



June 16, 2017

City Planning Commission
Los Angeles Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012

[Via electronic mail to CPC@lacity.org]

Re: The People's Plan and UNIDAD Comments and recommendations concerning the draft South and Southeast LA Community Plans

Dear Commissioners,

As part of The People's Plan coalition, the United Neighbors in Defense Against Displacement (UNIDAD) is pleased to submit these comments and recommendations concerning the draft South and Southeast LA Community Plans and the Community Plan Implementation Overlay (CPIO) Districts. This letter builds on our long-standing participation in the Community Plan update process, dating back to 2006 and including the submission of detailed policy recommendations in April of 2014 and on February 1, 2017. You'll have received numerous letters of support from a diverse group of People's Plan member organizations. The list includes organizations from throughout South LA and representing faith-based organizations, community-based organizations, workforce development groups, youth organizations, environmental groups, affordable housing organizations and more.

UNIDAD is a coalition of tenants, homeowners, workers, business owners, students, teachers, health providers and advocates, faith congregations, and community-based organization who work together to create a healthy and strong South Los Angeles community by ensuring that the interests of low-income communities, especially low-income communities of color, are represented in the decisions and processes that drive development in our neighborhoods. Our collaborative was formed in the early 1990s. We have seen entire blocks of Black residents and Black-owned businesses displaced from our community. We have seen Latino and immigrant communities harmed by slum housing, harassment and illegal eviction tactics. And we have seen large-scale development enter our neighborhoods without genuine and responsive community process. We have seen ill-advised development resulting in the loss of historical and cultural memory. And we understand the role that community-led and community-controlled development can play in restoring the physical, mental, economic and cultural health of a community.

In all of our work, we have sought to deepen the quality of community resident engagement in land use policy creation and implementation, knowing that such engagement ultimately results in better planning and more equitable outcomes. We have built capacity among local residents to be active participants in the planning processes through community-based programs, such as People's Planning School. Through this

process residents have created a set of Equitable Development Principles that guide our work. And these principles have been combined with numerous community planning processes to develop what we call **The People's Plan**.

The People's Plan document is being submitted separately (in order to avoid exceeding page limit guidelines), but also can be found at <http://www.unidad-la.org/peoplesplan> . The People's Plan is the result of an extensive community engagement process undertaken over many years, paired with considerable research, analysis and deliberation. Since the inception of the South and Southeast LA Community Plan updates in 2007, we have worked with families, residents, and business owners throughout South Central LA to build a vision for the Plans that meets our community's needs. From this process emerged a series of recommendations in four broad principles:

- I. Create a net gain of affordable housing.
- II. Promote inclusive economic development by supporting local workers and businesses.
- III. Promote community health and wellness.
- IV. Strengthen community leadership in the land use planning process.

The attached table provides specific recommended “redline” edits and inserts to the current Plans and CPIOs. We believe these proposed changes will to advance the People's Plan principles and enhance the housing, health, and economic livelihood of our communities.

With intentionality, our Community Plans can serve as a roadmap to build better neighborhoods, with the same neighbors. To that end, we request your careful consideration of the following:

Sincerely,

The People's Plan Coalition and the United Neighbors In Defense Against Displacement (UNIDAD) Coalition

ACT LA
A Place Called Home
CDTech
Community Health Councils
East LA Community Corporation (ELACC)
Esperanza
Jobs to Move America
Koreatown Immigrant Workers Alliance (KIWA)
Los Angeles Community Action Network (LA CAN)
LA Black Worker Center
LA Forward
LA Mas
LA Neighborhood Land Trust
La Voice
Little Tokyo Services Center
Neighborhood Housing Services

PSRLA
SCANPH
SCOPE
Thai CDC
Trust South LA
UTLA
SEACA
SAJE
TRUST South LA
St. John's
NRDC
St. Francis Center
United University Church
St. Mark's Lutheran Church
PVJOBS

