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CITY PLANNING**

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October 29, 2021

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

Attention: PLUM Committee

Dear Honorable Members:

GENERAL PLAN HOUSING ELEMENT UPDATE FOR THE PERIOD 2021-2029; CPC-2020-1365-GPA, ENV-2020-6762-EIR; CF 21-1230

On October 21, 2021 the Department of City Planning transmitted recommended actions and documents for a General Plan Amendment to the Housing Element. On October 26 a correction to Exhibit B was transmitted to correct for a graphic formatting error which resulted in text being cut off for the Policies under Objective 3.2. On October 29 additional modifications as requested by the City Planning Commission to Exhibit B were transmitted for your consideration. Therefore, the recommended action has been revised below.

RECOMMENDATION:

That the Planning and Land Use Management Committee:

1. Adopt the Findings in Attachment 2 of the City Planning Commission Report relative to the General Plan amendments; and
2. Adopt the Resolution in Attachment 3, to amend the Housing Element of the General Plan as shown in Exhibit B, as provided in supplemental transmittal to the Council File dated 10/26/2021 and revised in supplemental transmittal dated 10/29/2021; and as modified by the City Planning Commission in Attachment 1, in accordance with City Charter Section 555 and LAMC Section 11.5.6.; and
3. Adopt the Resolution in Attachment 4 to certify the EIR, adopt EIR Findings and a Statement of Overriding Considerations, and adopt a Mitigation Monitoring Program; or in the alternative, if the Resolution to certify the EIR has been adopted in a prior action by the City Council and the Housing Element Update and/or the Safety Element Update and/or the Health Element Update has been approved, find, as applicable, that the Housing Element Update and/or the Safety

PLUM Committee

CF 21-1230

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Element Update and/or the Health Element Update, was considered in the EIR and pursuant to CEQA Guidelines Sections 15162 and 15164, no subsequent EIR or supplemental EIR, or addendum is required.

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning



Nicholas Maricich

Principal City Planner

VPB: AV: nm: mg: bs

Enclosures

Correction to Exhibit B Dated 10/29/21



Department of City Planning

City Hall, 200 N. Spring Street, Room 525, Los Angeles, CA 90012

October 29, 2021

TO: Planning and Land Use Management Committee

FROM: Matthew Glesne, Senior City Planner

CORRECTION TO EXHIBIT B FOR COUNCIL FILE 21- 1230; CASE NO. CPC-2020-1365-GPA, ENV-2020-6762-EIR

The following corrections are to be incorporated into the proposed Housing Element (Exhibit B of the staff recommendation report, as reflected in the supplemental transmittal submitted on October 26, 2021) as recommended by the City Planning Commission (CPC) on October 14, 2021. The CPC directed Staff to revise analysis, reflected in Tables 4.32 through 4.37 and accompanying text in Chapter 4, and in Tables 4A-10 through 4A-21 in Appendix 4.4, to reflect edits to Inventory of Candidate Sites for Rezoning. The CPC also directed staff to revise Table 4.6 as well as any relevant text and table references in Chapter 4 and related appendices where these numbers are cited. Consistent with this recommendation the following **revisions** to Exhibit B dated should be incorporated:

Table 4.32

Rezoning Analysis: Summary of Census Tracts by Assigned Category, Total Rezoned Development Potential			
Census Tract Category	Total Rezoned Development Potential	Percent of Total City Census Tracts	Percent of Total Rezoned Development Potential
Lowest Capacity Neighborhoods	0 - 50	19%	0.2%
Lower Capacity Neighborhoods	51 - 500	31%	<u>54%</u>
Moderate Capacity Neighborhoods	501 - 1,500	21%	11%

Higher Capacity Neighborhoods	1,501 - 5,000	21%	35%
Highest Capacity Neighborhoods	5,001+	8%	49%

