

## Communication from Public

**Name:** Chase Engelhardt  
**Date Submitted:** 11/18/2020 05:33 PM  
**Council File No:** 20-1042

**Comments for Public Posting:** Dear Honorable City Councilmembers, At Climate Resolve we recognize the fundamental role that urban planning has in addressing climate change. In a state where the vast majority of our climate emissions (41%) come from transportation, land use decisions have a major impact on the feasibility of non-car transportation options. We also know that while climate change threatens all of us, it disproportionately impacts communities of color and low income communities. As such we strongly support this motion, which would allow for a transit-oriented, more equitable distribution of RHNA requirements, and help us address our housing crisis. There are many job centers in the City where a staggering number of people commute longer and longer distances to work because they cannot afford to live anywhere nearby. By way of example, in the Westside community plan area there are over 150,000 people that commute into work from outside of the area. 13% of those people drive over 50 miles to do so, which is almost double the amount of people in other plan areas. However, emissions are more than just numbers. The reality is a great injustice in mobility, where once again, low income communities of color must spend disproportionate amounts of their lives commuting and living exposed to deadly car emissions. The reality is also the fatal extreme heat events we see that disproportionately target these same communities. Finally, our unhoused Angelenos are those most exposed to climate impacts like extreme heat, precipitation and poor air quality. Climate resilience in Los Angeles not only means preparing our infrastructure for a changing climate, but also housing our most vulnerable, and keeping Angelenos housed to preserve human life. In summary this measure would allow us an excellent opportunity to significantly reduce our climate emissions, and make our City more resilient to the effects of climate change. Thank you, Chase Engelhardt

## Communication from Public

**Name:** Lauren Natoli

**Date Submitted:** 11/18/2020 04:01 PM

**Council File No:** 20-1042

**Comments for Public Posting:** I am Lauren Natoli from AIDS Healthcare Foundation. I object to this item and I urge the Council to vote no on this item. While I agree that LA needs to retool their zoning laws, I object to the lack of transparency and clarity as to what those changes will be. I am bothered by how understated the agenda item is for such a large change. Accountability is key in order to make progressive zoning changes, and this current plan must be revised to be transparent. Transit Oriented Communities are not a catchall solution to housing and jobs, in fact most new apartment buildings in Los Angeles are luxury buildings or are otherwise out of the price range of the average Angeleno. Often, it is wealthy people who buy units and continue to drive to work, undermining the purpose of TOC. I adopt all objections to item 20-1042

## Communication from Public

**Name:** Jessica Lall  
**Date Submitted:** 11/18/2020 04:40 PM  
**Council File No:** 20-1042  
**Comments for Public Posting:** Please see attached letter.



November 18, 2020

Councilmember Marqueece Harris-Dawson  
Chair, Planning and Land Use Management Committee  
200 N Spring Street  
Los Angeles, CA 90012

**Re: Planning and Land Use Reform (CF 20-1042, CF 20-1044, CF 20-1045)**

Dear Councilmember Harris-Dawson,

Established in 1924, Central City Association (CCA) is committed to advancing policies and projects that enhance Downtown Los Angeles' vibrancy and increase investment in the region. We are a membership organization representing approximately 300 members that have played a leading role in transforming Downtown Los Angeles by building over 17,000 units of new housing, and more than 6.6 million square feet of office and retail space and 3,600 hotel rooms that have resulted in hundreds of thousands of jobs and tax revenue dollars to the City. **Our members are deeply familiar with the City's planning and land use processes, and we believe these systems need reform to reduce subjectivity and political influence in the decision-making process, create certainty for communities and expeditiously deliver desperately-needed housing in alignment with the motions introduced by City Council President Nury Martinez.**

We have long advocated for more upfront, clear and objective standards in the development approval process and less discretionary review, which is fundamental to rooting out corruption and ensuring that no elected officials are presented with opportunities to abuse power. Reducing discretion in development approvals is also critical to achieving other City objectives, including streamlining the production of new housing amid our housing crisis and making it easier to build which supports job creation and our tax base amid our current economic and fiscal crises. We offer the following comments on three planning and land use reform motions regarding 1) the creation of a ballot measure to revise the City's Zoning Code; 2) developing a new approval process for "high value projects"; and 3) revising the Processes and Procedures Ordinance.

