

# Inventory of Sites for Housing

Chapter 3





Landscape  
by ZAC

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# Inventory of Sites for Housing

Under Housing Element law, the City must show that it has adequate land zoned to accommodate the entirety of its 2013-2021 Regional Housing Needs Assessment (RHNA) allocation of 82,002 housing units. This Chapter identifies the City's inventory of land suitable for residential development without the need for any discretionary zoning action by the City, in accordance with California Government Code §65583.2. The methodology used to identify these sites is also described here.

## A. Inventory of Adequate Sites

Per State law, the City's inventory is comprised of undeveloped and under-developed sites upon which the required number of housing units can be built without the need for any discretionary zoning action by the City. The City has identified 21,336 sites that have excess capacity to accommodate a minimum of 308,052 units (see Map 3.1 for locations of these sites). Appendix H contains a list of these sites and maps of the identified sites for each of the 35 Community Plan Areas. The general plan land use designation and zoning capacity are identified for each site as well as the potential number of housing units that could be added to the site. While the City is not required to build the units, it is required to show that adequate zoning capacity exists and to show the sites where that capacity is located.

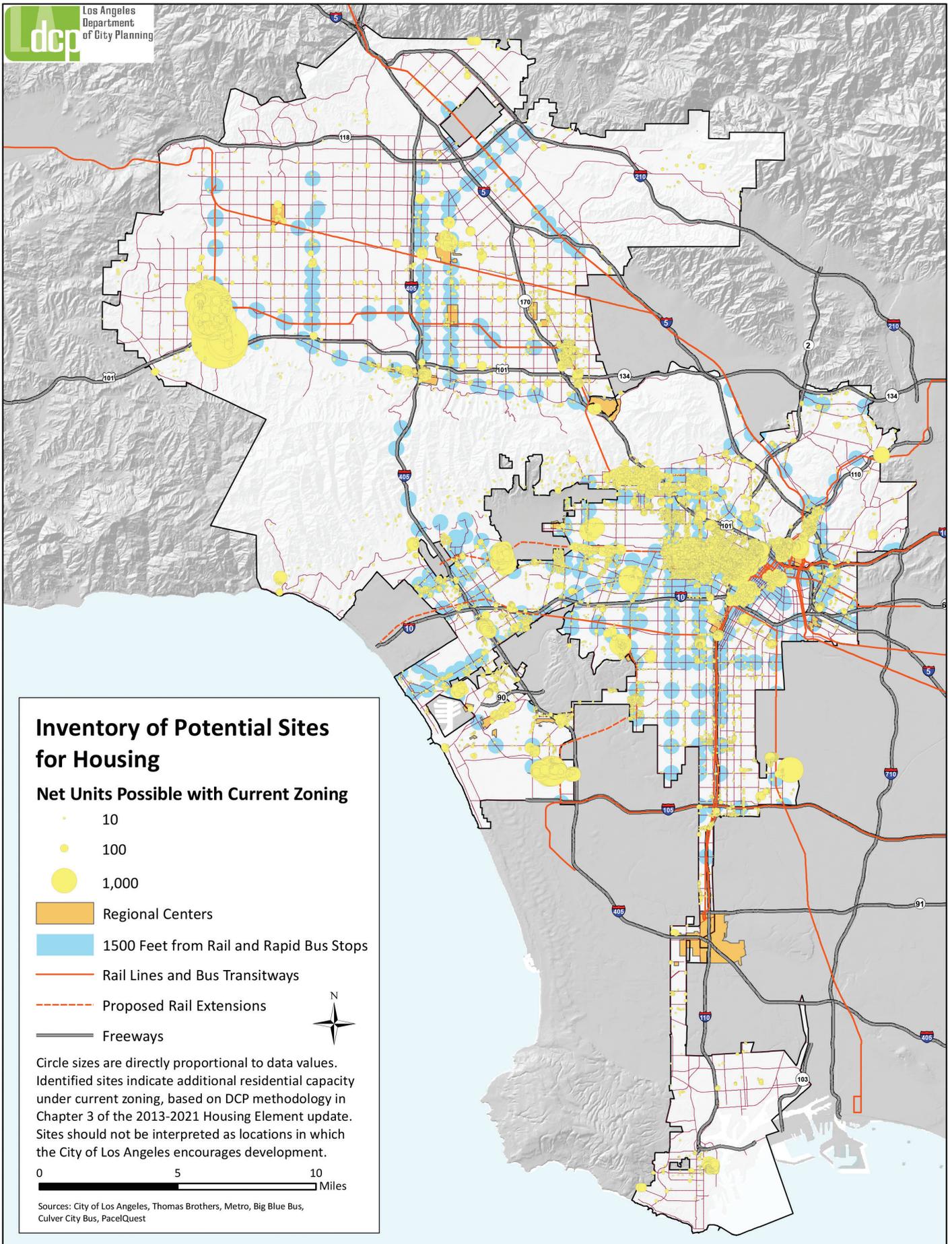
The permitted density for each site is also identified, illustrating the potential of the site to accommodate the very low-, low- and moderate-income units included in the City's RHNA allocation (per State law, a density of at least 30 units per acre serves as a proxy to identify sites suitable for affordable housing development). Of the identified sites and units, 10,198 sites are available for low- or very low-income units as they permit more than 30 dwelling units per acre.