Recommendation	Recommended edits/inserts	Notes/rationale																					
<p>1. Align community plan upzoning with affordable housing and incentives for local jobs - consistent with TOC Guidelines.</p>	<p>(A) Amend the CPIO definition of “Mixed Income Housing” (SLA p8, SELA p10) to require different levels of affordability depending on subarea, consistent with the adopted TOC Guidelines.</p> <p>Mixed-Income Housing: (1) A Project that provides market-rate dwelling units and Affordable Housing units, where <u>Affordable Housing units are provided as follows:</u></p> <p>(1) <u>For TOD Subarea E (TOD low)</u> a minimum of 20-21 12 percent of the <u>total units</u> are set aside for Low Income households, or 44 12 percent <u>of the total units</u> for Very Low Income households, or 79 12 percent <u>of the total units</u> for Extremely Low Income households as defined in this section (or any combination therein);</p> <p>(2) <u>For Subareas F, G, H, I and J, a minimum of 25% of the total units are set aside for Low Income households, or 15% of the total units for Very Low Income households, or 11% of the total units for Extremely Low Income households as defined in this section.</u> or (2) A For-Sale Project in all Subareas except Subarea G that provides a minimum of 40 percent of the units for Moderate Income households, as defined in this section.</p> <p>Affordable dwelling units within Mixed-Income Housing shall be no less than 90 percent the average square footage of market-rate dwelling units, with the same number of bedrooms and be reasonably interspersed throughout the development, and shall have access to the same amenities and use of the same entrance. Building materials and quality of design shall be consistent throughout.</p> <p>(B) Amend CPIO Section 2-1 and Table 2-2 to clarify that base FAR is 1.5:1 in TOD subarea H; allow additional density with affordability in all TOD subareas; and provide an additional incentive for projects that meet the employment standards in Measure JJJ..</p> <p>E. Floor Area Ratio (FAR). In TOD Subareas (E, F, G, <u>H</u>), all Projects are limited to 1.5:1 FAR except where Table 2-1 and 2-3 allow otherwise.</p> <table border="1" data-bbox="394 1091 1562 1446"> <thead> <tr> <th colspan="5">TABLE 2-2 RESIDENTIAL/MIXED-USE DENSITY, FAR, AND HEIGHT* continued</th> </tr> <tr> <th>Subarea</th> <th>Density Max</th> <th>Height Max</th> <th>FAR Max</th> <th>Incentives/Clarifications</th> </tr> </thead> <tbody> <tr> <td rowspan="3">H (TOD Regional Center)</td> <td>R3</td> <td>2 Stories minimum,</td> <td>2.25-1.5:1</td> <td rowspan="3">General commercial uses (i.e. retail, restaurant, entertainment uses) are permitted within the first two floors. <u>Mixed-Income and 100% Affordable Housing projects that adhere to the construction employment standards in LAMC 11.5.11 may also choose one additional incentive from the menu in LAMC 12.22.A.25(f).</u></td> </tr> <tr> <td>R4 (maximum density) for Density Bonus Projects</td> <td>12 Stories Maximum</td> <td>6:1 Mixed-Income or 100% Affordable Housing</td> </tr> <tr> <td>Unlimited for Mixed-Income or 100% Affordable Housing</td> <td>Conditional use for additional height over 12 stories.</td> <td></td> </tr> </tbody> </table>	TABLE 2-2 RESIDENTIAL/MIXED-USE DENSITY, FAR, AND HEIGHT* continued					Subarea	Density Max	Height Max	FAR Max	Incentives/Clarifications	H (TOD Regional Center)	R3	2 Stories minimum,	2.25- 1.5 :1	General commercial uses (i.e. retail, restaurant, entertainment uses) are permitted within the first two floors. <u>Mixed-Income and 100% Affordable Housing projects that adhere to the construction employment standards in LAMC 11.5.11 may also choose one additional incentive from the menu in LAMC 12.22.A.25(f).</u>	R4 (maximum density) for Density Bonus Projects	12 Stories Maximum	6:1 Mixed-Income or 100% Affordable Housing	Unlimited for Mixed-Income or 100% Affordable Housing	Conditional use for additional height over 12 stories.		<p>1(A): Align the CPIO with the recently adopted TOC Guidelines. The Plans propose a CPIO incentive structure that is different than the TOC Guidelines (which apply in all non-CPIO sites). The result is two inconsistent incentive structures in the CPAs. The CPIO provides significant density increases, in most cases, greater than the density provided under the TOC Guidelines, but with lower percentages of affordability. To avoid skewed incentives, the affordability percentages should align.</p> <p>This can be done by matching CPIO subareas with the affordability rates of corresponding TOC Tiers, based on the density increase offered. Specifically, because Subareas F, G, H, I and J allow FAR increases of at least 100%, we recommend alignment with the affordability provisions in Tier 4 of the TOC Guidelines. Subarea E proposes a smaller density increase (1.5 to 2 FAR), so we recommend alignment with the lower provisions of Tier 2 of the TOC Guidelines.</p> <p>1(B): The CPIOs should ensure <i>any</i> increase in density is aligned with affordable housing. Thus, the base FAR must be set at 1.5, with appropriate increases coordinated with affordable housing.</p> <p>If the CPIOs are to adjust the TOC Incentives for these CPAs, then they must provide an additional incentive for projects that meet Measure JJJ employment standards, as required by Measure JJJ.</p>
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<p>2. Create an area-wide No-Net-Loss Program.</p>	<p>(A) Include a new Policy and amend Program 63/57 to establish and implement an Area-wide No-Net-Loss Program (to be adopted with current plan).</p> <p>The Plans include a new Program (SLA P63, SELA P57), as required by Measure JJJ, to create an inventory of affordable and rent stabilized housing in the CPAs. We believe this will be an important step towards achieving a better collective understanding of existing community assets and housing opportunities and challenges. To create this inventory, we encourage the City to make use of existing programs and data, including the RSO rent registry and listings of existing covenants. To assess occupancy by lower income households, the City could look to census data and/or other available resources to assess averages or develop appropriate proxy counts. It is our hope that the City can create an accurate inventory by building on and leveraging existing city data and analysis, with the flexibility necessary to achieve this objective.</p> <p>But this inventory, and the information it provides, should be put to use. We believe that an accurate understanding of changes to the affordable housing stock will yield more <i>informed</i>, and ultimately more effective dialogue about decisions and strategies to ensure inclusive community growth. We strongly support amending this program to add a component that will enable the city to <u>assess</u> changes to the housing stock on an annual basis and <u>respond</u>, in real time, if a loss of affordable housing is occurring. The appropriate response to a loss should be determined by HCID and the Planning Department based on the specific and unique circumstances that are demonstrated by the annual inventory. We strongly encourage the creation of a Community Plan Policy and Program to achieve these goals. We have included possible language for your consideration below. But we are eager to understand and discuss a variety of policy options to achieve this <u>basic goal of assessing changes to the inventory and responding to a loss if it occurs</u>.</p> <p><u>Policy [X.XX] Area-wide No-Net-Loss. Immediately establish a comprehensive No-Net-Loss Program for the South/Southeast LA Community Plan Area, consisting of three components: (1) create and monitor an inventory of units subject to a recorded covenant, ordinance or law that restricts rents to levels affordable to persons and families of Lower or Very Low-Income; subject to the City Rent Stabilization Ordinance; and/or occupied by Lower-Income or Very Low-Income households; (2) publish an annual report of the affordable housing inventory, including the total number of units by affordability level, as well as the frequency and location of Ellis Act evictions, condominium conversions, and/or residential demolitions within the CPA, if known; and (3) if an annual report demonstrates a reduction in the inventory of units within any affordability category, the City should: (a), create a Recovery Action Plan with specific programs and investments to prevent further loss and increase affordable housing production in the area; and (b) require applications for discretionary land use approvals in the CPA to include a Displacement Impact Report. These provisions would cease to apply once an annual report demonstrates that the loss has been recovered.</u></p>	<p>Measure JJJ requires that all Community Plan updates must include “a program to create and monitor an inventory of units within the Community Plan Area that are: subject to a recorded covenant, ordinance or law that restricts rents to levels affordable to persons and families of Lower or Very Low-Income; subject to the City Rent Stabilization Ordinance; and/or occupied by Lower-Income or Very Low-Income households.” (LAMC 11.5.8A). To determine occupancy by lower income households, the Department should look to census data and/or other available sources. This program must be adopted with the current plan, not categorized as long range implementation.</p> <p>We recommend the City then make use of this required inventory by adding a component to evaluate and assess changes to the housing stock, and develop responsive strategies to recover a loss, if necessary. This will help the City achieve and implement numerous existing General Plan policies, including Housing Element <u>Policy 1.2.2</u> (“Encourage and incentivize the preservation of affordable housing”); <u>Policy 1.3.1</u> (“Monitor and report on the production and preservation of the housing supply”); <u>Program 26</u> (“Monitor and Preserve At-Risk Affordable Housing”) <u>Program 49</u> (“Affordable Housing Monitoring”); <u>Program 51</u> (“RSO Monitoring”); and <u>Program 53</u> (“Monitor and Report on Housing Production Goals”).</p> <p>If history is any indication, the lifespan of a new community plan</p>
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Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency	
<p>P63 (SLA)</p> <p>P57 (SELA)</p> <p><u>Revise program numbers as necessary to ensure the No Net Loss program is "adopted with current plan."</u></p>	<p>Measure JJJ <u>Area-wide No-Net-Loss Program</u>: The City Council directs the Los Angeles Housing and Community Investment Department to create a program for the South Los Angeles Community Plan that will <u>The Plan requires the immediate creation and implementation of a No-Net-Loss Program as follows:</u></p> <p><u>(1) Create an inventory.</u> Create and monitor an inventory of units within the Community Plan area that are subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of Lower or Very Low-Income; subject to the Rent Stabilization Ordinance; and/or occupied by Lower-Income; subject to the Rent Stabilization Ordinance; and/or occupied by Lower-Income or Very Low-Income households <u>This inventory should be updated annually.</u></p> <p><u>(2) Submit annual reports on existing affordable housing.</u> <u>The City should publish an annual report of the affordable housing inventory, including the total number of units, by affordability level. (Extremely Low Income, Very Low Income and Low Income), as well as the frequency and location of Ellis Act evictions, condominium conversions, and/or residential demolitions within the CPA, if known.</u></p> <p><u>(3) Develop Strategies to Prevent and recover affordable housing loss.</u> <u>If an annual report demonstrates a reduction in the total number of units within any of the three affordability categories, then the City should develop steps to attempt to recover the loss. These steps should include, but not be limited to: (a) a Recovery Action Plan,, with specific programs and investments to prevent further loss of affordable units and steps to increase affordable housing production in the area; and (b) a requirement that applications for discretionary land use approvals include an assessment of the project's impact on a net gain or loss of affordable housing within the CPA. These provisions would cease to apply once the CPA can demonstrate that the loss has been recovered.</u></p>	<p><u>LU</u> <u>XX.XX</u></p>	<p><u>DCP</u> <u>HCID</u></p>		<p>could be long. Static zoning is limited in its ability to respond to the shifting dynamics that communities will endure over many years. This proposal is intended to give the City greater flexibility to assess and respond, in real-time and with precision, to emerging pressures that threaten our affordable housing stock. It is intended to work in tandem with meaningful development incentives to advance inclusive growth.</p>