**Updating the City's Zoning Code by Ballot Initiative**

The best way of reducing the need for project-by-project approvals is by having planning and zoning codes that are up to date and reflect the city's vision for growth and contemporary real estate trends. The Mayor recognized this by issuing [Executive Directive No. 19](#) in March 2017, which directed all 35 Community Plans and all elements of the General Plan to be updated within six years. Regularly updating these plans is key to creating predictable pathways for by-right or ministerially-approved developments so that they don't require discretionary approvals like General Plan Amendments or Zone Changes, which trigger the lengthy and risky political approval process with City Planning Commission and City Council review. Our outdated codes usually require projects to go through the discretionary review process since existing plans largely do not yield financially feasible projects that reflect the kinds of buildings that people want to live or work in today. Moreover, having a contemporary areawide vision that is built on public input eliminates the need for each project to be scrutinized so long as they conform to the established plan that has already been thoroughly vetted.

However, updating every Community Plan and the General Plan takes considerable time and resources, even in better fiscal circumstances than we currently face. For instance, we have been engaged on the DTLA 2040 Community Plan Update since it was initiated in 2014. It will likely be another year before the new plan is adopted, which means it will have taken about seven years to complete a plan update in the area of the city most welcoming of growth and change. The time it takes is no fault of the City Planning Department – these plans are complex,

must balance the input and interests of myriad stakeholders and undergo extensive review per the California Environmental Quality Act (CEQA). Opportunities to reduce discretionary review in the meantime would also allow City Planning to more nimbly shift resources from case processing, called “current planning,” to Community Plan and General Plan efforts, “long-term planning,” which would have the benefit of speeding up their updates and create a virtuous cycle that helps shift away from outdated plans and ad hoc project review and approval.

We know that the City can enact strategic policies in the near-term to reduce discretionary review by legislation or ballot initiative while these long-term plans continue. The Affordable Housing Density Bonus, Transit Oriented Communities Program, Adaptive Reuse Ordinance, Small Lot Subdivision Ordinance and Assembly Bill 1197 are all great examples of citywide planning policies that were created outside of the Community Plan and General Plan update process that have enabled by-right and ministerial development and have been key housing production tools. **Based on the experience of our members with City planning and land use processes, we offer the following suggestions for focusing planning and land use reform efforts that could be implemented via legislation or a ballot initiative:**

- **Increase Site Plan Review thresholds or eliminate Site Plan Review for any projects that meet allowable zoning**
- **Lower minimum parking requirements and provide greater flexibility for transitional height requirements on commercial corridors**
- **Eliminate Q conditions citywide and revert to a site’s baseline zoning**
- **Allow all “P” zones to be developed using the zoning designations of closest surrounding parcels**
- **Base open space requirements on building square footage, not number of units or bedrooms**
- **Allow by-right adaptive reuse for buildings constructed after 1974 citywide, including requiring no new parking**
- **Allow quadplexes by-right in any single-family zoned areas**
- **Eliminate density limitations (dwelling units per acre) and instead use floor area ratio (FAR) to govern building size**
- **Broaden ground-floor retail requirements to include “active uses,” such as lobbies or recreation rooms**
- **Expand administrative review processes for Conditional Use Permits, like the proposed Restaurant Beverage Program**
- **Amend the outdated Fire District 1 to allow Type IV construction, which will enable mid-rise mass timber development**

This set of policy suggestions would reduce the need for projects to seek discretionary review, help to diminish political influence in approval processes and provide pathways for new housing to be built more efficiently, predictably and sustainably. **We also believe that the idea to create an independent commission that would make a comprehensive set of recommendations for reform and be put to an up or down vote by City Council, raised in a [recent Los Angeles Times Op-Ed authored by former City officials](#), is worth considering.**

### **Process for Approving “High-Value Projects”**

This motion directs City Planning and the Chief Legislative Analyst to develop criteria for “high-value” development projects to pass over the Planning and Land Use Management (PLUM) Committee during the approval process. **We do not think this would have a material impact as all City Councilmembers already currently review and vote on any projects subject to discretionary review, and the decisions are finalized by the City Attorney and Mayor. Instead, we recommend that there be clear timelines by which all discretionary projects must be heard**



by the PLUM Committee and City Council, and that no single elected official be able to determine when a project is scheduled for public hearing.

### Updating the Processes & Procedures Ordinance

This motion directs the City Planning Department and the Chief Legislative Analyst to update the Processes and Procedures Ordinance with additional criteria on when entitlements will be granted to more clearly establish if they are in the public interest or established policies and to create protocols that will increase transparency for communication between developers and council offices. We support the intent of this motion to reduce political influence and create clear protocols, but believe this would benefit from further clarification and discussion. **We ask you and the Committee members to request a report back from City Planning and the Chief Legislative Analyst with options for strengthening the Processes & Procedures Ordinance in line with the motion's goals.** We continue to track City Planning's proposed updates to the Processes & Procedures Ordinance very closely and look forward to providing additional input on the Ordinance upon a report back from City departments.

