A Policy Evaluation

BRIDGING THE GAP

HOUSING PRODUCTION AND THE LIMITS OF TRANSIT ORIENTED COMMUNITIES IN LOS ANGELES

Published
December 14, 2020

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MESSAGE FROM THE PRESIDENT OF PACIFIC URBANISM

Pacific Urbanism is a community serving enterprise that specializes in policy research and evaluation, data modeling, and community building. The mission is to serve as a resource, to communities throughout California, for data driven and multidisciplinary planning support tools. Our goals are environmental justice, public health, safety and welfare of all peoples, regardless of income, ethnicity, gender identity, national origin, religion, age, or ability.

Sincerely,
Dario Rodman-Alvarez

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Executive Summary

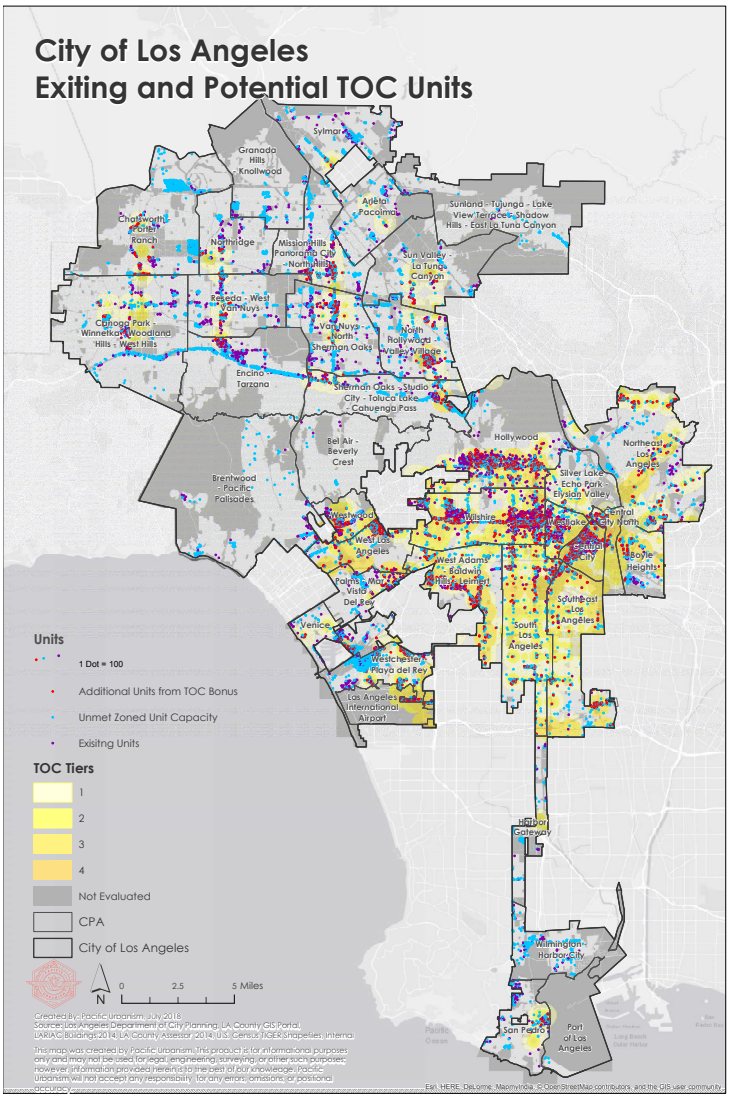
- City of Los Angeles has **299,949 acres of land**
- **149,562 acres** fall within **either commercial or residential zones**
- **TOC bonuses apply to 47,221 acres** within commercial and residential zones
- TOC bonuses **increase reasonable capacity in the City by 363,959 units**
- RHNA target for the City of Los Angeles is **463,683 units by 2029**

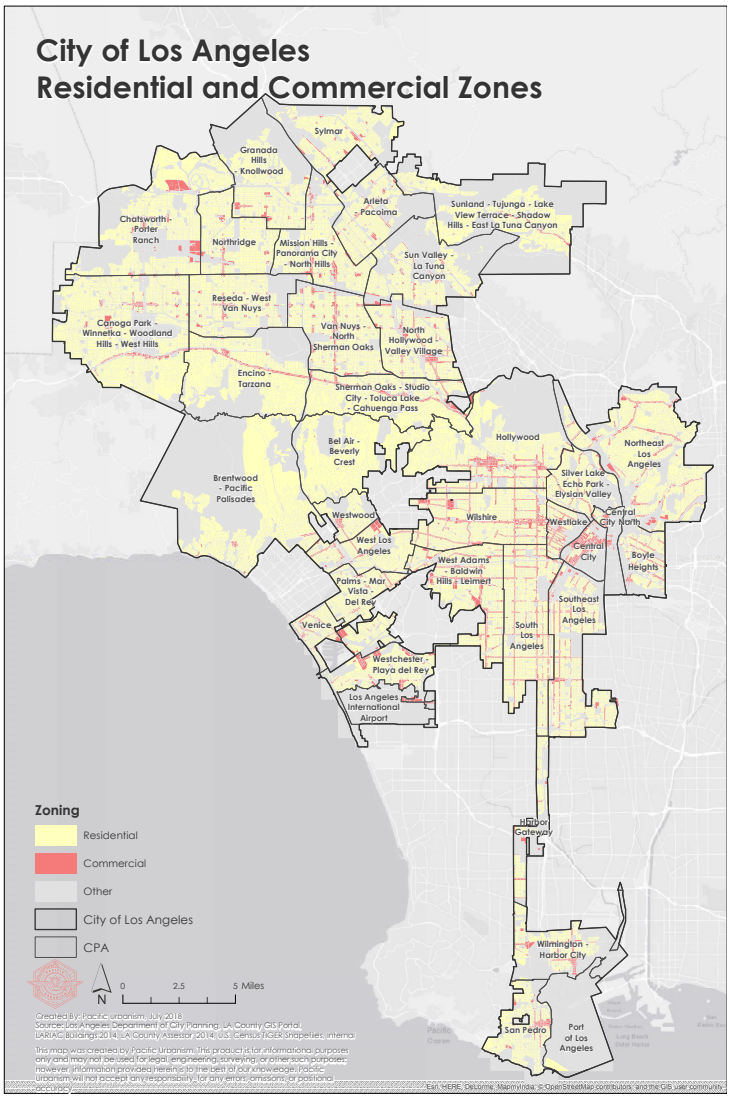
Transit Oriented Communities, or TOC, is a program implemented in 2016 by the City of Los Angeles which promises to alleviate the City's housing crisis by providing dense, affordable housing in land zoned for commercial and residential use near transit stops. The TOC program provides density bonuses to eligible developments depending on their tier, or proximity to a specified transit stop. Overall, TOC applies mostly within Central and South Los Angeles, with the highest density bonuses applying in tiers with larger proportions of commercially zoned land.