3. Protect tenant rights and strengthen RSO enforcement.

(A) Amend SLA Policy 1.17/SELA Policy 1.15 and 5.7 and add a new Program to strengthen tenants’ right of return.

Tenants’ Right of Return. Support Create new and strengthen existing programs to projects that offer former low income tenants of demolished units with the first right of refusal on leases for the new housing units.

Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency
<u>XX</u>	<u>Tenants’ Right of Return. Establish new programs and strengthen existing programs to provide former low income tenants of demolished or converted units with the first right of refusal on leases for new housing units.</u>	<u>LU XX.XX</u>	<u>DCP HCID</u>	

(B) Include a new Community Plan Policy to establish proactive coordination between the City and tenant rights organizations.

Policy [XX.XX] Coordination with Community Based Organizations. Foster effective collaboration and coordination between City departments and tenant organizations working in the Community Plan Area to more quickly identify displacement and eviction threats and more efficiently respond with adequate resources and strategies.

(C) Include South LA Program P74 in the Southeast LA Community Plan Programs.

Tenants Rights Enforcement: As a pilot program for future citywide implementation, encourage an increase in resources for tenants rights enforcement and protections. Such resources may include tracking of evictions in RSO units.

(D) Include a new Community Plan Policy to enhance RSO enforcement.

Policy [X.XX] Enhance RSO Enforcement. Establish and designate neighborhood-based RSO Enforcement Specialists responsible for proactively working with tenant, landlords, and community groups to enhance the habitability and prevent the loss of RSO units in the Plan Area.

We recommend policies and programs to strengthen right of return and enhance tenants’ rights enforcement and coordination. While not zoning per se, these policies would help advance citywide goals related to tenant protection and affordable housing preservation.

