

ATTACHMENT 2:

FINDINGS

Summary

The Proposed Plan as modified is consistent with the City Charter, LAMC, and General Plan Findings as recommended by the City Planning Commission on October 14, 2021 and the modifications approved by the City Planning Commission on October 14, 2021 are consistent with and further support the Findings of Fact.

Project Location

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

I. Finding Requirements for General Plan Amendments

City Charter Requirements

Charter Section 555 — Charter Section 555 provides that the City Council may amend the General Plan in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has significant social, economic, or physical identity. No legislative findings are required to amend the General Plan. The Proposed Plans propose amendments to three elements of the General Plan: (1) updating the Housing Element of the General Plan, including a new policy document and related Rezoning Program, (2) amendments to the Safety Element of the General Plan, and (3) amendments to the Health Element (Plan for a Healthy Los Angeles) of the General Plan. All the amendments to subject elements of the City's General Plan apply citywide.

State General Plan Consistency Requirement

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

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

State Housing Element Findings

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

II. Housing Element Consistency Discussion and Findings

A. General Plan Consistency Discussion

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

The Framework Element

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

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

Growth and Capacity

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

Land Use

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

Framework GOAL 3A

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

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

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

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

Objective 3.2 *Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.*

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

Objective 3.3 *Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.*

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

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

Policy 3.4.1 *Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred*

to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram (Figure 3-1 and 3-2).

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

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

The proposed Housing Element supports and is consistent with the Framework Element land use Goal 3A because its policies describe planning for local and citywide housing needs in balance with factors such as jobs and transit (Pol. 1.1.1), in alignment with the General Plan and the Citywide Housing Priorities (Pol. 1.1.2) and with an emphasis on achieving a more equitable distribution of affordable housing opportunities throughout the city, particularly in Higher Opportunity Areas that lack it today (Pol. 1.18, 1.3.1 and 1.3.2). The emphasis on Higher Opportunity Areas is in line with the Goal's first direction to balance land uses (housing is out of balance in these areas) as well as more equitably distribute public resources such as affordable housing. It also aligns closely with the Framework's overall Housing Goal 4A discussed below. The proposed Housing Element acknowledges that a focus on Higher Opportunity Areas need to be balanced with other growth considerations outlined in the General Plan, including the location of high-quality transit, jobs, hazard areas, and ecologically sensitive areas. The Plan also supports the preservation and enhancement of the quality of housing (Goal 2, Obj. 2.3, Pol. 3.1.4) as well as the conservation of sensitive areas. The Rezoning Program generally emphasizes corridors and boulevards, Regional Centers, new and forthcoming transit centers, as well as access to jobs and Higher Opportunity Areas. Overall, the Housing Element seeks to support the vision of an equitable, livable, sustainable city that meets the needs of the population through a thoughtful balanced distribution of different types of housing types.

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

Single-Family Neighborhoods

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

Framework GOAL 3B

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

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

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

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

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

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

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

Multi-Family Neighborhoods

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

Framework GOAL 3C

Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents.

Objective 3.7 *Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.*

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

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

The proposed Housing Element is consistent with the Framework Element in that it encourages multi-family housing that enhances the quality of life (Pol. 3.1.1, 3.1.2, 3.1.3, Programs 58, 59, 60, 63, 64, etc.). The Housing Element Update contains policies and programs that promote the new multi-family housing, particularly affordable and mixed-income housing, in areas near transit stations, jobs, and in higher opportunity areas. Furthermore, the Housing Element Update also supports the ability to reconstruct and ensure a right of return to existing residents if their housing is retrofitted or reconstructed after a disaster (Pol. 3.3.4. Program 53). The Rezoning Program proposes candidate sites for potential future rezoning actions, which will include updates to Community Plans as well as citywide zoning ordinances and affordable housing incentive programs.

Transit Stations

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

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

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

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

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

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

Framework GOAL 5A

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

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

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

Policy 5.2.3 *Encourage the development of housing surrounding or adjacent to centers and along designated corridors, at sufficient densities to support the centers, corridors, and the transit system. While densities and distances will vary based on local conditions, the following residential density standards, which are based on the City's adopted Land Use/Transportation Policy, should be used as a general guide when updating community plans through a public participation process:*

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

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

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

Objective 5.8 *Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented sub-areas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.*

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

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

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

Economic Development

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

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

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

Framework GOAL 7G

A range of housing opportunities in the City

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

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

Policy 7.9.2 *Concentrate future residential development along mixed-use corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements.*

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

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

Housing

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

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

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

Objective 4.1 *Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010 (Per Table 2-1, the Framework Plan 2010 population is 4,306,500 persons).*

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

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

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

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

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

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

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

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

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

Objective 4.2

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

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

Objective 4.3

Conserve scale and character of residential neighborhoods.

