

Transit-Oriented Development and Displacement Avoidance Plan

City of Commerce – Citadel Metro Station February 2025

TABLE OF CONTENTS

EXECU	JTIVE SUMMARY	5
Exist	ing Conditions	6
Comi	munity Outreach	8
Reco	mmendations	9
INTRO	DUCTION	11
Susta	ainable Transportation Equity Project and Commerce Moving Forward	11
Defin	itions of Transit-Oriented Development and Displacement Avoidance	12
Purpo	ose and Goals	12
Plan	Structure	13
1. EX	ISTING CONDITIONS	14
Over	view	14
Meth	odology	14
Land	Use and Environmental Conditions	18
1.	Land Use	18
2.	Housing	22
3.	Environmental Conditions	24
Resid	dent Demographics	26
1.	Populations	26
2.	Health	29
Work	force and Economic Conditions	30
1.	Jobs and Employers	30
2.	Economic Challenges	34
Walk	ability, Connectivity, and Accessibility	35
1.	Active Transportation	35
2.	Public Transit	37
3.	Traffic Safety	39
2. CC	MMUNITY OUTREACH	42
Over	view	42
Augu	st 2024 Listening Session Takeaways	43
1.	Transit Infrastructure and Connectivity	44
2.	Active Transportation	44
3.	Citywide Safety and Security	45
4.	Community Assets	45
5	Programs and Policies	45

Octobe	er 2024 Listening Session Takeaways	46
1.	Transit Infrastructure and Connectivity	47
2.	More Accessible and Affordable Housing	47
3.	Support For Renters and Housing Policies	47
Januar	ry 2025 Listening Session Takeaways	48
1.	Transit Infrastructure and Connectivity	48
2.	Affordable Housing	49
3.	Accessory Dwelling Units (ADUs)	49
4. RECO	MMENDATIONS	50
Overvi	ew	50
A. Met	ro Transit Oriented Communities Funding	52
B. Wal	kability, Connectivity, and Accessibility Strategies	53
1. lm	nplement Quick-Build Projects	53
a) Plan	Implement Quick-Build Projects from the 2020 Commerce Pedestrian and Bicycle by 2026	53
b)	Implement Quick-Build Projects from the 2024 Metro First/Last Mile Plan by 2028	55
2. P	ursue Active Transportation Grant Funding	56
	Pursue Metro Active Transport, Transit, and First/Last Mile Program Cycle 2 Fundir 025	
,	Pursue California Active Transportation Program Cycle 8 Funding in 2026 and Cycleding in 2028	
3. Eı	nhance Programming and Shuttle Service	58
a)	Implement Programming for Older Adults and Youth by 2027	58
b) 2028	Increase Shuttle Service Between Rosewood Park and the Planned Metro Station b	
4. Pi	ursue State and Federal Pedestrian Overpass and Underpass Funding	59
	Pursue Caltrans Reconnecting Communities: Highways to Boulevards Grant Fundi 5 Pedestrian Overpass and/or Union Pacific Railroad Pedestrian Underpass in 2026	
Fund	Pursue US Department of Transportation BUILD or Reconnecting Communities Gr ding for I-5 Pedestrian Overpass and/or Union Pacific Railroad Pedestrian Underpas 029	S
C. Hou	using, Business, and Land Use Strategies	61
1.	Protect and Support Existing Residents	61
a)	Enact a Residential Rent Stabilization Ordinance by 2025	61
b)	Provide Additional Legal Protections/Resources for Rental Households by 2025	62
c)	Establish a First-Time Homebuyer Program by 2029	62
d)	Establish a Right of First Refusal for Renter Households by 2029	62

2.	Accelerate Affordable Housing Production	63
,	Streamline Accessory Dwelling Unit (ADU) Permitting and Establish an ADU Amnes gram by 2025	ty 63
b)	Implement Minimum Affordability Requirements for New Construction by 2025	63
,	Create a Transit Oriented Development (TOD) Overlay Zone around the Planned or Station by 2030	64
d)	Partner with Metro to Prepare Staging Area for Joint Development by 2035	65
3.	Support and Protect Small Businesses	65
a)	Develop a Small Business Database and Needs Assessment by 2025	65
b)	Provide Resources for Commercial Tenants by 2026	66
c)	Develop a Commercial Rent Stabilization Framework by 2028	66
D. Cal	ifornia Affordable Housing and Sustainable Communities Funding	67
APPEND	DIX	68
Appen	dix A: Supplemental Analysis of Existing Conditions	68
1.	Land Use and Environmental Conditions	68
2.	Resident Demographics	76
3.	Workforce and Economic Conditions	80
4.	Walkability, Connectivity, and Accessibility	85
Apper	ndix B: Presentation to Commerce Planning Commission, February 19, 2025	88

EXECUTIVE SUMMARY

This Transit Oriented Development and Displacement Avoidance Plan (TOD-DAP) aims to prepare the City of Commerce (City) for the Metro Eastside Transit Corridor Phase 2 (ESP2) project, which includes a new underground light rail transit station adjacent to the Citadel Outlets slated for groundbreaking in 2029 and opening in 2035-2037, pending funding availability. The California Air Resources Board's Sustainable Transportation Equity Project (STEP) funded this plan as part of the larger *Commerce Moving Forward* grant.

Transit investments and planned infrastructure projects, such as the Commerce/Citadel Metro E Line station, often trigger real estate speculation, driving up property values in the surrounding area, increasing the risk of residential and business displacement, and attracting development interests that may not align with community needs. To address these challenges, this plan builds upon Metro's Transit-Oriented Communities policy and the principles of equitable transit-oriented development. Since Metro has not identified residential or commercial demolitions for the Commerce/Citadel Metro E Line station, this plan focuses on preventing economic displacement, using STEP's definition of displacement avoidance as "identifying and avoiding substantial economic, environmental, and public health burdens" that may result in the economic displacement of low-income families or small businesses.

Following a brief introduction, the TOD-DAP includes the following three sections:

- Existing Conditions An overview and analysis of the residential demographics, workforce and economic opportunities, walkability, connectivity, and accessibility conditions, and land use and environmental conditions within 0.5-mile and 1-mile of the planned Commerce Station.
- 2. **Community Outreach** A summary of engagement, community outreach activities, and input gathered from City residents, workers, and other interested parties between August 2024 and January 2025.
- Recommendations Proposed actions and strategies to address current challenges and advance the TOD-DAP goals of creating a walkable, connected, accessible, and equitable transit-oriented community.

Existing Conditions

To understand existing conditions near the planned Commerce/Citadel station, the consultant team collected, visualized, and analyzed quantitative and qualitative data, organized into four categories: (1) land use and environmental conditions; (2) residential demographics; (3) workforce and economic conditions; and (4) walkability, connectivity, and accessibility. The ESP2 Final Environmental Impact Report identifies the planned Commerce/Citadel E Line light rail station as underground and directly east of the Citadel Outlets along Smithway Street. The consultant team designated the area within a one-mile radius (or buffer) around this Planned Station Location as the Focus Area. The consultant team also analyzed conditions within a smaller half-mile radius of the Planned Station Location. The Focus Area is primarily within the City of Commerce but extends into unincorporated East Los Angeles.

Industrial, commercial, and transportation uses and infrastructure surround the Planned Station Location, limiting its walkability and accessibility. Large commercial parcels west of the Planned Station Location include the Citadel Outlets shopping center. The remainder of the Focus Area is primarily industrial, with residential areas limited to the southwest portion of the Focus Area across the I-5 freeway. Although many of these residential areas lie within the one-mile radius of the Planned Station Location, most are outside of the one-mile walkshed due to I-5 and the Union Pacific Railroad north of the Planned Station Location (Figure ES-1).

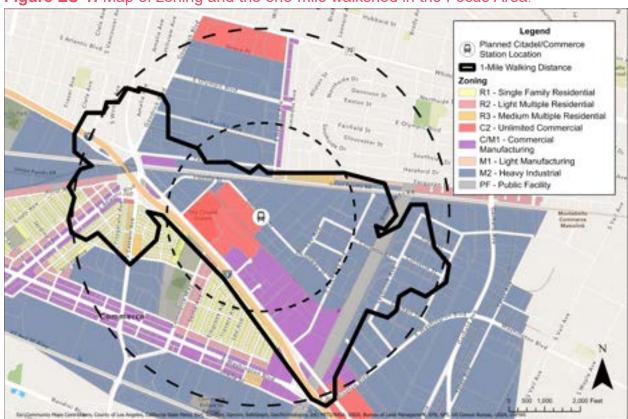


Figure ES-1: Map of zoning and the one-mile walkshed in the Focus Area.

Source: City of Commerce (2024) and Esri Business Analyst, Walkability Analysis (2024).

Beyond limited walkability, many of the Focus Area's 19,019 residents face other economic and environmental challenges. The Focus Area includes several potentially contaminated sites and experiences more pollution burden than 96% of similarly sized areas in California. The median household income in the Focus Area is approximately \$20,000 lower than the countywide median income, resulting in higher household poverty rates than the County overall. Residents also share space with nearly 23,000 people who work within the Focus Area, most of whom are employed in the manufacturing or trade sectors (**Figure ES-2**), and thousands of visitors to the Citadel Outlets shopping center.

Workers by NAICS Industry Sector Half-Mile Buffer One-Mile Buffer City of Commerce LA County 0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100% ■ Retail Trade ■Wholesale Trade ■ Manufacturing ■ Professional and Technical Services ■ Public Administration ■ Accomodation and Food Services ■ Other ■ Healthcare and Social Assistance ■ Educational Services

Figure ES-2: Chart of Workers by Sector in the Focus Area, City, and County

Source: Esri Business Analyst; Data Axle (2024)

Community Outreach

Between August 2024 and January 2025, the consultant team, City Staff, and the City's partner, Climate Resolve, co-hosted three listening sessions with residents and community stakeholders. These co-hosts held two in-person listening sessions at the Commerce Senior Center, and one hybrid session, combining in-person participation at the Senior Center with virtual access via Zoom. Climate Resolve promoted the listening sessions through email, social media, and in-person outreach at the Senior Center, Commerce Teen Center, and Rosewood Neighborhood Library.

The outreach meetings included a presentation from the consultant team, followed by facilitated breakout group discussions in English and Spanish. For each meeting, the consultant team prepared presentations that reiterated the purpose of the TOD-DAP and the study area while providing a high-level overview of existing conditions and proposed recommendations.

Each listening session built upon the content and feedback received in the previous session. During the facilitated group breakouts, participants engaged with the consultant team by providing feedback and requesting further information on the existing conditions or recommendations. Climate Resolve hired TLC Translators to provide Spanish interpretation throughout the listening sessions.

The purpose and intended outcomes of the listening sessions were to:

- 1. Inform community stakeholders about the TOD-DAP.
- Receive feedback from community stakeholders about the TOD-DAP.
- 3. Ensure the community shapes the decision-making process by incorporating community feedback into the final TOD-DAP.

After compiling feedback from the three listening sessions, the consultant team identified key opportunities, challenges, and considerations related to:

- 1. Transit Infrastructure and Connectivity
- 2. Active Transportation
- 3. Citywide Safety and Security
- Community Assets
- 5. Programs and Policies
- 6. More Accessible and Affordable Housing
- 7. Support for Renters and Housing Policies
- 8. Accessory Dwelling Units

Recommendations

The consultant team built upon the existing conditions and community input by recommending strategies to support the City's preparedness for the planned Metro station and ensure that the station's development maximizes benefits while minimizing negative impacts. The recommendations focus on improving walkability, connectivity, and accessibility, while also prioritizing the prevention of displacement and the creation of an equitable, transit-oriented community around the planned Metro station.

These recommendations are divided into four subsections:

- A. Metro Transit Oriented Communities Funding Identifies short- and long-term funding sources that support immediate and ongoing needs in the Commerce/Citadel station area.
- **B.** Walkability, Connectivity, and Accessibility Strategies Proposes actions to enhance the physical environment, fostering a well-connected, pedestrian-friendly and accessible community.
- **C.** Housing, Business, and Land Use Strategies Proposes strategies to preserve affordable housing while supporting local small businesses in the area.
- D. California Affordable Housing and Sustainable Communities Funding Identifies a critical funding source that supports sustainable and equitable transit-oriented development.

To summarize, the consultant team recommends that the City of Commerce:

- A. Pursue Metro Transit Oriented Communities Funding in 2025
- B. Implement Walkability, Connectivity, and Accessibility Strategies
 - 1. Implement Quick-Build Projects
 - a. Implement Quick-Build Projects from the 2020 Commerce Pedestrian and Bicycle Plan by 2026
 - b. Implement Quick-Build Projects from the 2024 Metro First/Last Mile Plan by 2028
 - 2. Pursue Active Transportation Grant Funding
 - a. Metro Active Transport, Transit, and First/Last Mile Program Cycle 2 Funding in 2025
 - b. Pursue California Active Transportation Program Cycle 8 Funding in 2026 and Cycle 9 Funding in 2028

- 3. Enhance Programming and Shuttle Service
 - a. Implement Programming for Older Adults and Youth by 2027
 - b. Increase Shuttle Service Between Rosewood Park and the Planned Metro Station by 2028
- 4. Pursue State and Federal Pedestrian Overpass and Underpass Funding
 - Pursue Caltrans Reconnecting Communities: Highways to Boulevards Grant Funding for I-5 Pedestrian Overpass and/or Union Pacific Railroad Pedestrian Underpass in 2026
 - Pursue US Department of Transportation BUILD or Reconnecting Communities Grant Funding for I-5 Pedestrian Overpass and/or Union Pacific Railroad Pedestrian Underpass in 2029

C. Implement Housing, Business, and Land Use Strategies

- 1. Protect and Support Existing Residents
 - a. Enact a Residential Rent Stabilization Ordinance by 2025
 - b. Provide Additional Legal Protections and Resources for Rental Households by 2025
 - c. Establish a First-Time Home Buyer Program by 2029
 - d. Establish a Right of First Refusal for Renter Households by 2029
- 2. Accelerate Affordable Housing Production
 - Streamline Accessory Dwelling Unit (ADU) Permitting and Establish an ADU Amnesty Program by 2025
 - b. Implement Minimum Affordability Requirements for New Construction by 2025
 - c. Create a Transit Oriented Development (TOD) Overlay Zone with Affordable Housing around the Planned Metro Station by 2030
 - d. Partner with Metro to Prepare Staging Area for Joint Development with Affordable Housing by 2035
- 3. Support and Protect Small Businesses
 - a. Develop a Small Business Database and Needs Assessment by 2025
 - b. Provide Resources for Commercial Tenants by 2026
 - c. Develop a Commercial Rent Stabilization Framework by 2028

D. Pursue California Affordable Housing and Sustainable Communities Funding During Commerce/Citadel Station Construction by 2035

INTRODUCTION

The City of Commerce (City), located in Southeast Los Angeles County, is home to nearly 12,000 residents and a majority Hispanic/Latinx population. Industrial land uses, freight traffic, and freeways have historically dominated the City, contributing to air pollution and limiting transportation options for residents. This Transit Oriented Development and Displacement Avoidance Plan (TOD-DAP) aims to address these conditions in preparation for the Metro Eastside Transit Corridor Phase 2 (ESP2) project, which will extend the Metro E Line light rail by approximately 9 miles from East Los Angeles to the cities of Commerce and Montebello, and adding three new stations. One of the new stations is an underground Commerce/Citadel Station adjacent to the Citadel Outlets, enhancing regional connectivity for Commerce residents, workers, and visitors. As of February 2025, Metro anticipates beginning ESP2 construction in 2029, with the Commerce/Citadel Station expected to open in 2035-2037, pending funding availability.

Sustainable Transportation Equity Project and Commerce Moving Forward

In 2021, the City secured grant funding from the California Air Resources Board's Sustainable Transportation Equity Project (STEP) to implement portions of its 2020 Bicycle and Pedestrian Plan and other sustainable transportation improvements. The STEP program funds clean and active transportation projects that meet community-identified needs and provide access to key destinations to achieve transportation equity. Through the STEP grant, *Commerce Moving Forward* resulted in the installation of the City's first Class II bike lanes, the planting of 400 trees to provide shading along transit, bicycle, and pedestrian corridors, and the addition of two new electric buses and two new electric shuttles to its bus and shuttle fleets to expand needed service. The final component of the grant is a Transit-Oriented Development and Displacement Avoidance Plan (TOD-DAP) focused on the Commerce/Citadel Metro E Line light rail station. The TOD-DAP builds on these efforts to expand clean, accessible, and equitable transportation while setting the foundation for equitable development that prevents displacement. After working with Estolano Advisors as a state-funded technical assistance provider during the STEP application and first year of STEP grant administration, the City retained Estolano Advisors to develop the TOD-DAP in May 2024.

¹ "California Air Resources Board." *Sustainable Transportation Equity Project*, 19 June 2024, ww2.arb.ca.gov/resources/fact-sheets/sustainable-transportation-equity-project

² "Sustainable Transportation Equity Project (STEP) Implementation Grant." *LCTI: Commerce Moving Forward*, ww2.arb.ca.gov/lcti-commerce-moving-forward

Definitions of Transit-Oriented Development and Displacement Avoidance

The anticipation of transit investments and planned infrastructure projects, such as the Commerce/Citadel Metro E Line station, often triggers real estate speculation, driving up property values in the surrounding area, increasing the risk of residential and business displacement, and attracting development interests that may not align with community needs.³ To address these challenges, this TOD-DAP is guided by the principles of equitable transit-oriented development (eTOD), which prioritizes preventing displacement and closing racial and socioeconomic gaps.⁴ This plan is also informed by Metro's Transit-Oriented Communities (TOC) policy, which emphasizes distributing the benefits of transit equally and stabilizing the communities surrounding a transit project to avoid displacement.⁵ Metro's TOC Implementation Plan describes these principles in further detail, aligning with other Metro plans and procedures.⁶

Additionally, this TOD-DAP adopts the STEP grant's definition of displacement avoidance as "identifying and avoiding substantial economic, environmental, and public health burdens" that may result in the "physical or economic displacement" of low-income families or small businesses. This is since Metro has not identified residential or commercial demolitions for the Commerce/Citadel Metro E Line station, this plan focuses on preventing economic displacement.

Purpose and Goals

The purpose of the TOD-DAP is to enhance connectivity and accessibility to the planned Commerce/Citadel Metro E Line station, and to avoid displacement of the City of Commerce's residents and small businesses.