	<p>(E) Strengthen Policies LU3.5 and 5.5 in the Southeast LA Community plan and Policy LU5.4 in the South LA Community Plan related to the preservation of rent stabilized units.</p> <p>LU X.XX Preserve Rent Stabilized Units. Encourage the pPreservation and maintainenance of rental units that are protected by the Rent Stabilization Ordinance and strive for a achieve no net-loss of affordable units in the Plan Area.</p>											
<p>4. Minimize the harmful impacts of demolitions & condominium conversions.</p>	<p>(A) Replace South LA Policy LU19.11 and include a clearer and mandatory Policy and Program in both Community Plans to establish an annual allowance for Residential Conversion Projects.</p> <p>[South LA] Policy LU19.11 Condo Conversion. Ease condo conversion pressure in TOD areas by limiting the number of existing affordable and rent stabilized units converted to condominiums annually, and by ensuring that such conversions do not negatively affect the local rental market. <u>Policy XX.XX Residential Conversion annual allowance. Residential Conversion Projects, as defined in LAMC Section 12.95.2, shall be denied if the vacancy rate is five percent or less and if the cumulative effect on the rental housing market is significant. In any event, the maximum number of units converted as part of a Residential Conversion Project in the Community Plan Area shall not exceed [XX] per 12-month period.</u></p> <table border="1" data-bbox="394 841 1570 1230"> <thead> <tr> <th data-bbox="394 998 506 1052">Program Number</th> <th data-bbox="506 998 1312 1052">Program Description</th> <th data-bbox="1312 841 1402 998">Policy/Section reference</th> <th data-bbox="1402 841 1486 998">Responsible Agency</th> <th data-bbox="1486 841 1570 998">Coordinating Agency</th> </tr> </thead> <tbody> <tr> <td data-bbox="394 1052 506 1230">XX</td> <td data-bbox="506 1052 1312 1230"><u>Residential Conversion Annual Allowance.</u> The Plan requires the immediate creation and implementation of an annual allowance for residential conversions. The maximum number of residential units converted as part of a Residential Conversion Project, as defined in LAMC Section 12.95.2, in the Community Plan Area shall not exceed [XX] per 12-month period</td> <td data-bbox="1312 1052 1402 1230">LU XX.XX</td> <td data-bbox="1402 1052 1486 1230">DCP HCID</td> <td data-bbox="1486 1052 1570 1230"></td> </tr> </tbody> </table> <p>(B) Include a new Policy and Program (adopted with current plan) to prevent issuance of residential demolition permits until an applicant has obtained all necessary building permits.</p> <p><u>Policy [XX.XX] Demolition permits. No permit for demolition in the Plan area shall be issued unless all necessary building permits have been issued for new construction on the site.</u></p>	Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency	XX	<u>Residential Conversion Annual Allowance.</u> The Plan requires the immediate creation and implementation of an annual allowance for residential conversions. The maximum number of residential units converted as part of a Residential Conversion Project, as defined in LAMC Section 12.95.2, in the Community Plan Area shall not exceed [XX] per 12-month period	LU XX.XX	DCP HCID		<p>4(A): The SLA Draft Community Plan includes a Policy that calls on the City to “[e]ase condo conversion pressure,” but does not provide any guidance on how to achieve that objective. The SELA Plan is completely silent on the issue of condo conversions. We recommend a new policy, establishing a clear annual allowance, which would apply in both CPAs.</p> <p>Both draft CPIOs currently provide that Residential Conversion Projects “shall be denied...if the vacancy rate...is five percent or less and if the cumulative effect on the rental housing market is significant.” This is good, but declaratory of existing law. The Plans should go further and establish a clear, predictable annual allowance.</p> <p>4(B)-(C): The Draft Community Plans are currently silent on the issue of residential demolitions. We recommend the City consider an approach similar to condo conversions: an annual allowance; and to avoid the harmful impacts of vacant lots, a requirement that all necessary building permits for new construction be obtained before the demo permit is granted.</p> <p>These protections are consistent with several General Plan policies and</p>
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Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency
XX	<u>Demolition Permits. To avoid the negative impacts of vacant lots, the Plan requires that no permit for demolition shall be issued unless and until all necessary building permits have been issued for new construction on the site.</u>	LU XX.XX	DCP HCID	

(C) Include a new Community Plan Policy and Program (adopted with current plan) to establish an annual allowance for residential demolition permits.

Policy [XX.XX] Residential Demolition annual allowance. The maximum number of residential units demolished in the Community Plan Area shall not exceed [X] per 12-month period.

Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency
XX	<u>Residential Demolition Annual Allowance. The Plan requires the immediate creation and implementation of an annual allowance for residential demolition permits. The maximum number of residential units demolished in the Community Plan Area shall not exceed [X] per 12-month period.</u>	LU XX.XX	DCP HCID	

programs, including Housing Element Policy 1.2.2 (“Encourage and incentivize the preservation of affordable housing, including non-subsidized affordable units, to ensure that demolitions and conversions do not result in the net loss of the City’s stock of decent, safe, healthy or affordable housing.”).

These types of policies have been implemented in other California jurisdictions, including San Francisco, Berkeley, Santa Monica, Beverly Hills, Oakland, Santa Barbara, etc.

*Demolition regulations should include an exemption for structures that require demolition for safety purposes.

<p>5. Elevate Community Leadership in Community Plan implementation.</p>	<p>(A) Include a new Policy establishing a Low-Income Renter Advisory Commission (LIRAC).</p> <p><u>Policy [XX.XX] Low-Income Renter Advisory Commission. Upon adoption of the Plan, the City shall immediately establish a Low Income Renter Advisory Commission, which body shall be charged with monitoring the implementation of Community Plan policies and programs related to affordable housing and rental housing issues.</u></p> <p>(B) Include a new Program, adopted with the current plan, to establish and staff the LIRAC.</p> <table border="1" data-bbox="394 418 1558 982"> <thead> <tr> <th data-bbox="394 570 499 618">Program Number</th> <th data-bbox="499 570 1297 618">Program Description</th> <th data-bbox="1297 418 1392 618">Policy/Section reference</th> <th data-bbox="1392 418 1476 618">Responsible Agency</th> <th data-bbox="1476 418 1558 618">Coordinating Agency</th> </tr> </thead> <tbody> <tr> <td data-bbox="394 618 499 982"><u>XX</u></td> <td data-bbox="499 618 1297 982"><u>Low Income Renter Advisory Commission (LIRAC). The Plan requires the immediate creation and implementation of a Low Income Renter Advisory Commission. The LIRAC shall be charged with monitoring the implementation of Community Plan policies and programs relating to affordable housing and/or rental housing issues and opportunities. The LIRAC shall be comprised of low-income resident renters and staffed by the Department of City Planning/Affordable Housing Commission. All required reports, including the required annual report on affordable housing, shall be submitted for review and comment to the LIRAC.</u></td> <td data-bbox="1297 618 1392 982"><u>LU XX.XX</u></td> <td data-bbox="1392 618 1476 982"><u>DCP HCID</u></td> <td data-bbox="1476 618 1558 982"></td> </tr> </tbody> </table>	Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency	<u>XX</u>	<u>Low Income Renter Advisory Commission (LIRAC). The Plan requires the immediate creation and implementation of a Low Income Renter Advisory Commission. The LIRAC shall be charged with monitoring the implementation of Community Plan policies and programs relating to affordable housing and/or rental housing issues and opportunities. The LIRAC shall be comprised of low-income resident renters and staffed by the Department of City Planning/Affordable Housing Commission. All required reports, including the required annual report on affordable housing, shall be submitted for review and comment to the LIRAC.</u>	<u>LU XX.XX</u>	<u>DCP HCID</u>		<p>The Community Plans and CPIOs do not include any renter oversight programs. We recommend a LIRAC body to elevate community leadership and implement an effective monitoring and implementation program for housing-related community plan policies and programs.</p> <p>Each LIRAC should be comprised of low-income resident renters and staffed by the City Planning Department, HCID, and/or the City’s Affordable Housing Commission.</p> <p>To select the LIRAC members, the City should partner with community-based organizations to create and implement an outreach plan targeting low-income renters and creating the education curriculum to increase the capacity of residents to participate in the LIRAC.</p>
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<u>XX</u>	<u>Low Income Renter Advisory Commission (LIRAC). The Plan requires the immediate creation and implementation of a Low Income Renter Advisory Commission. The LIRAC shall be charged with monitoring the implementation of Community Plan policies and programs relating to affordable housing and/or rental housing issues and opportunities. The LIRAC shall be comprised of low-income resident renters and staffed by the Department of City Planning/Affordable Housing Commission. All required reports, including the required annual report on affordable housing, shall be submitted for review and comment to the LIRAC.</u>	<u>LU XX.XX</u>	<u>DCP HCID</u>									
<p>6. Enhance Opportunities for Affordable Housing developers to acquire property.</p>	<p>(A) Include a new Community Plan Policy and amend Program P126 (South LA Community Plan) and P116 (Southeast LA Community Plan) to achieve proper implementation of the Surplus Land Act.</p> <p><u>Policy [XX.XX] Surplus Land Act. Prioritize the creation of affordable housing by facilitating below-market sale or lease of surplus and other underutilized property to affordable housing developers or for the creation of new park space, consistent with the procedures outlined in the state Surplus Land Act.</u></p>	<p>6(A): Effective local implementation of the Surplus Land Act is required and necessary to ensure that affordable housing and open space is prioritized in the disposition of city-owned land.</p> <p>6(C)(D): Affordable housing developers and Community Land Trusts face barriers to acquiring the property necessary to develop much-needed housing for low-income residents. This is especially challenging as land use speculation increases in areas near transit.</p>										

Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency
P126 (SLA)	Surplus Government Land: Support the re-use of CRA-owned and surplus City-owned property in [South/Southeast] Los Angeles for community uses, <u>prioritizing affordable housing and park space, consistent with the procedures outlined in the state Surplus Land Act.</u>	CF8.1, CF9.2, CF9.4 XX.XX	CD's	RAP GSD
P116 (SELA)				

(B) Include a new Community Plan Policy and Program to promote joint development on city-owned land that creates permanent supportive housing and 100% Affordable Housing development.

Policy [XX.XX] Strategic use of Public property. Encourage the use of public property and joint development to create 100% Affordable and/or Supportive Housing projects.

Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency
P77 (SLA)	Vacant Lots, City Owned: Identify city-owned vacant land and explore the potential to repurpose as open space, <u>100% affordable and supportive housing developments.</u>	LU1.3, LU8.6		GSD

(C) Include a new Policy to advance land acquisition by community land trusts and affordable housing developers.

Policy [XX.XX] Land acquisition by community land trusts and affordable housing developers. Develop strategies to assist community land trusts and affordable housing developers with property acquisition. Coordinate with non-profit developers and community land trusts to take advantage of off-site acquisition options provided under Measure JJJ.

(D) Include a new Policy and Program to establish a centralized, accessible database of land transactions.

Policy [XX.XX] Land Transactions. Make information about land sales and property transactions in the Community Plan Area publicly available, to the extent possible.

Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency
PXX	<u>Land sales/property transactions: Explore options to make information about land sales and property transactions in the Community Plan Area more publicly accessible, to support communities' access to information regarding changes to the built environment.</u>			

7. Avoid creating barriers to transitional housing and homeless shelters

(A) Amend Program 34 in the South LA and Southeast LA to clarify that a CUP is not required for transitional housing or homeless shelters in all areas that it is in fact permitted.

Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency
P34	Support Conditional Use Process for Transitional Housing and Shelters Development: The Plan designates specific areas for Medium Residential density development which would allow for the development of such housing by right . Continue to determine appropriate additional locations for such units within the community. the implementation of the Conditional Use permitting process in order to determine the appropriate locations for such units within the community.	LU1.8	DCP	

As currently drafted, Program 34 may be read to require a CUP for homeless shelters and transitional housing in areas designated for Medium Residential density development. Such a requirement would be a barrier to building the housing and shelter needed to address the City's homelessness crisis and may run afoul of Government Code Section 65583.

Section 65583 specifies that transitional housing shall be considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. Under LAMC 14.00A8, 12.80, and 12.81 shelters may be built by-right in the R3 zone.

8. Create quality employment opportunities for qualified local residents with barriers to employment.

(A) Amend Local Hiring Policies and Programs to specifically include opportunities for individuals facing barriers to employment.

LU6.1 (SLA)/4.1 (SELA) Local Jobs. Maintain and increase the commercial employment base for community residents, including those facing barriers to employment, through local hiring requirements, living wage provisions, job resource centers and job training. Create opportunities for individuals facing barriers to employment, including but not limited to being homeless; being a custodial single parent; receiving public assistance; lacking a GED or high school diploma; having a criminal record or other involvement with the criminal justice system; suffering from chronic unemployment; emancipated from the foster care system; or being a veteran.

LU14.3 Job Training and Local Hiring. Promote job training, living wage provisions and local hiring for community residents, including individuals facing barriers to employment, including but not limited to being homeless; being a custodial single parent; receiving public assistance; lacking a GED or high school diploma; having a criminal record or other involvement with the criminal justice system; suffering from chronic unemployment; emancipated from the foster care system; or being a veteran.

Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency
P61 (SLA) P55 (SELA)	Local Hiring: Encourage businesses to hire locally, and require local hiring for discretionary projects with Development Agreements to the extent feasible. <u>Local hiring programs should include opportunities for individuals facing barriers to employment, including but not limited to being homeless; being a custodial single parent; receiving public assistance; lacking a GED or high school diploma; having a criminal record or other involvement with the criminal justice system; suffering from chronic unemployment; emancipated from the foster care system; or being a veteran.</u>	LU6.1, LU14.3	DCP	

(B) Include the living wage program in both community plans.

The South LA Community Plan includes a Living Wage Program (P59). This should also be included in the Southeast LA Community Plan.

