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COMMUNITY IMPACT STATEMENT: MASTER PLANNED DEVELOPMENT ZONES PROPOSAL Council File # 15-0128

April 28, 2015

The Greater Echo Park Elysian Neighborhood Council (GEPENC) Board of Governors, at a regular Brown-act noticed meeting dated February 24, 2015, voted 12-yes; 0-no; and 0-abstentions to support the letter of opposition to the Master Planned Development Zones proposal submitted by Strategic Actions for a Just Economy (SAJE) to the City Planning Commission on December 9, 2014. This letter, which is attached, is signed by 22 other local agencies, including Public Counsel.

GEPENC recognizes that many of the objections raised in that SAJE letter have since been resolved, and are no longer an issue with the most recent version of the MPD Zone proposal. Therefore, at a regular Brown act-noticed meeting dated March 24, 2015, the GEPENC Board of Governors voted 16-yes; 0-no; 0-abstentions to support issuing the following Community Impact Statement, which focuses on the outstanding issues that still need to be addressed with the MPD Zone proposal.

GEPENC is opposed to the MPD Zone proposal as it currently reads, and respectfully suggests that changes to this proposal, along the lines described below, would help ensure that MPD Zone projects only impact their surrounding communities in a positive manner, if this proposal is passed:

- I. Uphold and extend the value capture strategy built into the MPD Zone proposal by:**
- 1) barring industrial conversions from being assigned an R4 base density, and**
 - 2) making baseline community benefits part of every MPD project.**

Page 3 of the second Supplemental Report issued by the Department of City Planning (January 8, 2015) states that the MPD Zone would introduce "an innovative value capture strategy not currently in the code that requires an applicant to provide affordable housing in exchange for additional density and community benefits in exchange for additional nonresidential floor area." This is a worthy goal, and two changes to the proposal would prevent that goal from being undermined:

First, decision makers currently have the option to grant industrial conversions eligible for MPD Zone changes an R4 base density. If such conversions were instead only granted an R3 base density, which allows only half as many dwelling units to be built in the same amount of space, this creates a powerful incentive to utilize density bonus provisions. **We are concerned that any industrial conversions at all would result in the loss of quality local jobs.** However, if industrial conversions remain

eligible for MPD Zone changes, we hope that assigning them a lower base residential density will at least insure that the change in the use of this land will generate some community benefits.

Second, making **baseline community benefits** a requirement for every MPD project helps insure that these high-impact projects give back to their communities in a way that upholds one of the major goals of the MPD proposal, which is to produce a more streamlined, predictable and efficient process. As is cited by DCP in their recommendations to the CPC, it is hoped that this ordinance would carry out Economic Development Objective 7.4 of the Framework Element of the General Plan, to "expedite the administrative processing of development applications." (See page 1 of Attachment 1 on the CPC determination letter of February 3, 2015.) While it remains important to continue to negotiate benefits unique to each MPD project and its surrounding community, with a baseline benefits requirement in place, these negotiations are not starting at ground zero every time an MPD project is proposed. This reduces the amount of time and steps in the processing of such proposals, thereby resulting in a more efficient and streamlined process.

If there were a menu of potential benefits to guide discussions between developers and the community, less time would be spent on speculation, and more spent on actual negotiation during such discussions, as this menu could establish clear parameters about the kind of benefits that are on the table. This would help head off the kind of lengthy, overly diffuse discussions that are frustrating and unproductive for everyone.

II. Increase the opportunity for community input during the MPD application and review cycle by building it into the pre-application and Economic Study process:

In their recommendations to the City Planning Commission for the January 8, 2015 hearing on this matter, DCP states that one advantage of the MPD Zone is that it will make the entitlement process "more comprehensible to the public" (Page 1 of Attachment 1 to CPC determination letter dated February 3, 2015.)