We are committed partners in the effort to reform our planning and land use system, and we know there are meaningful changes the City can make that will provide more certainty and confidence in our approval system, while also addressing our pressing housing, economic and fiscal crises. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "J. Lall".

Jessica Lall  
President & CEO,  
Central City Association of Los Angeles

cc: City Council President Nury Martinez  
Councilmember Bob Blumenfield  
Councilmember Gil Cedillo  
Councilmember Curren Price  
Councilmember John Lee

## Communication from Public

**Name:** Zennon Ulyate-Crow  
**Date Submitted:** 11/18/2020 11:01 AM  
**Council File No:** 20-1042

**Comments for Public Posting:** I am an Angeleno writing to express concern about our region's affordable housing shortage and its impact on the future of our city. I am frustrated by increasing homelessness, by the burden that displacement and gentrification place on our neighbors, and by community members and elected officials continuing to promote exclusion in our neighborhoods. Exclusionary zoning and land-use practices have led to an undersupply of affordable medium and high-density housing near jobs and transit, and have perpetuated segregated living patterns and the exclusion of historically disadvantaged communities. The housing and homelessness crisis, together with this year's COVID-19 pandemic, severe wildfires, and civil unrest, illustrate the need for a totally new approach to solving our city and region's housing crisis. Los Angeles has a valuable opportunity to address the need for more housing in a way that furthers equity, environmental sustainability, and housing justice. California's RHNA requires Los Angeles to plan for 456,000 new homes by 2029 through its housing element update, including 184,000 that are affordable to lower-income households. I believe every neighborhood must do its part to meet this goal. Los Angeles needs a housing element update based on fair neighborhood-level housing growth targets. This will reduce traffic and GHG emissions, increase access to jobs and transit, advance income and racial integration, roll back exclusionary zoning, and strengthen the region's economy. Therefore, I respectfully urge you to pass the City Zoning Code Update Ordinance in order to ensure that we move away from land-use and zoning decisions that have resulted in 66,000 unhoused folks, that have 1 million people living in overcrowded homes, that continues to displace and push-out BIPOC communities, and contributes to urban sprawl which worsens both our climate and traffic conditions. Thank you for your consideration.

## Communication from Public

**Name:** Miki Jackson

**Date Submitted:** 11/18/2020 01:38 PM

**Council File No:** 20-1042

**Comments for Public Posting:** Miki Jackson for Housing is a Human Right/ AIDS Healthcare Foundation. Vote no on Item 3. There has been too little public process related to any of this. A proposition is a huge undertaking and public scrutiny on this must be extensive. There is no real indication of what this will say or do. This unacceptable Great care must be taken to avoid any damage through a very unclear process. Vote no on this and go back to do a careful, well considered transparent process. Accountability is essential and must be built to a very public, transparent process if something this drastic is to be considered. Should this contemplate putting anything related or drawn from RE Code LA, that process was and is deeply flawed Using any part of it in a proposition is a very bad idea. That process excluded the public to a large degree and is of questionable use and legitimacy. TOC overrides the General plan, and that could create a situation where much of our city would, in effect, have few rules for these processes in our city. We hereby adopt all objections to this item.

## Communication from Public

**Name:** Zach Schlagel

**Date Submitted:** 11/18/2020 03:19 PM

**Council File No:** 20-1042

**Comments for Public Posting:** On behalf of PATH (People Assisting The Homeless), I ask the City Council and Council President to pass the City Zoning Code Update Ordinance in order to ensure that we embrace land-use and zoning decisions that increase housing affordability, encourage transit use, prevent displacement of communities of color, and create shared economic prosperity. In order to make progress on the fight against homelessness, it is imperative that housing be available in each part of the City. Individuals experiencing homelessness are far more likely to accept shelter and services if they are close to their current location. We can and we must smartly and strategically determine how and where to place permanent supportive housing, interim housing and affordable housing, but every neighborhood has to do their share in order to truly make progress. Lastly, zoning can provide several layers of complications that drive up costs and create significant delays on much needed projects. I urge you to consider reform that streamlines the process to site and locate the housing that we so desperately need to address the twin crises of housing and homelessness. Thank you for your consideration.