³ Zuk, M., Bierbaum, A. H., Chapple, K., Gorska, K., & Loukaitou-Sideris, A. (2018). Gentrification, Displacement, and the Role of Public Investment. Journal of Planning Literature, 33(1), 31-44. https://doi.org/10.1177/0885412217716439

⁴ Implementing Equitable Transit-Oriented Development (eTOD). Strong, Prosperous, and Resilient Communities Challenge. https://www.sparcchub.org/wp-content/uploads/2019/03/Implementing-ETOD-Factsheet 11 7FINAL.pdf

⁵ Transit Oriented Communities Policy. LA Metro. https://www.dropbox.com/scl/fi/nd3cz3wbnrcd28h2rq4cj/TOC-Policy-Final.pdf?rlkey=s5mesblyjfqwkoxrs4ghkz697&e=2&st=pdd9f4qo&dl=0

⁶ Transit Oriented Communities Implementation Plan. LA Metro. https://libraryarchives.metro.net/DB_Attachments/BP-Links/policy-2020-10-14-transit-oriented-communities-implementation-plan.pdf

⁷ Displacement and Housing Guidance. *California Air Resources Board*. https://ww2.arb.ca.gov/sites/default/files/classic/msprog/step/step_displacement_and_housing_quidance.pdf

The goals of the TOD-DAP include:

- 1. Preparing early and carefully for the planned Metro station
- 2. Maximizing benefits and minimizing harms of the planned Metro station
- 3. Increasing walkability, connectivity, and accessibility of the planned Metro station area
- 4. Preventing residential and commercial displacement in the City of Commerce
- 5. Connecting City of Commerce residents to the rest of Los Angeles County
- 6. Fostering an equitable transit-oriented community around the planned Metro station

Plan Structure

The TOD-DAP is organized into the following three sections:

- 4. **Existing Conditions** An overview and analysis of the residential demographics, workforce and economic opportunities, walkability, connectivity, and accessibility conditions, and land use and environmental conditions within 0.5-mile and 1-mile of the planned Commerce Station.
- 5. **Community Outreach** A summary of engagement, community outreach activities, and input gathered from City residents, workers, and other interested parties between August 2024 and January 2025.
- 6. **Recommendations** Proposed actions and strategies to address current challenges and advance the TOD-DAP goals of creating a walkable, connected, accessible, and equitable transit-oriented community.

1. EXISTING CONDITIONS

Overview

This section of the TOD-DAP outlines and analyzes the existing conditions surrounding the planned Commerce/Citadel Station (Planned Station Location). The consultant team collected, visualized, and analyzed quantitative and qualitative data, organized into four categories: (1) land use and environmental conditions; (2) residential demographics; (3) workforce and economic conditions; and (4) walkability, connectivity, and accessibility. To illustrate findings from this analysis, the subsections below highlight key takeaways, with additional details provided in Appendix A. This existing conditions analysis, along with community input, informs the development of the recommendations outlined in Section 3 of the TOD-DAP.

Methodology

According to the Metro Eastside Transit Corridor Phase 2 Final Environmental Impact Report, the planned Commerce/Citadel E Line light rail station will be underground and directly east of the Citadel Outlets along Smithway Street.⁸ This Planned Station Location is within the northern central portion of the City of Commerce. To analyze where the station may have major impacts, the consultant team designated the area within a one-mile radius (or buffer) around the Planned Station Location as the Focus Area. The consultant team also analyzed conditions within a smaller half-mile radius of the Planned Station Location. The Focus Area is primarily within the City of Commerce but extends north of its jurisdictional boundaries into unincorporated East Los Angeles (Figure 1). The portion of the Focus Area north of the City of Commerce is in the unincorporated community of East Los Angeles. Outside of the Focus Area, other nearby jurisdictions include the cities of Montebello, Bell, and Vernon (Figure 2).

⁸ Eastside Phase 2 Final Environmental Impact Report. LA Metro. https://www.dropbox.com/scl/fo/0yhjlp7mj3tlwoy1yele4/ALeSEWqjot1qm-VzsSGnxUo?rlkey=o0fzaxbojfy6i91rtl17ovyx1&e=1&st=gyt5sjx7&dl=0.



Figure 1: Map of the Focus Area and the City of Commerce.



Figure 2: Map of the municipalities and unincorporated areas in the region.

Source: US Census Bureau, Geography Division (2022).

Since the one-mile and half-mile buffers do not account for physical constraints near the station, the consultant team also visualized a one-mile walking distance from the Planned Station Location using Esri's Business Analyst software. By accounting for physical constraints such as buildings, waterways, and railroads, this one-mile "walkshed" provides an estimate of how far a pedestrian can walk from a specific location. The railroad tracks to the north and Interstate 5 (the I-5 freeway) to the southwest significantly limit the one-mile walkshed around the Planned Station Location (Figure 3).



Figure 3: Map of the one-mile walkshed in the Focus Area.

Source: Esri Business Analyst, Walkability Analysis (2024).

To thoroughly analyze the existing conditions in and around the Focus Area, the consultant team analyzed data from 13 sources. Where possible, the consultant team visualized these data at the census block group or census tract level. Additionally, the consultant team used Esri Business Analyst to compare data between the half-mile buffer, the one-mile buffer, the City of Commerce, and Los Angeles County (LA County). The consultant team also utilized Esri's Business Analyst data estimates to retrieve and visualize certain demographic variables for 2024. To supplement the quantitative data collected for this analysis, the consultant team also completed a walk audit of the Focus Area in August 2024.

The consultant team used data from these sources:

Source	Year	Use in Report
City of Commerce	2024	Citywide zoning; housing overlay zone; bike facility data
County of Los Angeles	2022	Parks and open space polygons; libraries, churches and hospitals point data
Los Angeles Homeless Services Agency (LAHSA)	2024	Point-in-time homeless counts
Los Angeles County Metropolitan Transportation Authority (LA Metro)	2024	Bus routes
Southern California Association of Governments (SCAG)	2015-2019; 2022; 2023	Land use data; bike facility data; high injury network
California Department of Toxic Substances Control (DTSC)	2024	Hazardous sites point data
Southern California Regional Rail Authority	2024	Metrolink routes
California Environmental Protection Agency (CalEPA)	2021	CalEnviroScreen 4.0 environmental and health data
California Healthy Places Index	2018	Extreme heat data
California Schools Campus Database	2021	Public school point data
United States Census Bureau	2022	Socioeconomic, demographic, and housing data
United States Geological Survey	2022	Polygons for local municipalities
Esri Business Analyst	2024	1-mile walkshed calculation; employee and business data; select demographic and commute data

⁹ Esri uses multiples sources to model demographic estimates for 2024, including: Experian; the U.S. Postal Service (USPS); Zonda, a Hanley Wood company; and RealPage, in addition to several ancillary sources. For more information, see: 2024/2029 Esri Updated Demographics.

Land Use and Environmental Conditions

The consultant team collected, visualized, and analyzed data on land use and environmental conditions within the Focus Area, the City of Commerce, and LA County as a whole. Zoning and land use data show that the City has designated most of its land to industrial uses. While some residential parcels are located within the Focus Area, they are largely inaccessible to the Planned Station Location due to the I-5 freeway. In addition, several parcels in the Focus Area may be contaminated by hazardous waste and other pollutants. These hazardous sites, industrial land uses, and the nearby freeway contribute to relatively high pollution levels near the Planned Station Location. As described in later subsections, these factors contribute to negative health outcomes and poor walking and biking conditions for residents, workers, and transit riders in the Focus Area.

1. Land Use

Figure 4 shows the zoning within the portion of the City of Commerce located within the Focus Area. The City is primarily zoned Heavy Industrial (M2). The Planned Station Location is situated on a corridor between parcels zoned Unlimited Commercial (C2) and Heavy Industrial (M2). The large C2 parcels west of the Planned Station Location include the Citadel Outlets shopping center. The remainder of the Focus Area is primarily zoned for Heavy Industrial (M2), with residential areas limited to the southwest portion of the Focus Area across the I-5 freeway. Residential zoning in Commerce includes three categories: R1 (Single-Family Residential), R2 (Light Multiple Residential), and R3 (Medium Multiple Residential). Although many of these residential areas lie within the one-mile radius of the Planned Station Location, most are outside of the one-mile walkshed (**Figure 5**).

¹⁰ See Appendix, Figure A.



Figure 4: Map of zoning in the Focus Area.

Source: City of Commerce (2024).



Figure 5: Map of zoning and the one-mile walkshed in the Focus Area.

Source: City of Commerce (2024) and Esri Business Analyst, Walkability Analysis (2024).

According to the Southern California Association of Governments (SCAG), land uses within the Focus Area generally mirror the City of Commerce's zoning code (Figure 6). Most existing uses in the Focus Area are industrial, with some parcels adjacent to the Planned Station Location dedicated to commercial services and office space. Most residential parcels are single family homes, but multifamily residential buildings cover most parcels on which they are allowed. There are relatively few vacant parcels within the Focus Area and in the City of Commerce overall.

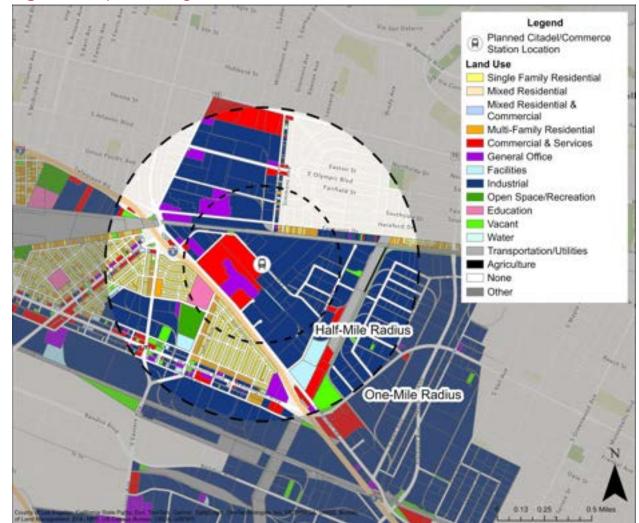


Figure 6: Map of existing land use in the Focus Area.

Source: SCAG Land Use Database (2022)

Within the Focus Area there is one park and one public school.¹¹ The public school is adjacent to the I-5 freeway, within the residential neighborhood southwest of the I-5 freeway. The park is directly southwest of the school in the same residential neighborhood. The Focus Area is also home to one medical facility on the southern end of the Focus Area¹², one library located next to city hall¹³, and 11 places of worship.¹⁴ These facilities within the Focus Area are not easily accessible to the Planned Station Location, and many are outside of the one-mile walkshed entirely.¹⁵

¹¹ See Appendix, Figure B.

¹² See Appendix, Figure C.

¹³ See Appendix, Figure C.

¹⁴ See Appendix, Figure D.

¹⁵ See Appendix, Figure AB.

2. Housing

According to the most recent Census data, 44.7% of households in the City are renters. Approximately 55% of all renters in the City are rent-burdened, meaning that they pay more than 30% of their income on housing. Severe rent burden is prevalent in the City of Commerce as well, with approximately 32% of renters paying over 50% of their income on housing. ¹⁶

Many households are considered overcrowded in the City, suggesting the need for new residential development to increase the availability of affordable housing options to address overcrowding. Approximately 23.4% of rental units and 16.1% of owner units are overcrowded. This is a stark contrast to LA County as a whole, where just 15.6% of rental units and 5.8% of owner units are overcrowded.

Figure 7 shows a decline in the number of unhoused individuals in the City over the past five years, but it is uncertain whether this trend will continue. The lack of affordable housing and support services are significant drivers of homelessness, and the City currently lacks a homeless outreach plan, shelters, and supportive services to assist the unhoused population.

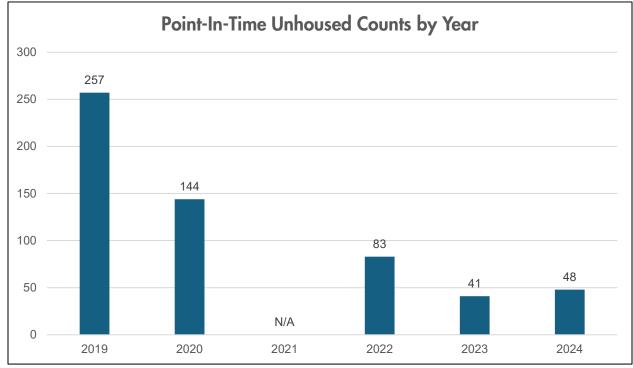


Figure 7: Unsheltered Persons in Commerce (2019-2024)

Source: Los Angeles Homeless Services Authority (2019-2024).

¹⁶ See Appendix, Figure V.

¹⁷ The U.S. Census defines an overcrowded unit as one occupied by 1.01 persons or more per room.

¹⁸ Source: US Census Bureau, ACS 5-Year Estimates (2022).

As **Figure 8** shows, the City of Commerce has a residential overlay zone where housing is allowed by-right on industrial parcels adjacent to the Commerce City Hall.¹⁹ The housing overlay zone has expedited the development of new housing in the City of Commerce, but the majority of the housing stock in Commerce was built decades ago. According to the most recent Census data, 55.6% of all housing units were built before 1960 in the city, and only 5.6% of all units were built between 2000 and 2020.²⁰



Figure 8: Map of Housing Overlay Zone in the City of Commerce.

Source: City of Commerce (2024)

¹⁹ "Commerce City Charter"; Chapter 19.47, https://library.municode.com/ca/commerce/codes/code of ordinances?nodeld=TIT19ZO CH19.47HOOPOVZO

²⁰ Source: US Census Bureau, ACS 5-Year Estimates (2022).

3. Environmental Conditions

The consultant team utilized data from the California Environmental Protection Agency's (CalEPA) CalEnviroScreen 4.0 tool to analyze multiple pollution factors at the census tract level. The consultant team found that most of the Focus Area consists of census tracts that are more burdened by pollution than at least 96% of tracts in California (**Figure 9**). Bisected by the I-5 freeway, the Focus Area's concentrations of traffic density and particulate matter contribute to these high overall pollution levels.²¹ Without major changes, these hazardous conditions will harm residents, workers, and transit riders after the Commerce/Citadel Station opens and for generations afterward.

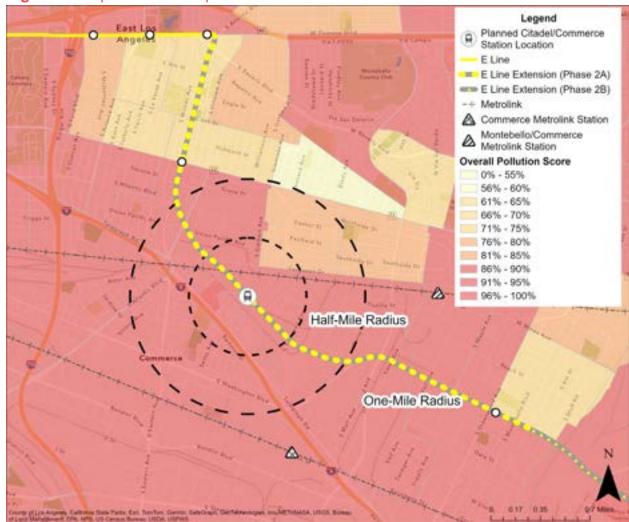


Figure 9: Map of combined pollution in the Focus Area relative to the state of California.

Source: CalEnviroScreen 4.0, California Environmental Protection Agency (2021)

²¹ See Appendix, Figure F, Figure G, and Figure H.

Furthermore, the City of Commerce portion of the Focus Area has more hazardous sites near its residential areas than in the residential neighborhoods to the northeast in unincorporated East Los Angeles. There are 13 hazardous sites within a one-mile radius of the Planned Station Location, five of which are active cleanup sites according to the California Department of Toxic Substances Control (DTSC). **Figure 10** shows these Hazardous Sites in relation to the Planned Station Location.

Legend
Planned Citadel/Commerce Station Location
E Line Extension (Phase 2A)
Metrolink
Hazardous Sites

Half-Mille Radius

One-Mile Radius

Figure 10: Map of potentially contaminated sites in the Focus Area.

Source: California Department of Toxic Substances Control (2024).

In addition to the high prevalence of hazardous sites in the Focus Area, several other environmental factors affect residents and transit users in this area. The California Healthy Places Index estimates that the Focus Area will experience at least 16 days of temperatures hotter than 100 degrees Fahrenheit each year by 2035. In addition, the Planned Station Location has minimal tree canopy coverage, with only two streets within the half-mile radius of the Focus Area having at least 38.6% canopy coverage. Along walking routes near the Planned Station Location, residents, workers, and transit riders have minimal opportunities to seek protective shade during high heat days. These dangerous health risks require extensive heat mitigation to protect people within the Focus Area and near the Planned Station Location.

Resident Demographics

The consultant team analyzed the demographics of residents in the City of Commerce and the Focus Area across several factors, including race, ethnicity, language, age, gender, and health. These indicators describe who lives within the Focus Area while also depicting the broader demographic characteristics of residents that may utilize the Commerce/Citadel Station. In general, the City of Commerce and the Focus Area have similar demographics to LA County. However, residents of the City of Commerce and the Focus Area face greater economic and health challenges compared to the average LA County resident.

1. Populations

Based on 2024 population estimates from Esri Business Analyst, the City of Commerce is home to approximately 11,974 people. This is roughly 0.1% of the total population of LA County. **Figure 11** compares the Focus Area population to the City of Commerce and LA County overall.

Figure 11: Chart of population in the Focus Area, City of Commerce, and Los Angeles County.

Area	Estimated Population
Half-Mile Radius	2,462
One-Mile Radius	19,019
City of Commerce	11,974
Los Angeles County	9,768,886

Source: Esri Business Analyst Population Estimates (2024)

²² See Appendix, Figure I.

²³ See Appendix, Figure J.

Despite the City's relatively small population, residential areas to the southwest and northeast of the Planned Station Location are densely populated (**Figure 12**). Within these residential areas, population density is at least 4,000 people per square mile – this is significantly higher than the countywide population density of 2,430 people per square mile. However, the area immediately surrounding the Planned Station Location has a much lower population density, highlighting the importance of first-last mile connections to the station.

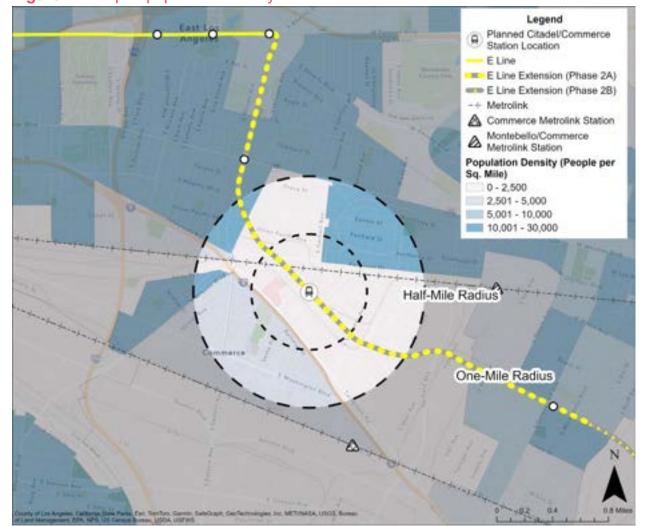
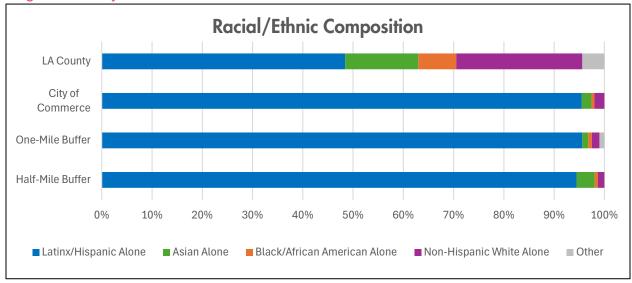


Figure 12: Map of population density in the Focus Area.

