

CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
ZONING INFORMATION FILE

ZI NO. 2512
Updated Feb 12, 2025

**HOUSING ELEMENT SITES - MAINTENANCE OF ADEQUATE SITES (NO NET LOSS) and
HOUSING REPLACEMENT REQUIREMENTS**

Pursuant to California Housing Element Law and the Housing Element Sites and Minimum Density Ordinance (HESMD), two requirements apply to sites identified in the 2021-2029 Housing Element's Inventory of Adequate Sites (hereafter referred to as Housing Element Sites).

First, CA Govt. Code Section (§) 65863 (aka "No Net Loss" Law) and Los Angeles Municipal Code (LAMC) § 16.70 E require the city to maintain adequate sites to accommodate its remaining unmet Regional Housing Needs Allocation (RHNA) goals for each income category. These "No Net Loss" provisions originated in SB 166 (2017). They generally forbid cities from making a land use decision or approving a development project resulting in fewer units than the capacity projected by income category for Housing Element Sites, unless findings can be made that there are enough remaining Housing Element Sites to meet the City's unmet RHNA goals.¹ At the time of this update, the City has adequate excess capacity to make these findings.

Second, Govt. Code § 65583.2(g)(3) and LAMC § 16.70 C impose housing replacement requirements for development projects located on Housing Element Sites. These largely overlap with existing requirements in the Resident Protections Ordinance (LAMC §§ 16.60 of Ch. 1 & 4C.15.1 of Ch.1A) and the Housing Crisis Act (HCA). However, single-family projects with only one protected unit are exempt from replacement requirements under the Resident Protections Ordinance and the Housing Crisis Act but must still comply with the replacement requirements under housing element law.

Applicable Sites

As of the date this ZI was updated, Housing Element Sites include sites identified in the 2021-2029 Housing Element's Site Inventory (Appendices 4.1, 4.2, 4.3) and any site rezoned as part of the Housing Element's Rezoning Program (see Table C of Appendix 5 of the final staff report) pursuant to HESMD. Housing Element Sites no longer include candidate sites for rezoning (Appendices 4.7 and 4.8), as a rezoning program has been adopted that accommodates the prior shortfall of sites.

Implementation

Housing Element Sites are identified in ZIMAS (zimas.lacity.org) under this Zoning Information File (ZI-2512). For informational purposes and to assist with implementation of the No Net Loss provisions during development review, the income category and number of housing units projected for each Housing Element Site are identified in ZIMAS under the "Housing" tab (see "Housing Element Sites").

¹ Please see Gov. Code Sec. 65863(b), LAMC Ch.1 § 16.70 E.1(a) or Ch. 1A § 4C.15.4. for more information.

For example, if 1.4 units are identified in the Lower Income category for a particular parcel, or aggregated for a group of parcels, the project must be redeveloped with at least 2 units of housing that is affordable at this or any lower income category² (or findings must be made). Above Moderate Income units correspond to market rate units, while Moderate and Lower Income Units require affordability covenants.

The Housing tab in ZIMAS also includes a HCA Replacement Requirements Eligibility Checklist as well as LA County Assessor data that identifies sites known to have had a residential use within the prior five years (see “Housing Use in the Last Five Years”). This information is provided to assist staff and members of the public but is not meant to be conclusive and more information may be required. For example, in some cases the underlying parcel or lot has been altered since adoption of the Housing Element. In these cases, an asterisk has been included in the ZIMAS fields to indicate further investigation may be needed to correctly apply the requirements.

City Planning will make the determination and include any required findings, if it approves a discretionary entitlement for a development project. LADBS will do the same when permits are issued to approve any development project. Development project in this context is understood to mean any new construction project (not demolition, conversions, alteration or additions).

Proposed development projects subject to Housing Element replacement requirements must either complete a No Net Loss Declaration ([Los Angeles City Planning Form No. CP-4069](#)) or, if not eligible, receive a [Housing Element Replacement Unit Determination](#) (RUD) from the Los Angeles Housing Department (LAHD). Form No. CP-4609 details the types of projects eligible to receive a No Net Loss Declaration. More information on the RUD process can be found here: <https://housing2.lacity.org/partners/hca-determinations>.

Full copies of the Housing Element Site lists are available on the Los Angeles City Planning website, here:

- [Appendix 4.1 - Inventory of Adequate Sites](#) (Note: excel file will automatically download)
- [Appendix 4.2 - Public Land Development Pipeline](#)
- [Appendix 4.3 - Private Development Pipeline](#)
- Housing Element Rezoning Sites (hyperlink will be added soon)

Please contact planning.housingpolicy@lacity.org with any questions regarding these requirements.

² Units provided at lower income categories are considered to be affordable for those at a higher income category (e.g. a Very Low income unit can satisfy a requirement for a Lower or Moderate Income unit).