more suburban areas, surface lots should at least require trees and runoff-mitigation measures.
4. Transportation Choice	42	142	Adding to the cost of living, since the cost of providing minimum required parking is passed down to the consumer in the price for goods, services, and housing, creating an unfair burden for those who do not drive.	Yes, but how many people in don't have a car, or friends who visit that don't have a car?
4. Transportation Choice	42	142	Adding to the cost of living, since the cost of providing minimum required parking is passed down to the consumer in the price for goods, services, and housing, creating an unfair burden for those who do not drive.	This is why lots of parking would be provided in a free market. But it doesn't make sense to require more spaces than are actually demanded - a lot of parking standards are based on arbitrary round numbers some guy in the 50s guessed.
4. Transportation Choice	42	142	Adding to the cost of living, since the cost of providing minimum required parking is passed down to the consumer in the price for goods, services, and housing, creating an unfair burden for those who do not drive.	"at"california12, a lot more people could live here without a car, and have more disposable income as a result of that more self-reliant lifestyle, if the government zoning code didn't effectively force them to drive everywhere.  Cutting ridiculous red tape in the parking requirements is a good way to invite more car-free households to move here, and ultimately reduce the number of cars clogging our streets.
4. Transportation Choice	42	143	First, the Cornfield Arroyo Seco Specific Plan (CASP) that was recently approved includes no minimum parking requirements.	Wholeheartedly support the CASP
4. Transportation Choice	42	144	If successful, this approach should be applied in other areas through area planning efforts such as Community Plans or Specific Plans.	Or near transit stations, as part of a city-wide TOD policy.
4. Transportation Choice	42	145	If a building's use changes, even if the new use has a higher parking ratio, the parking requirements stay the same;	This sounds like it could be a problem. For instance, a former electronics store became a restaurant, selling alcohol, and catering to parties and groups: said restaurant would need a lot more parking to accommodate the new use.
4. Transportation Choice	42	145	If a building's use changes, even if the new use has a higher parking ratio, the parking requirements stay the same;	This can be addressed by better parking meter policies. If a business needs parking spaces and can't simply shift the burden to the streets, it will invest in providing them somewhere nearby (e.g., a multistory garage).

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4. Transportation Choice	42	146	Buildings can move parking off-site, if it is located within 1,500 feet;	<p>The off-site/1500ft rule should apply everywhere and without special districts. In commercial areas, businesses should be able to lease nearby off-site spaces for employees and customers, even if other owners nearby prefer on-site. There is no real collective action problem here - ordinary contracting will work -, so coordinating structures like special districts are unnecessary.</p> <p>There is a risk that allowing nearby offsite parking will create a proliferation of ugly, inhospitable surface parking lots that impose severe externalities on the wider community. Adopting an off-site rule should be accompanied by a CUP requirement for surface parking lots, and possibly by an environmental remediation fee that would fund mitigation (e.g., pedestrian/cyclist infrastructure, parks, sidewalk repairs).</p>
4. Transportation Choice	42	146	Buildings can move parking off-site, if it is located within 1,500 feet;	I agree with this comment.
4. Transportation Choice	42	147	Individual projects can request fewer required parking spaces on a case-by-case basis;	In historic residential areas where street parking is not readily available, all infill construction will not benefit from the 2012 Modified Parking Requirement District Ordinance, and increased parking must be made available on-site for all residents in the new development, such that each unit must have one and one-half parking spaces for each bedroom in the unit.
4. Transportation Choice	42	148	Individual projects can request fewer required parking spaces on a case-by-case basis;	Increases in building envelope (including parking reductions) should be linked with policies to preserve existing affordable housing to avoid unintended consequences, such as the undermining of affordable housing incentives. Such increases should be prohibited in cases where the land use allows destruction or conversion of existing affordable housing units (including rent-stabilized units), unless the developer replaces the affordable units on a one-for-one basis.
4. Transportation Choice	43	149	Some of the parking standards in the zoning code need to be modified:	The standards for stalls sizes, drive aisle widths and turning radii need to be reexamined as well. The size standards in LA are much larger than many US cities. Seattle has proven a standard stall can be 8'x16' with 22' of back-up distance. LA's standards were based on driving your '57 Cadillac to a giant surface parking lot at the mall.
4. Transportation Choice	43	149	Some of the parking standards in the zoning code need to be modified:	Anecdotally, when designing a parking garage in Seattle or Portland, one can assume an average stall size 60 square feet smaller than one in LA. This difference, at +/--\$90 per SF to build (who knows what it will be in the future) times the number of stalls in a project creates needless additional construction cost.

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4. Transportation Choice	43	150	The parking ratios for all uses should be reevaluated. Parking ratios should be tailored to context within the City, and availability of transit should be considered, especially in mixed use, walkable areas such as Downtown.	If the new code includes parking requirements, especially on-site, the requirements should include a "buyout" provision - if a developer is willing to pay a fee, the parking requirements can be waived. The fee could be set by a calculation of the added costs imposed (added demand for public parking spaces, congestion as people look for spaces). Because developers will only pay this fee if they are confident that the alternative use they propose will create more value than providing parking, it will produce more efficient land use and ensure that developers internalize any costs they impose on the City.
4. Transportation Choice	43	151	The application of maximum parking requirements near transit stations should be studied.	Another possible approach could be to set impact fees for all parking built in station areas, and use to proceeds to support walkable capital improvements.
4. Transportation Choice	43	152	A more universal method for negotiating parking requirements would allow applicants to submit an alternative parking plan.	This is a great idea, but to the extent it relies on commitments by the developer (e.g., to provide vanpools, shuttles, or valet parking), consideration should be given to the possibility that the developer/operator may default (e.g., due to bankruptcy) at some point in the future. What would happen in such an event? Would the building lose its certificate of occupancy? Would the city step in to provide some of the services? Or would residents just end up parking on public streets, using up precious space? Performance bonds or other ways of ensuring compliance may need to be part of the alternative parking plan process.
4. Transportation Choice	43	153	Parking ratios should be more responsive to context and the availability of transit.	One other thing to think about: parking standards near transit stations. There are some terrible pictures of light rail systems in Texas where the station is surrounded on all sides by surface-level parking lots. The Zoning Code should discourage surface parking near stations and favor multistory, mixed-use parking structures that have ground level retail that serves transit users who arrive on foot or by bus connections too.
4. Transportation Choice	43	154	The purpose of the toolkit is to provide a set of design recommendations to help create bike-friendly development in Los Angeles.	The Code should consider ways to kill two birds with one stone. Imagine every parking meter and streetlight was designed so its base was a bike corral. Bike parking and other street design features can complement one another.
4. Transportation Choice	43	155	The bike parking ordinance should be refreshed as part of the re:code LA effort.	One other type of parking to think about - pedestrian parking! Places to tie pets while people go inside, and benches for people to "park" their behinds. Benches significantly enhance the pedestrian experience, enabling people to enjoy a sandwich on a bench rather than using up restaurant space or eating in the artificial light of the office. Benches enable pedestrians to take advantage of LA's exceptional weather. While there may be some issues with attracting homeless people, (1) good bench design can minimize this, and (2) is it really so bad to make homeless people's lives a little bit more tolerable?
5. Jobs and Innovation	44	156	5. JOBS AND INNOVATION	Clean jobs not polluting jobs that increase the load on electricity production or water usage.