Source: US Census Bureau, ACS 5-Year Estimates (2022)

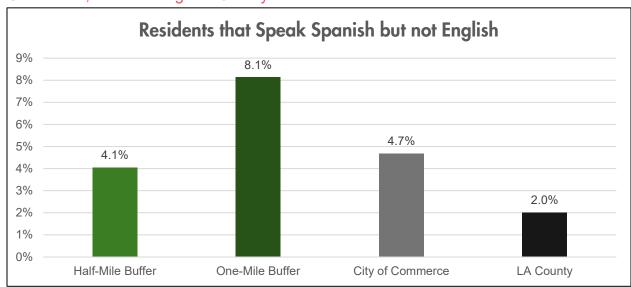
Both the City of Commerce and the Focus Area have much higher numbers of Latinx/Hispanic Residents than LA County as a whole. **Figure 13** shows that over 90% of residents in the City of Commerce and in the Focus Area identify as Latinx or Hispanic. Within the City and Focus Area, residents are more likely to be monolingual Spanish speakers when compared to the County. These monolingual Spanish speakers are concentrated between the half- and one-mile buffer around the Planned Station Location (**Figure 14**). As the average resident within the Focus Area is more likely to speak Spanish instead of English, wayfinding and other station area interventions must accommodate both languages.

Figure 13: Graph of race and ethnicity in the Focus Area, City of Commerce, and Los Angeles County.



Source: US Census Bureau, ACS 5-Year Estimates (2022)

Figure 14: Graph of monolingual Spanish speakers in the Focus Area, City of Commerce, and Los Angeles County.



Source: US Census Bureau, ACS 5-Year Estimates (2022)

Age and gender demographics of the City of Commerce and Focus Area closely mirror those of LA County.²⁴ The median age for all areas is between 36 and 40 years old. The proportion of residents below age 18 and over age 65 is also similar across these geographies, with about 23% of all residents at or below age 18 and around 15% of all residents at or over age 65. Additionally, the gender distribution within the City and Focus Area is also similar to LA County, with about 49.5% of residents across these geographies identifying as female.²⁵ These findings demonstrate that the Commerce/Citadel station area must accommodate all genders and ages.

Seniors in Commerce experience higher poverty rates compared to the County overall. Approximately 18.8% of Commerce residents at or over age 65 had an income below the federal poverty level, compared to 19.9% of all seniors throughout LA County. This suggests that seniors in Commerce have a higher need for key services, such as senior housing, rental assistance, and transportation services.

2. Health

Due in part to the high pollution rates described previously, residents in the Focus Area face a variety of health challenges. Within the Focus Area, residents experience higher rates of cardiovascular disease than residents in at least 76% of other census tracts in California. Focus Area residents also experience higher asthma rates than residents in at least 51% of other census tracts in California.²⁷ The City of Commerce also has a higher percentage of households (approximately 10% more) with at least one person with a disability compared to the LA County as a whole.²⁸ These factors will require thoughtful planning to ensure both accessibility and a comfortable environment near the Planned Station Location.

²⁴ See Appendix, Figure K.

²⁵ See Appendix, Figure L.

²⁶ Source: American Community Survey 5-Year Estimates (2022).

²⁷ See Appendix, Figure M and Figure N.

²⁸ See Appendix, Figure O.

Workforce and Economic Conditions

The consultant team collected, visualized, and analyzed quantitative and qualitative data on residents, employers, and jobs in the Citadel area and throughout the City. The City of Commerce is a hub for commercial and industrial business, creating significant employment opportunities for both sectors. However, residents in the Focus Area and the City of Commerce lag behind LA County overall on key economic metrics, such as education and income.

1. Jobs and Employers

As shown in **Figure 15**, there are notably more employees in the City of Commerce and the Focus Area than residents. With nearly four times as many employees as residents, the City serves as a significant employment hub for the region, contributing to a jobs and housing imbalance. This reflects the City's zoning policies, which dedicate a significant portion of the City's land to industrial and commercial uses. However, this creates an opportunity to integrate more residential development near these jobs centers to help accommodate the growing workforce and foster a more sustainable and livable community.

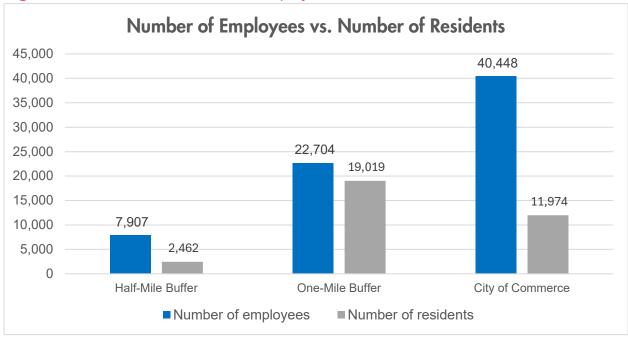


Figure 15: Chart of the numbers of employees vs. number of residents

Source: Esri Business Analyst; Data Axle (2024).

Most workers in the City of Commerce and the Focus Area are employed in the manufacturing or trade sectors. For example, over 60% of workers in the City work in retail trade, manufacturing, or wholesale trade, with each industry employing approximately 20% of the workers in the City (**Figure 16**). Workers in the Focus Area and the City participate in these sectors at much higher rates than they do in LA County as a whole.

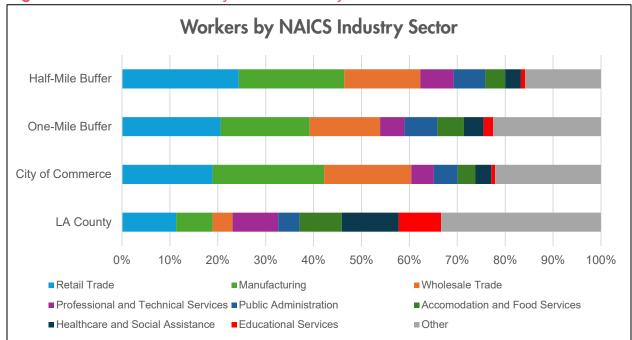


Figure 16: Chart of Workers by NAICS Industry Sector.

Source: Esri Business Analyst; Data Axle (2024)

Most of the large employers—defined as employers with 250 or more employees—in and around the Focus Area are in the industrial sector. Within a three-mile radius of the Planned Station Location, 33 businesses are large employers, and 19 of these businesses are in manufacturing, distribution, or wholesale trade (Figure 17). This is consistent with the "heavy industrial" zoning designation for most of the City of Commerce. The Citadel Outlets are not included in Figure 17 because the outlets are a conglomeration of dozens of smaller businesses rather than a single entity. However, the Citadel Outlets employ many of the Retail Trade workers described in Figure 16.

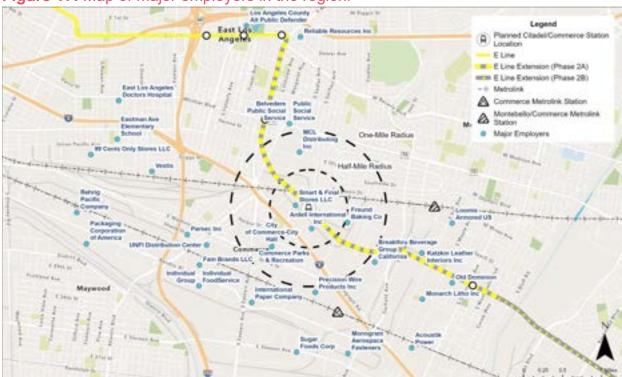


Figure 17: Map of major employers in the region.

Source: Esri Business Analyst; Data Axle (2024).

Figure 18 shows that small businesses—defined here as independent employers with less than 25 employees—are heavily concentrated at the Citadel Outlets and along Washington Boulevard and Eastern Avenue. Like the large employers in the area, a significant share of the small businesses in the City are in manufacturing, distribution, or wholesale trade. Notably, the single largest business classification by NAICS code is restaurants, with 54 restaurants located in Commerce.²⁹

²⁹ Source: Esri Business Analyst; Data Axle (2024)

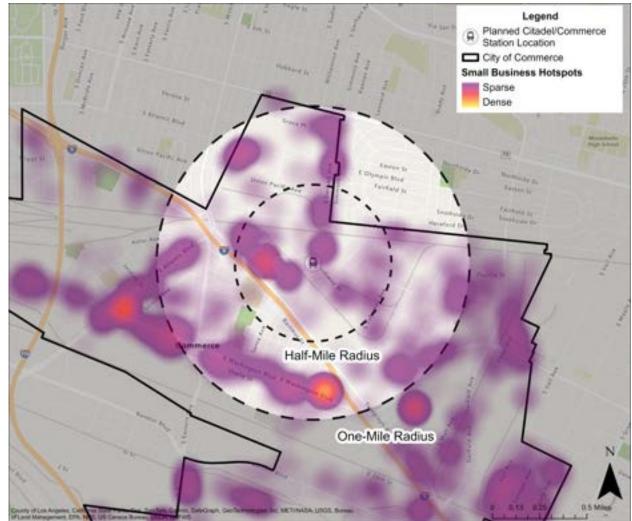


Figure 18: Heat Map of Small Businesses in Commerce.

Source: Esri Business Analyst; Data Axle (2024).

2. Economic Challenges

Despite ample employment opportunities in the City of Commerce, many residents face economic challenges. In both the Focus Area and the City, the median household income is approximately \$20,000 lower than the countywide median income. (Figure 19). Similarly, the Focus Area and the City have significantly fewer households making more than \$200,000 per year and significantly more households making less than \$15,000 per year compared to LA County. Onemployment is also higher in the City than in LA County. As a result, households in the Focus Area and the City live below the poverty line at a higher rate than households in the County overall.

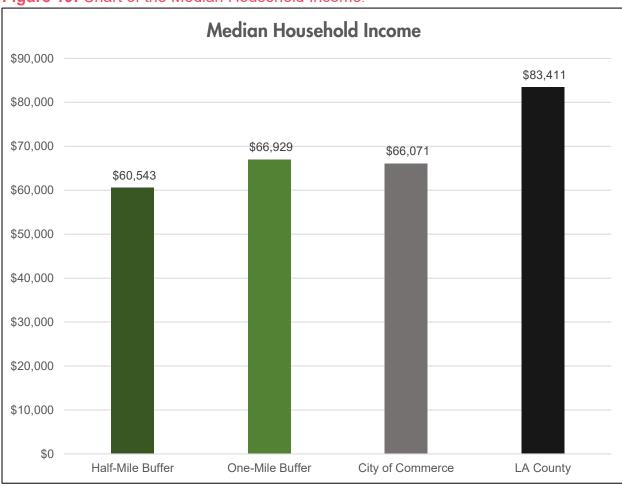


Figure 19: Chart of the Median Household Income.

Source: US Census Bureau, ACS 5-Year Estimates (2022)

³⁰ See Appendix, Figure Q

³¹ See Appendix, Figure R

³² See Appendix, Figure T

Walkability, Connectivity, and Accessibility

The consultant team analyzed and visualized data to understand the walkability, connectivity, and accessibility conditions in the Focus Area and City of Commerce. Although only about 20% of residents within the Focus Area commuted to work without an automobile, these residents biked, walked, and took public transportation at higher rates than other parts of LA County. Despite these relatively high rates of non-automobile travel, the consultant team found that current infrastructure within and surrounding the Focus Area does not facilitate safe and comfortable walking, biking, and public transit use.

1. Active Transportation

Active transportation—defined as walking, biking, and rolling to access destinations—is relatively popular, yet challenging, in the Focus Area and the City of Commerce. Most of the one-mile walkshed around the Planned Station Location encompasses industrial or commercial land. Although thousands of residents live in the Focus Area, several factors prevent them from walking or rolling to the Planned Station Location. To the southwest, the I-5 freeway creates a physical barrier between the Planned Station Location and the nearest residents of the City of Commerce. To the north, railroad tracks and industrial parcels separate the Planned Station Location from the nearest residents in unincorporated East Los Angeles. The nearest crossing of the railroad tracks and the I-5 freeway is Atlantic Avenue, approximately 0.75 miles west of the Planned Station Location. There is only one pedestrian-only bridge crossing the I-5 freeway in the City of Commerce, located outside of the Focus Area at Triggs Street and McDonnell Avenue near Bristow Park.

Despite these walkability challenges, many Commerce residents walk to work. **Figure 20** shows that a higher percentage of workers walk to work in the City of Commerce than in LA County overall. Although the City of Commerce has a very low share of workers who bike to work, residents within the unincorporated East Los Angeles portion of the Focus Area bike to work at a higher rate than in LA County overall.³⁷

³³ See Appendix, Figure AA

³⁴ See Appendix, Figure A

³⁵ See Appendix, Figure AB

³⁶ See Appendix, Figure A

³⁷ See Appendix, Figure AC

Percent of Workers 16+ that Walked to Work 7% 6% 6% 5% 5% 4% 4% 3% 3% 2% 1% 0% Half-Mile Buffer One-Mile Buffer City of Commerce LA County

Figure 20: Chart of the percentage of workers that walked to work.

Source: Esri Business Analyst (2024).

Very few bikeway segments currently exist in and around the Proposed Station Location, but there are Class II bike lanes on the Southern end of the Focus Area. Approximately 2.3 miles of Class II bike lanes were installed on Eastern Avenue, Commerce Way, and Harbor Street in 2024 (**Figure 21**). The Focus Area also includes two Class II bike lanes proposed by SCAG along Telegraph Road and Olympic Boulevard, as well as one proposed Class III bike lane along Hendricks Avenue.



Figure 21: Map of the existing and proposed bike facilities.

Source: Southern California Association of Governments (2023) and City of Commerce (2024)

2. Public Transit

Workers within the Focus Area took public transit to work at higher rates compared to the City of Commerce and LA County as a whole. Eight percent of workers within a mile of the planned station take public transportation to work compared to only five percent in LA County overall.³⁸ **Figure 22** shows the six LA Metro bus lines and two Metrolink regional rail stations in and around the Focus Area. The City of Commerce also operates seven bus routes in and around the Focus Area. ³⁹

³⁸ See Appendix, Figure Z

³⁹ See Appendix, Figure AD

The nearest Metrolink station is located south of the one-mile radius of the Planned Station Location. Part of the Metrolink Orange County Line, this station connects riders to Los Angeles Union Station to the northwest and to Orange County and the City of Oceanside to the southeast. Another Metrolink Station, east of the Focus Area and part of the Metrolink Riverside Line, connects riders to the cities of Riverside and Perris to the east.

Although there are at least 13 bus routes that serve the City of Commerce, there are currently no stops or routes located at the Planned Station Location. The closest bus routes are located on Telegraph Road and require walking approximately 0.3 miles across the Citadel Outlets parking lot to the Planned Station Location. Current bus routes serve Veteran's Park, Commerce Center, Bandini Park, Civic Center, Citadel Outlets, Downtown LA, other neighborhood parks, and libraries. In addition, Metro's Line 260 bus connects to the nearest existing Metro Rail station at Atlantic Boulevard in East Los Angeles.

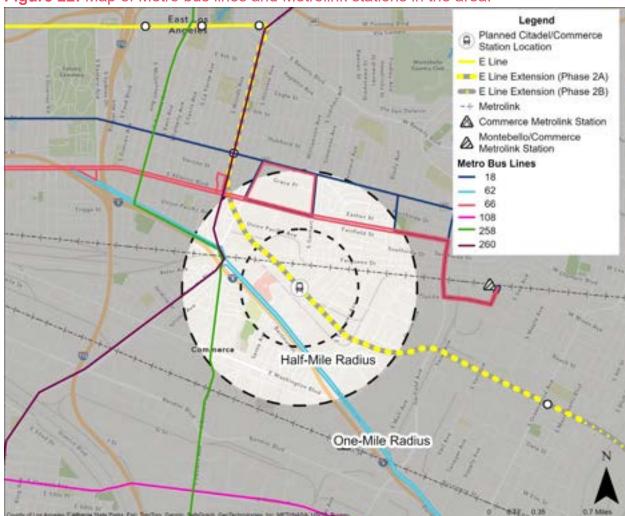


Figure 22: Map of Metro bus lines and Metrolink stations in the area.

Source: Los Angeles County Metropolitan Transportation Authority (2024)

3. Traffic Safety

Traffic injury data reveals potential safety issues for pedestrians, cyclists, and drivers in the Focus Area. **Figure 23** shows the SCAG's High Injury Network alongside reported traffic collisions in the Focus Area between 2015 and 2019. High injury corridors within the Focus Area include Atlantic Boulevard, Olympic Boulevard, and Gerhart Avenue. At least six automobile collisions, eight collisions between automobiles and pedestrians, and three collisions between automobiles and bicyclists occurred within the Focus Area. One auto-bicyclist collision occurred within a half-mile of the Planned Station Location at the southwest corner of the Citadel Outlets. Two auto-pedestrian collisions occurred along Atlantic Boulevard, including one at the intersection with Fitzgerald Avenue and another at the intersection with Ferguson Drive. **Figure 24** shows a photo taken during the consultant team walk audit, at the latter intersection.

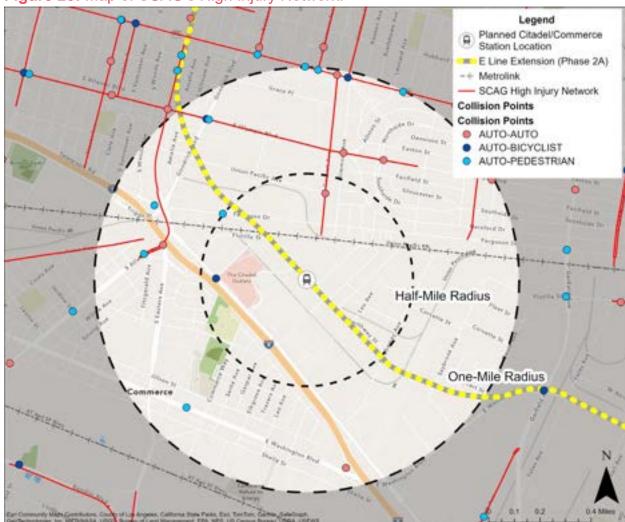


Figure 23: Map of SCAG's High Injury Network.