Table 4.33

Rezoning Analysis: Tenure and Median Household Income of Neighborhoods Identified in Rezoning Inventory, Total Rezoned Development Potential				
Census Tract Category	Percent Renter Households	Median Household Income	Median Household Income - Renter Households	Percent Low/Moderate-Income Households
Citywide Average	63%	\$64,065	\$50,404	61%
Lowest Capacity Neighborhoods	<u>73</u> 68%	<u>\$49,768</u> 60,965	<u>\$40,910</u> 7,828	<u>71</u> 66%
Lower Capacity Neighborhoods	<u>61</u> 3%	<u>\$62,745</u> 54,494	<u>\$48,862</u> 2,663	<u>65</u> 9%
Moderate Capacity Neighborhoods	<u>64</u> 3%	<u>\$65,178</u> 67,631	<u>\$51,945</u> 54,205	<u>60</u> 58%
Higher Capacity Neighborhoods	<u>60</u> 2%	<u>\$71,452</u> 0,276	<u>\$56,176</u> 55,924	<u>54</u> 5%
Highest Capacity Neighborhoods	60%	<u>\$84,539</u> 3,332	<u>\$63,748</u> 178	46%

Source: US Census Bureau; American Community Survey; 2019 ACS 5-Year Estimates.

Exhibit B - Page 206: Race/Ethnicity

Table 4.34 shows the extent of over- and underrepresentation of each neighborhood racial type (as determined by HCD), based on the amount of expected development potential identified in both the Adequate Sites Inventory and the Inventory of Candidate Sites for Rezoning. Representation is based on the percentage of the identified development potential in each neighborhood type compared to the share of that neighborhood overall in the city. For example, “Mostly white” neighborhoods make up 5.2% of the total census tracts but are estimated to accommodate 3.86.6% of the overall rezoning capacity and 59.8% of the lower-income rezoning capacity. As a result, these neighborhoods are underrepresented in the overall rezoning effort by 1.4% and overrepresented by 0.29.8% for lower-income rezoning. As another example, Black-Latinx neighborhoods make up approximately 12.4% of the total census tracts in the city

but are estimated to have approximately 1.82% of the total rezoning capacity and 1.78% of the lower-income rezoning category. This means that the Black-Latinx neighborhoods are underrepresented by 10.72% in overall rezoning and 10.86% for lower-income rezoning capacity. Underrepresentation is indicated in *Table 4.34* using negative percentages

Table 4.34

Comparative Representation of Neighborhood Types by Development Potential, Candidate Sites for Rezoning Compared to Existing Sites Inventory				
Neighborhood Type	Total Development Potential		Lower-Income Development Potential	
	Rezoning	Existing Inventory	Rezoning	Existing Inventory
Asian-white	6.3%	-0.6%	4.1%	-0.3%
Diverse	5.7%	4.4%	2.6%	3.2%
Black-Latinx-white	4.3%	1.6%	0.0%	1.5%
Latinx-white	2.8%	-4.0%	4.8%	-4.1%
Mostly white	1.4%	-3.0%	4.6%	-3.4%
Mostly Asian	0.3%	0.1%	0.0%	0.4%
Black-Asian-white	-0.1%	0.0%	-0.1%	0.1%
Other-white	-0.1%	-0.1%	0.0%	-0.2%
Black-white	-0.2%	-0.2%	-0.2%	-0.1%
Mostly Black	-0.2%	0.0%	-0.2%	0.0%
Black-Asian-Latinx	-0.6%	1.0%	-0.6%	0.1%
Black-Asian-Latinx	-0.6%	1.0%	-0.6%	1.1%
Asian-Latinx-white	-3.2%	-4.5%	-0.2%	-4.1%
Asian-Latinx	-4.9%	1.3%	-4.8%	3.9%
Mostly Latinx	-7.7%	-1.8%	-7.1%	-3.0%
Black-Latinx	-10.2%	7.9%	-10.6%	5.3%

