

Floor Area Carveouts as a Policy Tool for Downtown LA

Executive Summary:

Density bonus programs operate by granting developers the benefit of additional density in exchange for a policy goal—typically affordable housing. This density is conferred through two channels, increases to unit-area limits and to floor area ratio (FAR).

But there exists a third channel by which policymakers can confer density to developers in exchange for development that meets policy goals—the floor area carveout. This mechanism operates within the definition of floor area, exempting classes of space that policymakers deem favorable from counting toward the applicable FAR cap, circumventing limits in other programs.

The new code that applies downtown contains only one such carveout, which exempts street-fronting space dedicated to commercial and certain other uses from floor area. This exemption serves to incentivize development that provides a vibrant streetscape with dense mixed use, a core policy goal of the new code and the Downtown Community Plan.

Why stop there?

Policymakers and the Community Plan have many priorities for new development, and floor area carveouts provide a budget-neutral mechanism for the city to incentivize development that meets policy goals. This brief explores three proposals for additional carveouts to incentivize other desired building characteristics:

1. **Affordable Housing:** An exemption for deeply affordable units would increase buildable floor area for mixed-income and affordable developments in proportion to the affordable housing that they provide.
2. **Indoor Amenity Space:** Building amenities for residents contribute to a richer urban living experience, and a floor area carveout would decrease the cost to developers of providing them in a targeted way.
3. **Interior Commercial Space:** The current law floor area exemption narrowly targets the ground floor apron of a building, incentivizing active use of that space. That works fine for the 5-over-1 building form common in new development in LA, but in a denser environment like Downtown, classic LA building forms like through-block markets (Grand Central Market) and multi-story retail podiums (The Bloc) are not similarly incentivized.

The structure described could be harnessed toward delivering many other policy goals, and other eligibility and carveout delivery structures could multiply the available ends that this tool could serve.

I. Incentive Mechanism

In the Los Angeles code, residential density is regulated by either a unit-density cap (minimum lot area per unit) or a floor area ratio (FAR) limit provided by the parcel's height district. Where a unit cap is the binding constraint, uses like ground floor commercial and indoor resident amenity space don't come at the expense of leasable floor area for residential units. In building environments where floor area ratio binds, any non-leasable space necessarily trades off against leasable area, effectively placing an additional cost on developers that provide those spaces relative to projects where the unit cap binds. This discussion is particularly relevant downtown, where density is regulated only by FAR—no unit-density caps apply ([ZIMAS, 2026](#)).

Imagine the market for indoor amenity space—gyms, community rooms, etc.—in new mixed-use housing in Los Angeles. In any given multifamily housing market, renters place some value on indoor amenity spaces, which can be represented as a demand curve (Figure 1, green). The supply curve in that model represents the developers' marginal cost to provide it, which depends on which zoning constraint limits the project's density. In many parts of Los Angeles—the R3 zone, for example—a residential-only project building the maximum number of units to the market-optimal size will have slack under the FAR cap¹. Within that slack, developers can provide amenity spaces for residents at only the marginal cost of design and construction (Figure 1, orange).

If a limitation on floor area ratio is binding instead, space used for amenities and other non-leasable uses necessarily comes at the expense of leasable area in the form of dwelling units that generate income. That's effectively an additional cost placed on any square foot of space used for those purposes in buildings limited by FAR. Thus, for a project building to its FAR limit, the marginal cost of providing a gym for residents is not just the marginal cost of construction, but the additional cost of the revenue

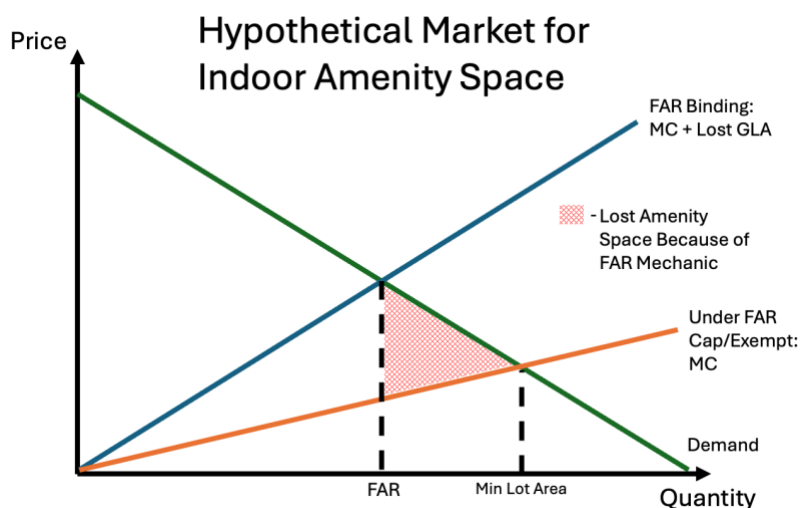


Figure 1. Graph illustrating difference in indoor amenity space provided in new multifamily housing between unit limit and FAR-dictated density regulation. Demonstration purposes only. Reflects no empirical data.