The dismantling of the Community Redevelopment Agency had a particularly devastating impact on workers in South Central, resulting in the loss of important policies that had previously given local residents an opportunity to access some of the benefits resulting from major development projects, including policies requiring employers to hire locally and from disadvantaged populations and to pay a living wage.

As noted in Recommendation 1(B) above, the CPIO incentives must now include an additional incentive for projects that meet the employment standards in Measure JJJ. These standards include hiring goals for individuals facing barriers to employment. Consistent with other city policies and in order to promote inclusive economic development, the Community Plan policies and programs related to local hiring should also encourage opportunities for those facing barriers to employment and should encourage living wage employment opportunities.

9. Create opportunities for community-serving small businesses.

(A) Amend the CPIO Commercial Use Incentives in Table 2-3 to incentivize projects that set aside a percentage of retail space for reduced rent for community-serving small business.

Subareas: A: Neighborhood Serving Corridor, B: Parkway Corridor, C: General Corridor, D: Commercial-Only Corridor,
E: TOD Low, F: TOD Medium, G: TOD High, H: TOD Regional Center

Use	Incentive	Applicable Subarea
Banks/Credit Unions	When part of a Mixed-Use Project 50% of this use's floor area may be exempt from the FAR maximum.	E, F, G
Full Service Grocery Stores		
Federally Qualified Health Centers	When part of a Mixed-Use Project 1 additional building story may be allowed.	E, F, G
Health Clubs		

Reduced Rent Community Serving Small Business

(B) Amend the CPIO definition of Targeted Commercial Uses.

Targeted Commercial Uses: Banks/Credit Unions, Child Care, Drug Stores, Federally Qualified Health Centers, Health Clubs, Full Service Grocery Stores, and Sit-Down Restaurants, and Reduced Rent Community Serving Small Businesses.

(C) Include a new CPIO definition of Reduced Rent Community Serving Small Business

Reduced Rent Community-Serving Small Business: A privately owned corporation, cooperative, non-profit, social enterprise or other corporate entity that has a long-term lease guaranteeing below market rate rent and meets the following standards: (a) at the time of executing a lease for commercial space has no more than twenty-five employees/shareholders; (b) is not franchised or affiliated with a national, corporate chain; (c) pays all employees/shareholders a Living Wage; (d) serves the local neighborhood by employing local residents or providing culturally appropriate and/or needed goods or services for a mixed income community.

(D) Include a new Policy and Program to prioritize appropriate parcel designations and sizes for small businesses.

Policy [XX.XX] Small Business retail space. Encourage Mixed Use and Commercial developments to provide retail spaces appropriate for community serving small businesses.

9(A)-(C): Allowing FAR adjustments and other incentives to projects that provide space and reduced rent for community-serving small businesses will help support the retention and expansion of a locally-grown cadre of business owners. This is necessary to ensure inclusive and sustainable economic growth for the existing community.

9(D)-(H): The community plans should call for strategic efforts to increase resources and opportunities for smaller businesses and micro-entrepreneurs that are often excluded from opportunities in traditional development. This should include supporting the implementation of a permitting program for legalized sidewalk vending; exploring options to incentivize or require small retail footprints in Commercial or Mixed Use developments that are more appropriate for smaller businesses; prioritizing long-term leasing to help small businesses withstand gentrification and displacement pressures; and leveraging procurement opportunities to support local and community-based entrepreneurs.

These efforts can bolster the small business economy, create and sustain jobs in South LA, and keep local capital in the community, thereby enabling a more inclusive and sustainable economic recovery.

		Policy/Section reference	Responsible Agency	Coordinating Agency
Program Number	Program Description			
PXX	<u>Identify resources and strategies to incentivize or require Mixed Use and Commercial developments to provide retail space that is appropriate for community serving small businesses.</u>			

(E) Include SELA Policy LU4.4 in the South LA Plan

Support Neighborhood Stores. Support existing neighborhood stores (i.e. mom-and-pop shops) that support the needs of local residents, are compatible with the neighborhood and create a stable economic environment.

(F) Include a new Policy to support permitted vending on sidewalks and in parks

Policy [XX.XX] street vending. Enhance opportunities for permitted vending on sidewalks and in parks. Coordinate with City departments to support vendors in obtaining permits and encourage healthy food vending.

(G) Include a new Program to increase resources for local entrepreneurs.

		Policy/Section reference	Responsible Agency	Coordinating Agency
Program Number	Program Description			
PXX	<u>Increase resources for local entrepreneurs and small businesses. Increase the availability of resources to finance small business startup/expansion for local entrepreneurs committed to benefitting the local community. Explore and enhance resources to finance development that is committed to leasing to local and less-credit-ready small businesses.</u>	<u>LUX.XX</u>		

(H) Include a new Policy and Program to increase availability of long-term commercial leases for local community serving small businesses

Policy [XX.XX] Long-term commercial leases. Promote and enhance the availability of long-term commercial leases for community-serving small businesses.

Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency
<u>PXX</u>	<u>Long Term Commercial Leases: Identify strategies to promote and enhance the availability of long-term commercial leases for community-serving small businesses.</u>	<u>LUX.X</u>		

(I) Include a new Policy and Program to increase procurement opportunities for community serving small businesses.

Policy [XX.XX] Procurement. Increase opportunities for community serving small businesses and social enterprises to secure procurement contracts from new development projects.

Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency
<u>PXX</u>	<u>Procurement: Identify strategies to increase opportunities for community serving small businesses and social enterprises to secure procurement contracts from new development projects.</u>	<u>LUX.X</u>		

10. Minimize the impacts of predatory lending institutions

(A) Amend definition of “Payday Lenders / Check Cashing Facilities” to include small, short-term “car title loans” and to exempt non-profit organizations that provide short-term loans as an alternative to high-interest for-profit lenders.

Payday Lenders / Check Cashing Facilities: For-profit lending facilities offering small, unsecured, short-term loans, either unsecured or “car title loans” in which the borrower’s car title is used as collateral, or a use that primarily consists of check cashing services for a fee.

The CPIOs include regulations to address the harmful impacts of an overconcentration of Payday Lenders/Check Cashing Facilities. However, it is unclear whether the CPIO regulations actually decrease discretion and/or regulation of these uses in the subareas where they would be permitted. We recommend the Commission consider additional, stronger protections.