Source: HCD categories based on ACS 2019 5-year summary data

Table 4.34

Comparative Representation of Neighborhood Types by Development Potential, Candidate Sites for Rezoning Compared to Existing Sites Inventory				
Neighborhood Type	Total Development Potential		Lower-Income Development Potential	
	Rezoning	Existing Inventory	Rezoning	Existing Inventory
Diverse	6.75%	4.5%	4.0%	3.3%
Asian-White	6.5%	-0.6%	3.5%	-0.3%
Black-Latinx-White	4.9%	1.6%	0.7%	1.5%
Latinx-White	3.3%	-4.0%	8.8%	-4.1%
Mostly Asian	0.3%	0.1%	0.1%	0.4%
Black-Asian-White	-0.1%	0.0%	-0.1%	0.1%
Diverse	-0.1%	0.1%	-0.1%	0.1%
Other-White	-0.1%	-0.1%	-0.1%	-0.2%
Mostly Black	-0.2%	0.0%	-0.2%	0.0%
Black-White	-0.3%	-0.2%	-0.3%	-0.1%
Black-Asian-Latinx	-0.9%	1.0%	-1.0%	0.1%
Black-Asian-Latinx	-0.9%	1.0%	-1.0%	1.1%
Mostly White	-1.4%	-3.0%	-0.2%	-3.4%
Asian-Latinx-White	-4.1%	-4.5%	-0.3%	-4.1%
Asian-Latinx	-4.7%	1.3%	-5.1%	3.9%
Mostly Latinx	-7.4%	-1.8%	-6.5%	-3.0%
Black-Latinx	-10.7%	7.9%	-10.8%	5.3%

Exhibit B - Page 208: Racially/Ethnically Concentrated Areas of Poverty and Affluence

Table 4.35 shows that, compared to the overall share of the city located within a R/ECAP (10.5%), a similar share of the total development potential created through the Rezoning Program (121.3%) is located in these areas, but a much lower share of the lower-income rezoned development potential (76.93%) is located in a R/ECAP. Considering RCAAs, a roughly equal share of total rezoned development potential is located in these areas, based on their overall share of the city (both approximately 7%); however, a substantially larger share of lower-income rezoned development potential is located in a RCAA (120.9%).

Table 4.35

Share of Development Potential Located in a R/ECAP or RCAA, Candidate Sites for Rezoning Compared to Existing Sites Inventory					
	Percent of City	Total Development Potential		Lower-Income Development Potential	
		Rezoning	Existing Inventory	Rezoning	Existing Inventory
R/ECAP - Racially/Ethnically Concentrated Areas of Poverty	10.5%	121.3%	13.9%	76.93%	15.6%
RCAA - Racially Concentrated Areas of Affluence	7.5%	7.83%	2.2%	120.29%	2.3%

Source: HUD, ACS 2019 5-year Summary Data

Exhibit B - Page 224

Table 4-37 shows that approximately 253% of the total rezoning capacity and 10% of the total low-income rezoning capacity is located in areas considered by the methodology to be “very high displacement pressure” and an additional 8% of total rezoning capacity and 7.5% of lower-income capacity is located in areas considered to have “high displacement pressure.” This is due in part to the significant amount of capacity proposed for the Downtown area as part of the Downtown Community Plan update. When compared to the existing Sites Inventory, the proposed Rezoning Program somewhat shifts development capacity (particularly lower-income development capacity) away from areas with displacement pressure. Whereas 41% of the existing inventory’s capacity and 46% of the existing inventory’s lower-income capacity was

located in areas with very high or high displacement pressure, only 331% of overall rezoning capacity and 187% of lower-income rezoning capacity are located in these areas.