The City of Los Angeles has a land area of 299,949 acres, of which 47,221 acres fall with TOC boundaries. Citywide, we can expect TOC bonuses to increase reasonable capacity by 363,959. Of these units, 56,738 units are within commercially zoned land while the remaining 307,221 are within residentially zoned land. These numbers include parcels in which the existing built density is higher than the maximum capacity per TOC bonuses, therefore the actual number of units we can reasonably expect to see developed from TOC is likely much lower.

When compared to the Citywide need per the 2029 Regional Housing Needs Assessment of 463,683, we find that the TOC program leaves a defecit of 97,327 units. Furthermore, the TOC program unevenly distributes the increased expected capacity throughout the City. Many of the City's 35 residential Community Plan Areas (CPAs) receive no increase at all in maximum capacity from TOC bonuses, while some CPAs receive over 10% of the total citywide increase per TOC.

While TOC does provide an increase in maximum housing capacity, this increase is restricted to specific areas near transit stops, excludes most of the City's land, and ultimately does not provide enough additional housing units to meet the City's need by itself. In order to meet the City's housing target, we must look to other policies that include residentially zoned land across Los Angeles.





Background

Since the 1970s, housing affordability in California, and Los Angeles in particular, has continuously worsened due to a shortage of housing production. Consequently, an insufficient housing supply coupled with population growth and regional demand has resulted in unconstrained price inflation. In 2013, 34.5% of all households in Los Angeles spent more than half their income on rent. This exacerbates existing income inequality by requiring certain households to spend a larger portion of their income on rent. For these households, this means having to budget for groceries, transportation, education, healthcare, and unforeseen expenses with the remaining portion of their income.

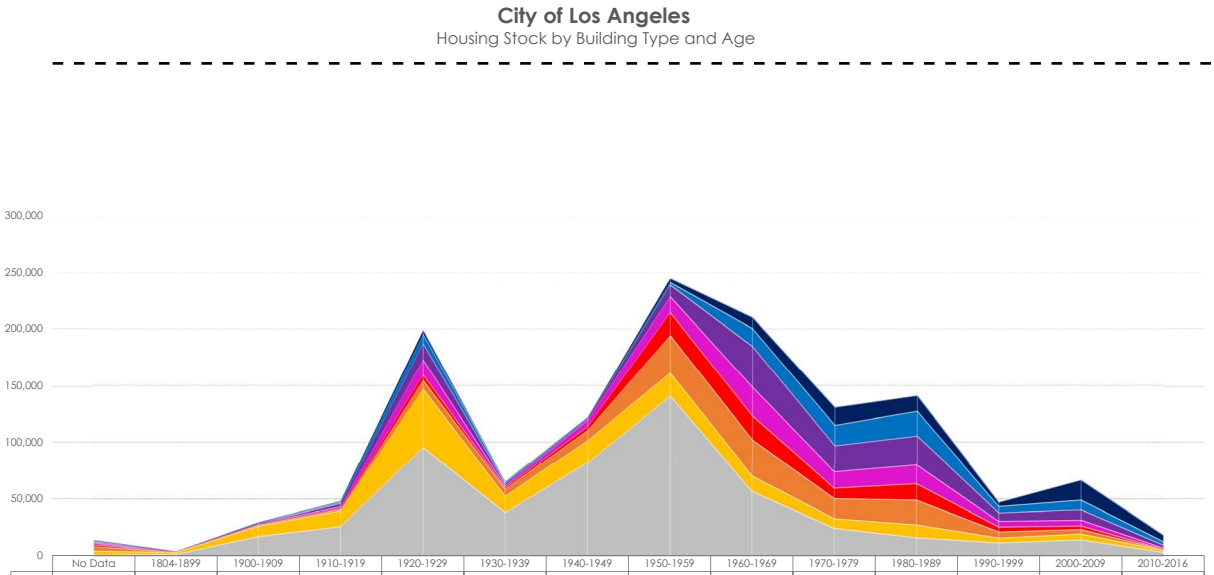
Furthermore, as a result of increased housing prices near job centers, workers are commuting farther to find adequate housing within their budget. However, in 2020, 41,290 Angelenos have not been able to find adequate housing and are currently experiencing homelessness. This represents a 14.2% increase in homelessness in the City of Los Angeles from the previous year. This relationship between housing unaffordability and increase in homelessness is documented -- nationwide, rent increases by 10% have been associated with an increase of homelessness by an additional 19.2 people per 100,000.

In order to remedy these issues stemming from housing unaffordability, we must first remedy the policy decisions that led to housing inequality in the first place. Land use policies in California, in particular, exclusionary zoning practices in affluent and coastal areas of Los Angeles, have played a large role in hindering housing production. Accordingly, California is required to produce 3.5 million homes by 2025 in order to rectify the current deficit.

Historically, housing and land use policies have led to patterns of discrimination in American cities including Los Angeles. Systems of racism and oppression have manifested nationwide through Jim Crow laws, redlining practices, and exclusionary zoning. Land use policies and zoning practices in Los Angeles have contributed to racial segregation, poverty, and environmental injustice that are still observed today.

Since the 1970s, population growth in Los Angeles has been concentrated in lower-income communities of color, while more affluent white neighborhoods have actually decreased their housing capacity through a process known as downzoning. Existing land use plans for the City of Los Angeles continue to create barriers for housing development such as widespread single-family zoning, stringent parking requirements, and building setbacks which reduce the amount of available space on which to build housing.