As an advisory body dedicated to increasing the ability of the public to weigh in on local issues, our board supports this move toward increased transparency. However, opportunities for public review are not clearly delineated in the current version of the MPD proposal. Because of this, our board is deeply concerned that the MPD Zone proposal as it currently stands would diminish the public's prospects of commenting on these projects, which are of such scale and scope that they must necessarily have a profound impact on the surrounding communities.

There are at least two points in the application and review cycle where community feedback could be gathered. The first of these is during the pre-application process. Currently, the proposal requires that an applicant participate in a series of pre-application meetings with a variety of City offices, such as the Departments of Building and Safety; Housing; and City Planning. While the proposal does state that this is not an exhaustive list, we would still like to see local advisory bodies like the Neighborhood Councils built into the language of the proposal, as currently, all the offices listed as pre-application meeting candidates exist at the City level.

Another excellent point during the MPD application process to get community input is described in the letter submitted by Public Counsel and SAJE on December 9, 2014. That letter suggests that a project's Economic Study is made available for public review once the study is completed, but before the City Planning Commission makes any recommendations on the project.

III. Economic studies should be required for every MPD project; not just in special cases:

While we appreciate that a 4th special case has recently been added to the list of MPD project types requiring an economic study, we feel that it is unavoidable for projects of this scale - which can have the footprint and population of a small town - to have a significant economic impact on the surrounding community. As a result, we would like to see economic studies conducted for every MPD project proposal, along guidelines such as those suggested in the SAJE/Public Counsel letter on this matter dated December 9, 2014 (attached; see Appendix A of this letter.)

At the very least, if the MPD proposal continues to only require economic studies under the four conditions currently specified, we ask that an economic study be required for any project utilizing a density bonus, and not just for projects seeking density bonuses over 35%. In fact, this is what was suggested in an earlier version of the MPD proposal.

IV. Development Agreements should be required for every MPD project:

Given the scale of MPD projects and their ability to profoundly affect the communities around them, a Development Agreement should be a requirement for any and every MPD project; not just an option. Such requirements are not unheard-of in Southern California. As the SAJE/Public Counsel letter points out, the Santa Monica Land Use Circulation Element (LUCE) states that this type of an agreement is mandatory for projects over a certain size (for example, see page 12 of Santa Monica's LUCE, which states that projects over the by-right base height of 32 feet are automatically subject to a Development Agreement: <http://www.smgov.net/uploadedFiles/Departments/PCD/Plans/General-Plan/Land-Use-and-Circulation-Element.pdf>.) It can additionally be argued that a developer's decision to utilize the MPD zoning and process for a project will be a voluntary decision in the first place.

V. Develop a concrete plan to assess and mitigate the significant ability of MPD Zone projects to displace lower income households; jobs; and small local businesses:

While the CPC guidelines for MPD economic studies require that displacement be recognized in the case of industrial conversions, applicants are not required to formulate a concrete plan to mitigate the displacement unavoidably generated by projects of such massive scale. We would like to see the potential for displacement acknowledged in any and every MPD project's economic study, and a requirement set for each project to develop a detailed strategy to either eliminate or at least mitigate the disruptive impact of that project on local people; businesses; jobs; and quality of life. Addressing this issue could become a routine part of the MPD application process, if every project were subject to an Economic Study.

Respectfully,


Kwazi Mkrumah
President of the Greater Echo Park Elysian Neighborhood Council

December 9, 2014

Los Angeles City Planning Commission
President David H. Ambroz
Vice President Renee Dake Wilson
Commissioner Dana Perlman
Commissioner Robert L. Ahn
Commissioner Maria Cabildo
Commissioner Caroline Choe
Commissioner Richard Katz
Commissioner John W. Mack
Commissioner Marta Segura

Re: Master Planned Development Zone, CPC-2010-3315-CA
Community Recommendations

Dear Honorable Planning Commissioners,

We submit this letter as an update to the Planning Commission on the progress made between the community organizations signed on to this letter and the Department of City Planning (DCP) regarding the Proposed Master Planned Development Zone (MPD) Ordinance. We hold that planning for projects of the greatest scale and impact to our communities should be done in the most comprehensive manner possible, which is why community-based organizations have responded in short time to the proposed ordinance.