Table 3.1 summarizes where the identified sites are located in the City, by showing the net additional units and acreage of sites in each of the City's 35 Community Plan Areas.

**TABLE 3.1**  
**Summary of Sites with Housing Capacity by Community Plan Area**

CPA	Sites	Net Units	Acres
Arleta - Pacoima	92	308	47.6
Bel Air - Beverly Crest	39	241	115.7
Boyle Heights	593	2,805	157.8
Brentwood	64	1,211	222.2
Canoga Park	402	60,750	883.5
Central City	443	17,893	123.3
Central City North	453	11,490	179.6
Chatsworth	76	860	164
Encino - Tarzana	181	1,355	224.4
Granada Hills	27	240	49.3
Harbor Gateway	168	1,346	77.5
Hollywood	2,024	24,185	662.1
Mission Hills	214	3,872	225
North Hollywood	1,193	8,726	329.5
Northeast Los Angeles	425	6,018	276.4
Northridge	124	350	79.4
Palms - Mar Vista	721	9,263	237.3
Reseda	168	1,344	107.4
San Pedro	190	4,137	92.4
Sherman Oaks	283	2,895	150.3
Silverlake - Echo Park	476	3,732	148.2
South Los Angeles	1,729	6,405	386
Southeast Los Angeles	1,691	8,405	413.5
Sun Valley	254	1,267	144
Sunland - Tujunga	47	443	65.6
Sylmar	105	690	123.1
Van Nuys	444	2,542	254.3
Venice	190	907	46.4
West Adams	1,456	8,368	417.3
West Los Angeles	629	10,862	268.6
Westchester	371	12,645	291.7
Westlake	1,853	39,506	500
Westwood	170	1,261	46.1
Wilmington	22	241	30.8
Wilshire	4,019	51,490	1,014.2
<b>TOTAL</b>	<b>21,336</b>	<b>308,052</b>	<b>8,554.3</b>

Map 3.1  
Inventory of Potential Sites for Housing



## B. Development Trends and Future Growth

The City's analysis of existing capacity shows that a minimum of 308,052 units can be built on 21,336 lots, in addition to what currently exist on these lots. While building activity may shift from year to year, the City anticipates that of these 308,052 units, almost 2.0%, or 6,000 units, may be developed each year on average, reaching a total of 46,500 units over the course of the nearly eight years of the Housing Element RHNA period (January 1, 2014 through September 30, 2021).

Los Angeles' General Plan is guided by its Framework Element, which directs anticipated growth to high density, mixed use centers and to the neighborhoods around its 80 rail stations. As part of this Plan, the City has recently embarked on an ambitious program to create Transit Neighborhood Plans for 24 current and proposed light-rail station areas across the City. Up-zoning is anticipated to occur in many of these areas located within ½ mile of light-rail and rapid bus transit, thereby creating additional capacity for housing growth. Up-zoning approved in 2013 for an update to the Warner Center Specific Plan and the new Cornfield Arroyo Seco Specific Plan (both along high-quality transit lines), will add approximately 41.6 million square feet of expected residential area to the City through 2035.