¹ The R3 zone has a minimum lot area of 800sf/unit (LAMC Ch.1 §12.03.C.4). With a FAR of 3 in Height District 1 (§12.21.1.A.1), a development built to hit both the unit area and FAR caps would have 2400 sf of applicable floor area per unit. The units themselves would be somewhat smaller than that because that average includes some non-leasable space like corridors, but those spaces make up a relatively small proportion of a floorplate (see footnote 2). The average size of a 3br apartment in Los Angeles is less than 1200sf ([Apartments.com, 2026](#)), so it's safe to assume that multifamily developments in R3 zones will have some slack below their FAR limit.

lost by not using that space for apartments (Figure 1, blue) as well. All else equal, that dynamic will result in less amenity space provided to residents and a higher price point for buildings that do provide it relative to a market restricted by minimum lot area.

This mechanism applies to any other category of floor area in a building as well, placing an incentive on developers Downtown, where residential density is limited only by FAR, to minimize floor area allocated to non-leasable uses like corridors, lobbies, mailrooms, and more—effectively penalizing them for providing it. That penalty is an additional unit cost imposed by the system beyond the cost of construction, accepted as normal and applying to all applicable floor area in projects where density is limited by FAR. That systemic cost provides an opportunity for policymakers to give targeted relief that incentivizes development that meets policy objectives with no direct cost to the city.

That targeted relief would come in the form of a floor area carveout—a provision that excludes some area of a building from counting as floor area for the purposes of FAR calculation. Those provisions are common and longstanding as applied to spaces that developers have little control over, including stairways, elevator shafts, mechanical rooms, trash rooms, etc. (Ch. 1A [Sec.14.2.7.A.1.c](#)). But that mechanic applies just as well to spaces where developers have more discretion, and the shape of a floor area carveout can help incentivize the kind of development that policymakers want to see.

This brief addresses how policymakers could more effectively harness this tool.

II. Floor Area Carveouts Past and Present

This structure of incentive does not currently exist for most of the city, but it has a long history in Downtown Los Angeles. In 2007, the city enacted the Greater Downtown Housing Incentive Area Program (GDHIA)—a suite of density-based incentives downtown given in exchange for set-asides for affordable and middle-income housing. Included in that package was a carve out from floor area calculations for “any public area accessible to all residents, including public common areas that serve both residential and commercial uses”. (Ch. 1 Sec 12.22.A.29(c)(1)). That carveout provided perhaps a 12%² increase in total allowable floor area but the incentive wasn’t very targeted, encouraging desirable features like interior amenity spaces, but also corridors and lobbies, for which a policy rationale is less clear. That works fine as an incentive providing additional density that goes around the FAR cap, but the carveout itself isn’t shaped toward any particular policy end.

When Downtown LA switched from the old zoning code (LAMC Ch. 1) to the new form-based one (LAMC Ch. 1A) with the adoption of the DTLA 2040 community plan update in 2025, the old GDHIA program was not carried over. As such, its FAR carveout incentive no longer applies in the Downtown Community Plan Area as it had before.

But the new code did not discard this policy lever. It contains just one carveout for “active spaces” at the building façade that extend at least 30 feet into the building footprint (Figure 3) (§14.2.7.A.3.b). Active spaces are indoor spaces for “general commercial uses, public & institutional uses, or common indoor amenity spaces” (Div. 14.3), and in most modern mixed-use development, this street-