First and foremost, we want to express our gratitude to the Commission for recognizing the need for dialogue between staff and community- and faith-based groups, non-profit organizations, and affordable housing developers. On November 5, 2014, we met with DCP staff. During this meeting, we presented DCP staff with a chart outlining our main concerns with the Proposed MPD Ordinance as currently drafted and articulated specific ways we believe these concerns could be addressed.

We want to emphasize, however, that our organizations seriously question the appropriateness of an MPD Ordinance as the tool for regulating and processing what are intended to be the largest projects in the City of LA. We believe further serious thought and time is necessary to determine how best to ensure that large-scale development happens both efficiently and responsibly. The complexity of issues raised in our discussions with DCP and with various stakeholders highlight the need for more time to consider the best way to plan for major projects. Additionally, there are various policymaking processes currently underway that could inform any citywide effort to plan for major development projects. These include the Re:Code LA process and various motions from City Council directing the Housing and Community Investment Department (HCID) and the DCP to provide reports back to the Housing Committee of City Council on issues of direct relevance to this proposed ordinance.

For these reasons, we call upon the City Planning Commission to avoid piecemeal planning and not rush the MPD ordinance before considering its relationship to other major initiatives in a comprehensive manner.

That said, we also understand that at the present time what is before us to comment on is the proposed MPD Ordinance. Therefore, while our overall concerns with moving forward with any MPD ordinance remain, this letter is intended as a status update and largely reflects a summary of our communication with DCP Staff concerning the language of the ordinance as currently drafted. Six critical concerns with the Proposed MPD Ordinance are outlined for you below, and have been previously presented to staff.

We ask the Commission to not move the MPD ordinance forward until each of these concerns is addressed and reflected in the revised ordinance.

Integrate Meaningful Community Benefits & Process

The Proposed MPD Ordinance lacks a mechanism for ensuring meaningful community benefits are included in all MPD projects. This is a missed opportunity for the City to implement real value capture policy. MPD developments are, by definition, the largest projects in the City, and as such, will have the greatest impacts on the communities they come into. Therefore, a provision for meaningful community benefits – and a meaningful community input process – is a necessary component. These baseline community benefits should be the starting point for all MPD projects, and should not limit or restrict any additional benefits or mitigation measures that may be determined to be appropriate for individual projects.

All MPD projects, given the size, impact and discretionary nature of the approval, should be required to utilize a Development Agreement.¹ All MPD projects should also be subject to a clearly established and meaningful community input process. Finally, given the significant impacts and value associated with an MPD project, there should be a more substantial affordability component built into the ordinance. Referencing already-existing density bonus law is not sufficient. There are a number of forms such an affordability provision can take. We have included a list of potential approaches below and are interested in exploring which ones would be most appropriate in this context, in addition to ways in which community input can be formally integrated into project review. Many of our organizations have significant experience drafting policies and provisions related to these approaches and we are interested in working with staff to explore which ones would be most appropriate in this context.

- On-site affordable housing requirement for all MPD projects that include a direct financial contribution or any other forms of assistance specified in Chapter 4.3 of Division 1 of Title 7 of the Government Code, including any concessions that

¹ See, e.g., the Santa Monica LUCE, where projects of a certain size are required to enter into Development Agreements.

result in identifiable, financially sufficient and actual cost reductions.²

- Affordable Housing Benefit Fee³
- Menu of benefits – in addition to universal affordability provision

We have clearly expressed to DCP Staff, and we wish to reiterate here, that the inclusion of a baseline provision of meaningful community benefits is an absolute necessity from our perspective. Although we outline additional concerns with the existing framework below, any changes and amendments that address the following concerns *must* also be paired with a strong vehicle for meaningful community benefits.