Section	Section Page	Report Order	Report Text	Comment
5. Jobs and Innovation	44	156	5. JOBS AND INNOVATION	Except to the extent that they impact neighbors relatively directly, these are better dealt with through environmental law and other areas of municipal, state, and federal law rather than the Zoning Code.
5. Jobs and Innovation	44	157	Retain jobs and attract industry to strengthen Los Angeles as a global center for employment and innovation.	Attracting business and reducing barriers to entrepreneurship are perhaps the most important goals for the Zoning Code. They deserve more analysis and attention.
5. Jobs and Innovation	44	157	Retain jobs and attract industry to strengthen Los Angeles as a global center for employment and innovation.	I agree. This is the commercial/industrial zoning equivalent of the need to increase affordability in the city by changing residential zoning. Affordable housing combined with low barriers to doing business will help create jobs and improve LA's economy.
5. Jobs and Innovation	44	158	Retain jobs and attract industry to strengthen Los Angeles as a global center for employment and innovation.	<p>The dismantling of the CRA/LA had a particularly devastating impact on workers, resulting in the loss of important policies that had previously given local residents an opportunity to access some of the benefits resulting from major development projects. Specifically, policies requiring employers to hire locally and from disadvantaged populations, and to pay living or prevailing wages, had helped ensure that residents could share in the opportunities created by new developments in their neighborhoods.</p> <p>We urge you to include policies in the zoning code to ensure that future development is limited to enterprises that will not continue to exacerbate the increasing inequality besetting our City. Local and disadvantaged hiring are particularly useful tools that can be implemented in the land use context to implement recommendation 5.4 which seeks to "enhance the jobs housing balance."</p>
5. Jobs and Innovation	44	158	Retain jobs and attract industry to strengthen Los Angeles as a global center for employment and innovation.	<p>Specific Recommendations</p> <ul style="list-style-type: none"> <li>• Include local &amp; disadvantaged hire policies within zoning code (e.g. set aside a significant percentage of both construction and permanent jobs for city residents within a certain radius and city residents experiencing severe barriers to employment)</li> <li>• Include Living Wage goals and policies in as many zones as feasible, and especially zones that benefit from high-tourism, TOD, or other public benefits</li> <li>• Include small business support policies to encourage entrepreneurs and prevent displacement (e.g. set aside of retail space with reduced rent for community-serving small businesses and social enterprises; incentives for long-term leases for small businesses; small business rent-control policies; local and targeted procurement policies, etc.)</li> </ul>

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5. Jobs and Innovation	45	159	5. JOBS AND INNOVATION	There should be two more separate sections here on promoting entrepreneurship (home businesses, shared workspaces, etc.), and targeting administrative burdens appropriately (polluters should get a lot of scrutiny and require a lot of CUPs; low-impact businesses should almost never require discretionary approvals and CUPs).
5. Jobs and Innovation	46	160	It is difficult to retain industrial uses where financial pressure from allowed retail, stand-alone office and residential uses extends into existing industrial areas.	<p>While zoning boundary buffers can be useful tools to separate incompatible land uses, they should be designed to fit the types of incompatibility that exist in each neighborhood.</p> <p>As an example, the widespread Port and Port-related land uses in Wilmington and San Pedro create a series of incompatible land uses throughout the neighborhood. The need for buffers is self evident; however, the types of impacts from these uses are not all the same. As our own noise study found, specific hot spots in Wilmington, such as neighborhoods close to rail yards, experience the highest level of impact-- in other neighborhoods, the greatest impact is diesel particulate matter, or glare.</p> <p>It's reasonable to conclude that other neighborhoods in LA have also face unique types of incompatibility. The framework offered here should call out for "need-based" approaches across the City so that "zoning boundary buffers" are effective and appropriate in separating incompatible land uses.</p>
5. Jobs and Innovation	46	161	A consistent approach to buffering or screening industrial uses from adjacent zones by applying a zone boundary buffer should be added to the zoning code.	<p>There are several reasons why industrial uses in LA face pressure. Some are not controlled by the city, e.g. the advent of large warehousing and distribution centered in the Inland Empire, which requires lot sizes that cannot easily be provided in LA.</p> <p>However, some reasons are under the city's control. The pressure to convert industrial land to commercial and residential uses partly stems from restrictions on increasing density in existing residential and commercial areas. Therefore, one way to reduce pressure on industrial land is to increase the allowable density in commercial and residential areas. This may be better than reducing the types of uses allowed on industrially zoned land, which would have negative effects on the overall city economy by reducing commercial and residential development.</p>
5. Jobs and Innovation	49	162	Allowing modest amount of "work" to occur in these settings, especially craft, artisan and similar modest-scale businesses is an excellent way to move up from a home occupation.	Strongly agree. I suggest that as many non-disruptive business uses as possible be permitted in all residential areas - one of those home businesses could turn into the next Apple, but even if it just alleviates the pain of poverty a little, it is a big positive.

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5. Jobs and Innovation	49	162	Allowing modest amount of “work” to occur in these settings, especially craft, artisan and similar modest-scale businesses is an excellent way to move up from a home occupation.	Yes, as long as it does not interfere with anyone else, with noise, odors, etc. Work/Live situations are desirable in the arts community. Would like to see more of this type of development.
5. Jobs and Innovation	49	162	Allowing modest amount of “work” to occur in these settings, especially craft, artisan and similar modest-scale businesses is an excellent way to move up from a home occupation.	And not just in arts. For all kinds of freelancers and entrepreneurs, being able to start working at home makes starting a business less risky because you don't need to pay two rents. That's especially important in historically disadvantaged communities, where increased costs are felt much harder. To the extent consistent with the neighbors' peaceful enjoyment of their homes, live/work arrangements could be a huge opportunity for LA to be at the forefront of innovation and new economic opportunities.
5. Jobs and Innovation	49	163	Mixed-Use Buildings. Another way to move toward a balance of jobs and housing is to focus on mixed-use projects, including both vertical mixed use (in the same building) and horizontal mixed use (in adjacent buildings).	Agree with letsbola. Also, there may be a need to fix height district problems that overly restrict mixed use in areas where it makes sense (and I think some parts of Pico exhibit this).
5. Jobs and Innovation	49	163	Mixed-Use Buildings. Another way to move toward a balance of jobs and housing is to focus on mixed-use projects, including both vertical mixed use (in the same building) and horizontal mixed use (in adjacent buildings).	Yes, mixed use can work very well given the right circumstances. Please, no more mattress stores, foot massage parlors on Pico Blvd.
5. Jobs and Innovation	49	163	Mixed-Use Buildings. Another way to move toward a balance of jobs and housing is to focus on mixed-use projects, including both vertical mixed use (in the same building) and horizontal mixed use (in adjacent buildings).	I disagree. The suitability of mattress stores and foot massage parlors for a commercial corridor like Pico is an entirely subjective matter, since there are no public nuisances resulting from these uses. If people do not like foot massage parlors, they should outbid the parlor operators for the commercial leases, not use zoning laws to ban them.
5. Jobs and Innovation	49	164	5.4. ENHANCE THE JOBS HOUSING BALANCE	Even with a balanced ratio of jobs to housing units, many local workers cannot afford local homes, requiring long commutes and/or overpriced or overcrowded housing. Thus, in addition to a jobs-housing balance, the City should aspire towards a jobs-housing fit, where a better match between wages and housing costs result in people of all income levels having equal opportunities to live and work within the same community. Increased employment opportunities that provide living wages and the preservation and production of affordable housing are key elements.
6. A Strong Core	50	165	6. A STRONG CORE	How about also allowing the things that worked there throughout the rest of the city? Adaptive re-use shouldnt have borders.
6. A Strong Core	50	165	Retool Downtown regulations to create a dense, livable pattern of development that supports a vibrant daytime and nighttime economy.	Strongly agree. Buildings suitable for adaptive reuse may be clustered downtown, but if there are good opportunities elsewhere, let's put them to good use!