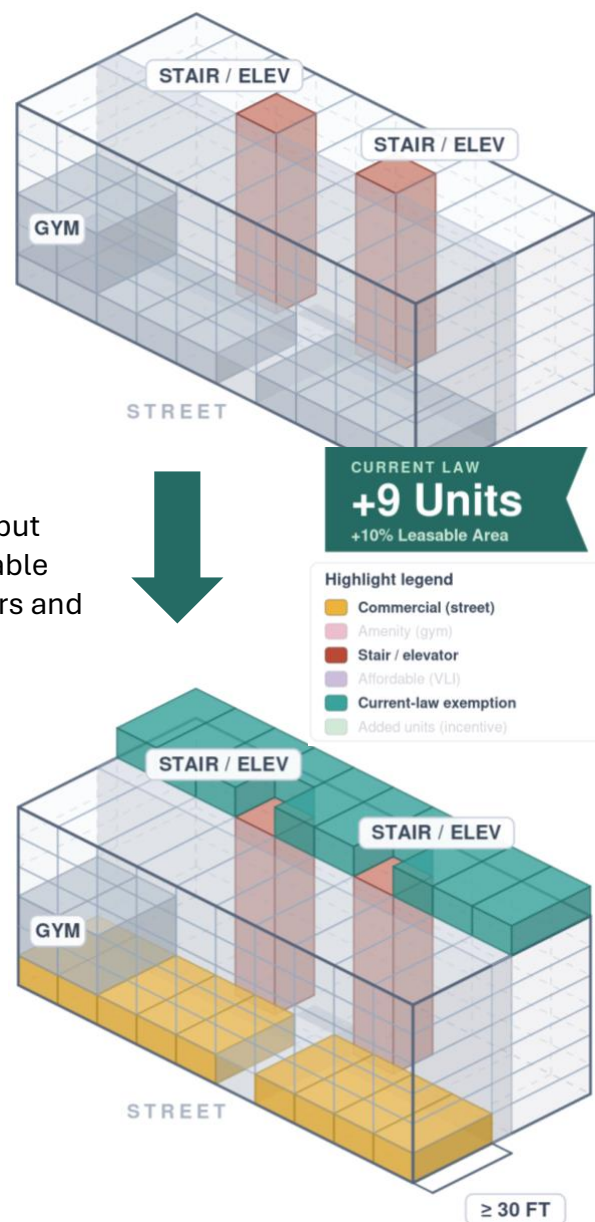


Figure 2. Demonstrates the floor area carveout mechanic under current law for a simplified hypothetical Downtown building with space for 100 units. 10 units of space is taken up by the gym, the stair/elevator blocks, and the lobby, leaving a GLA of 90 units. In this simplified example, the current law exemption adds 9 units’ worth of additional buildable area under the applicable FAR cap, a 10% increase in GLA.

² In an apartment building with a typical double-loaded corridor layout, circulation spaces—corridors, stairways, and elevators—are about 13% of total floor area (Eliason, 2021, p.7). However, the code exempts stairways and elevator shafts from counting as floor area already, so the marginal impact of exempting all circulation space would be somewhat smaller, maybe 9%. Additional common areas like mailrooms and amenity spaces are perhaps another 1-5%, so a reasonable estimate of the total impact of restoring the

LAMC Ch. 1A Sec.14.2.7.A.3:

“Active spaces with a minimum depth of 30 feet measured from the street-facing facade and located on the ground story are exempt from the calculation of floor area.”

Figure 3. Text of the only policy-oriented floor area carveout in the new zoning code (Ch. 1A) that applies Downtown. “Active space” includes commercial, amenity, and public/institutional uses. It applies only in Development Standards District 5. The old code (Ch. 1) had a floor area carveout as part of the GDHIA, but it was less targeted at a specific policy objective.

facing ground floor space is commercial. That means that ground-floor commercial space that faces the street does not count as floor area for the purposes of calculating FAR, allowing more leasable residential units³ than would otherwise be allowed without the carveout. The new code provides this effective FAR bonus without any affordability condition.

That carveout—narrowly targeted at enhancing streetscape activation through the ground floor space along the building facade—further the goals of the zoning code and the Downtown Community Plan. In the new code, development standards districts regulate site design, access,

landscaping, parking, etc. The new carveout only applies in Development Standards District 5 (DSD 5), which includes almost all of downtown. The intent section of the statute defining District 5 emphasizes the importance of a “dynamic and walkable environment” with “pedestrian access from the public realm to the interior of buildings”. Similarly, the floor area carveout for street-facing active space aligns with the land use goals of the Downtown Community Plan, including to “require active ground floors and street frontages that improve walkability and connectivity” (LU 11.1) and to “encourage development that is well integrated with the public realm” (11.2) ([Downtown Community Plan, 2025](#)). The carveout in the current code furthers those goals by incentivizing a consumer-oriented streetscape where the ground floor façade space contributes to the activation of the neighborhood.

The Los Angeles Municipal Code’s use of this tool to further the policy goals of the code itself and the Downtown Community plan invites broader use of the floor area carveout mechanism to advance those and other policy goals. The remainder of this brief will present and discuss three policy options that would use floor area carveouts to incentivize different features of new construction Downtown.

GDHIA carveout on allowed leasable residential floor area in a new building might be 10-14% depending on the building efficiency and amenities package.

³ This discussion focuses on mixed-use developments with commercial space below a multifamily residential development. To be clear, this floor area bonus under 14.2.7 also applies to office developments that provide consumer-facing commercial space on the ground floor.

III. Future Directions

III. A. Use a Floor Area Carveout to Incentivize Very Low-Income Housing

The City of Los Angeles faces a profound shortage of low-income housing units. More than halfway through the current RHNA cycle, the city is on pace to permit about two thirds the number of market-rate housing units that the housing element planned for through 2029 ([Los Angeles Department of City Planning, 2026](#)). In contrast, the city is on track to permit only about 10% of its RHNA target for housing for very low-income households. Providing a floor area carveout for very low-income housing would be a budget-neutral⁴ way to further incentivize developers to provide a higher share of affordable housing units beyond the incentives they already face.