Table 4.37

Comparative Distribution of Neighborhood Displacement Pressure by Development Potential, Candidate Sites for Rezoning Compared to Existing Sites Inventory				
Displacement Index	Total Development Potential		Lower-Income Development Potential	
	Rezoning	Existing Inventory	Rezoning	Existing Inventory
Very High Displacement Pressure (>.377)	253.50%	22.1%	10.19.8%	27.3%
High Displacement Pressure (.284-.377)	8.0%	18.5%	7.5%	18.3%
Medium Displacement Pressure (.203-.284)	6.12%	16.9%	5.68%	16.0%
Medium/Low Displacement Pressure (.162-.203)	9.95%	14.1%	130.35%	12.7%
Low Displacement Pressure (<.162)	9.57%	8.3%	142.8%	7.1%
Above Income Threshold	32.45%	27.6%	4853.57%	17.9%

Source: LA Mayor's Office I-Team Index of Displacement Pressure

Exhibit B - Page 225: Opportunity Areas

Table 4.38 shows the distribution of the total candidate sites for rezoning, total added rezoning development potential, and total added lower-income rezoning development potential by TCAC/HCD Opportunity Area. Compared to the same analysis presented above for existing conditions, the analysis reflects a reprioritization in creating new development potential, especially lower-income development potential, in the High and Highest Resource areas. Combined, these areas represent 4355% of the total added development potential, and 566% of the total added lower-income development potential. [1] [2] While the Rezoning Program includes efforts that would increase development potential in the other Opportunity Area categories, these areas are deprioritized and are underrepresented in terms of their overall share of the city's census tracts.

Appendix 4.4

Table 4A-10

Rezoning Analysis: Summary of Census Tracts by Assigned Category, Lower Income Rezoned Development Potential			
Census Tract Category	Total Lower Income Rezoned Development Potential	Percent of Total Census Tracts	Percent of Lower Income Rezoned Development Potential
Lowest LI Capacity Neighborhoods	0 - 25	<u>30</u> 6%	0.3%
Lower LI Capacity Neighborhoods	26 - 250	<u>20</u> 1%	3%
Moderate LI Capacity Neighborhoods	251 - 750	<u>21</u> 7%	<u>16</u> 1%
Higher LI Capacity Neighborhoods	751 - 2,500	<u>22</u> 7%	<u>45</u> 34%
Highest LI Capacity Neighborhoods	2,501+	<u>6</u> 8%	<u>36</u> 52%

Table 4A-11[1]

Rezoning Analysis: Racial / Ethnic Composition of Neighborhoods Identified in Rezoning Inventory				
Census Tract Category	Percent Population - White (Non-Latinx)	Percent Population - Black/African American (Non-Latinx)	Percent Population - Latinx	Percent Population - Asian (Non-Latinx)
Citywide Average	28%	9%	49%	11%
Lowest Capacity Neighborhoods	<u>17</u> 21%	<u>10</u> 9%	<u>56</u> 2%	<u>14</u> 15%
Lower Capacity Neighborhoods	<u>21</u> 46%	12%	<u>56</u> 61%	<u>9</u> 8%
Moderate Capacity Neighborhoods	<u>30</u> 2%	6%	<u>49</u> 7%	11%

Higher Capacity Neighborhoods	410%	56%	389%	12%
Highest Capacity Neighborhoods	497%	7%	256%	15%

Source: US Census Bureau; American Community Survey; 2019 ACS 5-Year Estimates.

Table 4A-12

Rezoning Analysis: Racial / Ethnic Composition of Neighborhoods Identified in Rezoning Inventory, Lower Income Rezoned Development Potential				
Census Tract Category	Percent Population - White (Non-Latinx)	Percent Population - Black/African American (Non-Latinx)	Percent Population - Latinx	Percent Population - Asian (Non-Latinx)
Citywide Average	28%	9%	49%	11%
Lowest LI Capacity Neighborhoods	146%	13%	6159%	10%
Lower LI Capacity Neighborhoods	247%	98%	521%	12%
Moderate LI Capacity Neighborhoods	31%	6%	50%	910%
Higher LI Capacity Neighborhoods	40%	6%	387%	13%
Highest LI Capacity Neighborhoods	5247%	6%	6%	154%

Source: US Census Bureau; American Community Survey; 2019 ACS 5-Year Estimates.