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6. A Strong Core	50	165	Retool Downtown regulations to create a dense, livable pattern of development that supports a vibrant daytime and nighttime economy.	Also, Downtown-like principles should be extended to smaller centers of activity elsewhere in the city. Certain parts of Hollywood and parts of the Wilshire corridor might be candidates for treatment less like suburbs and more like secondary cores. Polycentricity is an asset LA should make the most of.
6. A Strong Core	50	165	Retool Downtown regulations to create a dense, livable pattern of development that supports a vibrant daytime and nighttime economy.	I strongly agree with all of these comments. LA is a polycentric city, and it would take an inordinate amount of development in the core to change that.  So yes, let's have a strong core, but let's also have a strong Century City, a strong Hollywood, a strong Warner Center, and a strong West LA. Adaptive reuse should be allowed everywhere.
6. A Strong Core	50	166	Retool Downtown regulations to create a dense, livable pattern of development that supports a vibrant daytime and nighttime economy.	Skid Row occupies less than a square mile of downtown Los Angeles; yet it has become a major battleground and a potent symbol of the struggle between the forces of gentrification and the low-income residents they threaten to push out. Though it may come as a surprise, as it has to many policymakers, the majority of Skid Row residents are neither homeless nor transient. Our long experience with Skid Row residents has shown us a diverse (though mostly African-American) community with historic roots in the area and whose residents are willing and able to fight for self-determination and to contend with the daily racism and classism that permeates our society, our laws, and our economy. The most important source of housing in Skid Row is residential hotels. In recent years, LAFLA has won significant victories that forced city agencies to see the people living in these hotels as tenants and not transients. The zoning code revisions present a crucial opportunity for ensuring the enforcement of these policies and for expanding them.
6. A Strong Core	50	166	Retool Downtown regulations to create a dense, livable pattern of development that supports a vibrant daytime and nighttime economy.	Specific Recommendations Ensure that the revised Adaptive Reuse Ordinance (ARO) primarily supports the creation of affordable housing for Extremely Low-, Very Low-, and Low-Income residents. Ensure that that ARO does not permit Extremely Low-, Very Low-, and Low-Income units to be adapted to higher-income uses Incentivize and prioritize supportive permanent housing developments for homeless women and men Utilize and duplicate the powerful preservation tool developed in the validated judgment governing City Center and Central Industrial Project Areas, which requires preservation of all existing residential hotel units, replacement of any converted or demolished units, no net loss policy for all residential units, and a local hiring plan providing job opportunities to Skid Row residents.

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6. A Strong Core	50	167	Retool Downtown regulations to create a dense, livable pattern of development that supports a vibrant daytime and nighttime economy.	Accomodate do not eliminate parking and vehicles.
6. A Strong Core	50	167	Retool Downtown regulations to create a dense, livable pattern of development that supports a vibrant daytime and nighttime economy.	Again, this is just downtown!
6. A Strong Core	51	168	6.2. Revise the Adaptive Reuse Ordinance: Allow for retrofitting of uses other than residential and hotel, expand the concept citywide.	Strongly agree.
6. A Strong Core	51	169	6.3. Rethink the Transfer of Floor Area (TFAR): Create true sending and receiving sites, rethink the public benefits desired.	Create a TFAR "bank" for properties that cannot add additional area but are under FAR limits (such as historic landmarks or contributing building in a historic district)
6. A Strong Core	52	170	Apart from the State Historic Park, there are limited significant public outdoor options to actively exercise in or around Downtown.	Elysian park is also relatively close, though difficult to access due to the barrier formed by the 110 freeway. Downtown could use some more pocket parks, but perhaps developers could also opt to chip in for improvements to access to Elysian Park rather than provide on-site open space.
6. A Strong Core	52	170	Apart from the State Historic Park, there are limited significant public outdoor options to actively exercise in or around Downtown.	Disagree. Elysian is too far away for jogging, dog-walking, etc. Also disagree re "developers ... opt[ing] in" - there's a significant coordination problem here (parks are generally non-excludable and there's an incentive to free-ride), so open space requirements or dedicated payments in lieu are sensible. That said, South LA is probably a higher park priority than DTLA now - and has plenty of vacant lots and oversized parking lots that could be converted to park use relatively cheaply. Also, to the extent the Army Corps of Engineers would allow it, turning parts of the LA River bank into a linear park and filling the downtown gap in the bike path would be a good solution for DTLA.
6. A Strong Core	53	171	6.2. REVISE THE ADAPTIVE REUSE ORDINANCE	The ARO, which lowered minimum parking standards to one space per unit in downtown LA, produced homes affordable only to families making over \$90,000. The only exceptions were bond-subsidized properties. The ARO should be modified to include meaningful incentives for development of affordable housing. Again, it is imperative that increases to the building envelope be coupled with affordable housing requirements.
6. A Strong Core	53	172	Allow for retrofitting of uses other than residential and hotel, expand the concept citywide.	I completely agree with this proposal. The ARO should allow other uses and be expanded citywide.
6. A Strong Core	53	173	The City should expand the ARO so that it applies to retrofits for office and other nonresidential uses.	This begs the question - if the modified zoning and life-safety requirements are acceptable for reuse of existing buildings, should they also be acceptable for new buildings?

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6. A Strong Core	53	173	The City should expand the ARO so that it applies to retrofits for office and other nonresidential uses.	I don't think that's necessarily the case - it's open to the city to say that X+ is ideal and can now be done cheaply, but X isn't so dangerous that we'll require it sit vacant because retrofitting is expensive. And code requirements do serve an important information function in reassuring tenants that everywhere meets a basic safety threshold so they don't have to do their own surveys. But it is always worth checking that regulatory requirements are research-based and impose no more burden than necessary.
6. A Strong Core	53	173	The City should expand the ARO so that it applies to retrofits for office and other nonresidential uses.	It's proved true for parking requirements. Many ARO buildings had no parking on site. Some chose to add parking to basements or lower floors - i.e. parking to market where feasible.
6. A Strong Core	53	174	Under the ARO, the minimum size for a residential unit is 450 square feet, with an average minimum size of 750 square feet for all residential units in the building (these minimum don't apply to hotel rooms).	The minimum sizes and average size should be eliminated altogether. There is no need for the zoning code to dictate to people the size of the housing in which they choose to live.
6. A Strong Core	53	174	Under the ARO, the minimum size for a residential unit is 450 square feet, with an average minimum size of 750 square feet for all residential units in the building (these minimum don't apply to hotel rooms).	Strongly agree, especially in DTLA and other high-density areas.
6. A Strong Core	54	175	Changes to TFAR should be considered so that it can become a more direct tool used to help preserve historic buildings or create important public benefits such as Downtown recreational space, or preservation of land in environmentally- sensitive areas.	TFAR can be an effective tool for preserving existing affordable housing; enabling older affordable housing projects to sell excess zoning authority may help preserve affordability and provide projects with capital for deferred maintenance.
6. A Strong Core	54	176	This might mean identifying targeted growth centers (receiving areas) and places to be preserved (sending areas).	I think the market approach works relatively well, and to the extent that the City wants to control where growth will happen and where it will be restricted, it should do so by refusing to sell its own TFAR. Also, you may want to get some legal advice on (1) takings issues and (2) contract issues (since the city is selling a lot of TFAR rights, changing the rules might breach contracts).
6. A Strong Core	54	177	Conversely, developers who want to exceed the base FAR can buy floor area, or TFARs, and achieve a maximum FAR of 13:1 (or even greater using other options).	As noted on the next page, this can serve to undermine the affordable housing incentive.