HOUSING STOCK IN LOS ANGELES 1804-2016



	No Data	1804-1899	1900-1909	1910-1919	1920-1929	1930-1939	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000-2009	2010-2016
100+	923	0	467	1,049	3,529	269	624	3,671	9,932	15,867	13,855	3,780	17,485	5,921
50-99	562	0	476	1,194	8,537	1,337	321	2,279	15,779	18,136	21,923	5,720	8,659	3,019
25-49	1,108	168	480	2,622	14,297	1,718	1,482	10,255	36,039	22,966	25,495	7,332	8,914	2,492
16-24	1,592	69	418	1,687	13,104	1,553	5,408	13,925	25,405	14,328	16,439	4,903	5,041	958
10-15	1,742	76	282	830	4,910	1,436	3,565	20,268	21,305	9,098	14,376	4,109	3,034	540
5-9	3,767	257	1,158	1,261	7,876	6,136	8,916	33,167	31,621	17,536	21,544	5,427	3,899	574
2-4	3,414	1,687	8,824	13,552	51,618	14,282	19,617	20,485	13,589	8,428	11,168	4,184	5,131	1,720
1	1,605	2,164	17,684	26,387	95,590	38,405	82,372	141,001	56,995	24,790	16,701	12,181	14,822	3,885

Figure 02

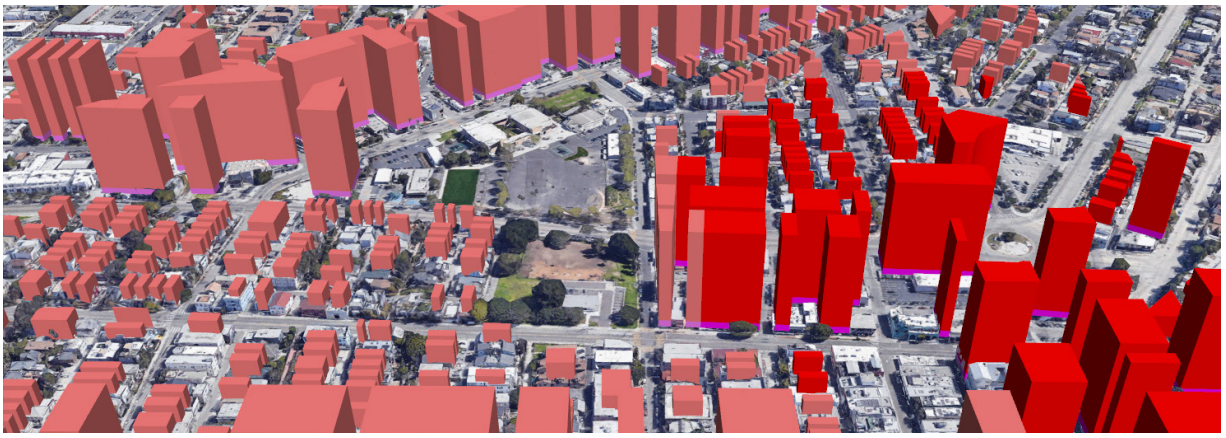
Housing production in Los Angeles has been in decline for several decades, particularly compared to the post-war period of the 1950s. A combination of restricted housing supply, and continued population growth has created a demand for housing in Los Angeles that results in high housing costs that many are unable to afford.

5,618 entitlement requests per year since implementation of TOC

In response to this housing affordability crisis, Measure JJJ was approved by City of Los Angeles voters in 2016. As a result, the Transit Oriented Community (TOC) program was created to provide market-rate and affordable housing near public transit nodes to alleviate housing shortages. The City of Los Angeles presents the TOC program as a strategy to provide enough housing near transit to alleviate regional demand. According to the Department of City Planning, since its inception, TOC entitlement requests have totalled 22,473 units, or 5,618 units per year. However, these are only entitlement requests, not unit production. This means that the actual number of units provided by TOC is likely much lower. Accordingly, the efficacy of this TOC program must then be evaluated to determine if it will solve the issues at hand, or if we must look to other strategies to solve the housing crisis.

LITERATURE REVIEW

Existing urban form



Transit oriented communities

Figure 03

TOC-style developments (red) are often criticized as being out-of-character for neighborhoods in Los Angeles.

There have been several arguments in favor of the TOC program in Los Angeles since it was introduced. Supporters of TOC claim the program will increase housing supply citywide, particularly increasing dense housing near public transit nodes. These advocates argue that TOC incentivizes the construction of affordable housing within its boundaries, and will improve regional air quality due to their proximity to public transportation.

However, critics of the TOC program have raised concerns over the efficacy of TOC to provide enough housing to meet regional demand. These critics claim overall housing production in the City of Los Angeles has actually decreased since the implementation of the TOC program, and that the strategy decreases overall production by concentrating housing production into a small pool of developers. Furthermore, some have observed that the existing built density in certain locations within TOC boundaries are actually higher than the allowable capacity per TOC bonuses. Additional criticisms of TOC include claims that the large building types associated with TOC are "out of character" for many parts of the City, and that TOC production actually incentivizes the demolition of rent-controlled units near transit options.

Methods & Results

Figure 04

Visualization of potential TOC-style developments (red) in Venice Beach. Concentrating developments along transit corridors excludes the opportunity to evenly and equitably distribute new housing across the City.

Pacific Urbanism is a community-serving enterprise that specializes in policy research and evaluation, data modeling, and community building. Our mission is to serve as a resource to communities throughout California for the creation of data-driven and multidisciplinary planning support tools that specifically advance environmental justice, public health, safety, and welfare of all peoples. Our efforts focus on reaching the goals of redefining sustainability in terms of environmental and economic justice, community development, public health, and the safety and welfare of all peoples.

Accordingly, our research efforts examine the following question:

> What policies and policy reforms are necessary in order to allow for housing production which will meet regional demand in a manner that is equitable, environmentally just and promotes fair housing?

We have identified three objectives which will provide an answer for the above prompt:

1. Identify hindrances to housing production
2. Evaluate efficacy of existing policies that claim to promote housing production
3. Create necessary policies that will result in equitable and fair housing production

In order to evaluate the efficacy of the Transit Oriented Community policy in Los Angeles, this paper will answer the following inquiries:

- Where does TOC apply in Los Angeles?
- What is the difference between existing zoned capacity and allowable capacity per TOC guidelines?
- What is the zoned dwelling unit capacity per zoning classification?
- What is the TOC bonus capacity per zoning classification within TOC tiers?
- What is the existing dwelling unit count per the Tax Assessor?
- What are the locations of unmet capacity relative to existing, including TOC bonus?
- What is the zoned capacity by residential and commercial zones?
- What is the unmet dwelling unit capacity in residential zones by Tiers?
- What is the unmet dwelling unit capacity in commercial zones by Tiers?