Table 4A-13

Rezoning Analysis: Tenure and Median Household Income of Neighborhoods Identified in Rezoning Inventory, Lower Income Rezoned Development Potential				
Census Tract Category	Percent Renter Households	Median Household Income	Median Household Income - Renter Households	Percent Low/Moderate Income Households

Citywide Average	63%	\$64,065	\$50,404	61%
Lowest LI Capacity Neighborhoods	<u>71</u> 68%	\$ <u>52,005</u> 4,783	\$ <u>42,194</u> 3,641	<u>62</u> 70%
Lower LI Capacity Neighborhoods	<u>65</u> 3%	\$ <u>61,243</u> 4,712	\$ <u>48,570</u> 51,291	<u>58</u> 60%
Moderate LI Capacity Neighborhoods	<u>63</u> 4%	\$ <u>66,683</u> 4,756	\$ <u>52,205</u> 651	<u>54</u> 8%
Higher LI Capacity Neighborhoods	<u>59</u> 62%	\$ <u>71,134</u> 69,117	\$ <u>55,628</u> 4,123	<u>45</u> 3%
Highest LI Capacity Neighborhoods	<u>50</u> 3%	\$ <u>96,453</u> 90,799	\$ <u>72,023</u> 66,519	48%

Source: US Census Bureau; American Community Survey; 2019 ACS 5-Year Estimates.

Table 4A-14

Rezoning Analysis: Household Characteristics of Neighborhoods Identified in Rezoning Inventory, Total Rezoned Development Potential		
Census Tract Category	Percent Households with Children	Household 65+
Citywide Average	30%	20%
Lowest Capacity Neighborhoods	<u>31</u> 2%	<u>18</u> 20%
Lower Capacity Neighborhoods	<u>34</u> 6%	<u>20</u> 19%
Moderate Capacity Neighborhoods	<u>30</u> 29%	19%
Higher Capacity Neighborhoods	26%	<u>21</u> 0%
Highest Capacity Neighborhoods	<u>22</u> 3%	<u>23</u> 2%

Source: US Census Bureau; American Community Survey; 2019 ACS 5-Year Estimates.

Table 4A-15

Rezoning Analysis: Household Characteristics of Neighborhoods Identified in Rezoning Inventory, Lower Income Rezoned Development Potential		
Census Tract Category	Percent Households with Children	Household 65+
Citywide Average	30%	20%
Lowest LI Capacity Neighborhoods	36%	<u>19</u> 20%
Lower LI Capacity Neighborhoods	<u>29</u> 30%	19%
Moderate LI Capacity Neighborhoods	29%	<u>21</u> 0%
Higher LI Capacity Neighborhoods	26%	20%
Highest LI Capacity Neighborhoods	<u>26</u> 3%	<u>24</u> 2%

Source: US Census Bureau; American Community Survey; 2019 ACS 5-Year Estimates.

Table 4A-16

Rezoning Analysis: Family Structure of Neighborhoods Identified in Rezoning Inventory, Total Rezoned Development Potential						
Census Tract Category	Percent Live Alone	Percent Live with Spouse	Percent Live with Unmarried Partner	Percent Live with Parents	Percent Live with Other Relatives	Percent Live with Non-Relatives
Citywide Average	14%	35%	7%	15%	19%	10%
Lowest Capacity Neighborhoods	13%	<u>32</u> 5%	<u>8</u> 7%	<u>16</u> 5%	<u>20</u> 19%	<u>12</u> 1%
Lower Capacity Neighborhoods	<u>12</u> 1%	<u>33</u> 1%	7%	<u>17</u> 8%	<u>22</u> 3%	10%
Moderate Capacity Neighborhoods	<u>13</u> 4%	36%	7%	15%	<u>19</u> 8%	10%
Higher Capacity Neighborhoods	15%	37%	7%	13%	<u>16</u> 7%	11%
Highest Capacity Neighborhoods	20%	40%	7%	<u>11</u> 0%	<u>12</u> 3%	10%

Source: US Census Bureau; American Community Survey; 2019 ACS 5-Year Estimates.