(B) Amend CPIO Table 2-4 to strengthen Payday Lender/ Check Cashing Facilities regulations.

Subareas: A: Neighborhood Serving Corridor, B: Parkway Corridor, C: General Corridor, D: Commercial-Only Corridor, E: TOD Low, F: TOD Medium, G: TOD High, H: TOD Regional Center			
Use	Regulation	Applicable Subarea	Exemptions/Clarifications
Payday Lenders/ Check Cashing Facilities	<u>Prohibited within ¼ mile of any census tract having a median household income below “Very Low Income” for a two person household</u>	C, D	
	Prohibited	A,B, E,F,G, H	N/A

(C) Include a new program to explore regulations that may address the negative impacts of an oversaturation of already approved/permitted Payday Lenders/Check Cashing Facilities.

Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency
<u>PXX</u>	<u>Predatory Lending: Identify strategies to address the negative impacts of an overconcentration of Payday Lenders /Check Cashing Facilities.</u>	<u>LUX.X</u>		

11. Prohibit Oil and Gas Extraction

(A) Amend Community Plan Policies to prohibit oil and gas extraction

SLA LU 1.13, 7.9, 15.4 / SELA LU 1.11, 7.9, 16.6 Oil Drilling and Extraction. Discourage Prohibit new and expanded oil facilities and extraction technologies intended for the exploration of, and production of, oil and gas within densely populated communities as a reasonable means of protecting the health and welfare of residents., that impact residential and other sensitive uses.

The Community Plans should prohibit all urban oil extraction uses and techniques, as these practices are incompatible with human health.

(B) Eliminate SLA Goal 28 / SELA Goal 24 and all corresponding policies related to oil extraction.

~~Goal LU 28/LU24: Oil extraction activities that are performed with the greatest regard for public and environmental health and welfare.~~

(C) Amend South LA Program 62 and Southeast LA Program 59 to prohibit new or expanded oil extraction uses.

Program Number	Program Description	Policy/Section reference	Responsible Agency	Coordinating Agency
P62 (SLA) P59 (SELA)	Oil District Amendments: Consistent with State and Federal Law, Explore the ability to a Amend the Oil Drilling District to include provisions that adequately regulate, limit and/or prohibit new or expanded extraction uses . Prohibit methods that utilize hazardous materials/chemicals to prevent the potential impact to human health (in addition to noise, water quality and geologic impacts) in proximity to residential and sensitive uses and to further address community concerns. In addition, require periodic monitoring and reporting of site conditions.			

(D) Amend CPIO Table 3-2 to better protect residents against noxious uses.

Subareas: I: Hybrid Limited, J: Hybrid, K: Compatible Industrial, L: Industrial Innovation			
Uses	Regulation	Applicable subarea	Exemptions/Clarifications
Noxious Uses	Prohibited	I,J,K	N/A
		L	Prohibited within 2500 feet of any densely populated communities.

12. Increase accessibility and amount of public open green space

(A) Amend the CPIO definition of “Pedestrian Amenities” and add a definition of “Publicly Accessible Open Space” to promote access to open space that is privately constructed and maintained.

Pedestrian Amenities: ~~Public plazas~~ Publicly Accessible Open Space, retail courtyards, water features, kiosks, paseos, arcades, patios, covered walkways, or spaces of outdoor seating or dining that are located on the ground floor, and are accessible to and available for use by the public.

Publicly Accessible Open Space: public plazas, pocket parks, passive and active recreation areas that are privately constructed and maintained, and that are accessible for use by the general public, are open at hours comparable to those of City parks and facilities, and have appropriate signage indicating that the space is open to the public.

(B) Include a new Guideline in South and Southeast LA Community Plan Design Guidelines Chapter 6 to promote publicly accessible open space in new development.

6A. REQUIRED ON-SITE OPEN SPACE
[...]

G4. Projects should include Publicly Accessible Open Space that is accessible, useable and welcoming to the public.

(C) Amend CPIO table 2-3 and the definition of “Targeted Commercial Use,” and include a new definition of “Accessible Open Space Projects” to create an incentive for the provision of public open space in new development.

TABLE 2-3: COMMERCIAL USE INCENTIVES* †

Subareas: A: Neighborhood Serving Corridor, B: Parkway Corridor, C: General Corridor, D: Commercial-Only Corridor, E: TOD Low, F: TOD Medium, G: TOD High, H: TOD Regional Center		
Use	Incentive	Applicable Subarea
Banks/Credit Unions Drug Stores Full Service Grocery Stores Federally Qualified Health Centers	When part of a Mixed-Use Project 50% of this use’s floor area may be exempt from the FAR maximum.	E, F, G
Health Clubs <u>Reduced Rent Community Serving Small Business</u>	When part of a Mixed-Use Project 1 additional building story may be allowed.	E, F, G

The Community Plans include several important policies to encourage the creation of open space. However, we fear there are insufficient policy tools and/or specific mechanisms to achieve these objectives. For example, LU 5.2 calls for the city to “incentivize the inclusion of public amenities, community facilities, full service grocery stores, child care and accessible open space areas in large mixed-use projects.” However the CPIO currently provides “commercial use incentives” for each of those uses *except* publicly accessible open space.

For Table 2-3 re: commercial use incentives, create a whole new use category for “Publicly Accessible Open Space.” If the intent is to get small pocket parks, then 5,000 sq ft would be an appropriate minimum. If the intent is to get multi-use space, then 1/4 acre (about 10,000 sq ft) would be an appropriate minimum. The incentive could be scaled according to the size of open space provided: 25% FAR exemption for a 5,000 sq ft open space and 50% FAR exemption for a 10,000 or larger sq ft open space.