In addition, the City continues to update its 35 Community Plans (which together make up the City's Land Use Element) on a regular basis in order to implement appropriate zoning and land use incentives that will facilitate such development in each of these locations. Although only current zoning is utilized for this inventory of sites, with the 10 Community Plan updates expected to be completed through 2021, more sites will be available for residential development during the life of this Housing Element update. These sites will coincide with the Framework Element's emphasis on designated centers, such as downtown Los Angeles and areas along the City's current and proposed light-rail and bus rapid transit lines, where the City has made significant public infrastructure investments, as depicted in Map ES.1. Only the Hollywood Community Plan has been adopted since the last Housing Element, but Community Plans for other transit-oriented neighborhoods such as West Adams-Leimert Park-Baldwin Hills, Boyle Heights, Sylmar, South and Southeast Los Angeles are likely to be approved in the next few years. Each is planned to add residential capacity, particularly in areas around transit stops, mixed-use boulevards and centers. Funding was approved in 2013 for important Community Plan updates in the downtown areas of Central City and Central City North.

Many of the programs identified in the Housing Element encourage housing capacity in the strategic and desirable locations throughout the City that are identified in the General Plan. Such programs include Program 70 "Targeting Growth in Community Plan Areas" and Program 89 "Planning for Neighborhood



Character". Program 60 "Implement CEQA Streamlining Measures" aims to facilitate the utilization of Statewide CEQA streamlining measures, including those transit-oriented projects that implement the regional Sustainable Communities Strategy. Program 68 "Reduced 'Trips' for Housing near Transit and/or with Affordable Housing" and Program 73 "Jobs/Housing Balance Incentives: Residential Exemptions in Transportation Specific Plans" both provide incentives for transit-oriented development. Program 69 "Transit Oriented District Studies" calls for conducting studies to identify housing opportunities and market potential for the neighborhoods around rail and bus rapid transit stops in the City.

While City policy dictates that housing units, in general, be located strategically, rather than dispersed evenly throughout the City, affordable housing should be dispersed throughout the City, per Objective 2.5. Affordable housing is needed in all communities and must be made available in all parts of the city. Nevertheless, land use and planning tools to generate affordable housing are severely limited with the demise of the Community Redevelopment Agency. In addition, following the Palmer vs. City of Los Angeles court decision, the City has no ability to require property owners to build rental housing that is affordable to people of all income levels<sup>150</sup>. Substantial public dollars are required to eliminate the gap between real housing costs and affordable rents. The Housing Element includes Program 98, "Community Level Affordable Housing Programs" that will establish affordable housing goals based on RHNA for each major community planning effort that enables or facilitates residential development. These targets will serve as affordability goals for new development in each Community Plan Area, so that new housing construction strives to meet the same income targets as the City's RHNA allocation. In the process of revising each Community Plan, neighborhood-specific tools and incentives can be incorporated to implement these goals that will work in each community. While a broad citywide policy can be developed to address affordability, a one-size-fits-all implementation strategy is not possible for the diverse communities of this city. In order to be effective, unique, neighborhood-specific implementation tools must be developed at a Community Plan level that reflect local circumstances and the particular character of each neighborhood.

The City also recognizes the importance of ensuring that sites are adequately zoned and available for the development of emergency and temporary shelters. Since 1986, the City has permitted the establishment of shelters for homeless people by-right in the R4, R5, C2, C4, C5 and CM Zones (Ordinance 161,427). Of the 21,336 parcels listed in RHNA Inventory of Sites for this Housing Element Update, 13,281 sites, ranging from 0.02 to 28.6 acres in size, have one of these zoning designations.

## C. Sites Suitability Analysis

In the City of Los Angeles, 15,467 acres, representing only 5.1% of the City's total acreage, is classified as vacant, undeveloped land. As the City is essentially built-out,

<sup>150</sup> Except in the state's Coastal Zone where the Mello Act requirements still apply.

most of the City's growth must occur and has been occurring on sites with existing uses. A DCP analysis of two years of building permits showed that the vast majority of all multifamily projects were built on sites that previously had another use. As recycling land with existing uses is virtually the only strategy to develop housing in the City, the existence of another use will not impede the development of housing in Los Angeles.

### **Infill Development and Redevelopment**

Nearly all sites with residential development potential already have an existing use, including some residential units on site. The Inventory of Sites shows the potential housing capacity (number of net units) over and above what is already on the sites. Of the 21,336 parcels in the Inventory of Sites, 8,791 parcels (41%) have 16,778 residential units on them. On these commercially and residentially zoned sites where there are existing residential uses, there is capacity for 83,040 more residential units in excess of what already exists on these sites. Thus, these 8,791 parcels have a gross capacity of at least 99,818 units. While the existing 16,778 units may be lost if these sites are redeveloped, in aggregate, the sites are zoned to support nearly six times the number of units that already exist on these sites.