Table 4A-17

Rezoning Analysis: Family Structure of Neighborhoods Identified in Rezoning Inventory, Lower Income Rezoned Development Potential						
Census Tract Category	Percent Live Alone	Percent Live with Spouse	Percent Live with Unmarried Partner	Percent Live with Parents	Percent Live with Other Relatives	Percent Live with Non-Relatives
Citywide Average	14%	35%	7%	15%	19%	10%
Lowest LI Capacity Neighborhoods	123%	301%	8%	17%	232%	10%
Lower LI Capacity Neighborhoods	143%	345%	7%	15%	2019%	10%
Moderate LI Capacity Neighborhoods	15%	36%	7%	15%	18%	10%
Higher LI Capacity Neighborhoods	145%	378%	7%	14%	17%	110%
Highest LI Capacity Neighborhoods	156%	441%	67%	132%	145%	910%

Source: US Census Bureau; American Community Survey; 2019 ACS 5-Year Estimates.

Table 4A-18

Rezoning Analysis: Disability Status of Neighborhoods Identified in Rezoning Inventory, Total Rezoned Development Potential		
Census Tract Category	Percent SSI Households	Population with Disability
Citywide Average	7%	10%
Lowest Capacity Neighborhoods	7%	10%
Lower Capacity Neighborhoods	78%	10%
Moderate Capacity Neighborhoods	76%	10%
Higher Capacity Neighborhoods	6%	10%
Highest Capacity Neighborhoods	7%	121%

Source: US Census Bureau; American Community Survey; 2019 ACS 5-Year Estimates.

Table 4A-19

Rezoning Analysis: Disability Status of Neighborhoods Identified in Rezoning Inventory, Lower Income Rezoned Development Potential		
Census Tract Category	Percent SSI Households	Population with Disability
Citywide Average	7%	10%
Lowest LI Capacity Neighborhoods	8%	10%
Lower LI Capacity Neighborhoods	7%	10%
Moderate LI Capacity Neighborhoods	7%	10%
Higher LI Capacity Neighborhoods	6%	10%
Highest LI Capacity Neighborhoods	6%	110%

Source: US Census Bureau; American Community Survey; 2019 ACS 5-Year Estimates.

Table 4A-20

Rezoning Analysis: TCAC/HCD Opportunity Area Domains, Average Score by Neighborhoods Identified in Rezoning Inventory			
Census Tract Category	Average Economic Domain Score	Average Environmental Domain Score	Average Educational Domain Score
Citywide Average	0.53	0.44	0.39
Lowest Capacity Neighborhoods	0.503	0.4750	0.2731
Lower Capacity Neighborhoods	0.5045	0.431	0.3428
Moderate Capacity Neighborhoods	0.526	0.47	0.414
Higher Capacity Neighborhoods	0.58	0.423	0.50

Highest Capacity Neighborhoods	0.7068	0.4139	0.59
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Source: TCAC/HCD Opportunity Area Map, 2021

Table 4A-21

Rezoning Analysis: TCAC/HCD Opportunity Area Domains, Average Score by Neighborhoods Identified in Rezoning Inventory, Lower Income Rezoned Development Potential			
Census Tract Category	Average Economic Domain Score	Average Environmental Domain Score	Average Educational Domain Score
Citywide Average	0.53	0.44	0.39
Lowest LI Capacity Neighborhoods	0.48	0.434	0.268
Lower LI Capacity Neighborhoods	0.554	0.45	0.379
Moderate LI Capacity Neighborhoods	0.503	0.453	0.412
Higher LI Capacity Neighborhoods	0.586	0.434	0.50
Highest LI Capacity Neighborhoods	0.7169	0.474	0.661

Source: TCAC/HCD Opportunity Area Map, 2021

Appendix 4.6
Exhibit B - Page 929

As a result of these adjustments, the model anticipates a total development potential of 42,76481 units over the eight-year period.