	<table border="1"> <tr> <td data-bbox="394 115 690 240">Publicly Accessible Open Space</td> <td data-bbox="690 115 1180 240">25% FAR exemption for a Publicly Accessible Open Space project between 5,000 and 10,000 sq ft; 50% FAR exemption for a 10,000 or larger sq ft Publicly Accessible Open Space project.</td> <td data-bbox="1180 115 1562 240">B, C, D, E, F, G, H</td> </tr> <tr> <td data-bbox="394 240 690 342">Child Care</td> <td data-bbox="690 240 1180 342">When part of a Mixed-Use Project 50% of this use's floor area may be exempt from the FAR maximum.</td> <td data-bbox="1180 240 1562 342">E, F, G</td> </tr> <tr> <td data-bbox="394 342 690 444" rowspan="2">Sit-Down Restaurants</td> <td data-bbox="690 342 1180 444">Sit-down restaurants of any size may provide a minimum of one parking space for every 500 square feet of floor area.</td> <td data-bbox="1180 342 1562 444">A, C, D, E, F, G</td> </tr> <tr> <td data-bbox="690 444 1180 547">When part of a Mixed-Use Project 50% of this use's floor area may be exempt from the FAR maximum.</td> <td data-bbox="1180 444 1562 547">E, F, G</td> </tr> </table> <p>Targeted Commercial Uses: Banks/Credit Unions, Child Care, Drug Stores, Federally Qualified Health Centers, Health Clubs, Full Service Grocery Stores, and Sit-Down Restaurants, Reduced Rent Community Serving Small Businesses, and Publicly Accessible Open Space.</p> <p>(D) Amend South LA Program 120 / Southeast LA Program 112 or include a new Community Plan Program in both Plans to reflect changes the City's fee program to ensure park acquisition and capital improvements meet or exceed the service standard of 10 park acres per 1,000 people</p>	Publicly Accessible Open Space	25% FAR exemption for a Publicly Accessible Open Space project between 5,000 and 10,000 sq ft; 50% FAR exemption for a 10,000 or larger sq ft Publicly Accessible Open Space project.	B, C, D, E, F, G, H	Child Care	When part of a Mixed-Use Project 50% of this use's floor area may be exempt from the FAR maximum.	E, F, G	Sit-Down Restaurants	Sit-down restaurants of any size may provide a minimum of one parking space for every 500 square feet of floor area.	A, C, D, E, F, G	When part of a Mixed-Use Project 50% of this use's floor area may be exempt from the FAR maximum.	E, F, G	
Publicly Accessible Open Space	25% FAR exemption for a Publicly Accessible Open Space project between 5,000 and 10,000 sq ft; 50% FAR exemption for a 10,000 or larger sq ft Publicly Accessible Open Space project.	B, C, D, E, F, G, H											
Child Care	When part of a Mixed-Use Project 50% of this use's floor area may be exempt from the FAR maximum.	E, F, G											
Sit-Down Restaurants	Sit-down restaurants of any size may provide a minimum of one parking space for every 500 square feet of floor area.	A, C, D, E, F, G											
	When part of a Mixed-Use Project 50% of this use's floor area may be exempt from the FAR maximum.	E, F, G											
<p>13. Protect air quality and reduce impacts of air pollution</p>	<p>(B) Include a new Policy to create green buffers next to highways that are not publicly accessible to reduce the amount of particulate matter in residential areas.</p> <p>(C) Policy [XX.XX] Green Buffers. Create non-publicly accessible green buffers next to highways to reduce the amount of particulate matter in residential areas.</p> <p>(D) Amend CPIO Environmental Standard for Air Quality AQ1, to provide additional protections for community members.</p> <ul style="list-style-type: none"> Limit truck routes solely to commercial corridors, and route trucks away from sensitive receptors such as schools and residences. Restrict truck idling and restrict parking on residential streets to limit diesel emissions. Identify sensitive receptors in the area and notify sensitive receptors before construction projects occur, including disclosure of the name and contact information for the construction officer acting as a community liaison. Incorporate the fugitive dust control requirements as described in the South Coast Air Quality Management District's Air Quality Management Plan. Use zero-emission trucks and equipment where available, or cleanest available technology. 	<p>The South and Southeast LA Community Plan Areas currently suffer from a myriad of localized sources of pollution, and residents suffer health impacts as a result. Additional construction will exacerbate air quality problems and release of toxic contaminants, making additional mitigation measures necessary. In addition, historic, long-lasting toxic contamination of the community has eroded public confidence, making additional public disclosure requirements necessary.</p>											

<p>(E) Amend CPIO Environmental Standard AQ1 to apply to all areas. AQ1 Projects (except for Residential Subareas M, N, and O) shall ensure all contractors include the best management practices provided in the bulleted list below in contract specifications:</p> <p>(F) Include a new CPIO Environmental Standard for Air Quality that requires the installation of high efficiency filtration systems (MERV 17 to 20) for housing within 500 feet of sources of pollution including freeways and oil drilling sites.</p> <p><u>AQ2. Require installation of high efficiency filtration systems (MERV 17 to 20) for housing within 500 feet of sources of pollution including freeways and oil drilling sites.</u></p> <p>(G) Amend the Environmental Standards for Hazards and Hazardous Materials (HM1) to include additional public disclosure provisions.</p> <p>HM1 Projects that involves construction-related soil disturbance located on land that is currently or was historically zoned as industrial shall ensure that a comprehensive search of databases of sites containing hazardous waste or hazardous materials, including on lists prepared pursuant to Government Code, section 65962.5, is conducted. A report setting forth the results of this database search shall be provided to the City, <u>and shall be publicly available</u> (e.g. historical environmental reports prepared by Envirosan, EDR or similar firms). If the report indicates the project site or property within one-quarter mile of the project site has the potential to be contaminated with hazardous waste or hazardous materials for any reason, a Phase I Environmental Site Assessment (ESA) shall be prepared. The Phase 1 assessment shall be prepared by a Registered Environmental Assessor (REA) in accordance with state standards/guidelines to evaluate whether the site or the surrounding area is contaminated with hazardous substances from the potential past and current uses including storage, transport, generation, and disposal of toxic and hazardous waste or materials. <u>The ESA shall be made publicly available.</u> Depending on the results of this study, further investigation and remediation may be required in accordance with local, state, and federal regulations and policies. Any further study found necessary by an REA or relevant federal, state, or local agency shall be performed prior to project approval or made a condition on the project if that is found to be adequate for remediation by an REA or the relevant federal, state, or local agency. Prior to the Department of Building and Safety's issuance of any permits that allow for grading or construction of the project site, the REA or relevant agency shall provide written confirmation to the City that such grading or construction may safely proceed. Written confirmation that required site remediation was completed consistent with the relevant federal, state or local requirements shall be provided to the City prior to issuance of certificates of occupancy.</p>	
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