Under a traditional FAR cap, units of affordable housing trade off against market rate residential or commercial space under the FAR limit. The current law floor area carveout for active space at the street frontage for DSD 5 punctures that limit, allowing a denser project than would otherwise be allowed to incentivize street activation. This proposal applies the same incentive mechanism to affordable housing, providing a carveout from the definition of floor area for any space devoted to units restricted to households below 50% AMI.

At face value, such a carveout would provide a nearly unlimited density bonus for 100% VLI projects, or mixed-income projects looking to add additional VLI units, requiring some sort of binding limit on exempt floor area. The proposed amendment below limits the carveout at the floor area given by the base FAR—effectively a roughly 90% bonus⁵ in

Affordable Incentive — 25% Very Low Income

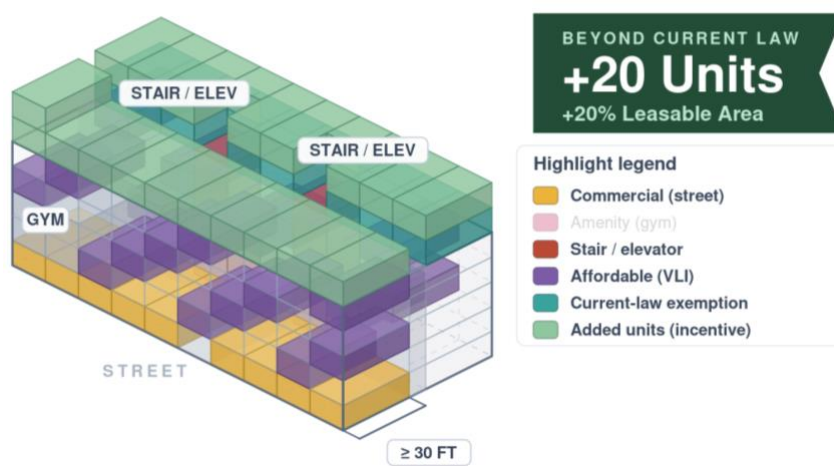


Figure 2. Shows the additional impact of a floor area carveout for deeply affordable units. The base building has space for 81 residential units after subtracting commercial, amenity, and circulation space, so 20 affordable units makes the building 24.7% affordable. The proposed exemption would give an additional 20 units beyond current law. In this hypothetical building, the GLA under current law is 99 units, so the 20 additional units that the exemption would provide represents a 20.2% increase in GLA.

⁴ Although this incentive and others like it would require no direct outlay from the city, the additional development intensity allowed by these carveouts would produce associated costs in terms of demand for city services, as well as shadow impacts from taller projects than would otherwise have been allowed.

⁵ In the case of a 100% affordable project with, for simplicity's sake, no commercial space, this carveout would give a floor area bonus equivalent to 100% of the base GLA. But when a project developer spends that bonus floor area, it doesn't all translate to leasable space because the new floors need corridors, stairways, maintenance closets, etc. Most of those spaces are exempt under law from counting as floor area (Ch. 1A §14.2.7) but corridors and common indoor amenity spaces are the largest categories not exempted. As discussed in footnote 2, these corridors make up maybe 9% of a typical floorplate and amenities could add

buildable floor area relative to the base FAR of the zone depending on building efficiency. But other limits could be just as easily justified, such as the building's applicable FAR after incentive programs are applied, or the amount of the FAR bonus given by housing incentive programs including but not limited to the State Density Bonus Program in [§9.2.1](#) or the Community Benefits Program in [Div. 9.3](#) or some fraction thereof.

Figure 4 shows how this would work. The affordable units, highlighted in violet, are excluded from the calculation of floor area. That exclusion provides additional space under the applicable FAR cap for additional market rate or affordable units. That added available floor area is shown in green. In this example, the building has 81 residential units, 20 of which (24.7%) are affordable. The building is thus provided an additional 20 units worth of floor area beyond the applicable FAR cap (Figure 4, green)—not accounting for corridors and common spaces—on top of the 9 units worth it receives under current law (Figure 4, blue). This incentive mechanism would operate the same way that the current law does for ground-floor commercial space, but toward the objective of affordable housing provision instead of street activation.

Proposed Amendment:

~~Added~~ ~~Removed~~ Current

LAMC Ch. 1A Sec. 14.2.7 – Floor Area

A. Measurement

...