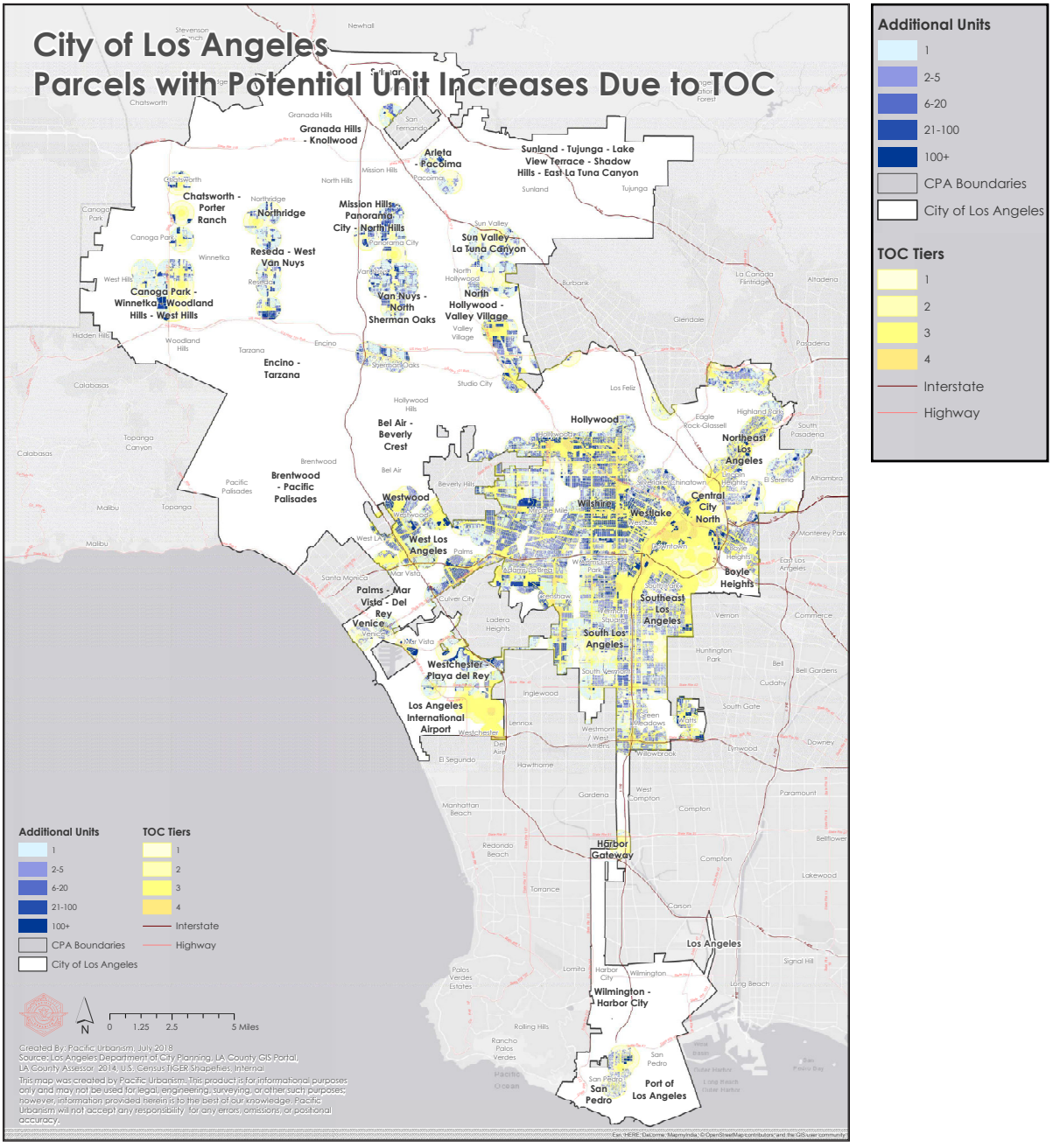
METHODS

1. Literature review on Transit Oriented Communities in City of Los Angeles
2. Review policy landscape to determine density bonuses and other incentives in Transit Oriented Communities (TOCs).
3. Specify maximum dwelling units per acre (either per Zoning classification or other land use designation)
5. Quantify maximum and reasonable expected dwelling unit capacity (without incentives and then with TOC bonuses)
6. Analyze results by Community Plan Area, zoning classification, and TOC tier
7. Geolocate existing and potential additional units per TOC
7. Discuss and evlaute policy
8. Describe topics for further research

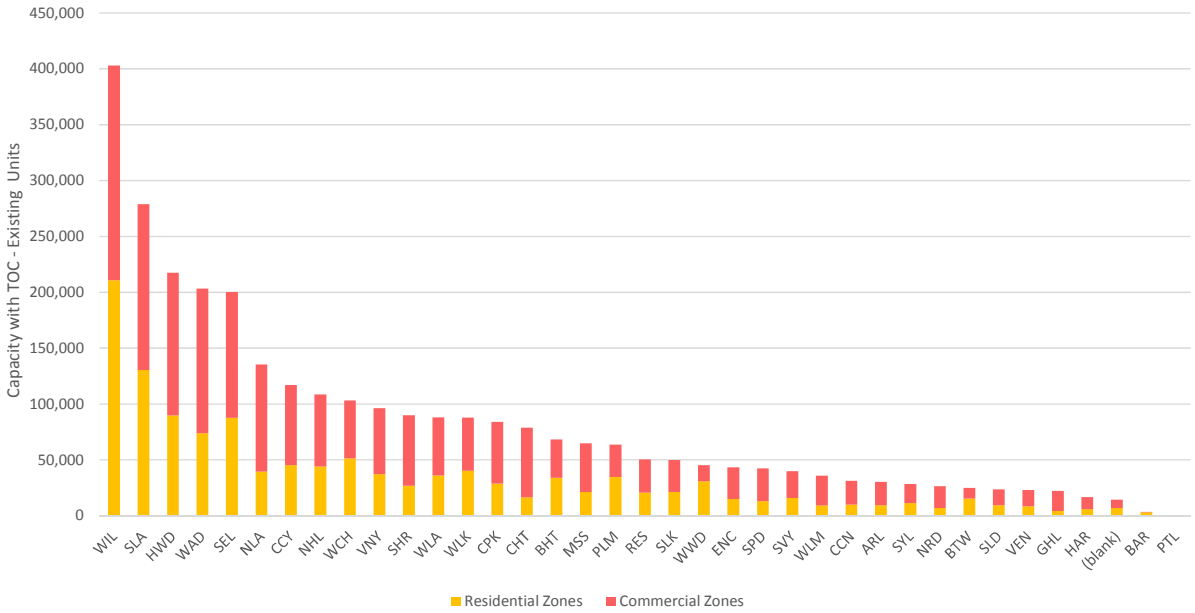
AREAS OF ZONED CAPACITY INCREASE PER TOC