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6. A Strong Core	55	178	The City should rethink the approach to affordable housing Downtown, and how it might function within the context of an updated approach to TFAR.	Any approach to affordable housing Downtown should include tools to protect at-risk units, including rent-stabilized units and SRO units that are affordable to and/or occupied by lower income households. Without corresponding preservation tools, any changes to the incentive program will likely be insufficient to avoid a net loss of affordable housing opportunities. See Housing Element Policy 1.2.2 (Encourage and incentivize the preservation of affordable housing, including non-subsidized affordable units, to ensure that demolitions and conversions do not result in the net loss of the City's stock of decent, safe, healthy or affordable housing.
6. A Strong Core	55	179	This may be due to the fact that there are too many competing incentives in Downtown (the main one being TFAR).	Pursuant to Housing Element Program 99, explore ways to improve affordable housing production under the program, including how the incentives under this program relate to those provided under the Downtown TFAR program.
6. A Strong Core	55	180	6.4. FIX THE GREATER DOWNTOWN HOUSING INCENTIVE ORDINANCE	The massive sidewalk to sidewalk developments pictured are going to overwhelm the ability of this city to be a livable city. Lower the height and make transitions more evident between zones.
6. A Strong Core	55	180	6.4. FIX THE GREATER DOWNTOWN HOUSING INCENTIVE ORDINANCE	This is only for Downtown!
7. A Healthy City	56	181	7. A HEALTHY CITY	<p>Specific Recommendations:</p> <p>Pollution</p> <ul style="list-style-type: none"> <li>o Designate truck routes solely on commercial corridors</li> <li>o Restrict idling and parking on residential streets</li> <li>o Create green buffers including next to highways that are not publicly accessible</li> </ul> <p>Toxic Remediation</p> <ul style="list-style-type: none"> <li>o Ensure that all development, especially affordable housing development, receive proper remediation screening and services to prevent risk of toxic exposure to low income residents.</li> </ul> <p>Parks</p> <ul style="list-style-type: none"> <li>o Designate all unneeded vacant land, surplus land, and incentivize its use as affordable housing or parkland in alignment with California Surplus Land Act.</li> <li>o Commit resources to improve and maintain these parcels, as well as existing parcels.</li> </ul> <p>Oil Extraction</p> <ul style="list-style-type: none"> <li>o Prohibit all oil extraction uses and techniques, including but not limited to acidization, fracking, and urban oil drilling, until these processes are demonstrated to be safe.</li> </ul> <p>Access to Health Services</p> <ul style="list-style-type: none"> <li>o Incentivize FQHC-incentivizing zones in low-income areas</li> </ul> <p>Access to Healthy Food</p> <ul style="list-style-type: none"> <li>o Incentivize full service grocery stores, produce markets, farmer's markets, community gardens, and other healthy food outlets in low-income areas</li> </ul>

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7. A Healthy City	56	181	7. A HEALTHY CITY	<p>We recognize the hard work that has gone into the Draft Plan for a Healthy Los Angeles. In addition to a robust health analysis, we strongly believe that the Health Plan, as well as the re:code effort, should be firmly grounded in an equity perspective. The Health Plan states that equity is a guiding principle throughout the General Plan. The principle directs the city to invest public resources on the basis of priority community needs. Decisions concerning the location and level of public investment necessary to meet citywide needs should be made in ways that do not unfairly impact any one single community.</p> <p>Many vulnerable Los Angeles communities that lack meaningful political power suffer from a disproportionate share of pollution from industrial uses, high-traffic highways, and a lack of parks. We urge that you use the zoning code to redress these critical environmental inequities. Certain LA neighborhoods are also severely underserved by healthcare professionals. Many low-income LA residents have not seen a doctor in years. Federally-Qualified Health Centers (FQHCs) have been able to address some of these grave access gaps. The zoning code should include measures to encourage and expand these uses.</p>
7. A Healthy City	56	182	Improve the community's health through greener, more resilient development.	Each new , adaptive or renovation should be required to lower electricity and water use and contain storm water runoff on the property even if it means eliminating the density and increasing the open space to accommodate water infiltration - require grey water infiltration on site.
7. A Healthy City	56	182	Improve the community's health through greener, more resilient development.	That's probably slightly too tough a rule, but the principle's a good one. More market-based solutions - like paying for infrastructure to deal with the pollution your development emits if you choose not to contain it onsite - should be considered.
7. A Healthy City	58	183	The zoning code, through its design standards, can create healthier places, with improved opportunities to walk, bike, and otherwise lead a healthy lifestyle.	In order to advance health equity, the zoning code needs to tackle the issue of industrial zoning abutting residential. It needs to designate truck routes and parking on commercial blvds, away from residential streets, and require better mitigation by industry type so that adjacent neighborhoods don't bear the brunt of the pollution burden. It also needs to ban oil extraction in residential neighborhoods. The negative public health impacts are too great to ignore. Lastly, more can be done to advance Open Space zoning in under-served areas.
7. A Healthy City	58	183	The zoning code, through its design standards, can create healthier places, with improved opportunities to walk, bike, and otherwise lead a healthy lifestyle.	Agree! In addition, the health impacts of residential and commercial displacement should not be overlooked. The zoning code can be a better tool to create healthy communities by establishing meaningful tools to protect affordable housing and economic opportunities for low-income residents.



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7. A Healthy City	59	184	Capture community opportunities-Foster a renewed, respectful River identity through watershed-sensitive design standards and land uses that help to strengthen neighborhoods.	As LAAMP rolls out, the City should implement strong anti-displacement policies so that existing residents can take advantage of this new amenity.
7. A Healthy City	59	184	Capture community opportunities-Foster a renewed, respectful River identity through watershed-sensitive design standards and land uses that help to strengthen neighborhoods.	If anti-displacement policies are coupled with targeted hiring programs, existing residents will have greater opportunities to enjoy the benefits of this investment.
7. A Healthy City	59	185	Capture community opportunities-Foster a renewed, respectful River identity through watershed-sensitive design standards and land uses that help to strengthen neighborhoods.	Certain areas along the river, where accessible by adequate transit, should be upzoned to allow more residents to live in close proximity to a walkable, (in-the-future) natural amenity.
7. A Healthy City	59	186	Capture community opportunities-Foster a renewed, respectful River identity through watershed-sensitive design standards and land uses that help to strengthen neighborhoods.	Improvements to the LA River might be a legitimate application for value capture, since improvements to the river will likely increase property values in the vicinity.
7. A Healthy City	59	186	The new zoning code must help the City implement the Master Plan, which encourages access to the LA River. As an initial step, the City has been hard at work on the River Improvement Overlay District (RIO).	Agree, but would this be possible without new state legislation?
7. A Healthy City	59	187	7.2. IMPLEMENT THE LA RIVER MASTER PLAN	LA River revitalization efforts should include provisions that allow local and disadvantaged residents to access employment opportunities, including construction and permanent jobs created by revitalization efforts.
7. A Healthy City	60	188	The new zoning code will be user-friendly and web-accessible, and the Planning Department's implementation of CEQA should follow suit.	Please establish clear thresholds for when various environmental reviews are triggered (EIRs, traffic studies, etc.) Seattle does this for unit court, square footage, etc. and it varies by zone & transit overlay.
7. A Healthy City	60	189	7.3. CEQA STREAMLINING AND IMPROVEMENTS	CEQA reform should encourage the use of mitigation-by-funding - paying for disruption to the community by giving it funds to reinvest in neighborhood infrastructure and amenities.
7. A Healthy City	60	190	Another idea is to use CEQA exemptions to accelerate implementation of new Community Plans and the zoning code.	YES! Strongly agree.
7. A Healthy City	61	191	Local food production options such as vertical gardening, front yard or parkway gardens, community gardens, farmers markets and other elements of urban agriculture.	Rooftop or other forms of urban gardening and greenhouse structures should be allowed (within limits) to exceed the underlying height limit of a zone, much like mechanical projections.
7. A Healthy City	61	192	7.4. REMOVE BARRIERS TO GREEN SOLUTIONS	Good! Please try to bring these ideas under building & safety. Currently you have to deal with DOT, Engineering, BOS etc... and its a disaster to try and do the right thing...
7. A Healthy City	61	192	7.4. REMOVE BARRIERS TO GREEN SOLUTIONS	How about removing the wings of space shuttle endeavor instead of cutting down 400 trees. That would have been a green solution.