3. Development Standards District 5

In a lot with an applied Development Standards District 5 (Sec. 4B.2.2.), the following rules apply:

- a. All covered, above-grade parking areas located on a lot zoned with Development Standards District 5 (Sec. 4B.2.2.) are included in the calculation of floor area.
- b. Active spaces with a minimum depth of 30 feet measured from the street-facing facade and located on the ground story are exempt from the calculation of floor area.
- c. The floor area of restricted affordable units reserved for very low income households is exempt from the calculation of floor area. Floor area excluded under this subparagraph shall not exceed the maximum floor area permitted by the base FAR of the applied Form District.

another 1-5%. A 100% affordable housing project is likely to have little indoor amenity space if any at all, so it seems to estimate that a floor area bonus of 100% of base GLA would lead to a roughly 90% increase in total GLA, depending on building efficiency.

III. B. A Floor Area Carveout Could Incentivize Interior Amenity Spaces

The code's current floor area exemption carves out "active spaces" from the definition of floor area if they are on the ground floor, facing the street, and if the space extends at least 30 feet in from the street frontage. In a downtown context where mixed-use development is dominant, that typically means commercial space, though interior resident amenity spaces are included in the definition of active space. That is to say that under current law, interior amenity spaces outside that narrow sliver—a 2nd floor gym, an interior community room, an enclosed pool-adjacent grilling space—come at the expense of leasable unit space. That additional cost disincentivizes provision of those interior spaces that deliver residents a richer and more enjoyable urban living experience (Figure 1).

Because Downtown has no single family zoning, it stands to produce a disproportionate share of affordable housing in Los Angeles. While tenants of market-rate and mixed-income housing are often willing to pay for interior amenity spaces like resident gyms, tenants of income-restricted units are less able to do so.

A targeted floor area carveout would make it more attractive for developers to provide amenity packages at a lower price point. Such a carveout would be a targeted way to incentivize new development to provide more enjoyable and community-building spaces to their residents with no public subsidy.

Doing so would align with the goals of the existing policy regimes. The Downtown Community Plan's land use goal 4 stipulates that development downtown should support a "diversity of housing options" and "Promote shared on-site amenities" (LU 4.3) (Los Angeles Department of City Planning, 2025). Under current law, that goal is just that—a goal. Adding a floor area carveout for amenity space would begin to deliver on that commitment.

Proposed Amendment:

~~Added~~ ~~Removed~~ Current

LAMC Ch. 1A Sec. 14.2.7 – Floor Area

A. Measurement

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Amenity Incentive (Current Law + Gym)

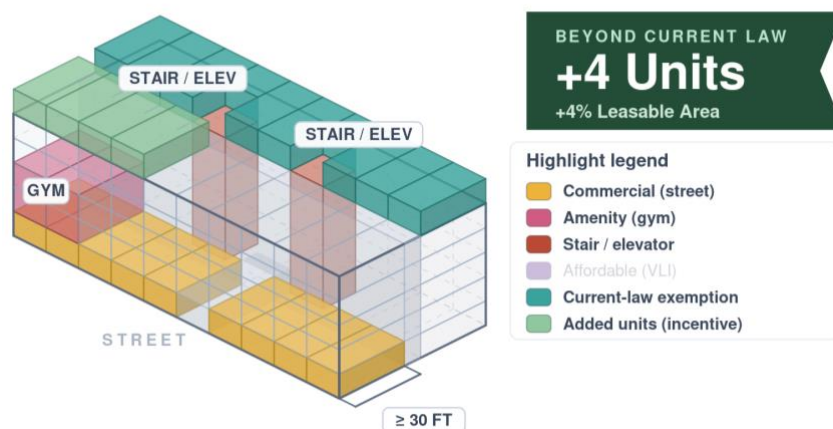


Figure 3. Diagram shows the effect of the proposed floor area carveout to incentivize provision of interior amenity spaces. The amenity space in this diagram takes up 4% of GLA for demonstration purposes. The carveout therefore adds 4 units worth of additional buildable area above the current law in DSD 5, or 13 units worth of space more than an identical project built outside of DSD 5. Actual bonus amount would depend on building amenity offerings.

3. Development Standards District 5

In a lot with an applied Development Standards District 5 (Sec. 4B.2.2.), the following rules apply:

...

c. Common indoor amenity spaces, regardless of their location in the building, are exempt from the calculation of floor area.

~~Added~~ ~~Removed~~ Current

III. C. A Commercial Exemption Across the Floorplate and Above the Ground Floor to Maximize Pedestrian Intensity

As previously described, [§14.2.7.A.3.b](#) exempts “active spaces”, including commercial use, from counting as floor area, but only on the ground floor, only at the street-facing facade, and only for spaces at least thirty feet deep. This proposal loosens those restrictions, with some key constraints, to promote additional street activation, consistent with the intent of DSD 5 and the Downtown Community Plan. Loosening the current restrictions would facilitate two building forms the current code does not: a multi-story commercial podium below a residential or office tower, and the through-block market or arcade. Both are familiar to Downtown residents.

