

# Vacancy, Visibility, and the Vanishing Units

## What Census Data Shows in Hollywood and West Los Angeles — and Why Affordable Housing Is a Structural Vacancy Issue

By Pini Herman

Los Angeles is arguing about vacancy again.

Before the debate goes any further, the numbers and the source must be clear.

The vacancy figures discussed here come from the **U.S. Census Bureau's American Community Survey (ACS), 2024 five-year estimates, Table B25002.**

This is federal census data.  
It is not a broker report.  
It is not a leasing snapshot.

It is a structural survey of the housing inventory.

According to the ACS:

- **City of Los Angeles overall vacancy rate: ~7.4%**
- **Hollywood (90028): ~18.2%**
- **East Hollywood (90038): ~12.9%**
- **Beverly Grove (90048): ~12.1%**
- **Century City (90067): ~12.6%**
- **90046 (Hollywood Hills / West Hollywood-adjacent): 10.84%**  
(32,219 total units; 3,492 vacant)

These are structural occupancy measures. And they reveal a clear pattern:

Hollywood and parts of West Los Angeles show materially higher vacancy than the citywide average.

The key question is not whether that is true.

The key question is what it means.

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## What the Census Actually Counts as “Vacant”

The ACS defines a housing unit as vacant if it is **not occupied by a usual resident at the time of survey.**

That includes:

- Units between tenants
- Units in lease-up
- Units under renovation
- Units for sale
- Seasonal or occasional units
- Units temporarily held off market

This is not a measure of “available tomorrow.”  
It is not proof of speculation.

It is a structural snapshot of occupancy.

When Hollywood shows an 18% vacancy rate, it means that nearly one in five housing units was not occupied at the moment of survey.

That reflects development cycles, turnover, and transitional states.

But it also includes something that is often overlooked:

**Affordable Housing (AH) units that are unleased are counted in that vacancy number.**

And that changes the conversation.

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## Why Hollywood and West L.A. Show Higher Structural Vacancy

Hollywood and West Los Angeles ZIP codes share development characteristics:

- Multi-lot 4–5 story podium projects
- Transit-oriented developments
- Block-long mixed-use corridors
- High-rise residential towers (Century City)

- Premium infill in Beverly Grove
- Hillside stock with intermittent occupancy (90046)

When large buildings open in clusters, lease-up takes time.

Add to that:

- Premium pricing strategies
- High renter churn
- Renovation downtime
- Market repositioning

All of that contributes to structural vacancy.

Some vacancy is normal in growth corridors.

But there is a second component that must be acknowledged:

**Affordable-restricted units that are not leased also contribute to structural vacancy.**

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## Affordable Housing as a Structural Vacancy Variable

This is the analytical pivot point.

Inclusionary affordable housing units — created through density bonuses and zoning incentives — are embedded inside many of these same Hollywood and West L.A. buildings.

If those units are not leased, they do not disappear from the housing stock.

They show up in ACS data as vacant housing units.

That means:

- Affordable units that are not properly marketed inflate structural vacancy.
- Invisible inclusionary units increase vacancy rates.
- Administrative failure becomes a statistical signal.

So when we look at Hollywood's 18% vacancy, or 90046's 10.84%, we cannot automatically assume those empty units are all premium lease-up stock.

Some portion may include affordable units that were required by covenant but never fully integrated into a functioning leasing pipeline.

This matters because affordable housing demand is extremely high.

If affordable units sit vacant, it is not because of weak demand.

It is because of breakdown in delivery.

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## The Inclusionary Pipeline Breakdown

Los Angeles requires developers receiving density bonuses to set aside affordable units — often around 10% of total units.

These are legally binding obligations.

In theory, each unit should follow a transparent path:

Covenant recorded →  
Unit entered into operational registry →  
Owner reports vacancy →  
Public listing appears →  
Applicant income certified →  
Unit leased →  
Annual recertification conducted.

In practice, oversight gaps have emerged.

The City outsourced compliance administration to a contractor responsible for:

- Maintaining inclusionary unit records
- Contacting owners
- Tracking vacancies
- Advertising units on the Affordable and Accessible Housing Registry
- Certifying applicants

The goal was efficiency.

But when the City Controller reviewed aspects of this system, recordkeeping deficiencies were identified.