Figure 05

Locations of parcels with potential unit increases per TOC guidelines. Areas in blue show parcels in which the allowable capacity (including TOC bonus) is greater than existing housing stock.

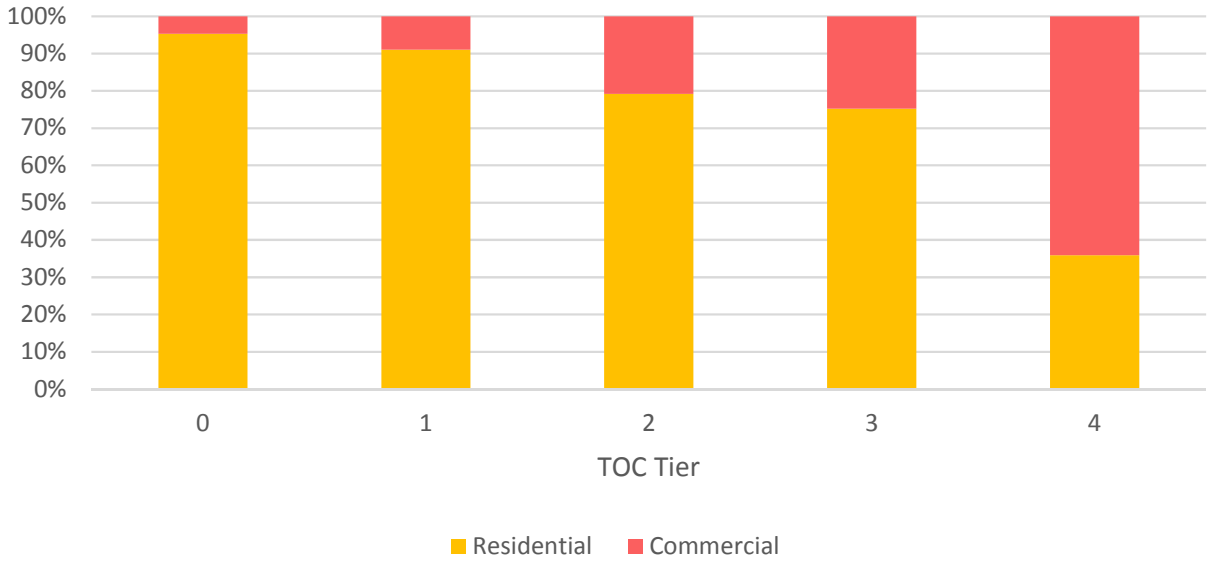


ADDITIONAL UNITS PER TOC CAPACITY BY CPA



TOC bonuses are unevenly distributed throughout the City, with some Community Plan Areas (CPAs) receiving more than 1000% the amount of potential additional units per TOC than other CPAs. In the above chart, we can observe the highest increase in potential units per TOC bonuses occurs within Wilshire, South Los Angeles, and Hollywood CPAs. In most CPAs, the majority of these potential TOC units are within land zoned for commercial use, which has historically been built to only ~10% of its housing capacity. This means we can only expect to see a tenth of the allowable dwelling unit capacity in commercial zones to actually be built and available for occupation. We refer to this distinction as the *reasonable* capacity.

ZONING CLASSIFICATION DISTRIBUTION BY TOC TIER



TOC tiers determine the density bonuses applicable to any given development within its boundaries. Tier 4 comprises the land nearest a transit stop, and therefore provides the greatest incentives per TOC guidelines. Accordingly, Tier 4 is predominantly in land zoned for commercial use, which has been observed to develop to a limit of near 10% of its housing capacity. Tiers with the lowest density bonuses are primarily in land zoned for residential use, which has historically developed to near 50% of its housing capacity.