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7. A Healthy City	61	192	7.4. REMOVE BARRIERS TO GREEN SOLUTIONS	Requiring tree replacement to be within the neighborhood is a good principle. While there may need to be exceptions - it would be nuts to put up more trees on Crenshaw when the light rail construction would require them to be replaced again within a couple years - it would defeat the point if developers could put trees in Bel Air to replace those they destroy in Watts.
7. A Healthy City	61	193	Remove barriers to new green approaches to energy production, stormwater management, landscaping and local food production.	The Zoning Code should preempt attempts by HOAs to block environmentally-friendly measures like distributed generation and line-drying clothes.
8. Code Delivery	62	194	8. CODE DELIVERY Ensure an open, transparent and responsive delivery and review process.	Please combine the Planning Department with Building and Safety Department to streamline and enhance code and enforcement.
8. Code Delivery	64	195	8.1. DEVELOP CLEAR AND TRANSPARENT REVIEW PROCEDURES	Clear and transparent procedures are absolutely necessary if we want to make LA affordable. In order for small-scale low-rise and mid-rise projects to move forward, there must be certainty that conforming projects will be approved in a timely manner and not burdened with arbitrary costs or delays.
8. Code Delivery	64	195	8.1. DEVELOP CLEAR AND TRANSPARENT REVIEW PROCEDURES	Strongly agree. Uncertainty kills investment. The city should reach out to groups that provide capital for development to see what criteria they use in assessing the regulatory climate in a city, and attempt to implement rules and procedures that maximize the city's ability to attract investment. This is particularly important in areas historically deprived of investment through redlining, like Watts or Boyle Heights.
8. Code Delivery	64	196	Neighborhoods would spend less time influencing specific applications, engaged instead up front in crafting clear, predictable standards that implement community planning policy.	Los Angeles is a City "in flux." Neighborhoods should never be disallowed input in decision making. A neighborhood's "well being" should never be sacrificed for the benefit of new construction.
8. Code Delivery	64	197	Although variations, adjustments and slight modifications should be considered carefully, some of these deviations have become standardized and almost automatic, simply because the current code is out of date and does not reflect desired development patterns.	If the neighborhood does not believe that a "development pattern" is "desired", then the neighborhood's participation in public hearings should not be eliminated for the sake of "quickly" processing of development applications.
8. Code Delivery	64	198	length of time to reach final decisions on even simple permits is daunting.	Nevertheless, the goal is not to "rubber stamp" development projects. The public shall be ensured the right to protest all development which adversely impacts a neighborhood's residential nature. All public hearings which have been available to the public before, including all appeals, shall remain in place.
8. Code Delivery	64	199	length of time to reach final decisions on even simple permits is daunting.	Clear and predictable timelines need to include maximum periods for review and/or appeal. These should be reasonable enough to allow for adequate review and comment, but chronic under-staffing and repeated appeals to drag out the process should not be the reasons projects aren't approved or completed.

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8. Code Delivery	64	200	Community Plans, Specific Plans, overlay districts, and rezoning conditions (Q's, T's, and D's) not only add to the development standards that must be met, but often also require extra layers of review.	The review process shall not become a process of "rubber stamping" development projects.
8. Code Delivery	65	201	Applicants that comply with the standards and agree to the standardized conditions of approval should be rewarded with a by-right approval, while applicants seeking to deviate should still proceed through a thoughtful, public review process.	However, there can be no "by right" approval in areas of the City where preservation plans and specific plans exist. In these situations, public hearings are mandated and necessary.
8. Code Delivery	66	202	Create a full series of new, innovative and flexible zones that allow the City to effectively implement both current and future Community Plans.	Strengthen do not de-facto eliminate the R-1 zone.
8. Code Delivery	66	203	If each floor of a new residential building is 5,000 square feet in area, does it really matter whether each floor contains two 2,500 square foot units or four 1,250 square foot units?	Yes! and they wonder why the lack of rentable units in LA...
8. Code Delivery	66	203	If each floor of a new residential building is 5,000 square feet in area, does it really matter whether each floor contains two 2,500 square foot units or four 1,250 square foot units?	Seconded.
8. Code Delivery	66	203	If each floor of a new residential building is 5,000 square feet in area, does it really matter whether each floor contains two 2,500 square foot units or four 1,250 square foot units?	Seconded (again).
8. Code Delivery	66	203	If each floor of a new residential building is 5,000 square feet in area, does it really matter whether each floor contains two 2,500 square foot units or four 1,250 square foot units?	Thirded (fourthed?)
8. Code Delivery	67	204	Page Layout. Generous use of white space, elegant font selection and prominent titles also add to the document's usability.	Agree. For online versions, cross-references and defined terms should be hyperlinked.
8. Code Delivery	67	205	Tables and Graphics. The existing zoning code makes limited use of tables and graphics.	This is a must and the incorporation of tables would go a long way to simplify verbiage of the code.
8. Code Delivery	68	206	The system will also allow users to start in ZIMAS, the City's property mapping system, with a specific property, and then link back to the zoning code.	ZIMAS is starting to look a little dated. Might be worth taking this opportunity to modernize it. Also, ZIMAS data should be available in an easily-exportable format so it can be analyzed and combined with other data to produce insights - e.g., combining with transit ridership data to see where to site a new rapid bus line, or seeing whether areas have particularly high levels of crowded housing that may suggest that it is time to upzone.

Section	Section Page	Report Order	Report Text	Comment
8. Code Delivery	68	207	8.4. PROVIDE A USER-FRIENDLY AND ACCESSIBLE CODE Offer the code in a variety of formats, focusing on a dynamic, web-based code system.	The entire code must be freely available to citizens. There has been a disturbing trend in modern regulation to incorporate by reference commercial standards that cannot be read for free by people who don't have hundreds or even thousands of dollars to license a copy of the commercial standard. The Zoning Code - and other related regulatory standards - must make sure that everything is available to the public at no cost.
9. Summary of Recommendations	70	208	The following table provides a summary of actions that are intended to occur during as part re:code LA, during parallel efforts by the Planning Department or other City Departments, and in future efforts that are neither funded or scheduled.	And Fire Department. LAFD standards often contradict with and overrule LADBS and LACP standards.
9. Summary of Recommendations	70	208	The following table provides a summary of actions that are intended to occur during as part re:code LA, during parallel efforts by the Planning Department or other City Departments, and in future efforts that are neither funded or scheduled.	Herein lies an inherent problem. "parallel" efforts by Planning Department. Before going much further please combine Building and Safety Dept. with Planning Department.
9. Summary of Recommendations	70	209	1.2 Continue to Protect Historic Resources and Established Neighborhoods	How are Specific Plans considered as a fit?
9. Summary of Recommendations	70	210	Update short-term rental policy	R-1 zones do not allow for short-term rental policy. This needs to be upheld, otherwise it's no longer a neighborhood, but a linear hotel.
9. Summary of Recommendations	70	211	Replace Parking (P) Zone using conversion based on zone for associated building	Removing P as a zone is a good idea. Too many areas have too much surface parking already, and having P zones just raises further barriers to redevelopment into something more useful.
9. Summary of Recommendations	70	211	Replace Parking (P) Zone using conversion based on zone for associated building	I would like to see what the new transition standards are, and how solid they will be. The old standards are commonly erased by variances that are approved.
9. Summary of Recommendations	71	212	Expand bonus and incentive provisions for affordable units within walking distance of transit	beware density bonuses that destroy true affordable housing <a href="http://argonautnews.com/westsiders-rally-to-change-state-density-bonus-law/">http://argonautnews.com/westsiders-rally-to-change-state-density-bonus-law/</a>
9. Summary of Recommendations	71	213	Apply new zones	If applying new zones can't be done as part of this process, can clear timelines be established for applying and updating the Community Plans?
9. Summary of Recommendations	71	214	Add standards for small lot subdivisions based on recent guidelines	Today, variances don't mean something's wrong - the code is too outdated, so variances are necessary. As for the rest, overly thin walls can be dealt with through building standards rather than by prohibiting terraced or semi-detached small lots projects.