If the operational registry is incomplete or inaccurate, the chain breaks:

- Vacancies are unknown
- Listings do not appear
- Owners are not systematically contacted
- Units are not visible to eligible renters

When that happens, affordable units can remain physically present but administratively invisible.

And those invisible units contribute directly to structural vacancy.

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## **Why Incentives Do Not Automatically Correct This**

Inclusionary units:

- Rent below market
- Require certification paperwork
- Require ongoing compliance
- Often produce lower revenue than market units

Owners accepted affordable units in exchange for zoning benefits.

Once the building is completed and entitlement benefits are secured, inclusionary units become a continuing obligation.

Without strong oversight and clear consequences for noncompliance, there is limited structural incentive to prioritize quick lease-up of restricted units.

This does not require intentional wrongdoing.

It requires only weak enforcement.

And when enforcement is weak, vacancy can persist — including among affordable units.

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## **Vacancy Data and the Affordable Housing Question Are Connected**

The census tells us:

- Citywide vacancy: ~7.4%
- 90046 vacancy: 10.84%
- Hollywood (90028): ~18%
- East Hollywood (90038): ~13%
- Beverly Grove (90048): ~12%
- Century City (90067): ~13%

Those numbers reflect structural conditions in high-development corridors.

But the affordable housing system exists inside those same buildings.

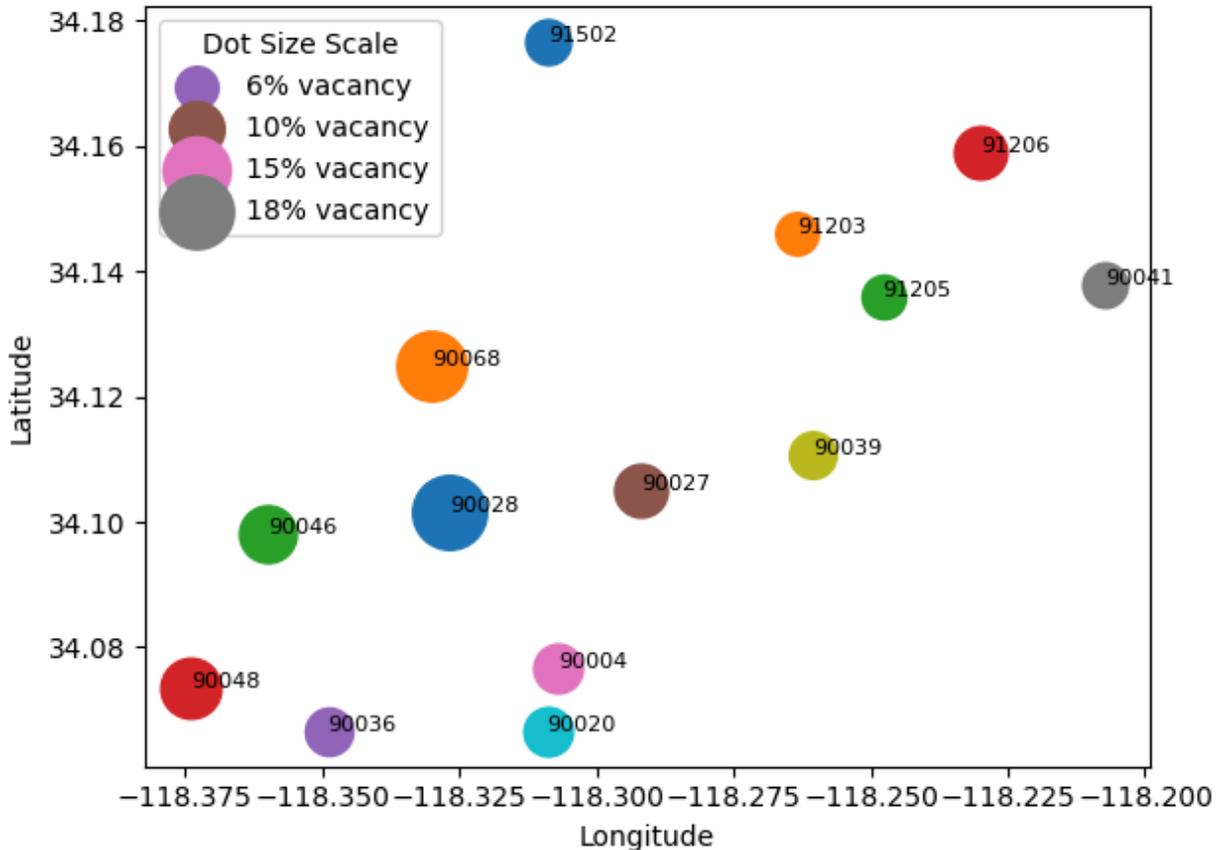
If even a fraction of inclusionary units are not properly marketed or leased, they:

1. Increase measured vacancy
2. Decrease functional affordable supply
3. Increase pressure on rents
4. Undermine public trust

Affordable housing is not separate from structural vacancy.

It is part of it.

CD30 ZIP Code Vacancy Map (ACS 2024 5-Year)



- “According to ACS 2024 data, some ZIP codes in CD-30 show elevated vacancy rates — including roughly 18% in 90028.”
- “That’s a significant number in the middle of what we call a housing crisis.”
- “At the same time, the Los Angeles City Controller’s 2025 Affordable Housing Oversight Audit found serious gaps in how LAHD tracks compliance and monitors restricted affordable units.”
- [https://firebasestorage.googleapis.com/v0/b/lacontroller-2b7de.appspot.com/o/LAHD%20Affordable%20Housing%20Oversight%20-%20Final%20Report%20\(2025.06.03\).pdf?alt=media&token=55422707-52ee-4230-b167-9fcba2d0a7f9](https://firebasestorage.googleapis.com/v0/b/lacontroller-2b7de.appspot.com/o/LAHD%20Affordable%20Housing%20Oversight%20-%20Final%20Report%20(2025.06.03).pdf?alt=media&token=55422707-52ee-4230-b167-9fcba2d0a7f9)

- “The audit identified weaknesses in rent-limit enforcement, documentation, inspections, and oversight systems.”
- “ACS vacancy data measures the broader housing market. The Controller’s audit examines administrative oversight of affordable units.”
- “They are different datasets — but they point in the same direction: we have a transparency problem.”
- “If we can’t clearly see which affordable units are being marketed, who is occupying them, and whether they’re compliant, we cannot credibly claim the system is working.”
- “Transparency isn’t optional when public subsidies and public trust are involved.”
- “I am not alleging fraud. I am raising questions about visibility, data systems, and enforcement.”
- “This is about governance, not blame.”
- “In a district where rents are crushing working families, every affordable unit should be visible, accountable, and occupied by someone who qualifies. If 5,000 inclusionary affordable units are hard to track or administratively invisible, that’s a policy problem we can fix.”

The LA City Controller provided information about Affordable Housing (AH) Covenant - 1985 to 2022

<https://housingcovenants.lacontroller.app/>

[https://docs.google.com/spreadsheets/d/1gG\\_-kU8JxEPEnvjRrvTobYSs\\_dzRpMZs/edit?gid=1687664545#gid=1687664545](https://docs.google.com/spreadsheets/d/1gG_-kU8JxEPEnvjRrvTobYSs_dzRpMZs/edit?gid=1687664545#gid=1687664545)

Which provided a sampling frame to randomly examine whether the inclusionary Affordable Housing units (developments where affordable housing consisted of less than 50% of total units) had been advertised on the LAHD Accessible and Affordable listings as well as on publicly accessible internet rental listings.

<https://lahousing.lacity.org/AAHR/ComCon/Tab/RenderTab?tabName=Search%20for%20Accessible%20Housing>

A randomized sample was created and searched.

[https://docs.google.com/spreadsheets/d/1zVb3bMohRoR8Ev\\_ocyAvWCbRBPSvbcOx/edit?gid=1157691420#gid=1157691420](https://docs.google.com/spreadsheets/d/1zVb3bMohRoR8Ev_ocyAvWCbRBPSvbcOx/edit?gid=1157691420#gid=1157691420)

## **Citywide Extrapolation of Affordable Units Which May Lack Public Discoverability The full dataset contains:**

- 1,155 mixed-income properties
- 5,661 affordable units embedded within them

Using the 95 percent confidence bounds:

Lower bound:  
≈ 4,938 units

Upper bound:  
≈ 5,296 units