TOP 15 COMMUNITY PLAN AREAS BY MAXIMUM CAPACITY INCREASE PER TOC

Zoning Classification	Area (Acres)	Existing Units	Remaining Existing Capacity from Existing Units	Existing Maximum Zoned Capacity	Maximum Capacity Increase per TOC	Total Maximum Capacity (with TOC Bonus)	Remaining Capacity (with TOC Bonus) from Existing Units
Wilshire	6,110.29	133,320	193,755	327,075	209,333	536,408	403,088
South Los Angeles	6,192.46	84,224	148,270	232,495	130,488	362,983	278,758
Hollywood	7,571.36	115,312	99,511	214,823	117,890	332,713	217,401
West Adams - Baldwin Hills - Leimert	5,370.09	68,313	110,311	178,624	92,997	271,621	203,308
Southeast Los Angeles	5,052.87	66,495	108,100	174,595	92,029	266,624	200,129
Central City	604.54	24,066	57,076	81,142	59,881	141,023	116,957
Northeast Los Angeles	8,505.04	81,374	84,723	166,098	50,733	216,831	135,457
Westlake	936.14	34,507	40,725	75,232	47,217	122,449	87,942
West Los Angeles	2,542.19	39,645	47,214	86,858	40,938	127,796	88,152
North Hollywood - Valley Village	4,053.87	58,236	76,428	134,664	32,016	166,680	108,444
Westchester - Playa del Rey	2,729.07	30,239	74,647	104,886	28,406	133,292	103,053
Van Nuys - North Sherman Oaks	4,913.71	64,071	69,316	133,387	26,968	160,355	96,284
Boyle Heights	1,516.73	22,605	42,004	64,609	26,276	90,885	68,280
Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass	6,278.13	45,217	64,738	109,955	25,166	135,122	89,905
Palms - Mar Vista - Del Rey	3,046.50	51,134	40,246	91,380	23,533	114,913	63,779
Westwood	1,126.30	22,055	23,206	45,261	22,013	67,273	45,218
Canoga Park - Winnetka - Woodland Hills - West Hills	10,583.99	60,492	63,410	123,901	20,535	144,436	83,945
Silver Lake - Echo Park - Elysian Valley	2,185.95	31,215	29,792	61,007	20,106	81,113	49,898
Mission Hills - Panorama City - North Hills	4,397.01	40,340	46,367	86,706	18,558	105,265	64,925
San Pedro	2,476.65	31,208	27,053	58,262	15,344	73,605	42,397
Central City North	234.56	5,195	16,404	21,600	14,725	36,324	31,129
Reseda - West Van Nuys	4,256.19	35,609	36,842	72,451	13,679	86,130	50,521
Sun Valley - La Tuna Canyon	3,331.74	23,033	29,230	52,263	10,729	62,992	39,959
Venice	1,078.67	22,274	13,499	35,773	9,475	45,248	22,974
Chatsworth - Porter Ranch	7,096.82	34,589	70,447	105,036	8,349	113,385	78,795
Northridge	3,938.95	23,858	18,300	42,158	8,229	50,387	26,529
Arleta - Pacoima	2,979.01	20,831	25,183	46,014	5,032	51,046	30,215
Encino - Tarzana	6,737.45	33,072	38,587	71,659	4,731	76,390	43,318
Sylmar	3,596.86	21,241	26,228	47,470	2,285	49,755	28,514
Brentwood - Pacific Palisades	8,889.91	27,491	23,344	50,834	1,618	52,452	24,962
Harbor Gateway	1,154.98	13,136	15,952	29,088	722	29,810	16,674
Bel Air - Beverly Crest	6,550.40	10,736	3,398	14,133	1	14,134	3,398
Wilmington - Harbor City	2,083.76	23,042	35,849	58,891	0	58,891	35,849
Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna	5,401.59	23,629	23,593	47,222	0	47,222	23,593
Granada Hills - Knollwood	4,193.44	21,380	22,384	43,764	0	43,764	22,384
Grand Total	**147,717**	**1,443,186**	**1,846,131**	**3,289,317**	**1,180,001**	**4,469,318**	**3,026,132**

Currently, the LA County Tax Assessor reports an existing dwelling unit count of 1,443,186 units. This is the result of all housing production that remains in the City, which includes housing units built before maximum allowable capacity was lowered or downsized through community plan updates since the 1970s. When taking into account the capacity per the current land use and community plans (before TOC bonuses), the City of Los Angeles has a maximum capacity of 3,289,317 units, of which 1,846,131 have not been built. Per TOC bonuses, the maximum capacity is increased by 1,180,001 additional units citywide, for a total of 4,469,318 units.

It is important to note that these figures represent the *best case scenario*, that is, these are the total amount of units that we could possibly see from the TOC program. This does not take into account parcels where the existing built density is higher than the maximum capacity per TOC. Furthermore, the maximum capacity does not include the fact that commercial and residential zones have been historically observed to reach only 10% and 50% of their maximum capacity, respectively.

TOP ZONING CLASSIFICATIONS BY MAXIMUM CAPACITY INCREASE PER TOC

Zoning Classification	Area (Acres)	Existing Units	Remaining Existing Capacity from Existing Units	Existing Maximum Zoned Capacity	Maximum Capacity Increase per TOC	Total Maximum Capacity (with TOC Bonus)	Remaining Capacity (with TOC Bonus) from Existing Units
C2	8,749.74	98,662	855,066	953,728	419,015	1,372,743	1,274,081
R3	10,071.45	362,491	181,342	543,832	197,512	741,344	378,854
R4	2,690.94	119,914	173,394	293,308	164,988	458,295	338,382
C4	2,139.67	25,498	207,715	233,213	100,566	333,779	308,281
R1	42,330.19	289,234	91,664	380,899	67,021	447,920	158,686
R2	6,985.82	92,688	26,081	118,769	53,483	172,252	79,564
RD1.5	6,140.77	144,078	34,000	178,078	43,321	221,399	77,322
R5	286.18	18,354	44,034	62,388	39,695	102,084	83,729
RD2	4,363.84	71,866	24,128	95,994	22,647	118,641	46,775
CM	965.73	6,063	46,079	52,141	19,029	71,170	65,108
C1.5	354.39	2,798	35,825	38,623	8,134	46,757	43,959
CR	154.60	1,717	15,133	16,850	5,719	22,569	20,852
C1	531.85	4,948	23,781	28,729	5,332	34,061	29,113
R1V2	2,589.90	17,422	5,879	23,301	4,785	28,086	10,664
C5	52.70	3,078	2,662	5,740	4,187	9,927	6,849
RD3	1,654.01	18,953	5,855	24,808	3,642	28,450	9,497
RAS4	75.23	2,516	5,687	8,203	3,536	11,739	9,224
RS	10,836.38	55,585	9,410	64,996	3,193	68,189	12,603
CR(PKM)	52.26	367	5,326	5,693	2,723	8,415	8,049
C2(PV)	157.97	3,193	14,026	17,219	1,778	18,996	15,804
R5P	8.73	613	1,290	1,902	1,340	3,242	2,630
R4P	18.36	431	1,571	2,002	1,306	3,308	2,877
R4(PV)	91.23	494	9,449	9,943	1,270	11,213	10,719
RE11	7,682.08	25,271	5,441	30,712	1,123	31,835	6,564
R1V3	214.04	1,520	404	1,924	1,100	3,023	1,503
C4(OX)	31.34	1,904	1,512	3,416	866	4,282	2,377
RAS3	39.42	650	1,478	2,128	752	2,880	2,230
R3(PV)	122.81	7	6,625	6,632	547	7,179	7,172
RE9	1,701.83	6,169	2,343	8,512	541	9,053	2,883
RA	12,616.86	27,880	3,651	31,531	397	31,929	4,049
RD4	249.54	2,368	369	2,737	341	3,078	710
RE15	8,290.07	20,455	4,420	24,875	333	25,209	4,754
R3P	13.61	242	491	733	313	1,046	804
R3(UV)	17.99	0	971	971	301	1,272	1,272
RD5	329.52	3,225	-260	2,965	243	3,208	-17
RW1	27.29	580	-64	517	222	739	158
RE20	2,980.35	5,004	958	5,962	186	6,148	1,144
RD6	903.35	4,233	2,542	6,775	89	6,864	2,631
Grand Total	**149,562.52**	**1,453,778**	**1,858,975**	**3,312,753**	**1,181,817**	**4,494,570**	**3,040,792**
Total Commercial	**13,200.46**	**148,228**	**1,207,676**	**1,355,904**	**567,375**	**1,923,279**	**1,775,051**
Total Residential	**136,362.06**	**1,305,550**	**651,298**	**1,956,849**	**614,442**	**2,571,291**	**1,265,741**