Where the current exemption targets that narrow apron, this proposal would allow for pedestrian-accessible commercial space to be exempted from floor area wherever it lies on the floorplate up to a building’s 5th floor.

The rationales for incentivizing this kind of commercial density are simple and well founded in urban design literature around retail agglomeration and streetscape activation. These building forms, with pedestrian-oriented frontage flowing continuously from the street to building interiors, multiply the amount of pedestrian-accessible commercial frontage available per unit area. The density and diversity of use that these spaces enable—with a mix of different types and sizes of businesses—promotes public safety, increases economic vitality, and builds neighborhood community ([Jacobs, 1961](#)). High-quality active retail frontage increases pedestrian activity and public perception of safety, comfort, and interest ([Heffernan et al., 2014](#)), and retail businesses benefit significantly from agglomeration effects ([Kickert & von Hofe, 2017](#); [You et al., 2003](#)). The increased

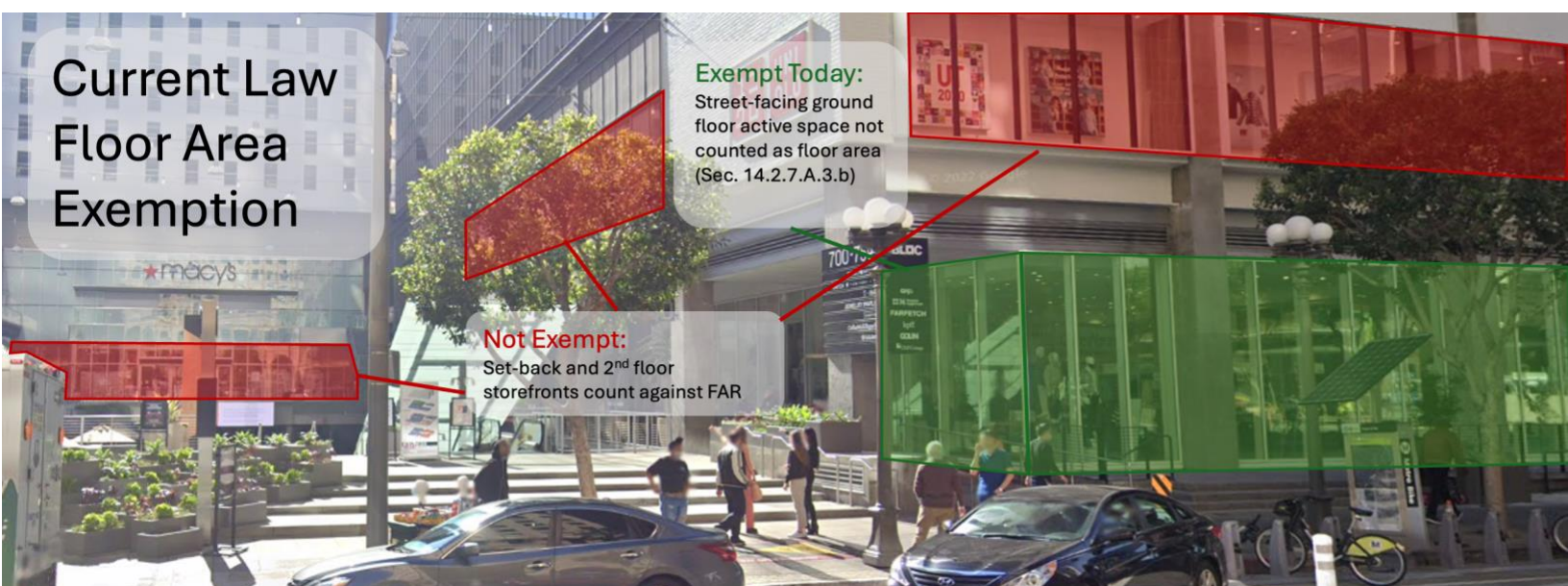


Figure 4. The Bloc at 7th and Flower. The ground floor of the Uniqlo store, highlighted in green, does not count as floor area for density purposes. That carveout incentivizes developers to build those spaces because the marginal cost of doing so is lowered by not having to compete with other uses under the FAR-imposed cap. The other commercial space in the back of the bowl, shown here with the old Macy’s, is not similarly exempted, nor is the Alamo Drafthouse on the second floor, or the upper space of the Uniqlo store, highlighted here in red.

variety of commercial use that this proposal incentivizes has been linked to increased pedestrian dwell time and spending (Hahm et al., 2019). Because of these agglomeration effects, a denser retail environment could potentially produce not only more shopping and dining options for customers but a more fruitful business climate than most retail space in Downtown LA currently enjoys.