Objective 4.4

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

Policy 4.4.1

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

a. Establish development standards that are sufficiently detailed and tailored to community and neighborhood needs to reduce discretionary approvals requirements.

b. Streamline procedures for securing building permits, inspections, and other clearances needed to construct housing.

c. Consider raising thresholds for categorical exemptions for CEQA clearances for projects conforming to the City's development standards, particularly when housing is combined with commercial uses in targeted growth areas.

d. Consider establishing City service which assists applicants in processing applications for housing projects.

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

The Housing Element aligns with the Framework's Objective 4.1 and associated policies with its focus on planning for capacities to provide a supply to make housing available at affordable types and costs (Pol. 1.1.2), while alleviating overconcentration of affordable housing (Obj. 1.3), overcrowding (Pol. 1.1.1), creating incentives and priorities for affordable housing (Pol. 1.1.8), adaptive reuse (Pol. 3.2.8), large families (Pol. 1.1.2 and Program 49) and health buffers (Pol. 3.1.4). The Plan also continues to emphasize transit as a key location for growth (Pol. 1.3.1 and 3.2.2) in alignment with Objective 4.2, the reduction of barriers to production in appropriate locations (Pol. 1.2.3, 1.2.5., 1.2.9) as well as to continue to balance production goals with

preservation and conservation policies (Goal 2, Obj. 2.3, Pol. 3.1.2). The Rezoning Program is consistent in that it is necessary to provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost to meet projections of housing needs and plans to minimize the overconcentration of very low- and low-income housing developments in City subregions by providing incentives for scattered site development citywide, particularly in Higher Opportunity areas that have seen less affordable housing production than others.

Other General Plan Elements

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

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

Mobility Plan 2035 (Circulation Element)

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

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

Mobility Objective 3.1

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

Mobility Objective 3.2

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

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

Plan for a Healthy Los Angeles (Health Element)

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

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

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

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

Health Element Goal 2

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

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

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

The proposed Housing Element is consistent with the Health Element goals, objectives, and policies related to housing in the City in that it prioritizes affordable housing, anti-displacement policies and orienting housing development around health, economic stability, and well-being (Obj 1.2, 2.1, 3.1 and Policies 1.1.7, 1.2.1, 1.2.6, 2.1.1, 2.1.7, 3.1.5, 3.1.6, 3.3.2 etc.). The focus on health has increased in the Housing Element Update, with new policies guiding development to

better orient building siting and features toward beneficial uses and away from polluting or hazardous features (Pol. 3.1.4).

Air Quality Element

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

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

Air Quality Element Goal 2

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

Air Quality Element Goal 4

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

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

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

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

Air Quality Element Goal 5

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

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

The proposed Housing Element is consistent with the Air Quality Elements' goals, objectives, and policies related to housing development in the City in that it encourages housing locations near jobs and transit, as well supports various green-building and other sustainability efforts (Pol. 1.1.1, 1.3.1, 3.2.2, 3.2.3, 3.2.6). These efforts facilitate high quality, healthy housing in neighborhoods that mix uses, incomes and improve accessibility to jobs and services, which reduces vehicle miles traveled (VMTs) and therefore improves air quality. These programs and policies are also aligned with the regional and state mandates of improving air quality. The Housing Element supports providing technical assistance and disseminating information and guidelines to the residential development community to encourage the use of quality building materials, sustainable materials and practices to protect air quality, water conservation, and energy efficiency. The proposed Housing Element also supports improved air quality in residential development by encouraging residential developers to use building orientations that take advantage of natural ventilation opportunities, filtered air systems, landscaping, venting appliances to the outside, and the use of low-emitting construction and finish materials (Programs 70-74, 76 and 79).