Source: SCAG Regional High Injury Network (2015-2019)

City of Converce Training

Figure 24: Picture of intersection of Atlantic Boulevard and Ferguson Drive.

Source: Estolano Advisors (2024)

Like other large intersections in the Focus Area, existing infrastructure prioritizes drivers, allowing them to turn rapidly with limited protection for pedestrians. As future Commerce/Citadel Station users will need to cross similarly designed intersections to travel past the Citadel Outlets, the City must prioritize pedestrian and bicycle safety in the Focus Area. **Figure 25** illustrates the conditions at the intersection of Atlantic Boulevard and Telegraph Road, one of the key intersections connecting the Planned Station Location with the residential neighborhood on the southern end of the Focus Area. In the foreground, a pedestrian uses an umbrella to protect them from the sun, highlighting the lack of shade in the area.

Figure 25: Picture of intersection of Atlantic Boulevard and Telegraph Road.

Source: Estolano Advisors (2024)

2. COMMUNITY OUTREACH

Overview

In August 2024, the consultant team conducted an existing conditions analysis of the area surrounding the Planned Station Location. The consultant team identified key assets, challenges, and considerations for the area, using the analysis to inform stakeholders that reside, work in, or visit the City of Commerce and the surrounding project area. This section outlines the approach the consultant team took during community engagement.

Between August 2024 and January 2025, the consultant team, City Staff, and the City's partner, Climate Resolve, co-hosted three listening sessions with residents and community stakeholders. These co-hosts held two in-person listening sessions at the Commerce Senior Center, and one hybrid session, combining in-person participation at the Senior Center with virtual access via Zoom. Climate Resolve promoted the listening sessions through email, social media, and in-person outreach at the Senior Center, Commerce Teen Center, and Rosewood Neighborhood Library.

The outreach meetings included a presentation from the consultant team, followed by facilitated breakout group discussions in English and Spanish. For each meeting, the consultant team prepared presentations that reiterated the purpose of the TOD-DAP and the study area while providing a high-level overview of the existing conditions, proposed recommendations, and final recommendations.

Each listening session built upon the content and feedback received in the previous session. During the facilitated group breakouts, participants engaged with the consultant team by providing feedback and requesting further information on the existing conditions or recommendations. Climate Resolve hired TLC Translators to provide Spanish interpretation throughout the listening sessions.

The purpose and intended outcomes of the listening sessions were to:

- 4. Inform community stakeholders about the TOD-DAP.
- Receive feedback from community stakeholders about the City's progress on the TOD-DAP.
- 6. Ensure the community shapes the decision-making process by incorporating community feedback into the final TOD-DAP.

After compiling feedback from the three listening sessions, the consultant team identified key opportunities, challenges, and considerations. The following section describes these takeaways categorized by listening session and key themes.

August 2024 Listening Session Takeaways

On August 22, 2024, Climate Resolve and the consultant team co-hosted an in-person meeting at the Commerce Senior Center to share findings from the existing conditions analysis. This section categorizes the feedback from the first listening session into five themes: transit infrastructure and connectivity, active transportation, citywide safety and security, community assets, and programs and policies.

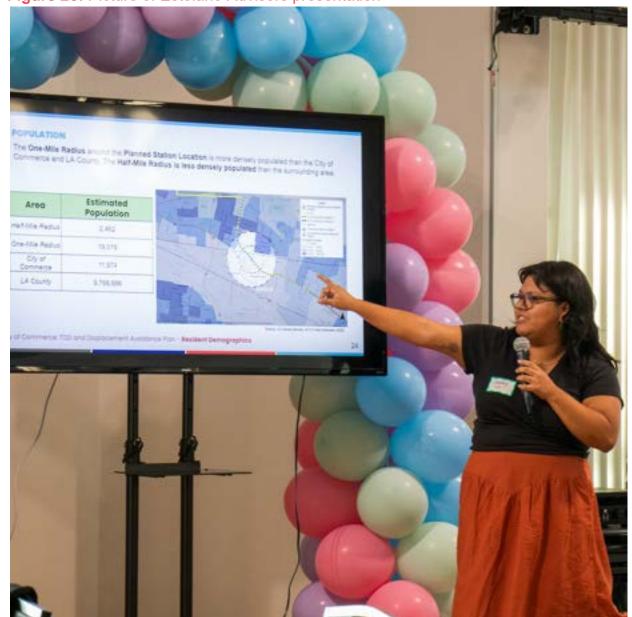


Figure 26: Picture of Estolano Advisors presentation

Source: Climate Resolve (2024)

1. Transit Infrastructure and Connectivity

Community stakeholders cited transit services, including frequency and reliability, as an important opportunity area. Participants shared that they would like to see more consistent bus service to reduce wait times and increase ridership, with some expressing disappointment that the City has reduced bus services on Sundays. Other participants suggested that the City invest in new transit options, such as shuttles that travel directly from the Planned Station Location to key neighborhood destinations like Rosewood Park.

Participants shared that they would like to see various amenities at the Planned Station Location to promote ridership. Some suggested building a plaza at the Planned Station Location with plenty of seating, spaces for vendors, and other community activities. Other participants requested that the City provide ample parking to ensure that residents who cannot walk or bike to the Planned Station Location can park there. Cleanliness was a key concern for participants, with many suggesting that the area around the Planned Station Location be regularly cleaned and maintained.

2. Active Transportation

Community stakeholders emphasized the need to improve walking infrastructure to promote active transportation in the City. Safety and comfort were top priorities among participants, with many highlighting the lack of shade and limited walking space on sidewalks. Other participants noted that it can be difficult or unpleasant for Citadel Outlets employees and shoppers to walk in the area, especially at night due to the lack of adequate lighting. Participants shared that they would like more trees, lighting, and expanded sidewalks in the area near the Planned Station Location to promote a safer and more comfortable pedestrian environment.

Bike and pedestrian connectivity were key concerns for community stakeholders. Participants noted that the residential neighborhoods near the Citadel Outlets are already walkable and densely populated, but the Citadel Outlets and the Planned Station Location are not easily accessible from these areas. Community stakeholders underscored that Atlantic Boulevard, Eastern Avenue, the I-5 Freeway, and the railroad tracks are contributors to the limited connectivity in the area.

Participants suggested several ways to improve connectivity between nearby residential neighborhoods and the Planned Station Location, including a pedestrian bridge across the I-5 Freeway, from Commerce Way to Citadel Drive. One stakeholder noted that a bridge used to exist in this location and expressed a desire to see it rebuilt. Additionally, to better connect the Planned Station Location to the residential neighborhoods to the north, one stakeholder proposed building a pedestrian tunnel from the Citadel Outlets to Gerhart Avenue. Other stakeholders suggested building a bridge over the railroad tracks to better connect the two areas. Some community members suggested upgrades to the existing bridge on Atlantic Boulevard, highlighting the need for wider sidewalks and a comfortable walking experience.

3. Citywide Safety and Security

Participants expressed concerns that the Planned Station Location will bring more unhoused individuals to the City of Commerce, and shared mixed opinions about potential solutions. Some participants expressed a desire to provide increased homeless services to support the existing and future unhoused population in the City. Others requested that the City or Metro provide ample police or other safety personnel to enforce rules in and around the Planned Station Location.

Similarly, community stakeholders identified citywide safety as a key area of concern. Participants highlighted a need for security at the Planned Station Location, including public safety officers patrolling around the community. Other stakeholders expressed a desire for the City to create its own police department to enhance safety in the community.

4. Community Assets

Community stakeholders expressed a strong desire to preserve and expand community assets in the City of Commerce. Participants and employees highlighted numerous small businesses that are viewed as valuable along Atlantic Boulevard and Eastern Avenue, such as a gym, local non-profit East Yard Communities for Environmental Justice's office, and restaurants, such as Lee Sandwiches, Xris Burgers, and Lucky Guys. Participants also expressed favorable opinions of the nearby industrial businesses and the Commerce Casino due to the employment opportunities and tax revenue they bring to the City. Some noted that they would appreciate more City-led partnerships with these stakeholders.

However, many community stakeholders stated that they would like to see a more diverse set of businesses serving the community. For example, participants noted that there are many fast-food restaurants in the area, but there are few fresh food options. Participants also shared that they would like to have more grocery stores and pharmacies in the City, noting a need to drive to East LA or Bell to reach the closest grocery store or pharmacy.

5. Programs and Policies

Participants expressed pride in the existing programs that the City of Commerce offers and shared that they would like to see more programming that benefits residents, specifically seniors and youth. For example, some participants suggested that the City should use grant money or other funds to provide swimming lessons, after-school courses, or programs for seniors. Others expressed a desire to see more City-sponsored events that cater to youth or young adults, such as the return of boxing events and other programs the City used to have that directly engaged youth. Participants also noted the lack of job opportunities for youth, suggesting that the Planned Station Location could offer opportunities for local hire through the construction of the station, transit ambassadorship once the station opens, or other local programs.

Community stakeholders also uplifted various housing policies. Participants highlighted the need to keep rents affordable in Commerce, with many sharing the desire to enact rent control policies similar to the City of Los Angeles' Rent Stabilization Ordinance (RSO), which caps rent increases for rental units subject to the RSO at 4-5% and provides other tenant protections.⁴⁰ Others noted that they would like more affordable housing developments in the City.

October 2024 Listening Session Takeaways

On October 17, 2024, Climate Resolve and the consultant team co-hosted an in-person meeting at the Community Senior Center to share a set of draft recommendations for walkability, accessibility, housing, businesses, and displacement avoidance. Feedback from the second listening session is categorized into three themes: transit infrastructure and connectivity, additional housing, and protections for renters and property owners.



Figure 27: Picture of English-language breakout session

Source: Climate Resolve (2024)

⁴⁰ "Renter Protections." What You Need to Know about LA's Renter Protections, Los Angeles Housing Department, housing.lacity.gov/renter-protections-2#:

^{~:}text=Annual%20rent%20increases%20for%20rental,additional%201%25%https://housing.lacity.gov/renter-protections-

^{2#:~:}text=Annual%20rent%20increases%20for%20rental,additional%201%25%20can%20be%20added.20can%20be %20added. Accessed 6 Feb. 2025

1. Transit Infrastructure and Connectivity

Community stakeholders shared that proposed infrastructure improvements near the Planned Station Location would encourage them to bike, walk, and utilize transit. Many participants expressed support for a pedestrian bridge over the I-5 freeway from the Rosewood Park area to the Citadel Outlets. They also shared that it is important to install traffic calming measures along wide streets, such as Telegraph Road. General street improvements, including more streetlights and shading, are also needed near the Planned Station Location.

Participants also underscored that the public transportation serving the area needs increased frequency and other improvements. They shared the need for more frequent service on some bus lines, such as the City of Commerce bus service that sometimes runs only once an hour. Additionally, some residents were unfamiliar with some of the newer Metro bus routes, including the 108-bus line, so there is a need for increased awareness of new transit services in the area.

2. More Accessible and Affordable Housing

Overall, community stakeholders noted that the City needs to increase the amount of available housing. Some participants recommended increasing the number of accessory dwelling unit (ADU) permits and streamlining the application process. They shared that there are already many informal ADUs and that increasing the number of permits would give the City a better understanding of what is available and increase protections for tenants. They hope that increasing and facilitating the ADU permitting process will lead to more habitable units.

Participants also shared that they are in support of high-rises and higher density housing near the Planned Station Location. Although they do not necessarily support high density housing throughout the City, they do not feel that high-rises near the station would disrupt the aesthetic of housing throughout the City.

3. Support For Renters and Housing Policies

Community stakeholders shared that they would like to see more protections for renters. Renters expressed concern over rent increasing, putting them at a higher risk for evictions. Some participants who have lived in informal ADUs shared that they have been held responsible for building improvements and faced eviction due to the lack of a formal leasing contract with the homeowner. Other residents expressed concern with seniors being at a higher risk for displacement due to the limited amount of affordable senior housing in the area.

Landlords noted that protections for renters should not create additional barriers for landlords. For example, when discussing Section 8 vouchers, landlords shared that they prefer to receive funds from vouchers directly instead of having the funds go to renters to minimize the risk of not receiving rent payments on time.

January 2025 Listening Session Takeaways

On January 22, 2025, Climate Resolve and the consultant team provided an overview of the full TOD-DAP during a hybrid listening session at the Commerce Senior Center and over Zoom.



Figure 28: Picture of Spanish-language breakout session

Source: Climate Resolve (2024)

1. Transit Infrastructure and Connectivity

Similar to the first two listening sessions, participants emphasized the need for affordable and reliable public transit near the station. Many participants expressed support for expanded shuttle service but stressed the importance of these services remaining free like other Commerce Transit options. Some senior residents recommended having additional shuttle services as an alternative in the event that bus service lines are interrupted due to project construction.

In addition, many participants were supportive of more bus lanes, but were also concerned about the safety of cyclists and the potential for increased traffic. Participants concerned with increased traffic stated that they rarely see the bike lanes being used and some have seen them used incorrectly. Some residents shared that they do not use the bike lanes currently available because they are unprotected and require them to ride alongside large semi-trucks. Participants shared that it would be helpful to have more education on (1) how to use bike lanes safely and (2) how drivers can be mindful of cyclists on the road. Participants also suggested preventing station-induced cut-through traffic on Ferguson Drive between Atlantic Blvd and Garfield Ave.

2. Affordable Housing

Participants were generally supportive of more affordable housing near the station but emphasized the importance of ensuring affordable housing benefits residents of Commerce. Many participants were excited about the possibility of mixed-use development as an option for more affordable housing.

Some residents were concerned that new affordable housing may eventually get sold to another owner and no longer be affordable. Participants shared anecdotes of these sales affecting senior residents who are on fixed incomes. They stressed that seniors should be given priority regarding affordable housing to ensure that they are able to age in place. Other participants shared concerns about affordable housing being included in a project proposal but not being built at the scale promised. One resident shared that townhomes near the Senior Center were supposed to include affordable unit set-asides, but this did not end up being included. Overall, participants stressed accountability for any promises around affordable housing.

3. Accessory Dwelling Units (ADUs)

Participants were supportive of a streamlined ADU permitting process but were worried this would not be enough to support residents trying to build more units. Some participants recommended the City provide financial help for those trying to build an ADU. Other participants shared that the permitting process itself is too expensive and recommended having a more affordable option. One resident shared their experience of having to tear down their unpermitted ADU that they built as a young adult at their parents' house to stress how beneficial having a simplified and affordable process could be for the economic development of younger residents.

4. RECOMMENDATIONS

Overview

This section of the TOD-DAP outlines recommendations that build upon the existing conditions described in Section 2 and address the community input presented in Section 3. The strategies detailed in this section aim to achieve the overarching goals set forth in the plan to support the City's preparedness for the planned Metro station and ensure that the station's development maximizes benefits while minimizing negative impacts. The recommendations focus on improving walkability, connectivity, and accessibility, while also prioritizing the prevention of displacement and the creation of an equitable, transit-oriented community around the planned Metro station.

These recommendations are divided into four subsections:

- **A. Metro Transit Oriented Communities Funding** Identifies short- and long-term funding sources that support immediate and ongoing needs in the Commerce/Citadel station area.
- **B.** Walkability, Connectivity, and Accessibility Strategies Proposes actions to enhance the physical environment, fostering a well-connected, pedestrian-friendly and accessible community.
- **C.** Housing, Business, and Land Use Strategies Proposes strategies to preserve affordable housing while supporting local small businesses in the area.
- D. California Affordable Housing and Sustainable Communities Funding Identifies a critical funding source that supports sustainable and equitable transit-oriented development.

To summarize, the consultant team recommends that the City of Commerce:

- A. Pursue Metro Transit Oriented Communities Funding in 2025
- B. Implement Walkability, Connectivity, and Accessibility Strategies
 - 1. Implement Quick-Build Projects
 - a. Implement Quick-Build Projects from the 2020 Commerce Pedestrian and Bicycle Plan by 2026
 - Implement Quick-Build Projects from the 2024 Metro First/Last Mile Plan by 2028

- 2. Pursue Active Transportation Grant Funding
 - a. Metro Active Transport, Transit, and First/Last Mile Program Cycle 2 Funding in 2025
 - b. Pursue California Active Transportation Program Cycle 8 Funding in 2026 and Cycle 9 Funding in 2028
- 3. Enhance Programming and Shuttle Service
 - a. Implement Programming for Older Adults and Youth by 2027
 - b. Increase Shuttle Service Between Rosewood Park and the Planned Metro Station by 2028
- 4. Pursue State and Federal Pedestrian Overpass and Underpass Funding
 - Pursue Caltrans Reconnecting Communities: Highways to Boulevards Grant Funding for I-5 Pedestrian Overpass and/or Union Pacific Railroad Pedestrian Underpass in 2026
 - Pursue US Department of Transportation BUILD or Reconnecting Communities Grant Funding for I-5 Pedestrian Overpass and/or Union Pacific Railroad Pedestrian Underpass in 2029

C. Implement Housing, Business, and Land Use Strategies

- 1. Protect and Support Existing Residents
 - a. Enact a Residential Rent Stabilization Ordinance by 2025
 - Provide Additional Legal Protections and Resources for Rental Households
 by 2025
 - c. Establish a First-Time Home Buyer Program by 2029
 - d. Establish a Right of First Refusal for Renter Households by 2029
- 2. Accelerate Affordable Housing Production
 - Streamline Accessory Dwelling Unit (ADU) Permitting and Establish an ADU Amnesty Program by 2025
 - b. Implement Minimum Affordability Requirements for New Construction by 2025
 - c. Create a Transit Oriented Development (TOD) Overlay Zone with Affordable Housing around the Planned Metro Station by 2030
 - d. Partner with Metro to Prepare Staging Area for Joint Development with Affordable Housing by 2035
- 3. Support and Protect Small Businesses
 - a. Develop a Small Business Database and Needs Assessment by 2025
 - b. Provide Resources for Commercial Tenants by 2026
 - c. Develop a Commercial Rent Stabilization Framework by 2028

D. Pursue California Affordable Housing and Sustainable Communities Funding During Commerce/Citadel Station Construction by 2035

A. Metro Transit Oriented Communities Funding

As the first step in implementing these recommendations, the City of Commerce should pursue Metro Transit Oriented Communities (TOC) funding, including Technical Assistance Program (TAP) and Grant Writing Assistance Program (GWA), as early as possible in 2025. Metro TOC funding would support many of the policies and projects outlined in these recommendations, including housing development to enhance affordability and achieve Regional Housing Needs Allocation (RHNA) goals, pedestrian and bicycle infrastructure, and small business support.⁴¹

As of February 2025, Metro TOC TAP and GWA applications are open currently and accepted year-round, with the Commerce/Citadel station area eligible for TOC funding. Metro TOC TAP funding could award the City up to \$200,000 for analysis that would support the immediate steps required to implement these recommendations. This funding could be used for planning efforts such as an "Affordable Housing Production Feasibility Study" to identify specific parcels and new zoning designations for the TOD Overlay Zone or a "First/Last Mile Strategy Design Refinement" to develop detailed designs and updated cost estimates for pedestrian and bicycle projects. 42 For example, Metro recently awarded the City of Glendora \$200,000 to analyze housing development potential and develop a specific plan around the Glendora Metro A Line station under construction.