Section	Section Page	Report Order	Report Text	Comment
9. Summary of Recommendations	71	214	Add standards for small lot subdivisions based on recent guidelines	The case studies shown for small-lot development contained numerous "variances". Seems like there needed to be so many exemptions and variances to do this. That tells me that it just might be a little too dense for parts of LA. Do you really want to be able to hear all your neighbor's bodily noises? How would you maintain the side of your home if there were only a 2 foot separation?
9. Summary of Recommendations	71	214	Add standards for small lot subdivisions based on recent guidelines	yes, please learn from the lesson in Venice...small lot subdivisions are destroying the community character. <a href="http://spiritofvenice.wordpress.com/2014/01/07/calling-for-a-moratorium-on-small-lot-subdivisions-mansionization-in-venice-ca/">http://spiritofvenice.wordpress.com/2014/01/07/calling-for-a-moratorium-on-small-lot-subdivisions-mansionization-in-venice-ca/</a>
9. Summary of Recommendations	71	215	Allow micro-units Downtown	Should be considered in other urban centers along rail lines as well.
9. Summary of Recommendations	71	216	3.2. Require Enhanced Walkability and Form Standards	Should be considered in certain urban centers along rail lines as well.
9. Summary of Recommendations	71	217	Add new building form standards that encourage pedestrian activity	Yes, add new building standards to encourage pedestrian activity, and eliminate counting private balconies as "outdoor open space" when developments are vetted.
9. Summary of Recommendations	71	217	Add new building form standards that encourage pedestrian activity	Agree. But make sure that open space requirements are decoupled and can be provided off-site - I'd far rather have a real park than a nominally open roof terrace half a mile in the sky.
9. Summary of Recommendations	72	218	3.4. Provide Enhanced Standards for Landscaping	More trees and drought tolerant landscape.
9. Summary of Recommendations	72	218	3.4. Provide Enhanced Standards for Landscaping	Yes. But make sure the trees aren't the kind that destroy sidewalks. Also, adopting standards that incentivize private developers to deal with their own runoff/pollution should be a high priority.
9. Summary of Recommendations	72	219	3.5. Integrate Sign Types and Design Standards within the New Zoning	No more digital billboards. They are an unsafe distraction to drivers along streets and roadways, ugly, and a waste of electricity.
9. Summary of Recommendations	72	220	3.6. Consider Improved Options for Design Review	Consider eliminating Design Review.
9. Summary of Recommendations	72	221	4. Transportation Choice	The Zoning Code should take account of Metro's First Mile/Last Mile report, and should look to ways to implement it within the Code's framework. For example, TOD design should incorporate Metro's recommendations like mid-block paseos in long blocks; street design should favor raised continental crosswalks and clear, safe pathways to stations.
9. Summary of Recommendations	72	222	4.1. Rethink Zoning Around Transit Stations	Yes, re-think zoning around transit stations. allow for some measure of comfort= building setback, natural light, landscape, aesthetic design. What we don't need are gargantuan projects that benefit the private developer over the community as a whole.

Section	Section Page	Report Order	Report Text	Comment
9. Summary of Recommendations	72	222	4.1. Rethink Zoning Around Transit Stations	yes, nearby residents need a real voice in this. cities should not approve massive mixed use projects just because of their transit adjacency. ultimately this density will just result in less sun and more cars on road. look at the mess in santa monica with bergamot transit village plan!
9. Summary of Recommendations	72	222	4.1. Rethink Zoning Around Transit Stations	"The community as a whole" includes people priced out because of insufficient housing availability. TOD should be well-designed, but it's important that there not be too many regulatory barriers to convenient multi-family housing in the very location where it is most likely to decrease congestion. The alternative isn't no building - it's people commuting 60 miles by car from the Inland Empire.
9. Summary of Recommendations	73	223	Continue to apply industrial retention policy	Industrial and manufacturing zoning needs to be maintained. This is very important to LA.
9. Summary of Recommendations	73	223	Continue to apply industrial retention policy	If done in a smart way. Preserving industrial land for industries that aren't coming back is a waste of land, but careful scrutiny should distinguish the industrial land worth preserving from the industrial land that's a lost cause.
9. Summary of Recommendations	73	224	7.1. Implement the Plan for a Healthy Los Angeles Create citywide design standards that support healthy living	How about some more trees, and protection of trees from illegal cutting by merchants who feel their business signs are blocked.
9. Summary of Recommendations	74	225	8.1. Develop Clear and Transparent Review Procedures	City councilmembers should not be allowed to over-rule planning commission on private residential projects.
9. Summary of Recommendations	74	225	8.1. Develop Clear and Transparent Review Procedures	Disagree. Democracy requires oversight. Constraint through clear rules is better than disempowering the Council.

# Appendix C – Regional Forum Outreach Materials

## Project Banners



### WHAT ARE WE GOING TO ACCOMPLISH?

- + A new zoning code for Downtown and the rest of the City
- + Enhanced base zones that do a better job at preserving and enhancing district identities
- + A toolkit of new innovative and flexible zones that can be used for existing and future planning efforts
- + Improved standards for design, landscaping, lighting, signs and parking
- + Map changes for key portions of the City, including Downtown, other current Community Plan areas and in Transit Neighborhood Plan areas
- + A dynamic, web-based code that provides universal and user-friendly access to the new zoning code
- + A more open, balanced and predictable review and approval process

### HOW ARE WE GOING TO ACCOMPLISH IT?



### HOW LONG IS IT GOING TO TAKE?



To create livable communities, encourage sustainable development and foster economic vitality, we need a modern and user-friendly zoning code – we need to **re:code LA**

### CORE VALUES and STRATEGIES

- 1 DISTINCT NEIGHBORHOODS**  
+ Provide a clearer, more prescriptive approach to promoting and preserving neighborhood character
- 2 HOUSING AFFORDABILITY AND DIVERSITY**  
+ Expand housing options to provide for a more complete range of people and incomes
- 3 CENTERS AND CORRIDORS**  
+ Rethink commercial corridors and centers to focus on providing accessible and healthy environments to live, work, play, learn and thrive in
- 4 TRANSPORTATION CHOICE**  
+ Provide mobility choices that balance the needs and safety for all modes of transportation
- 5 JOBS AND INNOVATION**  
+ Retain jobs and attract industry to strengthen Los Angeles as a global center for employment and innovation
- 6 A STRONG CORE**  
+ Retool Downtown regulations to create a dense, livable pattern of development that supports a vibrant daytime and nighttime economy
- 7 A HEALTHY CITY**  
+ Improve the community's health through greener, more resilient development
- 8 CODE DELIVERY**  
+ Ensure an open, transparent and responsive delivery and review process





# One-Sheet Summary Handout of Code Evaluation

### WHAT ARE WE GOING TO ACCOMPLISH?

- + A new zoning code for Downtown and the rest of the City
- + Enhanced base zones that do a better job at preserving and enhancing district identities
- + A toolkit of new innovative and flexible zones that can be used for existing and future planning efforts
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- + Map changes for key portions of the City, including Downtown, other current Community Plan areas and in Transit Neighborhood Plan areas
- + A dynamic, web-based code that provides universal and user-friendly access to the new zoning code
- + A more open, balanced and predictable review and approval process