Require Economic Study for All MPD Projects

The Proposed MPD Ordinance would require an Economic Study in three limited situations: 1) where the developer requests a Development Agreement; 2) where the developer seeks a Density Bonus; and 3) where the development involves conversion from Industrially-zoned property to the new, proposed MPD zone. As stated above, MPD projects are by definition the largest developments in the City, and thus, will create some level of economic impact on the surrounding neighborhood and market. It is the sheer size and magnitude of an MPD Project - not some other factor like use of a density bonus or a Development Agreement - that brings about the need for a meaningful analysis of economic impacts. Thus, the Economic Study should be a required component of all MPD project applications.

We also expressed our concern with the lack of specifics or direction concerning the Economic Study provision. Staff indicated that they are currently working on Draft Guidelines that would spell out in greater detail the contents, procedure and process for evaluating an Economic Study. Staff invited us to provide recommendations for these Guidelines. After several conversations with our community partners, we then carefully drafted and submitted to Staff a detailed memorandum on November 21, 2014. This memo includes specific recommendations regarding the Economic Study Guidelines, and further articulates our other major concerns. (*see* Attachment A). The provisions included in Attachment A should be incorporated into the Economic Study Guidelines and govern the contents of the Study.

To ensure no MPD project will contribute to significant displacement pressure, the City Planning Commission should hold a public hearing, with proper notice, to consider and discuss the Economic Study and the project, and to permit the project applicants, Economic Study consultants and the public to comment on the Economic Study and the proposed project. This hearing should be held prior to any hearing in which the City Planning Commission makes a recommendation. An MPD project may not be approved unless the

² Any on-site requirement could be drafted, as proposed above, to fit squarely within the Costa Hawkins exception. See Cal. Civ. Code 1954.52(b).

³ The 2011 Affordable Housing Benefit Fee Study, commissioned and underwritten by the City of Los Angeles and prepared by Economic Roundtable could serve as the basis for such a fee program.

City can make certain findings,⁴ on the basis of the Economic Study and any other available information in the public record. Possible required findings include the following:

- a. The MPD will not adversely affect the City's small businesses;
- b. The MPD will result in a net gain of housing affordable to and occupied by lower-income households on site; and
- c. The MPD will not adversely affect the supply of housing units that are affordable to or occupied by lower-income households within the Impact Area.

Prevent Displacement of lower income households and community serving businesses

MPD projects have enormous potential for displacement of lower income residents. This includes the physical destruction of affordable housing on-site, as well as catalyzing the displacement of lower-income residents in the surrounding community. Likewise, MPD projects threaten the economic displacement of community serving small businesses and important cultural and community assets. This potential is neither acknowledged nor addressed in the current draft. In fact, the draft MPD ordinance actually requires a developer to submit certain sub-plans - including a Circulation Plan and a Landscape Plan - as part of the Development Plan and Standards, and yet there is absolutely no requirement to meaningfully account for any displacement impacts. At a minimum, a developer should submit a comprehensive plan that identifies specific strategies to mitigate or eliminate the physical and/or economic displacement of lower-income residents, small businesses and employment opportunities, both on-site and in the surrounding neighborhood. All MPD projects, not just those that utilize a density bonus, should result in no-net-loss of affordable housing.⁵

Protect Quality Jobs

The potential loss of quality industrial jobs as a result of an MPD zone change is not adequately addressed in the current proposed MPD Ordinance. Currently, the Ordinance states that "[i]t is the City's policy to retain industrial land for job producing uses wherever viable or appropriate. Use of industrial land for uses that are not job producing may be approved only if there is no net loss of existing nonresidential floor area on the site."⁶ While we support this general policy, we do not think this language is comprehensive enough. We raised this issue with DCP but it remained unresolved at our meeting. After continued thought and analysis we believe the most appropriate solution

⁴ We believe that an Economic Study should be a meaningful tool to evaluate the impacts of projects and ensure that only those projects that benefit the community will be eligible. To this end, we would like to continue discussing the ability to establish findings that the City would make on the basis of the Economic Study.