Metro TOC GWA funding would help the City apply for State and Federal grants identified in these recommendations. TOC GWA would provide a Metro-funded and Metro-identified grant writer to apply for grants. 43 such as California's Active Transportation Program Cycle 8 grant and the US Department of Transportation (USDOT) Better Utilizing Investments to Leverage Development (BUILD) grant. The Metro TOC GWA program recently resulted in two successful applications to the USDOT Safe Streets and Roads for All grant for a total of \$15.3 million.44

⁴¹ LA Metro. "We're supporting TOC projects in local jurisdictions: Transit Oriented Communities Funding Programs." Feb 2025, metro.net/tocfunding

⁴² LA Metro. "TOC TAP Application Guide." Feb 2025, https://www.dropbox.com/scl/fo/2n9vo848zqzpceu3k9f8c/h?dl=0&e=1&preview=TOC+TAP+Application+Guide.pdf&rlkey=ew1chinf33hmwysufci6drrj2

⁴³ LA Metro. "Transit Oriented Communities Grant Writing Assistance Program." Feb 2025, https://www.metro.net/about/metro-toc-grant-writing-assistance-gwa-program/

⁴⁴ LA Metro. "We're supporting TOC projects in local jurisdictions: Transit Oriented Communities Funding Programs." Feb 2025, metro.net/tocfunding

B. Walkability, Connectivity, and Accessibility Strategies

1. Implement Quick-Build Projects

a) Implement Quick-Build Projects from the 2020 Commerce Pedestrian and Bicycle Plan by 2026

In 2020, the City adopted the Commerce Pedestrian and Bicycle Master Plan, which represents at least two years of safety assessments, surveys, community outreach, and partnerships with Montebello Unified School District, Bandini Elementary School, Rosewood Park School, and Caltrans. Improvements identified in the Plan would provide better access to the planned Metro station and overall improve the experience for pedestrians in the City. To provide first/last mile improvements for the planned Metro station, the City should implement the high visibility crosswalks, curb ramps, speed humps, and bicycle hubs projects identified in the 2020 Pedestrian and Bicycle Plan.

Figure 29 shows quick-build projects identified in the Pedestrian and Bike plan in relation to the planned Metro station. Most of these projects fall outside of the ½ mile radius around the Planned Station Location and include high-visibility crosswalks, curb ramps, bicycle hubs, and speed humps. The 2020 Plan also includes several bikeways shown in **Figure 30**, including a Class III bikeway connecting the planned Metro station to Telegraph Road via Smithway Street, Flotilla Street, and Camfield Avenue.

The City should prioritize implementing quick-build projects that are typically lower-cost interventions, especially those closest to the planned Metro station, identified in the 2020 Commerce Pedestrian and Bicycle Plan. Whereas larger projects often require right-of-way acquisition and extensive construction, improved signage and targeted automobile speed reduction measures can increase pedestrian safety at a lower cost. For example, the nonprofit Vision Zero Network estimates that a traffic sign costs roughly \$300 and a speed hump costs roughly \$2,725 on average. The plan also identifies several bicycle facilities, integrated transit and bicycle hubs, and traffic calming measures that fall within this price range. The City should prioritize projects within one-half mile and then within one mile of the planned Metro station using the 2020 Plan's prioritization criteria of need, equity, health, safety, community support, and network connectivity.

⁴⁵ Commerce Bicycle & Pedestrian Plan, Oct. 2020, https://www.ci.commerce.ca.us/home/showpublisheddocument/1950/637394104249470000

⁴⁶ Cost References for Sample Quick-Build Traffic-Calming Treatments & Road-Safety Countermeasures, Vision Zero Network, Aug. 2022, docs.google.com/presentation/d/1saKQBszXz8pSqvMwx74XmKudjKlhT26-/edit#slide=id.p1

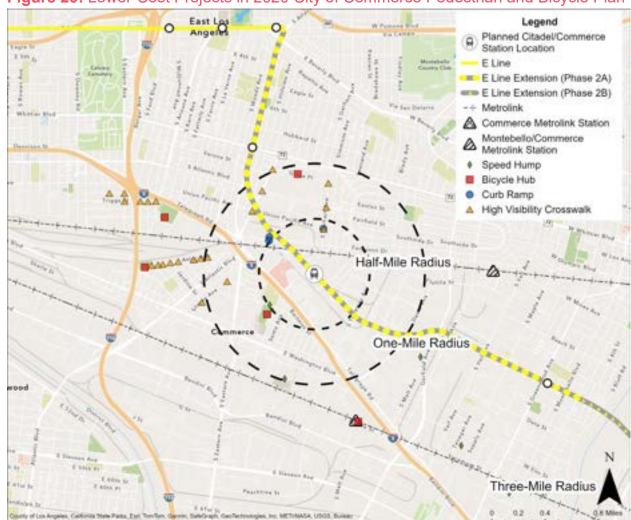


Figure 29: Lower-Cost Projects in 2020 City of Commerce Pedestrian and Bicycle Plan

Source: City of Commerce and Estolano Advisors (2024)

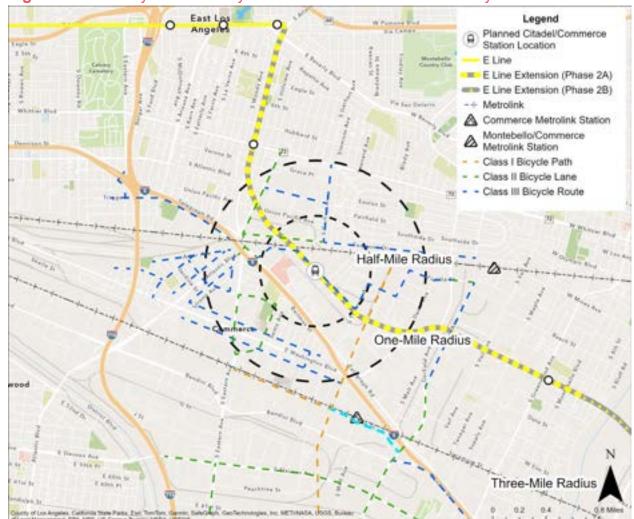


Figure 30: Bikeways in 2020 City of Commerce Pedestrian and Bicycle Plan

Source: City of Commerce and Estolano Advisors (2024)

b) Implement Quick-Build Projects from the 2024 Metro First/Last Mile Plan by 2028

The Metro's 2024 Eastside Transit Corridor Phase 2 First/Last Mile Plan (FLM)⁴⁷ covers the area from East Los Angeles to Montebello. The plan includes an existing conditions analysis, walk and wheel audits, local agency coordination, community and stakeholder engagement, and a list of priority and non-priority projects for implementation. Metro's FLM plan identifies bus stop improvements, shade structures, and additional curb ramps and wayfinding improvements not included in the 2020 City plan (**Figure 31**). The City should also prioritize these interventions using the 2020 City plan's criteria of need, equity, health, safety, community support, and network connectivity. Implementation of priority projects from Metro's First/Last Mile Plan would also help fulfill the 3% local match requirement for the Planned Commerce Citadel Station.

⁴⁷ LA Metro. "First/Last Mile Plan Prioritization Summary." *Eastside Transit Corridor Phase 2 (Metro E Line)*, Sept. 2024, metro.legistar1.com/metro/attachments/63063925-bf7b-4ec7-af93-4df7b8747a40.pdf

Legend Planned Citadel/Commerce Station Location E Line Extension (Phase 2A) E Line Extension (Phase 2B) Metrolink Commerce Metrolink Station Montebello/Commerce Metrolink Station Shade Structure Curb Ramps **Bus Stop Improvements** Wayfinding and Signage Half-Mile Radius One-Mile Radius Three-Mile Radius

Figure 31: Lower-Cost Projects in 2024 Metro Eastside Phase 2 First-Last Mile Plan near Planned Commerce/Citadel Station

Source: LA Metro and Estolano Advisors (2024)

2. Pursue Active Transportation Grant Funding

a) Pursue Metro Active Transport, Transit, and First/Last Mile Program Cycle 2 Funding in 2025

To fund lower-cost pedestrian and bicycle improvements near the planned Metro station, the City of Commerce should pursue grant funding from the Metro Active Transport, Transit, and First/Last Mile (MAT) Program Cycle 2. ⁴⁸ The 2016 Measure M half-cent sales tax established MAT to improve active transportation and transit accessibility throughout Los Angeles County.

⁴⁸ "Metro Active Transport, Transit and First/Last Mile Program - La Metro." *LA Metro*, <u>www.metro.net/about/metro-active-transport-transit-and-first-last-mile-program/</u>

MAT emphasizes enhancing walking, biking, and transit connectivity, particularly for first- and last-mile connections around transit hubs. Eligible projects focus on safety improvements, multimodal integration, and access equity, particularly in underserved areas. It does not fund non-transportation infrastructure or projects unrelated to active transportation or transit.

Metro opened the MAT Cycle 2 solicitation period on February 6, 2025, for up to \$10 million per project between 2026 and 2030, with applications due April 6, 2025. Cycle 2 projects must fall within eligible First/Last Mile Areas such as the planned Metro station area, Pedestrian Districts such as the area southwest of the Telegraph Road and Atlantic Blvd intersection, and Active Transportation Corridors. Metro has released a list of areas it will fund on a priority list for Cycle 2, including the planned station, but has not provided a score for the Commerce/Citadel station yet.⁴⁹

Through the MAT Cycle 1 solicitation opened in 2020, Metro awarded the City of Los Angeles \$3.6 million to improve pedestrian and bike infrastructure within a half-mile radius of the Western Ave and Slauson Ave intersection in South Los Angeles. ⁵⁰ This project includes enhanced sidewalks, bike facilities, and safety measures to address accessibility gaps in a historically under-resourced community, similar to improvements proposed by the City.

b) Pursue California Active Transportation Program Cycle 8 Funding in 2026 and Cycle 9 Funding in 2028

The City should pursue grant funding from the California Transportation Commission's Active Transportation Program (ATP) Cycle 8. ATP promotes active transportation modes such as walking and biking, consolidates existing funding sources, and encourages healthier, more sustainable communities. Funding supports infrastructure improvements, non-infrastructure programs like safety education, and community-wide transportation plans, especially in underresourced communities. ATP allocates an average of \$200 million to \$400 million per funding cycle, divided among state, metropolitan, and small urban/rural projects. Since 2017, funding rounds have occurred every two years, with the latest Cycle 7 applications due in June of 2024. Therefore, ATP will likely open the Cycle 8 and Cycle 9 solicitations in 2026 and 2028, respectively.

⁴⁹ "MAT Program Cycle 2 Eligible First/Last Mile Areas." Dropbox, LA Metro, https://www.dropbox.com/scl/fo/nukqwvmjy30wdogxjyiyb/AE5tRD7waP9GK4mL5o4Q_To?dl=0&e=1&preview=MAT%2BCycle%2B2%2BEligible%2BFLM%2BAreas.pdf&rlkey=vdo8ba8vhaxon0b6ogeaxyrym&st=imiikcko

⁵⁰ "Western/Slauson First/Last Mile Project." *ArcGIS StoryMaps*, Esri, 29 Aug. 2024, storymaps.arcgis.com/stories/598bb553e5d64b2eb10670fb13f3783d

⁵¹ California, State of. "Active Transportation Program (ATP)." *California Transportation Commission*, catc.ca.gov/programs/active-transportation-program. Accessed 16 Dec. 2024.

Cities near Commerce have received tens of millions of dollars from ATP for transformative projects that improve walkability, connectivity, and accessibility. In 2024, the City of Los Angeles received over \$23 million from ATP to improve pedestrian and bicycle safety along Normandie Avenue, a major corridor in a low-income, underserved area. The Normandie Beautiful Project in South Los Angeles includes traffic-calming measures, enhanced crosswalks, upgraded sidewalks, and new bicycle facilities to address community-identified mobility barriers.

3. Enhance Programming and Shuttle Service

a) Implement Programming for Older Adults and Youth by 2027

As part of their Bicycle and Pedestrian Master Plan, the City identified the goals to increase rates of walking/biking and to ensure safe access to City destinations. Because the City has a higher percentage of residents under the age of 18 and over the age of 65 compared to other parts of Los Angeles County,⁵³ and given the multiple health and environmental benefits of active transportation, the City should implement transportation-focused programming for older adults and youth.

For example, the City of Commerce can replicate and build upon the City of Santa Monica's 2023 Active Aging program,⁵⁴ which used \$400,000 in ATP Cycle 3 funds to pilot a program to enhance the health, mobility, and safety for seniors in their city.⁵⁵ The program did not build new infrastructure, but instead familiarized older adults with existing transportation options and resources. A similar program in Commerce would expand access to City resources and services which would enhance mobility and accessibility among older adults. The City may also consider pursuing a grant from the American Association of Retired Persons (AARP) to fund transportation-focused demonstration projects and capacity building.⁵⁶

⁵² "City of LA to Receive over \$200 Million in State Grants For ..." Los Angeles Department of Transportation, ladot.lacity.gov/sites/default/files/press-releases/city-of-la-to-receive-over-200-million-in-state-grants-for-active-transportation-projects.pdf

⁵³ U.S. Census Bureau, "American Community Survey 5-Year Estimates: Comparison Profiles 5-Year," 2022, http://api.census.gov/data/2022/acs/acs5

⁵⁴ Active Aging, City of Santa Monica, http://www.santamonica.gov/programs/active-aging, Accessed 13 Oct. 2024.

⁵⁵ California, State of. "Active Transportation Program (ATP)." *Active Transportation Program (ATP)*, Caltrans, dot.ca.gov/programs/local-assistance/fed-and-state-programs/active-transportation-program.

⁵⁶ "2025 AARP Community Challenge." *AARP*, AARP, 8 Jan. 2025, <u>www.aarp.org/livable-communities/community-challenge/info-2025/2025-challenge.html?CMP=EMC-DSM-NLC-OTH-LC-2006103-2090403-8953603-NA-01152025-LivableCommunities-F1-2025challenge-BTN-ALL-Community-&encparam=yDizBR6AQX2Uz0qLWYx4CDAYCKICwEYe%2F548zpzwHSs%3D</u>

b) Increase Shuttle Service Between Rosewood Park and the Planned Metro Station by 2028

To enhance connectivity between existing residents and the planned Metro station area, the City should increase shuttle service between the Rosewood Park area and the Citadel Outlets. Although the City already has free bus and shuttle services, more frequent service during November and December would help address additional traffic around the Citadel Outlets. The City should also install dedicated lanes for shuttles and buses between Rosewood Park and the Citadel where possible to increase speed and on-time performance. In addition to the increased shuttle services, the City should pilot and enforce residential parking permits in the Rosewood Park area to minimize spillover parking from visitors. A permit-based parking system would allow residents south of I-5 to connect to the Citadel Outlets and the planned Metro station while preserving their own access to private automobiles.

4. Pursue State and Federal Pedestrian Overpass and Underpass Funding

a) Pursue Caltrans Reconnecting Communities: Highways to Boulevards Grant Funding for I-5 Pedestrian Overpass and/or Union Pacific Railroad Pedestrian Underpass in 2026

To connect residents in the Rosewood Park area directly to the planned Metro station and expand the area accessible within a one-mile walk (refer to **Figure 3**), the City should pursue California Department of Transportation (Caltrans) Reconnecting Communities: Highways to Boulevards Pilot Program (RC:H2B) funding in 2026. The City's 2020 Bicycle and Pedestrian Plan and Metro's 2024 First-Last Mile Plan propose a pedestrian crossing of Interstate 5 from Commerce Way to the Citadel Outlets. The cost and complexity of this proposed crossing may require a federal grant such as the US Department of Transportation's Better Utilizing Investments to Leverage Development (BUILD) or former Reconnecting Communities Pilot (RCP) grants.

Although the current federal government has modified or eliminated these grant programs as of February 2025,⁵⁷ the State of California's January 2025 budget includes \$1.1 billion for RC:H2B, which could help the City prepare for comparable future state or federal grants.⁵⁸ Among other goals, RC:H2B helps fund planning and implementation for the mitigation or retrofit of "transportation infrastructure facilities that create barriers to mobility, access, or economic development." These facilities could include Interstate 5 southwest of the planned Commerce/Citadel station and the Union Pacific Railroad north of the planned station. In 2024, Caltrans awarded the San Mateo County Transportation Authority a RC:H2B grant to improve connections between neighborhoods in the City of South San Francisco divided by "infrastructure such as the US 101, El Camino Real, Colma Creek, and railroad tracks."

EstolanoAdvisors.com 59

-7

 ⁵⁷ Reviewing America's First and Last Federal Reconnecting Communities Pilot. Streetsblog USA.
 https://usa.streetsblog.org/2025/02/05/op-ed-reviewing-americas-first-and-last-federal-reconnecting-communities-pilot
 ⁵⁸ 2025-2026 Governor's Budget Summary – Infrastructure. State of California. https://ebudget.ca.gov/2025-26/pdf/BudgetSummary/Infrastructure.pdf

b) Pursue US Department of Transportation BUILD or Reconnecting Communities Grant Funding for I-5 Pedestrian Overpass and/or Union Pacific Railroad Pedestrian Underpass in 2029

After pursuing Caltrans RC:H2B funding, the City should prepare to apply for a federal grant in 2029 for pedestrian crossings of I-5 southwest of the planned station and/or the Union Pacific Railroad north of the planned station. These grants may include, but are not necessarily limited to, the US Department of Transportation (USDOT) Better Utilizing Investments to Leverage Development (BUILD) grant, formerly known as Rebuilding American Infrastructure with Sustainability and Equity (RAISE), and the USDOT Reconnecting Communities Pilot grant.