In a change to the City's methodology of computing its inventory of sites from the previous update, every parcel with residential units on it must now be zoned to accommodate at least three times the number of existing units in order to be included in the inventory. That is, if a current site has 10 units on it, the potential must exist to construct at least 30 units under current zoning. This change was made to be more realistic about current development trends in Los Angeles, based on an evaluation of recent building permit data and in consultation with the City's development community. While City staff was advised that circumstances vary widely depending on the local market and different development circumstances, developers typically only begin to look at a site when they can at least triple or quadruple the number of units on an existing residential site. The threshold is used in Housing Elements across the State according to our CEQA housing sub-consultant Veronica Tam and Associates. The housing developers on the Housing Element Task Force agreed with this threshold and permit data backed it up. For example, a 16-unit apartment building in the Koreatown neighborhood was demolished in 2007 to make way for a 49-unit apartment. Another 23-unit apartment in Westlake was demolished that year to make way for a 74-unit affordable housing development.

In line with the policies of directed growth in the City's Framework Element, a total of 85% of all the net units that could be built on sites included in the inventory are located within a half-mile of a high-quality transit stop (rail and transitway, as well as rapid bus stops) and/or a designated Regional Center (262,986 units). Seventy percent of the units (216,086) are located within 1,500 feet of such a location. This indicates that the City has more than sufficient development capacity in its transit and mixed-use centers to accommodate the entire RHNA for the 2013-2021 period.

Some sites on the Inventory currently support commercial and institutional uses. Many of these sites, with redevelopment potential, frequently have excess land or parking areas that can be developed with housing. The Department of City Planning is working closely with the Los Angeles Unified School District, for example, to reconfigure school sites in order to “free up” land for the development of affordable housing, particularly for teachers. LAUSD has a Division focused on this effort and the Planning Department is working closely with the Division in the development of several sites. It is anticipated that several hundred new affordable housing units can be created on LAUSD school sites through this collaboration. For example, the fifty unit Rio Vista apartment complex that was built in Glassell Park in 2011 is on a site that previously had been a parking lot for Glassell Park Elementary School. Another similar project is currently in pre-development in the University Park neighborhood and is proposed to have 29 units.

The City recognizes the importance of preserving the affordability of units that may be lost due to demolition and redevelopment of an existing site. Therefore, the City is committed to preserving the affordability of any publicly subsidized housing project identified in the Inventory facing redevelopment by requiring that the new units retain their affordability covenants if redevelopment occurs on the site.

For units protected under the Rent Stabilization Ordinance, the City will enforce the replacement and relocation requirements if and when these units are redeveloped.

### Density and Realistic Capacity

While the Inventory of Sites shows the capacity for a minimum of 308,052 additional units on 21,336 lots, 58% of the units are on commercially zoned sites and 42% are on residentially zoned sites. Recent trends in development show that much of the housing in Los Angeles is now being built in commercial zones. In 2001, 40% of building permits for new multi-family housing in the City were on sites in commercial zones. From January 1, 2006 to May 31, 2012, 47% of building permits for new multi-family units in the City were located in commercial zones.

While the City permits relatively high density residential development by-right in all of its commercial zones, we recognize that not all of the commercially-zoned sites will be redeveloped with residential use. Therefore, in line with the City’s current Community Plan capacity methodology, we assume different “conversion factors” in different land use categories to reflect the potential these sites have for commercial and mixed use development. In Community Commercial areas with Height District 1 (FAR = 1.5:1) we assume that only 10% of the capacity of commercially-zoned sites in the inventory will be utilized for residential uses. In Community Commercial areas with FARs over 3:1 a 50% factor is used, while areas considered Regional Centers use 60%. These assumptions reduce the Inventory capacity on commercially zoned properties by 55% from 396,764 to 179,067 potential units.