Conservation Element

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

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

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

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

Safety Element

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

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

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

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

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

Policy 3.1.5 Restoration. Look to the future and rebuild based on the lessons of the past. Prior to a disaster, develop and establish procedures for securing assistance and expediting inspection and permitting activities to facilitate the rapid repair and rebuilding of those parts of the private and public sectors which were damaged or disrupted as a

result of the disaster with an added consideration of future safety. Develop and establish procedures to enhance the resilience of buildings and infrastructure that are rebuilt following a disaster. Develop tools to ensure that vulnerable residents and business owners are included in community rebuilding efforts.

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

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

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

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

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

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

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

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

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

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

Average rental vacancy rate in the Census Public Use Microdata Area (PUMA) during the prior 5-year period	✓	✓
Average remaining commercial lease duration in the CPA	✓	

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

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

*[i] the extent to which **existing uses** may constitute an impediment to additional residential development,*

*[ii] the city's or county's **past experience** with converting existing uses to higher density residential development,*

*[iii] the current **market demand** for the existing use,*

*[iv] an analysis of any **existing leases** or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development,*

*[v] **development trends,***

*[vi] **market conditions,** and*

*[vii] regulatory or other **incentives** or standards to encourage additional residential development on these sites."*

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

- i. "The extent to which existing uses may constitute an impediment to additional residential development" is reflected by the conditioning of the model on existing use categories and on existing structures' age and FAR utilization, as well as being subject to the Rent Stabilization Ordinance and the remaining local commercial existing lease duration variable.
- ii. "The city's or county's past experience with converting existing uses to higher density residential development" is captured by the basic premise of the exercise: Predicting future permitting based on an empirical estimate that draws on the city's recent (5-year) experience. That experience consists primarily of converting existing uses--including less dense residential use--to higher density residential development.
- iii. "The current market demand for the existing use" is reflected in the existing use indicators, as well as the remaining local commercial existing lease duration variable and the local information on rental vacancy rates and on residential property values and rents.
- iv. "An analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development" is addressed in the model by the inclusion of the local remaining existing commercial lease duration variable. This is also addressed by subsequent steps which removed any sites from the Sites Inventory that have an existing regulatory agreement or other regulatory protection related to affordable housing units that would preclude the redevelopment of the site during the planning period.

- v. "Development trends" are captured by the basic premise of the exercise as explained in item II, and also by the local ratio of total permitted units to total base-zoned units over the prior 5-year period. That variable captures the recent level of permitting for housing in the area. (The division by total base-zoned units is necessary for that variable to not simply convey the size of the Community Plan Area, and to account for regulation-imposed differences in past permitting, as opposed to market-driven development trends.)
- vi. "Market Conditions" are captured by the local ratio of total permitted units to total base-zoned units over the prior 5-year period, as well as the local information on rental vacancy rates and on residential property values and rents, the remaining local commercial existing lease duration variable, and the set of existing land use indicators, as well as the City's identification of four residential market area types.
- vii. "Regulatory or other incentives or standards to encourage additional residential development on these sites" are reflected by the distinction between base-zoned units and bonus-zoned units, as well as the inclusion of their ratio. The model results are further adjusted to consider the overall influence of the City's Transit Oriented Communities (TOC) Affordable Housing Incentive Program on site-level development outcomes.

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

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

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

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

III. Safety and Health Element Findings

See separate Council Files for Safety Element and Health Element specific findings.

IV. Summary of CEQA Findings

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

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

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

Recommended Project

The Proposed Project was analyzed in the Draft EIR. As discussed above some changes have been made to the Proposed Project since the Draft EIR was published. None of the changes

affect the analysis or conclusions in the Draft EIR. In particular, while the Proposed Project has been revised to include a higher overall required rezoning need (increased to 255,415 units from 220,000 units), this changed number does not affect the analysis presented in the Draft EIR as the rezoning need is determined to be needed in order to accommodate build-out of the RHNA. The Draft EIR analyzed build-out of the RHNA, and therefore this and other changes do not result in new significant impacts or an increase in the severity of the significant impacts identified in the Draft EIR. As such, that change and the others to be described in the Final EIR do not result in significant new information as defined in CEQA Guidelines Section 15088.5 requiring recirculation.

FINAL EIR

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

CPC RECOMMENDATION

Pursuant to Section 15025(c) of the CEQA Guidelines, the City Planning Commission, as a recommending body on the Proposed Project, is required to consider the Draft EIR and make a recommendation to the City Council.

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