BUILD provides funding for infrastructure projects that promote safety, sustainability, and quality of life.⁵⁹ The program prioritizes economic opportunity while improving accessibility and connectivity. BUILD funds capital projects such as bridges with grants ranging from \$5 million to \$25 million for urban areas. One example of a City utilizing BUILD/RAISE funding is the City of Santa Ana, which in 2024 received \$25 million in RAISE funding to build an underpass at a busy railroad crossing on the Metrolink Orange County Line by replacing it with an underpass. The redesign includes protected bike lanes, pedestrian overpasses, and reduced vehicle lanes.⁶⁰

Between 2022 and 2024, RCP offered planning grants of up to \$2 million and funds capital construction grants ranging from \$5 million to \$100 million. These grants aimed to improve accessibility by removing or transforming infrastructure such as freeways, railroads, and other physical barriers that have historically divided under resourced communities such as Commerce. In 2023, Metro, Los Angeles County, and Caltrans received a capital grant of approximately \$10 million in 2023 to build the I-710 Humphreys Avenue Crossing which serves as a dedicated pedestrian and bicycle bridge over Interstate 710 in unincorporated East Los Angeles. The bridge also includes other pedestrian safety improvements nearby including upgraded crosswalks, improved sidewalks, and ADA-compliant curb ramps. ⁶¹ RCP opened solicitations in 2022, 2023, and 2024 - the 2024 solicitation combines funding for fiscal years 2024, 2025, and 2026, with no indication of future funding availability. However, the City should prepare for the possibility that a new administration would restart the program in 2029.

⁵⁹ BUILD 20205 NOFO Amendment. *U.S. Department of Transportation*, https://www.transportation.gov/sites/dot.gov/files/2025-01/BUILD%202025%20NOFO%20Amendment

⁶⁰ "RAISE 2024 Awards." *U.S. Department of Transportation*, <u>www.transportation.gov/policy-initiatives/raise/raise-2024-awards</u>

⁶¹ "Reconnecting Communities FY23 Awards." *U.S. Department of Transportation*, www.transportation.gov/grants/reconnecting/rcn-fy23-awards

C. Housing, Business, and Land Use Strategies

The TOD-DAP draws upon the displacement avoidance framework established by the STEP program to guide the recommendations. STEP defines displacement avoidance as "identifying and avoiding substantial economic, environmental, and public health burdens" that may result in the "physical or economic displacement" of low-income families or small businesses. The following recommendations focus on key housing, business, and land use strategies designed to promote equitable growth, prevent displacement, and foster a sustainable and thriving community for Commerce residents and businesses.

1. Protect and Support Existing Residents

a) Enact a Residential Rent Stabilization Ordinance by 2025

With rising housing costs placing pressure on the stability of existing low- to middle-income renter households, the City of Commerce must consider proactive measures to prevent displacement and ensure long-term affordability. To address this, the City should draft and adopt a residential Rent Stabilization Ordinance (RSO) to mitigate the impact of market-driven rent increases. An RSO would help residents remain in the City, while aligning with neighboring jurisdictions that have implemented similar renter protections. For example, the cities of Maywood⁶², Bell Gardens⁶³, and Huntington Park⁶⁴ have each adopted RSOs that cap the annual rent increases to four percent (4%) to maintain housing stability and affordability in their communities while also allowing residential property owners to obtain a return on their investments. Typically, RSOs restrict rental increases to properties older than a certain year, which may be beneficial for the City as most of its housing stock is over 60 years old.⁶⁵ The City could draw from these existing ordinances to develop a consistent and effective policy tailored to the local needs.

^{62 &}quot;City of Maywood Rent Stabilization Ordinance" https://www.cityofmaywood.com/DocumentCenter/View/2752/Ordinance-23-07-Rent-Stabilization

^{63 &}quot;City of Bell Gardens Rent Stabilization Ordinance" https://www.bellgardens.org/home/showpublisheddocument/5797/637993638196800000

⁶⁴ "City of Huntington Park Rent Stabilization Ordinance" https://lapublicpress.org/2024/11/huntington-park-rent-control/

⁶⁵ Source: US Census Bureau, ACS 5-Year Estimates (2022).

b) Provide Additional Legal Protections/Resources for Rental Households by 2025

To protect renters from losing their homes due to financial hardships or displacement risks, the City should consider the following Tenant Protection measures.

- 1. Just Cause for Eviction Ordinances
- 2. Relocation Assistance for Economic Displacement Ordinances
- 3. Tenant Anti-Harassment Protection
- 4. Culturally relevant "Know Your Rights" materials for renters
- 5. Financial assistance for multi-family residential property owners who are low-income or otherwise financially challenged to make necessary repairs

c) Establish a First-Time Homebuyer Program by 2029

To combat displacement and empower long-term tenants with pathways to homeownership, the City should reinstitute its First-Time Homeowner Buying Program, which is currently operated as the Home Preservation Grant Program. While this program provides renovation grants of up to \$25,000 for middle-income property owners, it does not offer pathways to homeownership such as a downpayment assistance program. Residents note that home prices in Commerce are increasingly unattainable and that downpayment assistance is needed. Restructuring this rehabilitation grant into a downpayment assistance grant, in combination with other state and federal homebuyer loan programs, can offer local residents an opportunity to buy homes in the City. Similar measures are outlined in the Los Angeles County Department of Consumer and Business Affairs 2023 Tenant Protections Toolkit⁶⁶, and have been implemented by many jurisdictions of all sizes across the county.

d) Establish a Right of First Refusal for Renter Households by 2029

The City of Commerce should adopt a Right of First Refusal policy to provide tenants with the first opportunity to purchase their homes when it goes up for sale. Policies such as the Tenant Opportunity to Purchase Act (TOPA) would ensure that tenants are not priced out of the market by allowing them to buy their home at competitive rates. Providing tenant purchase opportunities would ensure that neighborhoods remain stabilized while providing pathways for low- to middle-income residents to achieve homeownership and build generational wealth. The City could draw from the County of Los Angeles' recent research and policy consideration on TOPA to explore similar strategies and assess how the policy could be tailored to support local renters, promote housing stability, and homeownership opportunities in Commerce.⁶⁷

⁶⁶ "Los Angeles County Consumer & Business Affairs Tenant Protections Toolkit" https://dcba.lacounty.gov/wp-content/uploads/2023/09/Tenant-Protections-Toolkit-Final-9.11.23.pdf

⁶⁷ Los Angeles County Consumer & Business Affairs. "Final Report on Developing Recommendations for Tenant Opportunity to Purchase Act for Unincorporated Los Angeles County" https://file.lacounty.gov/SDSInter/bos/bc/1142362 2023-05-22FinalReportBackonTOPA rc.pdf

2. Accelerate Affordable Housing Production

a) Streamline Accessory Dwelling Unit (ADU) Permitting and Establish an ADU Amnesty Program by 2025

Accessory Dwelling Unit (ADU) provides an opportunity to accelerate housing development in the City of Commerce. Increasing ADU production also supports the City's Regional Housing Needs Assessment (RHNA) targets. According to the Southern California Association of Governments' (SCAG's) allocation of the State of California's latest RHNA, the City of Commerce must add 247 housing units to meet its population needs by 2029.⁶⁸

While the City is currently compliant with state law requirements, it has the fourth lowest rate of permitted ADUs in the County, with only 3.64 permits for every 1,000 residents. ⁶⁹ The City should dedicate staff to manage the ADU development and conversion process, with a focus on streamlining the ADU permitting process and offering technical assistance to ensure compliance with current regulations. Additionally, the City should establish an ADU amnesty program that allows property owners to legalize unpermitted ADUs without penalties or enforcement actions. Legalizing unpermitted ADUs would ensure safer living conditions and promote long-term stability for both property owner and tenants. The City could draw from existing programs, such as the City of Los Angeles, to design the Amnesty program tailored to the community needs.

b) Implement Minimum Affordability Requirements for New Construction by 2025

As public transit infrastructure improvements encourage development and population growth, the City of Commerce should plan for this growth by requiring Minimum Affordability Requirements for any new developments. Minimum Affordability Requirements refer to the number of units in a housing development that must be income restricted in a given jurisdiction. These requirements could range, but a mix of affordability could have the potential for higher income units to effectively subsidize the cost of lower income units, ensuring that projects are able to meet their financial targets during the development process. During a community feedback session, residents supported mixed income housing development adjacent to the station. This type of development would promote a socioeconomically diverse community and allow residents of all income levels to access services that contribute to community stability.

EstolanoAdvisors.com 63

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⁶⁸ Southern California Association of Governments (SCAG). "SCAG 6th Cycle Final RHNA Allocation Plan" https://scag.ca.gov/sites/main/files/file-attachments/6th cycle final rhna allocation plan 070121.pdf

⁶⁹ Castleman, "Backyard ADUs booming in LA County" https://www.latimes.com/california/story/2024-07-30/la-is-the-epicenter-of-the-adu-boom-these-surprising-cities-are-building-the-most

c) Create a Transit Oriented Development (TOD) Overlay Zone around the Planned Metro Station by 2030

The City should establish a Transit Oriented Development (TOD) Overlay Zone surrounding the Planned Station Location to create walkable, mixed-use development on parcels currently zoned exclusively for commercial and/or industrial use. **Figure 32** shows where the City could implement a potential overlay zone in relation to the Planned Station Location within the gold circle. A TOD Overlay Zone would enable housing, community-serving retail, and other services to be developed on various parcels, contributing to the City's goals in meeting its RHNA while minimizing traffic and automobile ownership among new residents due to access to transit.

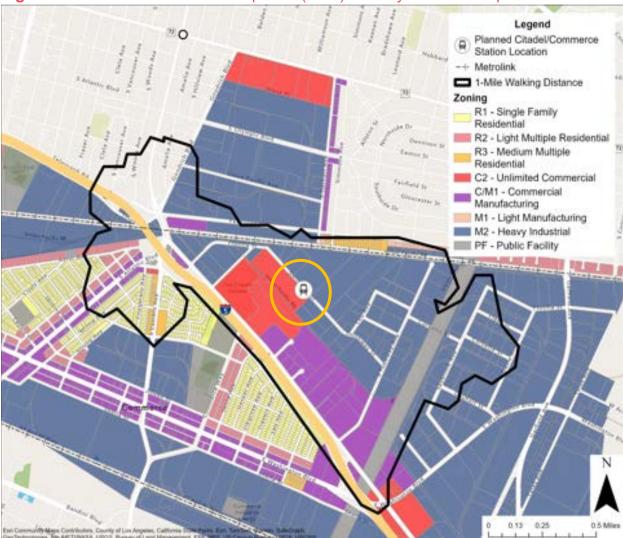


Figure 32: Transit-Oriented Development (TOD) Overlay Zone Concept

Source: City of Commerce, Esri Business Analyst, and Estolano Advisors (2024)

d) Partner with Metro to Prepare Staging Area for Joint Development by 2035

In addition to designating a TOD Overlay Zone, the City should partner with Metro's Joint Development Program to prepare income restricted, transit-oriented housing for the Planned Station Location's staging area after construction. Metro defines joint development as transitoriented developments built on Metro-owned properties in partnership with developers and community stakeholders⁷⁰. To build the Commerce/Citadel station, Metro will acquire at least one adjacent parcel to be used as interim construction staging or construction-supportive uses such as parking lots. Metro will retain fee ownership of its land, relying on long-term ground leases on its joint development properties. After the construction of the transit station, the City of Commerce should partner with Metro to support the joint development on Metro-owned property. This includes streamlining land use approvals, supporting stakeholder outreach, developing community goals for the site, and expanding infrastructure improvements to ensure readiness for future housing and commercial development on the site. The City of Commerce should also foster community partnerships with local organizations such as Women in Non-Traditional Employment Roles (WINTER), a women-focused construction pre-apprenticeship program, for these infrastructure and development opportunities while contributing to Metro's female construction workforce participation goals.

Metro has already completed several Joint Development projects, including two in Boyle Heights (Los Liros and La Veranda) that is adjacent to Metro E Line stations and bus routes. These projects include indoor community/study spaces, laundry facilities, outdoor green space, and gyms. If the City decides to pursue a transit-oriented development overlay zone around the Planned Citadel Station, the first level of a Joint Development project could include space for retail and community serving organizations that meet resident needs. During feedback sessions, residents consistently report that they desire more healthy and fresh produce options from grocery stores such as Trader Joes in their City. They also noted desires for space to relax before or after work, and more community space, similar to the space at Mariachi Plaza, another Metro E Line station. A Metro Joint Development project near the Planned Citadel Station would ensure that affordable, income restricted housing that moves the City closer to its RHNA goals is Transit Oriented and community serving.

3. Support and Protect Small Businesses

a) Develop a Small Business Database and Needs Assessment by 2025

Defining and identifying where small businesses are throughout the City of Commerce is critical for providing targeted support to mitigate the risks of displacement. Due to the City's industrial and manufacturing land use, small businesses in Commerce look different from typical "mom and pop" shops that sell goods or food in a small storefront. Most small businesses in the City are warehouses that provide industrial and/or manufacturing services.

⁷⁰ LA Metro. "Metro Joint Development" https://www.metro.net/about/joint_dev_pgm/

Currently, the City does not have a dedicated definition of small business or services within its business council. Establishing a consistent criterion for small business will lay the groundwork for the City to develop a comprehensive landscape scan of all eligible businesses, creating a searchable database and ensuring that they receive the support they need. These efforts can help protect local businesses, allowing them to remain and thrive in the community while coexisting with the potential pressures from surrounding development and real estate activities near the planned station.

b) Provide Resources for Commercial Tenants by 2026

The City should provide resources for commercial tenants to help them understand their rights and opportunities available to them. The City may lead or partner with commercial Legal Aid Clinics that focus on educating small businesses on commercial tenant protections and lease negotiations. The City should consider partnering with these organizations to maximize its own capacity in outreach to small businesses, ensuring that small businesses can continue to operate in Commerce despite development pressures.

c) Develop a Commercial Rent Stabilization Framework by 2028

Similar to residential rent stabilization, a Commercial Rent Stabilization Ordinance (RSO) can protect small businesses from unexpected and market driven rental increases that surpass a business's revenue. This is especially true for community serving organizations and non-profits that provide essential services to residents. Commerce could position itself at the forefront of small business protection through measures, such as an RSO. Other options for Commercial Rent Stabilization include Commercial "vouchers" or short-term emergency financial assistance for community serving businesses struggling to make their rental payments. Planning for commercial stabilization can help ensure that residents within Commerce are able to access the essential services they need while keeping the local economy strong.

D. California Affordable Housing and Sustainable Communities Funding

The City should partner with an experienced affordable housing developer to pursue Affordable Housing and Sustainable Communities (AHSC) funding during construction of the Commerce/Citadel Metro E Line station to develop a project within the recommended TOD overlay zone that includes affordable housing, as well as the pedestrian, bicycle, and transit improvements outlined in the recommendations. A collaboration between the California Strategic Growth Council and the California Department of Housing and Community Development, AHSC funds new affordable housing and transportation project construction through a competitive grant process. An AHSC grant could simultaneously contribute significant funding toward an affordable housing project adjacent to the planned Metro station and multiple pedestrian, bicycle, and transit improvements. As of November 2024, the AHSC scoring criteria provides a competitive advantage to many of the Commerce/Citadel station area characteristics, including its location within a "disadvantaged community" as defined by the State of California.

If feasible, the City should partner with Metro and apply for AHSC to fund joint development on the staging area(s) identified for the Commerce/Citadel station. By partnering with Metro and focusing on joint development, the City and its development partner would enhance their competitiveness for an AHSC grant, which prioritizes electrified public transit infrastructure and publicly owned land in its scoring criteria.⁷³

⁷¹ California Strategic Growth Council. "Affordable Housing and Sustainable Communities." Feb 2025, https://sgc.ca.gov/grant-programs/ahsc/docs/20230519-AHSC-Program-FactSheet.pdf

⁷² California Strategic Growth Council. "Affordable Housing and Sustainable Communities." Feb 2025, https://sgc.ca.gov/grant-programs/ahsc/docs/20241106-DraftR9Guidelines.pdf

⁷³ California Strategic Growth Council. "Affordable Housing and Sustainable Communities." Feb 2025, https://sqc.ca.gov/grant-programs/ahsc/docs/20241106-DraftR9Guidelines.pdf

APPENDIX

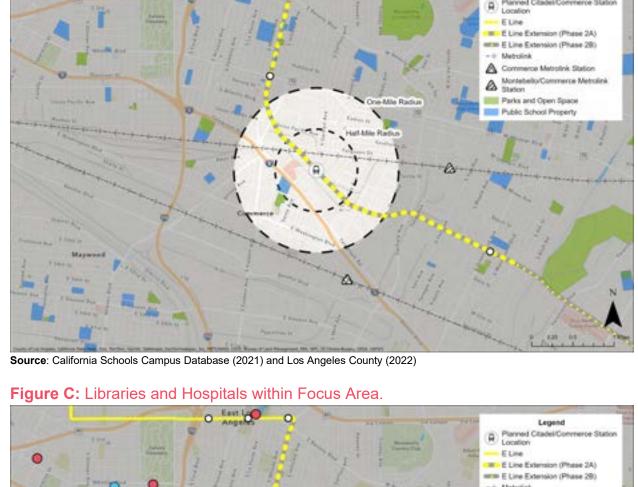
Appendix A: Supplemental Analysis of Existing Conditions

1. Land Use and Environmental Conditions



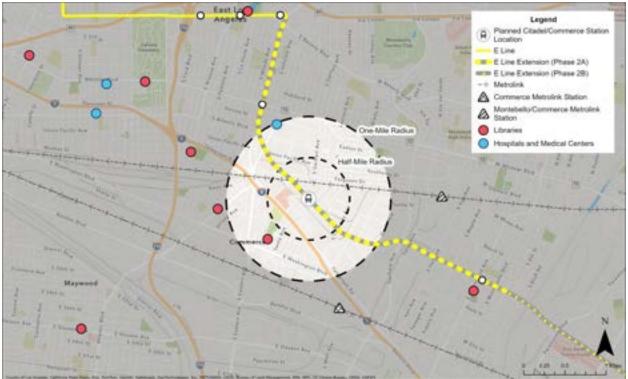


Source: City of Commerce (2024)



Legend

Figure B: Parks and Public Schools within Focus Area.



Source: Los Angeles County (2022)

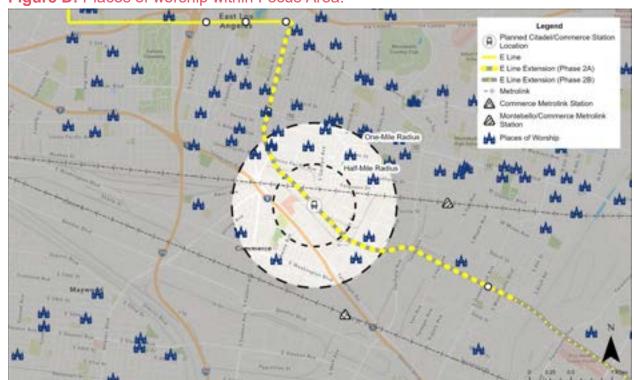


Figure D: Places of worship within Focus Area.