## Suitability of Small Sites

While the size of lots on the Inventory range from 1,000 square feet to several acres, all sites on the Inventory are suitable for the development of housing, including affordable housing. Smaller sites were only included if they were able to accommodate a minimum of five new units. The small sites that are included are generally of a higher density, which allows for the construction of significant numbers of units, including affordable housing units, to be built on smaller sites. This is because in Los Angeles, unlike many cities, zoning regulations facilitate housing construction at relatively high densities. In Los Angeles, development can occur at densities as high as 50 to 100 units per acre in many multi-family neighborhoods and near transit nodes, and up to 218 units per acre in all Regional Centers. In addition, due to a recent zoning ordinance, density is completely unlimited in all of the downtown (building sizes are now limited only by a floor area ratio). This zoning facilitates strategic growth per the Framework Element as depicted in Map ES.1.

The suitability of small sites is evidenced by a sample of 34 100% affordable housing projects that were permitted between 2006 and 2011. These 34 projects range from 6 units (6,991 sf) to 97 (43,580 sf) units for a total of 895 affordable units. In addition, many of the current round of Affordable Housing Trust Fund project submittals are on sites that are less than .4 acres.

The City of Los Angeles has also promoted infill development on smaller sites through its Small Lot Ordinance, which has been used to provide affordable home ownership. The Small Lot Ordinance allows fee-simple, structurally independent infill housing (such as town homes, row houses, bungalows) to be built on commercial and multi-family zoned lots as small as 600 square feet without yard or setback requirements. From January 2005, when the Ordinance came into effect, to the middle of 2012, 184 projects have been filed with the City, representing 1,527 homes on lots that range from 1,000 to 2,000 square feet. Los Angeles Neighborhood Housing Services, the Enterprise Foundation and the CRA/LA have all used the Small Lot Ordinance to provide affordable home ownership in South Los Angeles and other lower income neighborhoods.

Finally, the City has also recently expanded the ability to utilize floor area ratio averaging across several parcels in a unified development in greater areas of the City. This allows developers to more easily combine parcels for lot consolidation. The City is also updating the planned unit development (PUD) code provisions, which currently are tailored towards larger single-family suburban type developments. The idea is to update the Zoning Code (LAMC 13.04) to make this tool available for a broader range of infill and mixed-use development types.

## Water and Sewer Capacity

All parcels identified in the Inventory of Sites are suitable for development in the current planning period, pursuant to zoning and building code requirements, and are not



subject to any general environmental constraints that would preclude development. Water, sewers, and other utilities are available throughout the City of Los Angeles and their capacity and availability have been analyzed in the environmental analysis for the Framework Element of the City's General Plan. Streets and highways are available to all sites in the inventory and in most cases, transit is within close proximity. In addition to its streets and freeways, the City of Los Angeles has a heavy rail, light rail, rapid bus, fixed guideway, and an extensive bus transit system. Each housing project will be granted a permit on a site-by-site basis, at which time it is possible that some projects may be required to improve the existing infrastructure or comply with specific environmental regulations (such as certain types of roofing materials in high fire areas). However, the City's environmental laws in general do not preclude development. A project proposed on any site in the Inventory would be allowed "by-right" and would be issued a permit by the Department of Building and Safety (provided no extraordinary site-specific health and safety circumstances were found to exist).

## D. Selection Methodology

One of the main requirements of the Inventory is that it show that the requisite capacity (RHNA allocation) can be built without the need for a zone change. Every effort was therefore made to eliminate parcels which might require a zone change in order for (additional) units to be built. Also, since the inventory is intended to identify parcels with the potential for redevelopment, it excludes parcels smaller than 1,000 square feet, which were deemed unlikely to be suitable for development. Also, the inventory excludes parcels on which buildings have been constructed in the past 20 years. Sites with existing structures that are 20 years or older were used as an appropriate threshold for potential redevelopment for the following reasons. Property owners begin to weigh alternatives for their properties at the 20 year mark as significant building systems, such as roofs, decks, or HVAC require replacement around this time. Also, before the mid-1980s, residential buildings were built well under the maximum densities, as there was land available for development in the City.

The total capacity figure was calculated according to the following method:

- All parcels with zoning that does not allow by-right residential development were eliminated. As such, all industrial zones were eliminated, despite the fact that the City is currently in the process of evaluating its industrial land and has identified some industrial zoned land in which residential use could be mixed with industrial uses and some industrial land that should be converted to residential use. In the end, only existing residential and commercial-zoned parcels were counted as eligible for the Inventory.
- Some parcels have more than one zoning designation. When a parcel had a residential or commercial component, it was included in the inventory.