The Bloc at 7th and Flower, which puts office towers above 3 levels of pedestrian-oriented commercial space alongside a multi-story parking garage, provides an instructive example of how the exemption would work. The current code seeks to incentivize commercial integration with the street and would, if this project were built today, exempt some of the retail space from counting against the lot's maximum buildable floor area, but only the part with street frontage. The Uniqlo on the corner, but not the old Macy's at the back of the bowl or the Alamo Drafthouse on the 2nd floor. This proposal would exempt all of those publicly-accessible commercial spaces from counting toward FAR.

Multi-Level Commercial Podium

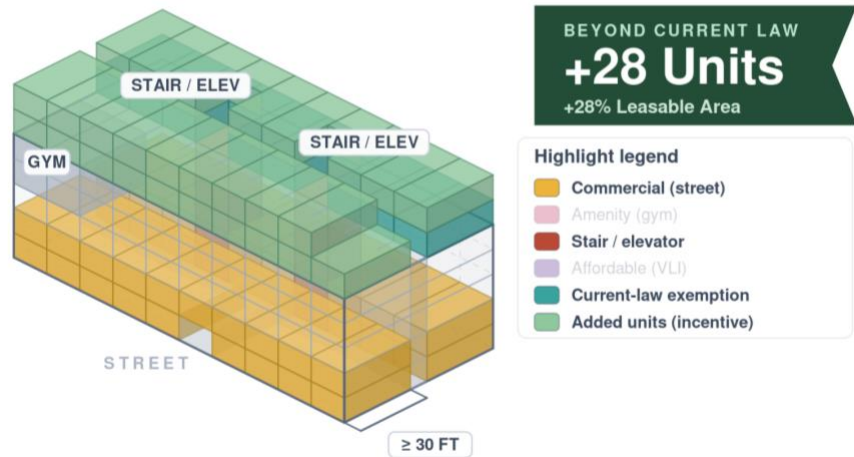


Figure 7. Demonstrates the mechanics of the proposal to exempt commercial space across the floor plate and beyond the ground floor. In the modeled building, a two-story commercial podium uses 37 units of space. Under the proposed exemption, an equivalent amount of floor area—37 units' worth—would be given as a bonus compared to just 9 units exempted under current law, a difference of 28 units.



Figure 8. Showing The Bloc at 7th. and Flower with the proposed floor area exemption. Exempting pedestrian-oriented commercial floor area set in from the street and not at ground level would facilitate a greater diversity of uses and promote street activation in areas where the market will support increased commercial density.

Extending the exemption to these forms would not be a new policy direction. Doing so would extend DSD 5’s stated intent to prioritize the pedestrian experience and to facilitate “pedestrian access from the public realm to the interior of buildings through frequent, direct and convenient access to building entrances,” producing “a dynamic and walkable environment” ([Sec. 4B.2.2.A](#)). Multi-level and interior commercial—access into the building, not merely along its edge—is exactly the experience DSD-5 describes; the current floor-area rule rewards only the street wall and taxes anything set in from the street.

Limiting this proposal to the 5th floor avoids quietly allowing unlimited commercial density. Targeting public-facing enterprises like restaurants, retail, and personal services prevents office space from qualifying.

Through-block malls are another staple of the Downtown LA built environment, from Grand Central Market on Broadway to the through-block flower markets off San Pedro. That form of development largely does not align with the floor area carveout in current law, which only targets the building apron with street frontage. Those through-block commercial spaces are cornerstones of the community that facilitate intense pedestrian integration with the built environment. By exempting such spaces from the calculation of floor area, the code could more effectively facilitate their provision in new construction.

The exemption also pulls development in the same direction as another special provision for DSD 5—that above-grade parking is counted against floor area ([§14.2.7.A.3.a](#)). Taxing parking area and exempting ground floor commercial both push toward pedestrian-accessible spaces being used for pedestrian-oriented use, and this proposal merely extends that logic, allowing more leasable area above in exchange for socially beneficial uses below.

Proposed Amendment:

~~Added~~ ~~Removed~~ Current

Sec. 14.2.7

...

A. Measurement

3. Development Standards District 5

a. All covered, above-grade parking areas located on a lot zoned with Development Standards District 5 (Sec. 4B.2.2.) are included in the calculation of floor area.

b. Active spaces ~~below the 6th floor with a minimum depth of 30 feet measured from the street-facing facade and located on the ground story~~ are exempt from the calculation of floor area.

IV. Discussion

This brief describes a framework to more effectively use floor area carveouts as an incentive for development that meets policy ends.

Use of this tool to achieve policy ends is not common (Figure 2) but not unprecedented. For example, New York City offers carveouts from the definition of floor area for building features like rooftop greenhouses and amenity spaces, as well as a carveout for certification as an energy-efficient building worth 5% of floor area ([ZR Art. 1 Ch. 2 §12-10 \(l\)](#)). Seattle gives exemptions for amenity areas and childcare centers in addition to more technical exclusions ([SMC §23.45.510.D](#)). Santa Monica makes extensive use of this tool to incentivize the kinds of developments they want to see, with exemptions for ADUS, rooftop restaurants, indoor atria, arcades, and paseos ([SMMC §9.04.080](#)). In contrast, municipal codes in many large cities—Chicago and San Francisco, for example—contain technical exclusions like mechanical rooms and stairways and operate density bonus programs that include FAR increases, but don't use the floor area carveouts themselves as a tool to achieve policy ends.