TOC bonuses apply in land zoned for either residential or commerical land use. As such, we further analyzed increase in maximum capacity by specific zoning classifications. Within commercial zones, TOC increases the maximum capacity by 567,375 units. However, since commercial zones historically develop to only 10% of their maximum capacity, we can expect commercial zones to increase their *reasonable* capacity by only 56,738 units. Accordingly, the maximum capacity in residential zones is increased by 614,442 units per TOC bonuses. Since residential zones develop to 50% of their maximum zoned capacity, we can expect residential zones to increase their *reasonable* capacity by 307,221 units. Consequently, TOC only increases the *reasonable* capacity overall by 363,959 units citywide, or 99,723 units less than the City's 2029 RHNA target.

As previously stated, most of the residentially zoned land within TOC boundaries fall within its lowest categories, receiving the lowest density bonuses. Despite this, R zones provide the largest increase in maximum capacity per TOC bonuses. In fact, seven of the top ten zoning classifactions per increase in maximum capacity are R zones. This means that although the greatest TOC bonuses apply within commercial zones, they do not increase maximum capacity the most in commercial zones.

INCREASE IN MAXIMUM CAPACITY BY TOC TIERS

Zoning Classification	Area (Acres)	Existing Units	Remaining Existing Capacity from Existing Units	Existing Maximum Zoned Capacity	Maximum Capacity Increase per TOC	Total Maximum Capacity (with TOC Bonus)	Remaining Capacity (with TOC Bonus) from Existing Units
0	**102,351.97**	**660,814**	**695,296**	**1,356,111**	**0**	**1,356,111**	**695,296**
Commercial	4,734.76	39,082	434,375	473,458	0	473,458	434,375
Residential	97,617.21	621,732	260,921	882,653	0	882,653	260,921
1	**20,999.42**	**285,962**	**295,329**	**581,291**	**277,885**	**859,176**	**573,213**
Commercial	1,878.41	19,027	173,447	192,474	96,237	288,712	269,684
Residential	19,121.01	266,935	121,881	388,816	181,647	570,464	303,529
2	**9,266.10**	**149,713**	**254,092**	**403,804**	**232,219**	**636,023**	**486,311**
Commercial	1,928.09	17,313	182,141	199,454	119,672	319,127	301,813
Residential	7,338.01	132,400	71,951	204,350	112,547	316,897	184,497
3	**15,763.09**	**325,144**	**531,802**	**856,946**	**580,469**	**1,437,415**	**1,112,272**
Commercial	3,902.20	54,665	354,828	409,493	286,645	696,139	641,473
Residential	11,860.89	270,478	176,975	447,453	293,824	741,276	470,798
4	**1,181.94**	**32,145**	**82,456**	**114,601**	**91,244**	**205,845**	**173,700**
Commercial	756.99	18,140	62,885	81,025	64,820	145,844	127,704
Residential	424.95	14,005	19,571	33,576	26,425	60,001	45,995
Grand Total	**149,562.52**	**1,453,778**	**1,858,975**	**3,312,753**	**1,181,817**	**4,494,570**	**3,040,792**

TOC bonuses are determined by tiers, or distance from a central transit node. Tier 4, the closest to transit stops, provides the highest density bonuses. However, tier 4 is also the smallest by area, only increasing the maximum capacity by 91,244 units. In fact, we can observe tier 3 provides the greatest increase in maximum capacity at 580,469 units. This is largely due to tier 3 being predominantly zoned for residential land use, as opposed to commercial land use.

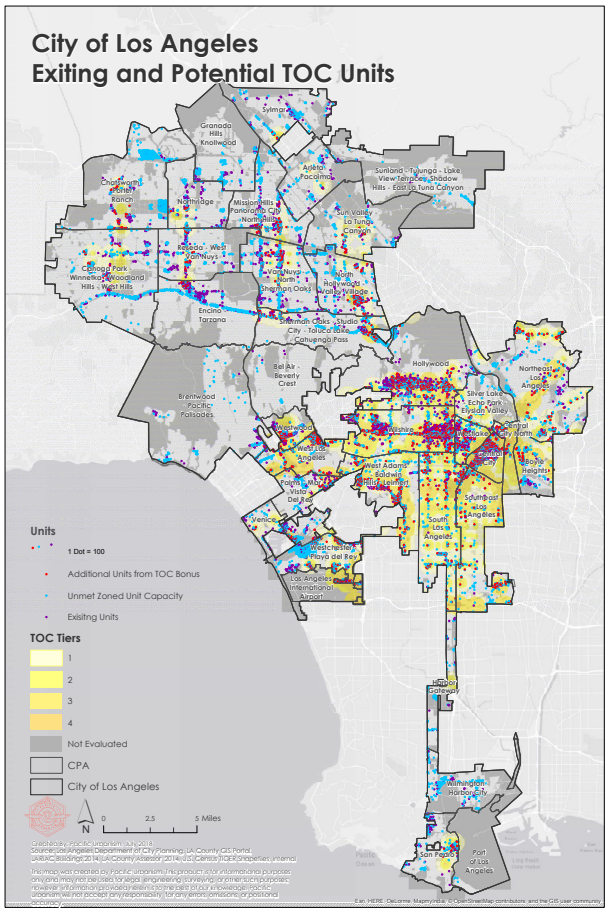
Again, these numbers represent a best case scenario which is unlikely due to historical trends within commercial and residential zones. Additionally, these figures do not exclude parcels in which the existing density is higher than the maximum capacity per TOC. The amount of additional units we can reasonably expect to see is likely much lower, as explored in the table below.