- For the initial screen, all parcels in a Specific Plan area, a Historic Preservation Overlay Zone, a Historic Cultural Monument, or subject to the Mills Act were removed from consideration. At a later stage, each Specific Plan was analyzed individually and parcels within those plans were included in the inventory if the Specific Plan did not limit, or only minimally limited density of residential development. (For example, some Specific Plans limit only alcohol permits, some affect only commercial development, some address design).
- Parcels with a General Plan land use designation of "Regional Center Commercial" and "Regional Commercial" were removed and calculated separately, in accordance with Zoning Code Section 12.22 A.18 (a) that permits the R5 zone density (218 units per acre) rather than the R4 zone density (108 units per acre) for residential development on commercially zoned lots (excluding CM Zones) in areas designated as "Regional Center" and "Regional Commercial."
- For the initial screen, all zones with "Q" (Qualified) and "D" (Development) conditions were removed from consideration. Each Q and D condition is a unique and tailored condition tied to a specific zoning ordinance for a particular site and there are several hundred thousand throughout the City. As such, there is no generalized way of knowing what, if any, density restrictions a Q or D condition puts on a particular zone without reading each enacting ordinance. For the previous update, some Q- and D-conditioned zones were individually reviewed and added back in. For example, much of the Central City Community Plan area is governed by zones with the same D condition applicable to all lots; these lots were added back in to the inventory. Due to workforce and time constraints, the potential net units for Qs and Ds were not recalculated for this update. The numbers from the previous Housing Element update were carried over into this update.
- Parcels within a hillside area that are designated for Minimum Density Residential Use and subject to the Slope Density Ordinance were removed from the inventory.
- Under the Los Angeles zoning code there are two main tools for regulating the capacity of sites –Floor Area Ratio (FAR) and density (lot area per unit). As a rule of thumb, FAR is more likely to be the determining factor for the number of units that one can build on a commercially zoned property and density the more likely determining factor for capacity of residentially zoned property. This is largely because some 80% of the commercially zoned land falls into Height District 1, which is limited to an FAR of 1.5:1. Following this rule of thumb, the capacity of a given parcel was calculated using FAR for commercial properties and lot size per unit for residential properties. A few exceptions to this rule were made when residential parcels had zoning with Q-conditions or were in a specific plan area that limited FAR, in which case FAR was used to calculate capacity. The FAR calculation was made by multiplying the lot square footage by the FAR to obtain a total buildable square footage. (Using the lot square footage as a base represents an average because the City's zoning code defines "lot area" in commercial zones with many deviations, some of which effectively

increase the size of the lot and some of which effectively decrease the size of the lot for purposes of calculating the buildable area; see below for details).<sup>\*</sup> This number was then divided by 1,406, the square footage of the median multiple family residential unit built in the City from August 2007 to May 2012. .

- Any units existing on a site were subtracted from the total capacity to obtain the net capacity for each parcel.
- Net units calculated for a site were divided by the number of existing units on the site. Only those sites with a net potential three times the existing number of units were kept in the inventory. For example, if a site had three existing units and was calculated to show a potential of nine or more net units, it was kept in the inventory.
- Only parcels with a net capacity of at least five units were included in the inventory<sup>151</sup>.
- The data used in the Inventory were collected on or prior to February 2013 from the Los Angeles County Assessor's Office and the Los Angeles Department of City Planning.

<sup>\*</sup>The following regulations define the "buildable area" in commercial zones:

- a. Residential development in commercial zones requires side and rear yard setbacks as established for the R4 zone (except that the CR zone requires the side and rear setbacks established in the R3 zone). Buildable area is calculated using the lot area minus the setbacks and multiplying by the FAR.
- b. Zoning Code Section 12.22 A.18(c) eliminates all setback requirements for mixed-use buildings located on commercially-zoned lots (excluding CM Zones) on the sides of a lot that abut a street, private street, or alley.
- c. Zoning Code Section 12.22 C.16 permits property that abuts one or more alleys to include one-half the width of the alley as a portion of the lot area in calculating number of allowed dwelling units.
- d. Zoning Code Section 12.22 C.10 permits rear yards that open onto an alley or a court to count one-half of the width of the alley or court, up to 15 feet, as a portion of the rear yard requirement.
- e. Zoning Code Section 12.22 C.3 eliminates all setback requirements in the Greater Downtown Housing Incentive Area.

<sup>151</sup> Parcels that show less than 5 units do so because of commercial conversion factors explained earlier.

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