This policy tool requires no additional city expense and layers neatly with existing density bonus programs. The form-based code enacted in 2025 was a crucial step toward a land use regime that will result in a brighter and more vibrant Los Angeles for decades to come. The task before policymakers today is to understand the new policy levers at their disposal and tune the code toward providing abundant development of the kind they'd like to see. Numerous other programs in the code do exactly that, facilitating affordability, proximity to transit and more using density-based incentives.

This tool provides the same result—more units—by a different means that sidesteps the limits on FAR imposed by the applicable form district and other incentive programs. This is a general-purpose, budget-neutral incentive structure that city and state law barely touch, made newly relevant by the new code implemented in 2025, which eliminated Downtown's unit-area caps, leaving density regulated only by FAR. It bears noting that while the floor area carveout mechanism sidesteps applicable FAR limits, height limits in

20 Story Build-Out with All Proposed Exemptions

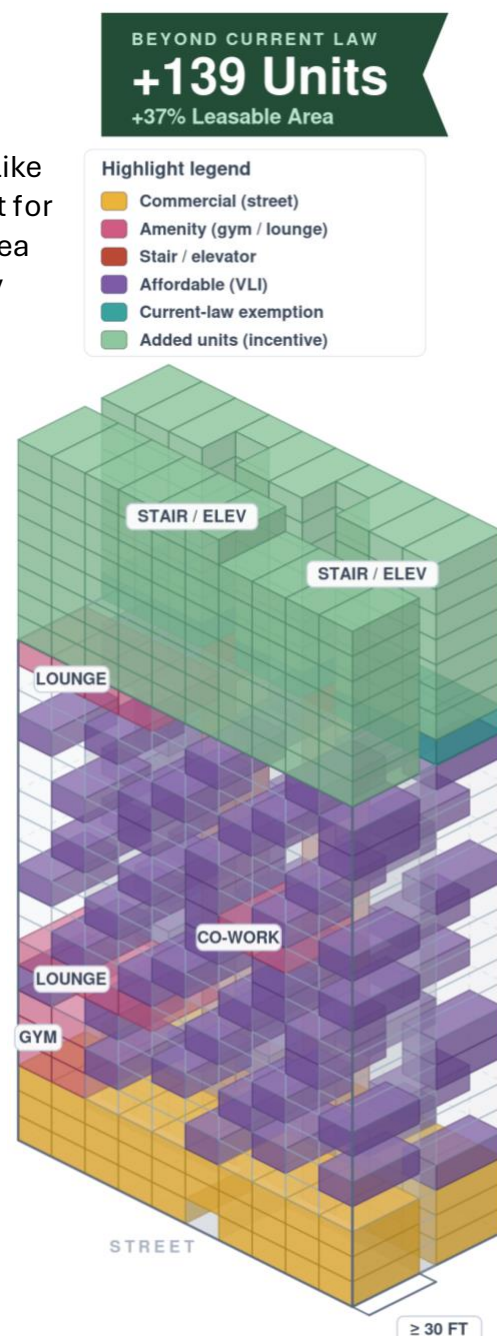


Figure 5. Showing an example 20-story (379-unit) project and the density added by implementing all of the floor area carveouts discussed. Base building is 25% affordable with 4% amenity space and a 3-level podium. Taken together, these bonuses would increase the allowable density by almost 50%.

Los Angeles may bind before the additional density can be exhausted depending on carveout design and the applicable form district.

Whereas the previous code's floor-area carveout was one piece of a broader affordability bonus program that did not need to be targeted to be effective, the incentives proposed here are narrowly directed at a specific objective, each with a natural limit: the affordable-unit carveout caps out at base FAR; the market will support only so much amenity space; and the commercial exemption is capped at the fifth story to preserve a separation of uses within a tall Downtown building.

While this brief is designed to illustrate how this mechanism works to incentivize particular use patterns the incentive structures proposed and the eligibility cutoffs are fairly crude. They could be easily fine-tuned to meet policymakers' intent. For example, the affordability incentive described above provides an exemption for floor area devoted to units available to households at <50% AMI at a one-to-one exchange. A more nuanced bonus delivery structure could provide different bonuses for different levels of affordability such that floor area dedicated to <30% AMI units gets a 2-to-1 bonus instead of 1-to-1, <50% AMI floor area—1.5-to-1, <80% AMI— .5-to-1, and <120%AMI—.25-to-1.

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