### HOW ARE WE GOING TO ACCOMPLISH IT?

Step 1. Develop an Outline for the New Zoning Code

Step 2. Review and Incorporate External Material into the New Zoning Code

Step 3. Consolidate Existing Zones and Their Overlays into Base Zones

Step 4. Draft New Zones to Implement Future Planning

Step 5. Prepare New Standards that Improve the Quality of Development

Step 6. Strategically Amend the Zoning Map

### HOW LONG IS IT GOING TO TAKE?

2014: Zoning Evaluation, project direction

2015: Downtown Zoning Code and beta Web-Based Code

2016: Citywide Zoning Code and final Web-Based Code

2017: Citywide Zoning Code Implementation



## CORE VALUES and STRATEGIES

### A New Zoning Code for a 21st Century Los Angeles

To create livable communities, encourage sustainable development, and foster economic vitality, we need a modern and user-friendly zoning code – we need to re:code LA




Visit our website at

recode.la



### 1. DISTINCT NEIGHBORHOODS

Provide a clearer, more prescriptive approach to promoting and preserving neighborhood character.

- + Combine the Existing Residential Requirements into a New System
- + Continue to Protect Historic Resources and Established Neighborhoods
- + Address Impacts within Single-Family Residential Neighborhoods
- + Enhance Multi-Family Design Standards
- + Improve the Transition Between Corridors and Neighborhoods
- + Retain the Rural Lifestyle

### 2. HOUSING AFFORDABILITY AND DIVERSITY

Expand housing options to provide for a more complete range of people and incomes.

- + Continue to Provide Incentives for Affordable Housing
- + Provide a More Prescriptive Set of Housing Options
- + Improve Regulations for Second Units
- + Enhance the Design of Small Lot Subdivisions
- + Remove Barriers to Micro-housing
- + Improve Options for Shared Housing Communities

### 3. CENTERS AND CORRIDORS

Rethink commercial corridors and centers to focus on providing accessible and healthy environments to live, work, play, learn and thrive in.

- + Improve Base Zoning Options for Commercial Corridors
- + Require Enhanced Walkability and Form Standards
- + Expand and Improve the Approach to Commercial Corners
- + Provide Enhanced Standards for Landscaping
- + Integrate Sign Types and Design Standards with the New Zoning
- + Consider Improved Options for Design Review

### 4. TRANSPORTATION CHOICE

Provide mobility choices that balance the needs and safety for all modes of transportation.

- + Rethink Zoning Around Transit Stations
- + Prepare a Comprehensive Set of Street and Block Standards
- + Rightsize the Code's Approach to Parking

### 5. JOBS AND INNOVATION

Retain jobs and attract industry to strengthen Los Angeles as a global center for employment and innovation.

- + Create Industrial Sanctuaries to Meet Future Employment Needs
- + Prepare New Industrial Zones to Implement Community Plans
- + Rezone Industrial Land Only Where Necessary
- + Enhance the Jobs Housing Balance

### 6. A STRONG CORE

Retool Downtown regulations to create a dense, livable pattern of development that supports a vibrant daytime and nighttime economy.

- + Make Downtown a More Complete Neighborhood
- + Revise the Adaptive Reuse Ordinance
- + Rethink the Transfer of Floor Area (TFAR)
- + Fix the Greater Downtown Housing Incentive Ordinance

### 7. A HEALTHY CITY

Improve the community's health through greener, more resilient development.

- + Implement the Plan for a Healthy Los Angeles
- + Implement the LA River Master Plan
- + CEQA Streamlining and Improvements
- + Remove Barriers to Green Solutions

### 8. CODE DELIVERY

Ensure an open, transparent and responsive delivery and review process.

- + Develop Clear and Transparent Review Procedures
- + Develop New Zones to Implement Current and Future Plans
- + Modernize the Look, Feel and Organization of the Code
- + Provide a User-Friendly and Accessible Code
- + Ensure Continued Maintenance and Upkeep of the Code

C-2



# Display Boards

## 1. DISTINCT NEIGHBORHOODS

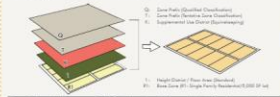
Provide a clearer, more prescriptive approach to promoting and preserving neighborhood character



Community Plans guide the physical development of neighborhoods by establishing the goals and policies for land use. In LA today there are 35 Community Plan areas.

### Combine the Existing Residential Requirements into a New System

Translate existing residential zones plus overlays into new base zones.



The intent of re:code LA is to simplify and clarify the existing zoning regulations. Each combination of base zoning, rezoning conditions and zoning overlays, results in a different (and unique) set of rules for property development.

### Continue to Protect Historic Resources and Established Neighborhoods

Consider adding neighborhood conservation districts, improving base zoning standards.



Angelino Heights is a small quarter within Echo Park. It is most notable for its historic Victorian era residences.

### Address Impacts within Single-Family Residential Neighborhoods

Unregulated group living arrangements, short-term rentals, eldercare facilities, and State licensed community care facilities are perceived as threats to single-family neighborhoods.

### Improve the Transition Between Corridors and Neighborhoods

Set standards for commercial and industrial development abutting residential areas.

### Enhance Multi-Family Design Standards

Ensure multi-family project quality, apply Baseline Mansionization and Hillside standards.



An example of a well-designed multi-family complex (JMK & Harvard). The re:code LA project provides an excellent opportunity to ensure that new multi-family can be a higher quality.

### Retain the Rural Lifestyle

Provide for the long-term viability of equine keeping and other unique uses in rural areas.



re:code LA provides an opportunity to improve the approach to animals in rural and suburban residential zones.

## 2. HOUSING AFFORDABILITY AND DIVERSITY

Expand housing options to provide for a more complete range of people and incomes



This bungalow court located near the intersection of Harvard and Martin Luther King is an example of just one of the unique housing options in LA.

### Continue to Provide Incentives for Affordable Housing

Keep providing a density bonus as well as reduced parking, lot width and setbacks for development that includes affordable housing.

### Provide a More Prescriptive Set of Housing Options

The zoning code should contain prescriptive standards for a more comprehensive menu of housing typologies.



### Improve Regulations for Second Units

New regulations for second units must be developed and incorporated into the zoning code.

### Enhance the Design of Small Lot Subdivisions

Revise the Small Lot Subdivision ordinance to require a higher level of design and improved compatibility with neighboring properties.



The Culver Street Art District Plan shows above-walk developed as three separate homes on three individual lots.

### Remove Barriers to Micro-housing

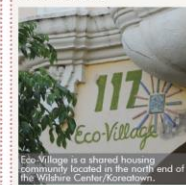
In areas with higher land values, such as near transit, micro-units help to provide an affordable housing option.



Micro-units have growing need: often in a space no greater than 300 square feet.

### Improve Options for Shared Housing Communities

Modify density restrictions for cohousing projects in specific zones.



Eco-Village is a shared housing community located in the north end of the Wilshire Center/Koreatown.



## 3. CENTERS AND CORRIDORS

Rethink commercial corridors and centers to focus on providing accessible and healthy environments to live, work, play, learn and thrive in



Wilshire Boulevard is not your typical commercial corridor. Running 15.83 miles from Grand Avenue in Downtown to Ocean Avenue in Santa Monica, Wilshire Boulevard is densely developed throughout most of its span. Many of the post-1956 skyscrapers are located along Wilshire.

### Improve Base Zoning Options for Commercial Corridors

New commercial zones must be developed that address the variety of character that exists today, but are flexible enough to grow with the needs of the City over time.