Source: Los Angeles County (2022)

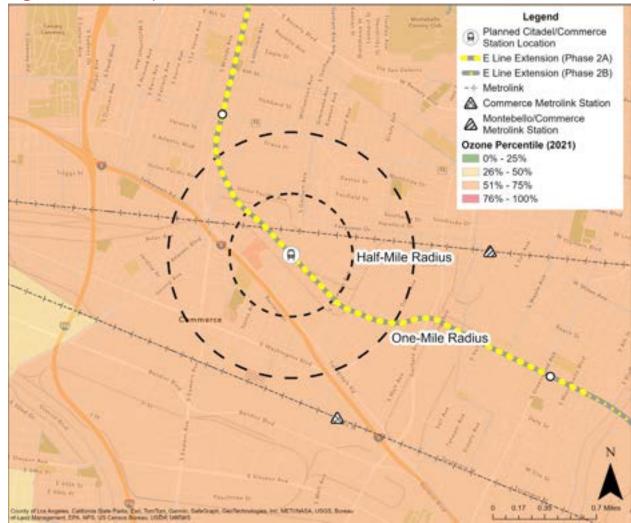


Figure E: Ozone Exposure within Focus Area.

Source: CalEnviroScreen 4.0 California Environmental Protection Agency (2021)

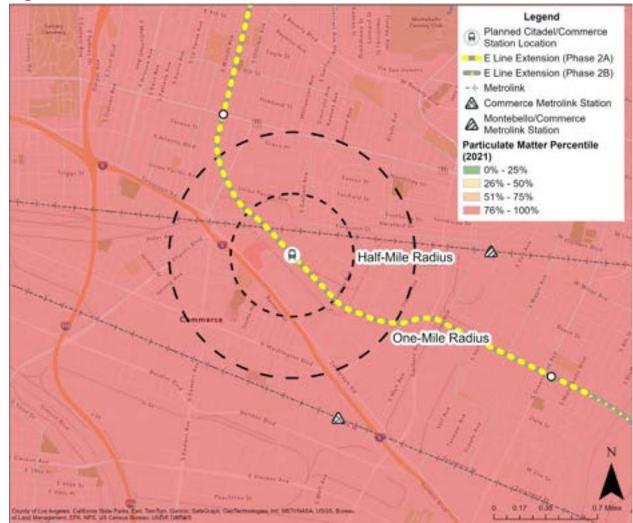


Figure F: Particulate Matter within Focus Area.

Source: CalEnviroScreen 4.0 California Environmental Protection Agency (2021)

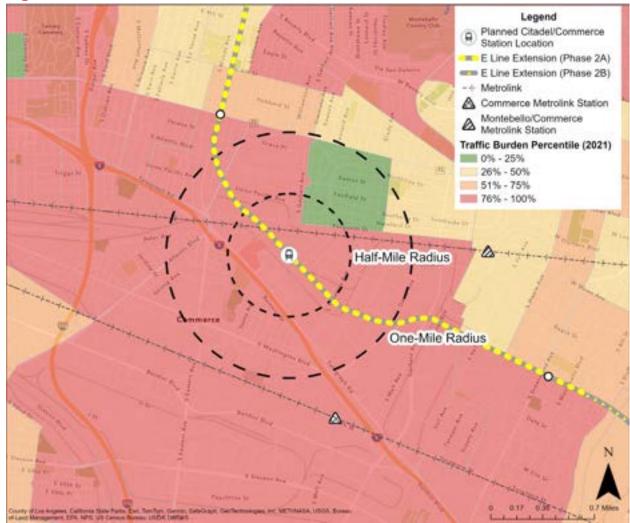


Figure G: Traffic Burden within Focus Area.

Source: CalEnviroScreen 4.0 California Environmental Protection Agency (2021)

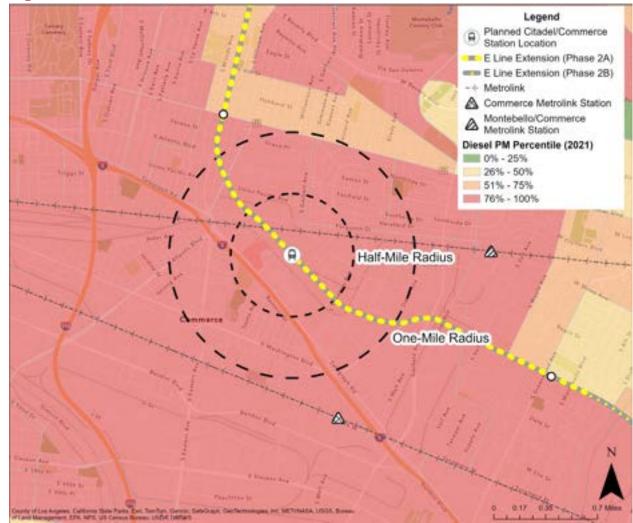


Figure H: Diesel Particulate Matter within Focus Area.

Source: CalEnviroScreen 4.0 California Environmental Protection Agency (2021)

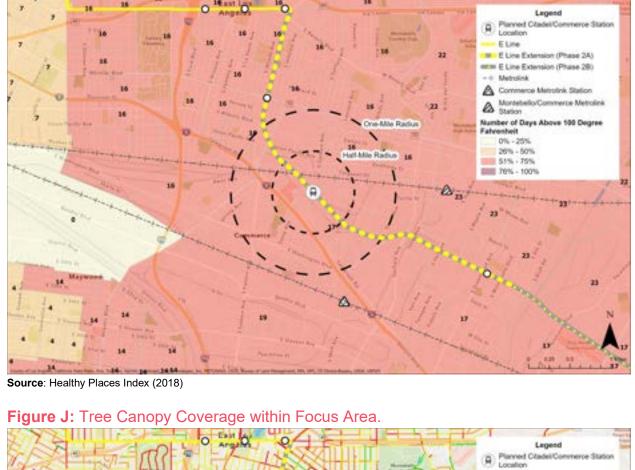


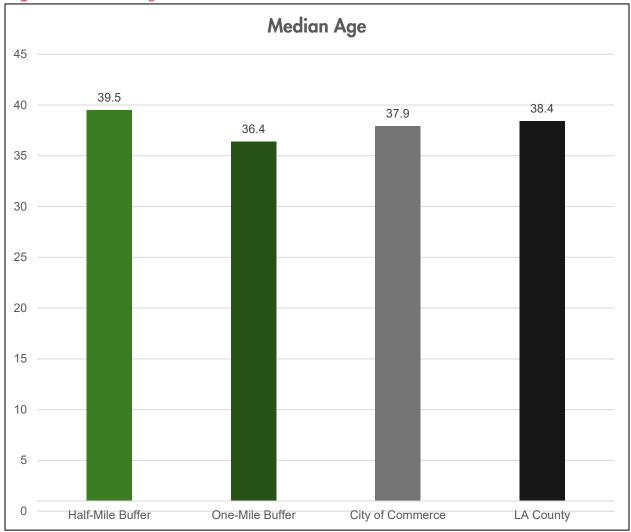
Figure I: Temperatures within Focus Area.



Source: U.S. Environmental Protection Agency (2016)

2. Resident Demographics

Figure K: Median Age within Focus Area.



Source: US Census Bureau, ACS 5-Year Estimates (2022)

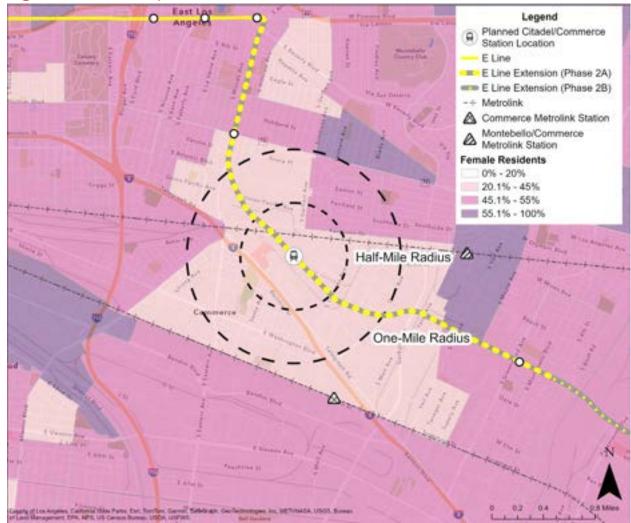


Figure L: Female Population within Focus Area.

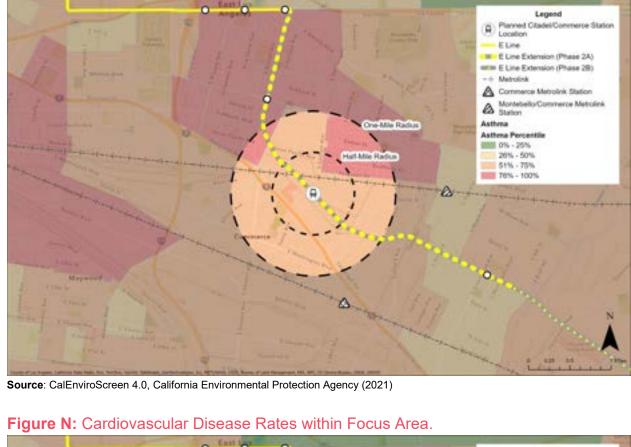
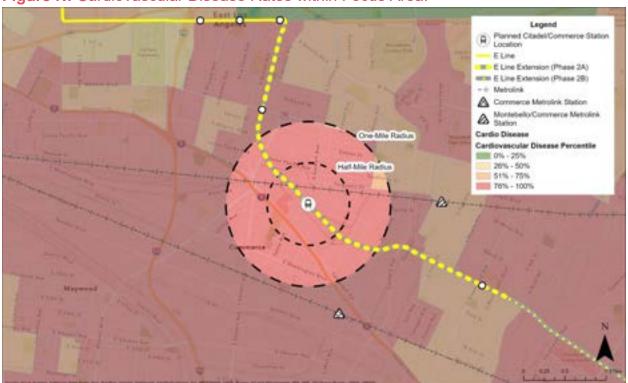


Figure M: Asthma Rates within Focus Area.



Source: CalEnviroScreen 4.0, California Environmental Protection Agency (2021)

Households with at Least One Person with a Disability 35% 33.29% 29.55% 30% 27.44% 25% 23.16% 20% 15% 10% 5% 0% Half-Mile Buffer One-Mile Buffer City of Commerce LA County

Figure O: Disability within Focus Area.

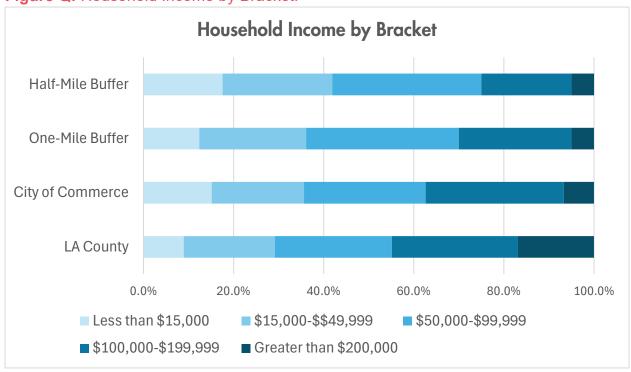
3. Workforce and Economic Conditions

Figure P: Map of Median Household Income in Focus Area.



Source: US Census Bureau, ACS 5-Year Estimates (2022)

Figure Q: Household Income by Bracket.



Source: US Census Bureau, ACS 5-Year Estimates (2022)

Unemployment Rate 7% 6.6% 6% 5.3% 4.9% 5% 4.3% 4% 3% 2% 1% 0% Half-Mile Buffer One-Mile Buffer City of Commerce LA County

Figure R: Unemployment Rate.

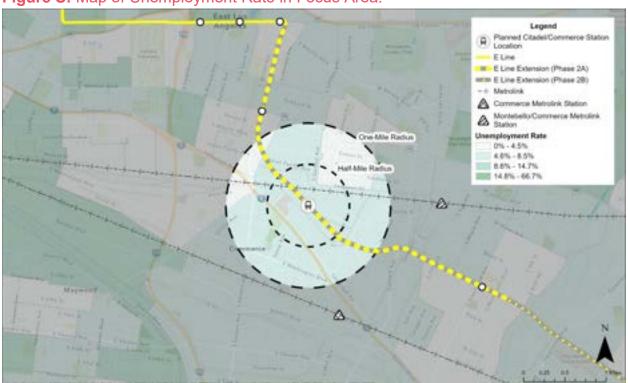


Figure S: Map of Unemployment Rate in Focus Area.

Source: US Census Bureau, ACS 5-Year Estimates (2022)

Households below Poverty Line 20% 18.3% 18% 16.5% 16% 14.6% 13.8% 14% 12% 10% 8% 6% 4% 2% 0% Half-Mile Buffer One-Mile Buffer City of Commerce LA County

Figure T: Households below Poverty Line.

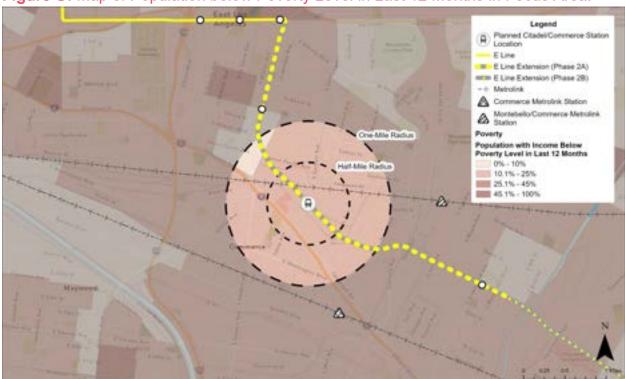


Figure U: Map of Population below Poverty Level in Last 12 Months in Focus Area.

Source: US Census Bureau, ACS 5-Year Estimates (2022)

Rent-Burdened Households 70% 57.6% 60% 55.3% 54.5% 48.2% 50% 40% 33.5% 33.2% 29.1% 30% 24.2% 20% 10% 0% Households Paying >30% on housing Households Paying >50% on housing ■ Half-Mile Buffer ■ One-Mile Buffer ■ City of Commerce
■ LA County

Figure V: Rent-burdened Households.

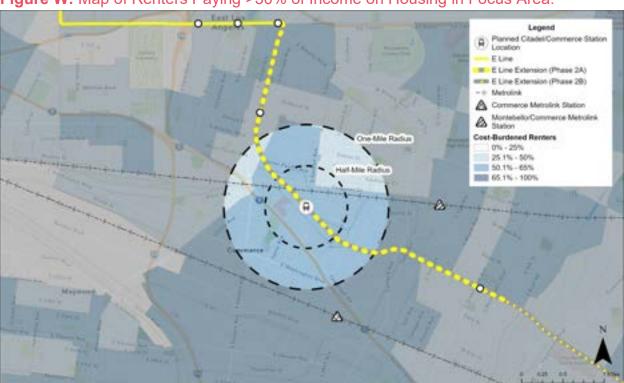


Figure W: Map of Renters Paying >30% of Income on Housing in Focus Area.

Source: US Census Bureau, ACS 5-Year Estimates (2022)

Residents with a Bachelor's Degree or Higher 35% 32.0% 30% 25% 22.8% 20% 15% 11.9% 10.3% 10% 5% 0% Half-Mile Buffer One-Mile Buffer City of Commerce LA County

Figure X: Residents with a Bachelor's Degree or Higher.

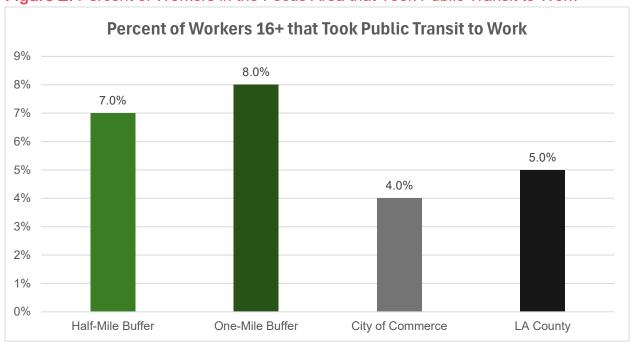


Figure Y: Map of Residents with a Bachelor's Degree or Higher in Focus Area.

Source: US Census Bureau, ACS 5-Year Estimates (2022)

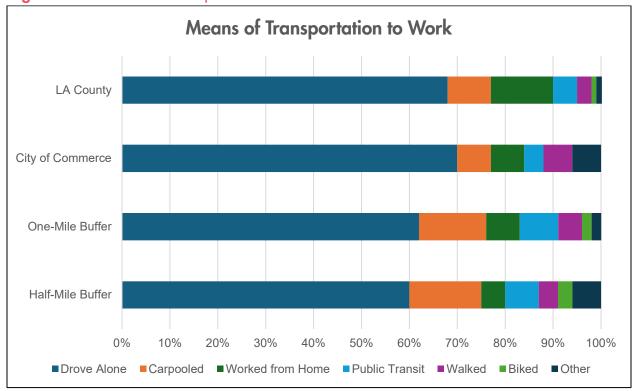
4. Walkability, Connectivity, and Accessibility

Figure Z: Percent of Workers in the Focus Area that Took Public Transit to Work



Source: US Census Bureau, ACS 5-Year Estimates (2022)

Figure AA: Means of Transportation to Work in the Focus Area



Source: US Census Bureau, ACS 5-Year Estimates (2022)

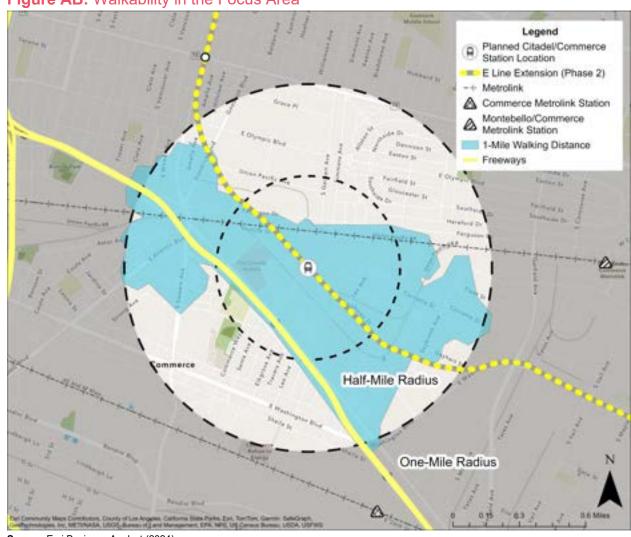
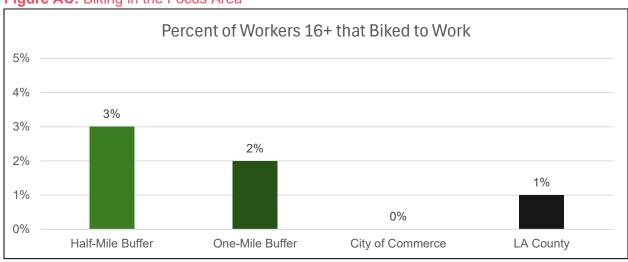


Figure AB: Walkability in the Focus Area

Source: Esri Business Analyst (2024)





Source: Esri Business Analyst (2024)

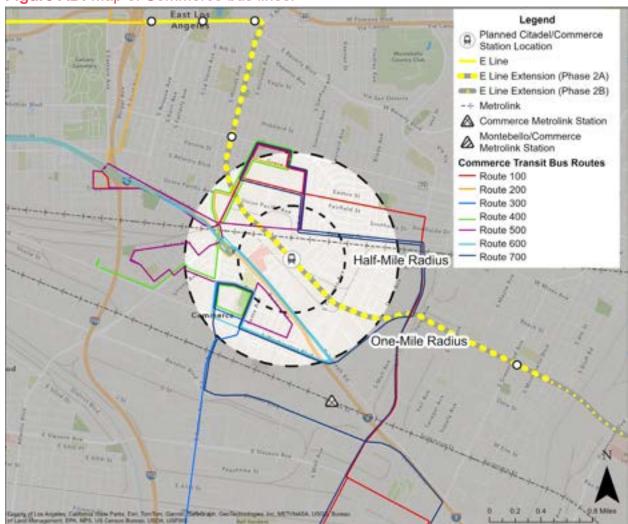


Figure AD: Map of Commerce bus lines.