⁵ Specifically, we urge the City to consider options to apply the replacement framework contained in AB 2222 to all large-scale projects that result in a zone change.

⁶ October 9, 2014 Department of City Planning Supplemental Recommendation Report, Project CPC-2010-3315-CA, A-7.

would be to eliminate industrial conversions altogether as eligible for an MPD zone change. This recommendation would then eliminate the need to address our fifth – and next – concern below.

Avoid Undermining the Density Bonus in Industrial Conversion Projects

While we support incentivizing use of the Density Bonus Ordinance for industrial conversion projects, there are serious challenges with implementing such a policy within the proposed MPD framework. Most problematic is that, as currently drafted, the MPD ordinance grants the decision-maker the discretion to set the base density for an industrial conversion at R4 density.⁷ It is unlikely that any MPD project would ever seek a density bonus if automatically granted a change from industrial to R4. By permitting a higher base density for industrial conversions, the MPD ordinance would dramatically increase the residential density permitted on a site without any affordability component, thereby undermining the Density Bonus Ordinance. This plainly violates the General Plan's Housing Element.⁸ Starting with such a high base density for industrial conversions is also inconsistent with the Industrial Land Use Policy Staff Directive, which calls for the inclusion of community benefits—including affordable housing—in projects that involve an industrial conversion.⁹

If industrial conversion projects are included in the MPD ordinance, they should be subject to a base density, and increases in density should be achieved through compliance with state density bonus law. But this will simply not work if the base density is set at R4. While elimination of the R4 base density option could potentially address this concern, as articulated above, there are other reasons (i.e., the need to adequately protect quality industrial jobs) supporting the elimination of industrial conversions altogether from MPD zone changes. Therefore, a more comprehensive solution to both concerns would be to remove industrially zoned land as eligible for an MPD zone change.

Relationship to Other Zoning Regulations

⁷ When originally presented to the Planning Commission on July 24, 2014, the draft MPD ordinance did not allow a base R4 density. Instead, it established that dwelling units may be approved for those portions of the development site currently zoned industrial, subject to a base density of the R3 zone minimum lot area. Any increases in residential density above R3 were described as being permitted only with the use of a density bonus. Since then, the MPD ordinance was revised to grant the decision-maker the discretion to set the base density for an industrial conversion at the higher R4 density. It is unclear why this change was made. But as described above, the change contravenes the intent behind setting a base density for industrial conversion projects and improperly undermines the state and local density bonus program.

⁸ City of Los Angeles Housing Element, Program 73 (“When building envelopes are increased, take care not to undermine the density bonus program.”); Program 101 (“Take care to not undermine the density bonus program by providing significant land-use incentives without an affordable housing provision.”)

⁹ January 3, 2008 Memorandum from Gail Goldberg, Director of Planning and Cecilia Estolano, Chief Executive Officer, Community Redevelopment Agency, to Department of City Planning Staff and Community Redevelopment Agency Staff, re: staff direction regarding industrial land use and potential conversion to residential or other uses, 8.

Absent a citywide policy on affordable housing, communities have successfully advocated for affordable housing policies in various land use planning documents governing development in the City. Recognizing past – and the likelihood of future – efforts to ensure production of affordable housing in communities throughout Los Angeles, it is critical that the Proposed MPD Ordinance enhances rather than undermines such policies. Therefore, if an MPD project is proposed on a site (or sites) that is subject to any affordable housing incentive programs contained in any Specific Plan, Community Plan, Community Plan Implementation Overlay, Transit Neighborhood/Station Area Plan, any Citywide TOD ordinance or other land use tool, the provisions resulting in the greatest number of affordable housing units at the deepest level of affordability shall prevail.