Under the current base zoning, car along Freeway in the same area along Van Nuys. In reality, the conditions in these two parts of the City are very different and therefore require a distinct set of rules.

### Require Enhanced Walkability and Form Standards

In order to create a mixed use, pedestrian-friendly environment with a balance of mobility options, the typical approach to zoning must be reconsidered.



Walking is encouraged by the right relationship between the building and the street, and by active ground-floor uses, street trees, and on-street parking.

### Expand and Improve the Approach to Commercial Corners

The mini-shopping centers and commercial corner development rules should be replaced with citywide standards that apply to all commercial development.



One of LA's many Mini-Shopping Centers featuring parking between the building and street, and the level setbacks required to attract vehicles, as opposed to pedestrian.

### Integrate Sign Types and Design Standards with the new zoning structure

Ensure that signs reinforce community character, while serving their business and communication objectives.



Iconic signs in Hollywood and the Downtown Core help to provide a sense of place.

### Provide Enhanced Standards for Landscaping

Improve the citywide landscaping standards to respond to LA's climate and provide standards for transitions.

### Consider Improved Options for Design Review

Clarify the authority for and applicability of existing design guidelines, enhancing their effectiveness; move standards to the zoning code.

## 4. TRANSPORTATION CHOICE

Provide mobility choices that balance the needs and safety for all modes of transportation



Many Angelenos spend a significant amount of their daily lives in traffic on the area's freeways and major arterials.

### Rethink Zoning Around Transit Stations

The new zoning code should contain tools to successfully implement transit-neighborhood planning efforts.



The LA region is poised to make a significant investment in public transit. A number of rail and bus line improvements are scheduled to be completed in the next 10 years. Major rail and rapid bus improvements currently programmed will enhance the ability of residents to get between home and jobs.

### Prepare a Comprehensive Set of Street and Block Standards

New street and block standards that enhance the link between transportation and land use must be included in the zoning code.



As LA re-stripes its streets, the City is taking the opportunity to include improved bike and pedestrian facilities. Digital graphic design tools provide the opportunity to illustrate what these sections in a realistic way.

### Rightsize the Code's Approach to Parking

Required parking can be a significant development constraint, and the new zoning code provides the opportunity to study and comprehensively fix the requirements.





## 5. JOBS AND INNOVATION

Retain jobs and attract industry to strengthen Los Angeles as a global center for employment and innovation



The Port of LA is a significant industrial presence, generating jobs and spin-off activity.

### Create Industrial Sanctuaries to Meet Future Employment Needs

Preserve job opportunities by revising the existing zones to help ensure available land for industrial, manufacturing and distribution purposes.



An example of poor screening and transition between industrial and residential uses.

### Prepare New Industrial Zones to Implement Community Plans

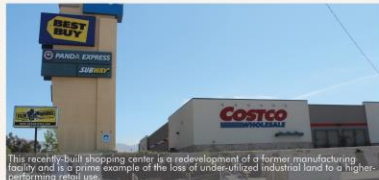
New industrial zones that reflect the changing needs and character of industrial areas are needed.



As some industrial areas start to allow for a broader range of recreational amenities will be needed, providing pedestrian-friendly sidewalks, on-site open space and on-street parking.

### Rezone Industrial Land Only Where Necessary

Rezone industrial land only where corrections are needed and where industrial land is designated as being in transition in a Community Plan or Specific Plan.



This recently built shopping center is a redevelopment of a former manufacturing facility and is a prime example of the loss of under-utilized industrial land to a higher performing retail use.

### Enhance the Jobs Housing Balance

Increase the number of jobs in close proximity to housing. There are many ways in which existing zones could allow more jobs close to housing:

- » Home Occupations
- » Live/Work
- » Business Incubator, Coworking
- » Mixed-Use Buildings

## 6. A STRONG CORE

Retool Downtown regulations to create a dense, livable pattern of development that supports a vibrant daytime and nighttime economy



Today, Downtown LA is a diverse residential neighborhood of some 50,000 people. During the day, an influx of workers swells the population to more than 200,000.

### Make Downtown a More Complete Neighborhood

Improve safe and convenient access to goods and services needed by Downtown residents on a daily or regular basis.



Kolphi at 9th and Hope is the only major grocery store in Downtown today. Apart from the State Historic City, there are limited options to actively exercise in downtown Downtown.

### Revise the Adaptive Reuse Ordinance

Allow for retrofitting of uses other than residential and hotel, expand the concept citywide.



The Historic Gas Company Lofts were originally used as offices by the Southern California Gas Company and were added to the National Register of Historic Places in 2004.

### Rethink the Transfer of Floor Area (TFAR)

Create true sending and receiving sites, rethink the public benefits desired.



The largest TFAR transfer involved the Central Library, with 206,000 square feet transferred to the US Bank tower.

### Fix the Greater Downtown Housing Incentive Ordinance

Reduce the number of competing incentive programs trying to generate affordable housing.



The Greater Downtown Housing Incentive Ordinance was established in 2007. The ordinance eliminates density, reduces parking and yield requirements, and allows for up to a 35% increase in floor area in exchange for the provision of affordable units.



## 7. A HEALTHY CITY

Improve the community's health through greener, more resilient development



The SYNThe Green Roof project in Downtown is planted with fruit trees, vines, herbs and vegetables.

### Implement the Plan for a Healthy Los Angeles

Support Plan for a Healthy Los Angeles policies that envision making the healthy choice the easiest choice throughout the City.



Walkability Index Map, one of many maps from the Health Atlas for the City of Los Angeles that should influence the new zoning code.

### Implement the LA River Master Plan

Ensure watershed-sensitive design and public access to the river in future development.



In January 2013, the LA river was designated a real river (not just an irrigation ditch), protecting it under the Clean Water Act and guaranteeing public access. Image on the right is one vision of a reimagined, accessible river.

### CEQA Streamlining and Improvements

Carry over the transparency of the new zoning code to CEQA implementation.

### Remove Barriers to Green Solutions

Remove barriers to new green approaches to energy production, stormwater management, landscaping and local food production.



Ron Finley's pathway garden caused a reconsideration of LA's rules.



## 8. CODE DELIVERY

Ensure an open, transparent and responsive delivery and review process



The re:code LA Listening Sessions provided excellent input regarding challenges with the existing zoning code.

### Develop Clear and Transparent Review Procedures

Provide for fair, predictable project review with effective public involvement as needed.

### Develop New Zones to Implement Current and Future Plans

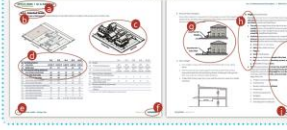
Create a full series of new, innovative and flexible zones that allow the City to effectively implement both current and future Community Plans.



Over the coming years, LA has the opportunity to replace old zones with a series of new innovative and flexible zones.

### Modernize the Look, Feel and Organization of the Code

Create a modern page layout that is intuitive and easy to use.



- 1 Running header
- 2 Prominent titles
- 3 Graphics and illustrations
- 4 Clean, easy to read tables convey information
- 5 Page numbers reference title
- 6 Adoption date
- 7 Graphics reinforce how to measure standards
- 8 Consistent numbering, indented paragraphs
- 9 Generous use of white space
- 10 Running footer

### Provide a User-Friendly and Accessible Code

Offer the code in a variety of formats, focusing on a dynamic, web-based code system. During drafting of the zoning code, [www.recode.la](http://www.recode.la) will offer the public an opportunity to comment on code drafts posted as the project moves forward.



### Ensure Continued Maintenance and Upkeep of the Code

Ensure the code can be easily amended as needed in the future, and that interpretations can be available along with the code text.



First adopted in 1946, the zoning code has grown from a simple, 84-page pamphlet to an unwieldy, 600+ page book.