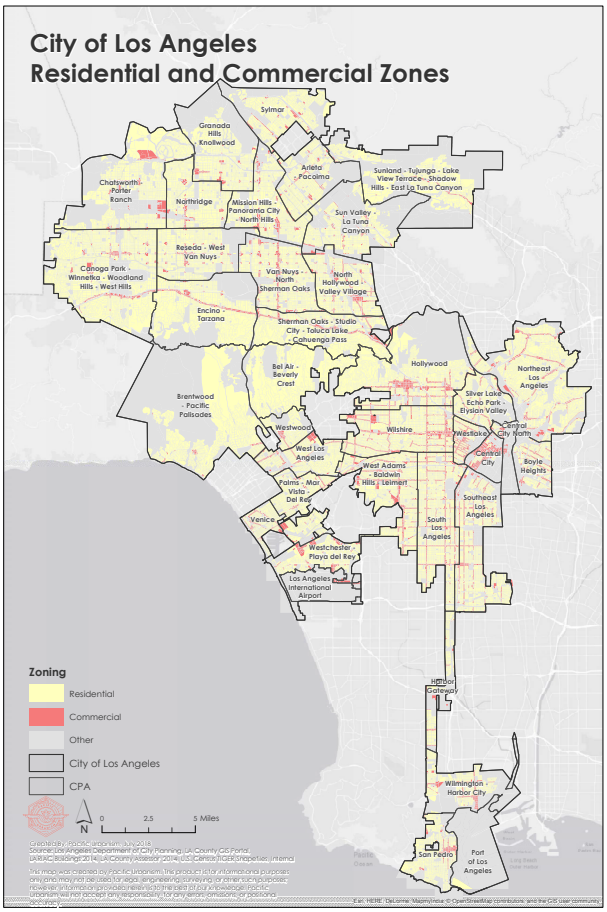
TOP COMMUNITY PLAN AREAS BY UNMET CAPACITY IN RESIDENTIAL PARCELS

CPA	Area (Acres)	Exisiting Units	Remaining Existing Capacity from Existing Units	Existing Maximum Zoned Capacity	Maximum Capacity Increase per TOC	Total Maximum Capacity (with TOC Bonus)	Remaining Capacity (with TOC Bonus) from Existing Units
Wilshire	4,066	99,183	91,351	190,535	121,594	312,129	5,832
South Los Angeles	3,154	40,201	68,908	109,109	58,993	168,102	5,018
Hollywood	3,808	47,829	48,952	96,781	52,572	149,353	34,071
Southeast Los Angeles	2,862	29,583	47,246	76,830	39,951	116,781	13,688
West Adams - Baldwin Hills - Leimert	2,918	38,213	35,874	74,087	35,827	109,914	9,977
Westlake	536	19,512	19,643	39,156	23,726	62,881	45,433
Central City	138	6,846	23,258	30,104	22,175	52,279	15,276
West Los Angeles	1,353	23,031	14,629	37,659	19,782	57,441	23,092
Northeast Los Angeles	3,395	22,246	27,039	49,285	15,612	64,898	12,624
Westwood	779	17,529	15,498	33,028	15,260	48,288	2,642
North Hollywood - Valley Village	1,580	28,773	27,712	56,485	15,013	71,499	4,882
Grand Total	**59,622**	**631,452**	**706,191**	**1,337,643**	**542,273**	**1,879,916**	**1,248,463**

Some parcels within TOC boundaries currently have an existing built density which is higher than the maximum capacity per TOC bonuses. These parcels are unlikely to redevelop and provide additional units through the TOC program. Accordingly, when only taking into account parcels with unmet capacity, we can observe that the *expected* maximum capacity increase from TOC in residential zones lowers from 614,442 units to 542,273 units. Since residential parcels historically develop to a reasonable capacity of 50%, this means we can *reasonably expect* 271,137 units within residential zones per TOC bonuses.

In order to fully analyze whether we can *reasonably expect* TOC to provide enough housing to meet the City's need, we must next determine how many parcels in commercial areas currently have an existing density greater than the maximum capacity per TOC bonuses. However, since since *reasonable* maximum capacity within commercial zones is 56,738 units, we can expect the *reasonable expected* capacity for commercial zones to be even lower.





TOC bonuses, and therefore potential additional units per TOC, apply the most in Central and South Los Angeles. However, there are currently concentrations of unmet capacity outside these areas, most notably in Chatsworth-Porter Ranch, Granada Hills - Knollwood, Palms-Mar Vista, Westchester - Playa del Rey, and along Ventura Boulevard in the San Fernando Valley. Furthermore, most of the City of Los Angeles is zoned for residential land use, which TOC tiers with the highest bonuses exclude.

Conclusion

The TOC program in Los Angeles does increase maximum zoned capacity for many parts of the city, however when compared to the citywide 2029 RHNA target of 463,682 units, we can expect TOC to fall short by almost 100,000 units. By excluding residentially zoned land, particularly single-family residential zones away from transit, the TOC program misses a large opportunity to incentivize housing production across most of Los Angeles.

It is clear that we cannot expect the TOC program alone to provide for the citywide housing need. Therefore, we must explore and implement other strategies that will increase *reasonable expected* capacity across the City of Los Angeles. By upzoning, or increasing the allowable capacity, residential areas within neighborhoods, we can apply a "density bonus" to most of the City. Additionally, by equitably distributing the 2029 RHNA target to each Community Plan Area, we can avoid the concentration of housing production in specific areas of the City that lead to housing inequality. This process would most efficiently be implemented through the periodic Community Plan Updates, which decide land use, density, and allowable housing capacity throughout the City.

AREAS FOR FURTHER RESEARCH

1. Conversion of commercial floor area to residential floor area after COVID-19 decrease in demand for commercial and retail space.

2. Correlation between average rental price, increase in zoned capacity, increase in housing permitting, and timeline of production.

3. Increase in maximum allowable capacity per ADUs

4. Increase in reasonable expected capacity excluding parcels in commercially zoned land where existing density is higher than maximum capacity per TOC

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