We look forward to continuing to work with DCP staff to ensure that the City's policies protect and benefit the communities most impacted by large-scale development projects. **Again, we ask the Commission to not move the MPD ordinance forward until each of these concerns is addressed and reflected in the revised ordinance.**

Sincerely,

All Peoples Community Center

Asian Pacific Islander Obesity Prevention Alliance

Community Development Technologies Center (CDTech)

Esperanza Community Housing Corporation

Inquilinos Unidos

Koreatown Immigrant Workers Alliance (KIWA)

LA Human Right to Housing Collective

LA-Mas

Little Tokyo Service Center

Los Angeles Community Action Network

People Organized for Westside Renewal (POWER)

Physicians for Social Responsibility-LA

Public Counsel

St. Agnes Church

St. Francis Center

Southeast Asian Community Alliance

Southern California Association of Non-Profit Housing (SCANPH)

Strategic Actions for a Just Economy (SAJE)

Tenemos que Reclamar y Unidos Salvar la Tierra-South LA (T.R.U.S.T. South LA)

Thai Community Development Center

Venice Community Housing Corporation

Women Organizing Resources, Knowledge and Services (WORKS)

ATTACHMENT A

Proposed CPC Guidelines

City of Los Angeles Guidelines for the Preparation and Review of an Economic Study for Master Planned Development Applications

1. Purpose of the Economic Study

The Los Angeles City Planning Commission hereby establishes this policy and procedure for the preparation, review and use of an Economic Study for applications for a Master Planned Development zone. The purpose of the Economic Study is to provide a thorough evaluation of the economic and social consequences of the proposed project. Such evaluation, together with all other available information in the public record, including information received before or at a public hearing, is intended to help the decision-making body, local residents and community stakeholders to assess whether a proposed MPD project will benefit or adversely affect the City's economic viability and the social health and welfare of [the Impact Area, defined as a three mile radius around the proposed site.]

Economic Studies may also be used as appropriate by the City Council, the City Planning Commission, and City Staff to assist in the negotiation and consideration of development agreements and/or direct assistance for eligible projects.

2. Covered Projects

All applicants for a Master Planned Development zone, as defined in Section 12.03 of the Los Angeles Municipal Code, must prepare and submit an Economic Study to the City for consideration in accordance with Section 12.04.10.B.5 of the Los Angeles Municipal Code.

3. Costs and Preparation of Economic Study

Applicants for an MPD zone shall be responsible for all costs associated with the preparation, administration and processing of the Economic Study, including the cost of consulting services, noticing, and any subsequent analysis required by the City. Consultants preparing Economic Studies must be designated or approved by the City Planning Commission.

4. Contents of the Economic Study

Economic Studies must analyze and discuss each of the following factors in sufficient detail to assist City officials, local residents and bodies responsible for project review and entitlement determinations in assessing whether the proposed MPD project, after consideration of all economic benefits and costs, will materially benefit or adversely affect the City's economic viability and the social health and welfare of the Impact

Area, defined as a three mile radius around the proposed site.

For each factor listed below, the Economic Study should analyze project impacts within a three mile radius for a five year period from the date of application. Economic Studies may analyze and discuss, in addition to the following factors, any additional factors or information an applicant deems important or relevant for a meaningful assessment of the project's economic impact.

- d. The economic impacts, including increased land values on site or within the defined Impact Area, resulting from any proposed change of allowed uses or intensity of uses permitted on the site;
- e. For the conversion of property zoned MR1, M1, MR2, M2, or M3 to a project containing residential use, consistency with the underlying policies and applicable provisions of the City's Industrial Land Use Policy, including those provisions included in the 2008 Memorandum and Staff Directive concerning Community Benefits;
- f. Whether the proposed project would require the demolition of housing, or any other action or change that results in a decrease of housing on site that is affordable to or occupied by Extremely Low-, Very Low-, or Low-income households. For purposes of determining this impact, the applicant must identify whether the site includes housing units that are, or if the dwelling units have been vacated or demolished in the five-year period preceding the application, have been: (1) subject to a recorded covenant, ordinance or law that restricts rents to levels affordable to persons and families of Extremely Low-, Very Low-, or Low-income; (2) subject to any other form of rent or price control; or (3) occupied by Extremely Low-, Very Low-, or Low-income households.
- g. Whether the proposed project would contribute to a decrease in housing units affordable to or occupied by lower-income residents on site or in the defined Impact Area, or otherwise result in the physical or economic displacement of any lower-income residents on site or in the defined Impact Area. For purposes of determining this impact, the applicant must undertake a market analysis of existing housing stock and potential revaluations or other displacement pressures to which the proposed project would contribute.
- h. Whether the proposed project would contribute to a decrease in the number of businesses or the affordability of commercial space or otherwise result in the physical or economic displacement of any businesses on-site or in the defined Impact Area, specifying the nature of any resulting displacement;
- i. Whether the proposed project would result in the destruction or demolition of, or strain the capacity of any park or other green space, playground, childcare facility or community center;
- j. Whether the proposed project would displace jobs on the site or provide economic revitalization and/or job creation. For purposes of determining this impact, the applicant must identify (i) the number, sector, and type of jobs