Source: City of Commerce (2024)

Appendix B

Transit Oriented Development and Displacement Avoidance Plan

Commerce/Citadel Metro Station

City of Commerce Planning Commission

EstolanoADVISORS

February 19, 2025

Agenda

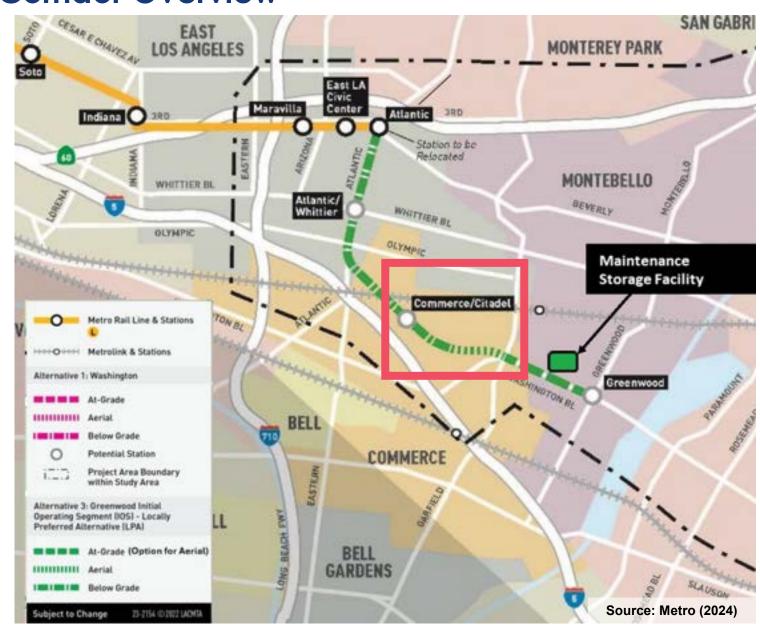
- 1. Metro Project Background
- 2. Plan Overview
- 3. Existing Conditions
- 4. Community Outreach
- 5. Recommendations

METRO PROJECT BACKGROUND



Metro Project Background - Corridor Overview

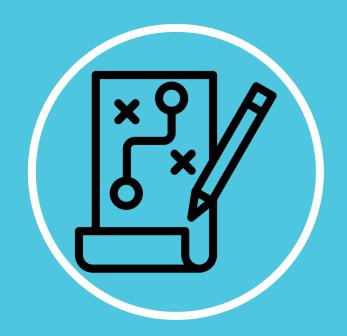
- Extension of Metro E Line (formerly Gold Line) Light Rail from East LA to Washington/ Greenwood in Montebello
- E Line Connects to Downtown
 LA and Santa Monica
- Construction Expected in 2029
- Opening Expected 2035-2037



Metro Project Background – Station Location



PLAN OVERVIEW



Plan Overview - STEP Grant

• In 2020, the City of Commerce received a \$3.2 million Sustainable Transportation Equity Project (STEP) grant from the California Air Resources Board



• STEP is part of California Climate Investments, a statewide initiative to reduce greenhouse gas emissions, strengthen the economy, and improve public health



Plan Overview - STEP Grant

Commerce's STEP grant "Commerce Moving Forward" included:

- 2.31 miles of Class II bike lanes
- 400 tree plantings
- Two electric buses
- Two electric shuttles
- This Transit-Oriented
 Development and Displacement
 Avoidance Plan









Plan Overview - Goals

- Prepare Early and Carefully
- Maximize Benefits and Minimize Harms
- Increase Accessibility, Connectivity, and Walkability
- Prevent Residential and Commercial Displacement
- Promote an Equitable Transit-Oriented Community

Plan Overview - Schedule

	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25
Research and Analysis of Existing Conditions									
Community Outreach									
Recommendations									
Final Comprehensive Plan									

EXISTING CONDITIONS



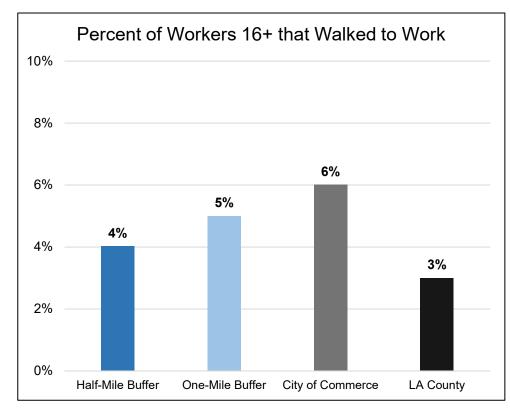
Existing Conditions – Focus Area

The **Planned Station** is located within the North Central portion of the City of Commerce. The **Focus Area** includes the half-mile and one-mile radius around the **Planned Station Location**.



Existing Conditions – Walkability

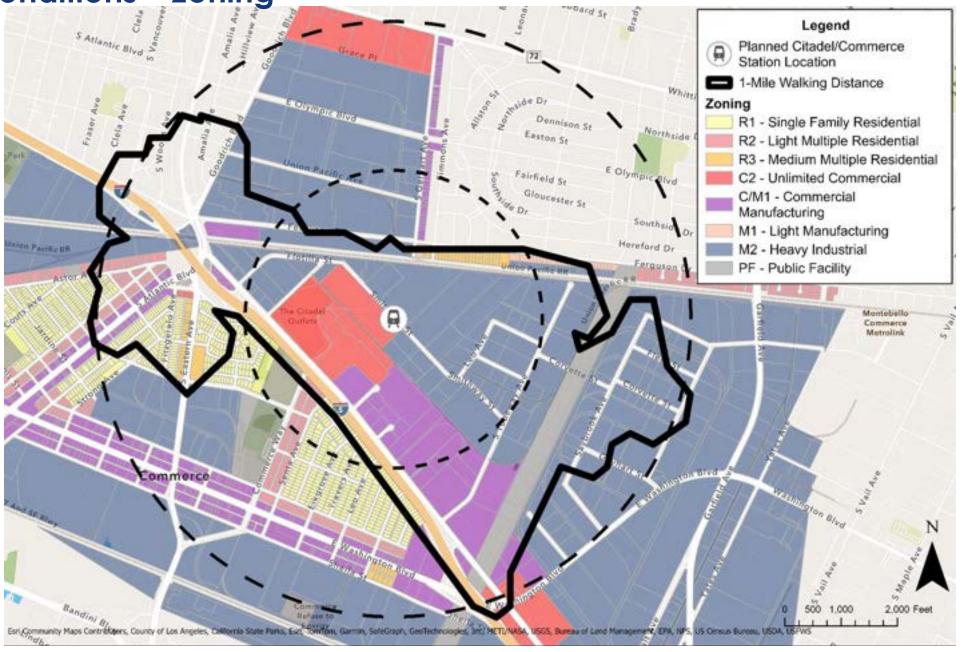
Due to I-5 and the Union Pacific Railroad walkability is limited north and southwest of the planned Metro station.





Source: Esri Business Analyst (2024)

Existing Conditions – Zoning

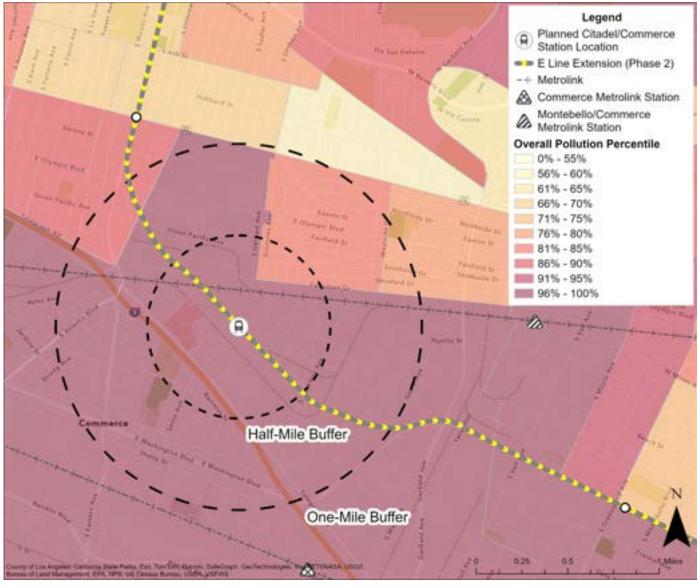


Source: City of Commerce (2024)

Existing Conditions – Environment and Health

The Focus Area experiences more pollution
than 95% of neighborhoods in California,
mainly due to diesel particulate matter, toxic
releases, cleanup sites, and hazardous waste.





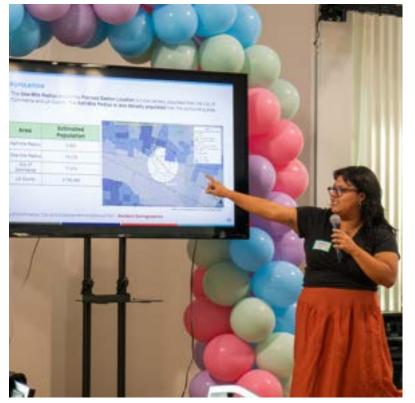
Source: CalEnviroScreen 4.0, California Environmental Protection Agency (2021)

COMMUNITY OUTREACH



Community Listening Sessions

August 2024





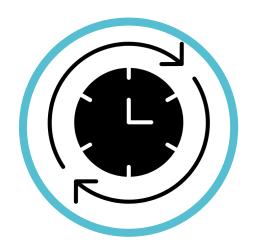
October 2024

January 2025



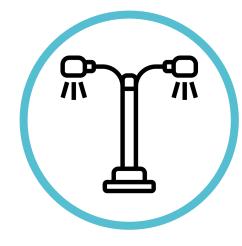
Source: Climate Resolve

Community Feedback: Mobility











Frequent and consistent bus service

Shuttle services

Bike and pedestrian connectivity

Shade and lighting

Public safety

Community Feedback: Businesses



Appreciation of Small Businesses



Economic Benefits of Industrial Businesses and Commerce Casino



Access to Healthier Amenities (Fresh Food, Grocery Stores, and Pharmacies)

Community Feedback: Housing



Rising rents are pricing neighbors out of the City of Commerce

Home values are increasing resulting in homes being harder to buy

Homelessness is noticeable around the City of Commerce and on transit

RECOMMENDATIONS



Recommendations - Summary

- A. Pursue Metro Transit Oriented Communities (TOC) Funding
- B. Implement Walkability, Connectivity, and Accessibility Strategies
- C. Implement Housing, Business, and Land Use Strategies
- D. Pursue State of California Affordable Housing and Sustainable Communities (AHSC) Funding

Recommendations – Metro TOC Funding

 TOC Technical Assistance Program Could Fund Detailed Studies and Designs

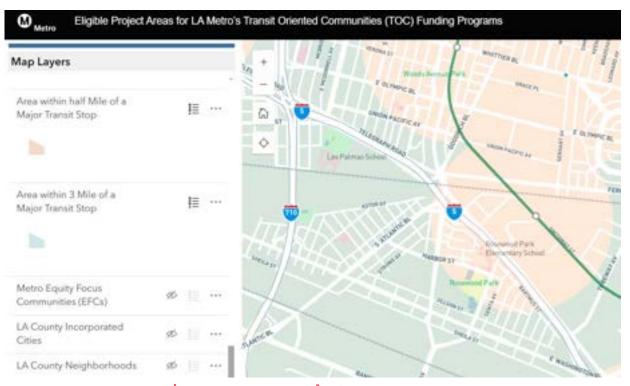
TOC Grant Writing
 Assistance Program Could
 Help Applications to State
 and Federal Programs

 Commerce/Citadel Station is Automatically Eligible



Technical Assistance Program

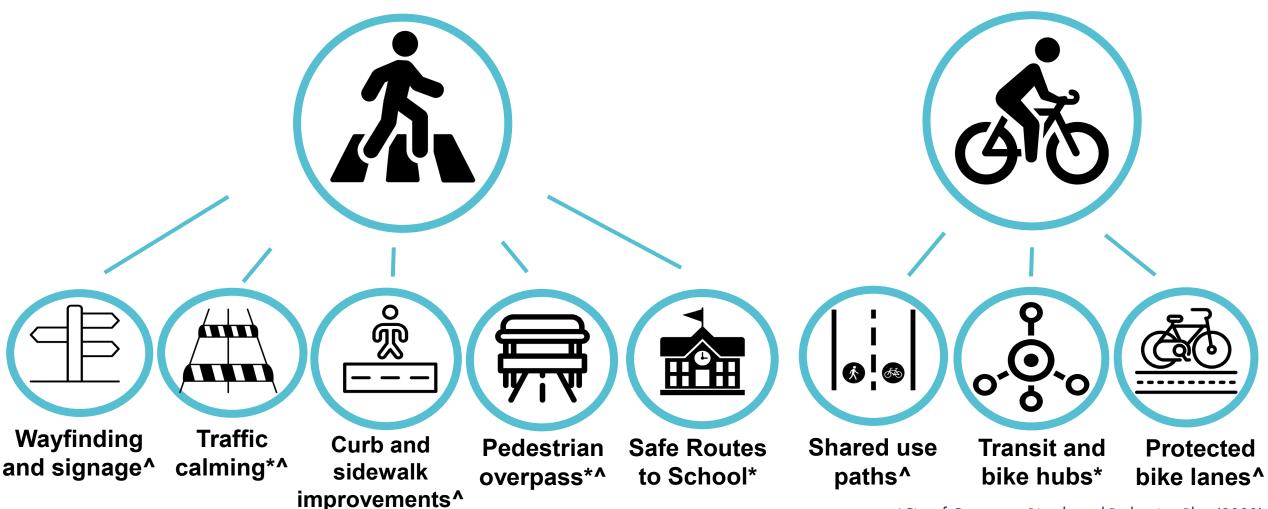
Grant Writing Assistance Program



Recommendations – Walkability/Connectivity/Accessibility

- B. Implement Walkability, Connectivity, and Accessibility Strategies
 - 1. Implement Quick-Build Projects
 - 2. Pursue Active Transportation Grant Funding
 - 3. Enhance Programming and Shuttle Service
 - 4. Pursue State and Federal Pedestrian Overpass and Underpass Funding

Recommendations – Implement Quick-Build Projects from Existing Plans



*City of Commerce Bicycle and Pedestrian Plan (2020)

^Metro First-Last Mile Plan (2024)

Recommendations – Implement Quick-Build Projects from Existing Plans

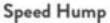
OFFICIAL TRAFFIC SIGNS



Typical Dimensions: Varies by sign type.

Estimated Cost: \$25 - \$200.

Overview: Consult local guidelines for traffic control signs requirements, as well as signs associated with your project brand or program.

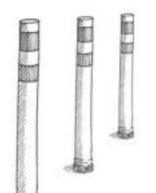


Average Cost: \$2,725 each Minimum Cost: \$712 each Maximum Cost: \$7,075 each





HIGH PERFORMANCE DELINEATOR POST



Typical Dimensions: 27 in. - 36 in. high.

Estimated Cost: \$84 - 90\$ / per delineator.

Overview: A high-performance delineator that remains flexible and continues to fully rebound even after 100 hits at 60mph.

Source: Vision Zero Network (2022), City of Long Beach (2025)

Recommendations – Enhance Programming and Shuttle Service





Bike and Transit Programs for Older Adults and Youth

Enhanced Shuttle Service from Rosewood Park to Citadel

Source: City of Santa Monica, City of Commerce (2024)

Recommendations – Pursue State and Federal Pedestrian Overpass and Underpass Funding





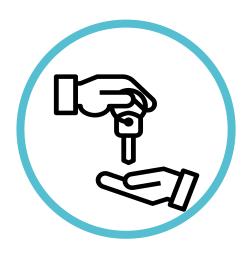
Belvedere Park, Highway Cap Park Project

Source: LA County

Recommendations – Housing/Business/Land Use

- C. Implement Housing, Business, and Land Use Strategies
 - 1. Protect and Support Existing Residents
 - 2. Support and Preserve Small Businesses
 - 3. Accelerate Affordable Housing Production

Recommendations – Protect and Support Existing Residents







Rent Stabilization Ordinance



Tenant
Protection
and Eviction
Defense



Right of First Refusal

Recommendations – Support and Preserve Small Businesses







Legal and Financial Resources for Small Businesses



Commercial Rent Stabilization

Recommendations – Accelerate Affordable Housing Production

Regional Housing Needs Allocation (RHNA) requires **247 additional** units of housing built by **2029**



Accessory
Dwelling Unit
(ADU) Permit
Streamlining



Minimum
Affordability
Requirements for
New Construction



Recommendations – Accelerate Affordable Housing Production

The gold circle represents a recommended Transit Oriented Development overlay zone around the Planned Station Location.

720 Planned Citadel/Commerce Station Location -- Metrolink 1-Mile Walking Distance Zoning R1 - Single Family Residential R2 - Light Multiple Residential R3 - Medium Multiple Residential C2 - Unlimited Commercial C/M1 - Commercial Manufacturing M1 - Light Manufacturing M2 - Heavy Industrial PF - Public Facility

Source: City of Commerce, Esri Business Analyst, and Estolano Advisors (2024)

Recommendations – Accelerate Affordable Housing Production



Source: Metro (2024)

Recommendations – Pursue State of California Affordable Housing and Sustainable Communities (AHSC) Funding





Source: California Strategic Growth Council (2025)