displaced and created, including construction related, permanent, part-time and full-time; (ii) whether the proposed project will result in significantly increased or decreased permanent part-time jobs (35 hours or less per week) or permanent full-time jobs (more than 35 hours per week) compared to applicable local or regional employment projections; (iii) estimated employee wages, benefits and employer contributions, compared with relevant data for the City of Los Angeles, such as living wages established in the Los Angeles Municipal Code or other occupational wage data;

- k. Project setting, including relevant population, housing and economic trends and community amenities in the 3-mile radius of the project site. This shall include but not be limited to total population; population by age; vacancy rate; total number of households; households by tenure; average household size; renter households by number of persons in the household; poverty rates; median household income; number of affordable housing units; major employers; employment by industry sector; commute mode and time for residents and employees; historical unemployment rate for the last ten years compared to the County; availability of affordable housing for employees of businesses in the area; and community amenities in the area, including transit stations, schools, parks, libraries, medical clinics, and full scale grocery stores/supermarkets of at least 25,000 gross interior square feet or neighborhood markets of 5,000 gross interior square feet where staples, fresh meat, and fresh produce are sold.
- l. Any measures proposed to mitigate any adverse economic or social impacts identified in the Economic Study.
- m. Any other information or analysis required by the Director of Planning.

5. Notice of Availability and Public Review

The Economic Study must be completed and submitted for public review prior to the first public hearing. Upon submission, the Director of Planning shall review the Economic Study for completeness with respect to the factors enumerated at Section 12.04.10.B.4 of the Los Angeles Municipal Code. The director shall not accept the submission of any incomplete Economic Study. Upon receipt of the completed Economic Study, the Department of City Planning must provide a public notice of its completion and availability for public review. The notice must be provided by mail to all property owners within 1,000 feet of the project site and to all others that have requested such a notice in writing. The notice should also be provided on the Department of City Planning website. The notice should also contain the time and place of the first public hearing for the project, if such information is available. These procedures concerning a Notice of Availability for the Economic Study are in addition to all other notice requirements for public hearings, including the provisions of Los Angeles Municipal Code section 12.32.C.4.

The City shall provide for public review of the Economic Study on the same timeline as the public review and comment period for the project Environmental Impact Report. But

in no event shall a public hearing be held until the Economic Study has been available for public review for at least [XX] days.

6. Economic Study Hearing

Before the City Planning Commission makes a recommendation on any MPD application, the City Planning Commission will hold a public hearing, with proper notice, to consider and discuss the Economic Study and the project, and to permit the project applicants, Economic Study consultants and the public to comment on the Economic Study and the proposed project. The purpose of the Economic Study hearing is to have a public discussion of the proposed project's impacts and mitigation proposals before any land use entitlements are granted. If the City Planning Commission determines, as a result of staff review, public comments at the Economic Study hearing, or otherwise, that the Economic Study is incomplete, inaccurate, or otherwise inadequate, the Commission may require the applicant to submit a revised Economic Study before taking further action on the proposal.