

# Appendix L

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Bracketed Public Comments Received for the Draft EIR

# Agencies Comments



Housing Element <housingelement@lacity.org>

## Fwd: Draft Housing Element

**Cally Hardy** <cally.hardy@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Aug 16, 2021 at 9:15 AM

----- Forwarded message -----

From: **Matthew Glesne** <matthew.glesne@lacity.org>  
Date: Fri, Aug 13, 2021 at 4:19 PM  
Subject: Fwd: Draft Housing Element  
To: Ari Briski <ari.briski@lacity.org>, Betty Barberena <betty.barberena@lacity.org>, Blair Smith <blair.smith@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Pallini, Conni <conni.pallini-tipton@lacity.org>, Wajiha Ibrahim <wajiha.ibrahim@lacity.org>

FYI

----- Forwarded message -----

From: **Vince Bertoni** <vince.bertoni@lacity.org>  
Date: Fri, Aug 13, 2021 at 4:09 PM  
Subject: Fwd: Draft Housing Element  
To: Arthi Varma <arthi.varma@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Yeghig Keshishian <yeghig.keshishian@lacity.org>

FYI



**Vincent P. Bertoni, AICP**  
Pronouns: He, His, Him  
Director of Planning  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: vince.bertoni@lacity.org



----- Forwarded message -----

From: **Councilmember Martinez** <councilmember.martinez@lacity.org>  
Date: Fri, Aug 13, 2021 at 2:53 PM  
Subject: Draft Housing Element  
To: Vince Bertoni <vince.bertoni@lacity.org>, Ann Sewill <Ann.sewill@lacity.org>  
Cc: Max Podemski <max.podemski@lacity.org>

Dear Mr. Bertoni and Ms. Sewill,

Please find the attached letter regarding the Draft Housing Element.

If you have any questions you can contact my staff member, Max Podemski, at [max.podemski@lacity.org](mailto:max.podemski@lacity.org).

Sincerely,

NURY MARTINEZ  
LA City Council President  
Councilwoman, 6th District  
--



**Matthew Glesne**

Preferred Pronouns: He, Him, His  
Senior City Planner

**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA 90012  
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**Cally Hardy** (she/her/hers)

City Planning Associate  
**Los Angeles City Planning**

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**8.13.21 Housing Element Letter\_vF.pdf**  
431K



CITY HALL  
LOS ANGELES, CALIFORNIA 90012

August 13<sup>th</sup>, 2021

Letter A-1

Mr. Vince Bertoni, Director of Planning  
Los Angeles Department of City Planning  
200 North Spring Street  
Los Angeles, CA 90012

CC: Ann Sewill, General Manager HCIDLA

**RE: Draft Housing Element**

Dear Mr. Bertoni,

For decades, the City of Los Angeles, the surrounding region, and the State as a whole have critically underbuilt housing. This shortage has led to some of the highest rents and home prices in the nation. The biggest impact is on working class families of all backgrounds, rendering the American Dream of homeownership and upward mobility out of reach. A direct consequence of this lack of housing is evident through the increasing numbers of families and individuals experiencing displacement, gentrification, and, for our most vulnerable, homelessness.

Systemic inequity in our planning and land use policies has fostered our current housing crisis, with Los Angeles, like cities across the country, still reeling from the racist practice of redlining. This federal policy segregated urban areas into zones based on their demographic and physical characteristics. The result was generational and systematic disinvestment in many neighborhoods which continues to deny generations of black and brown families the ability to build wealth through homeownership.

While redlining has officially been abolished, its impact is still evident in the scope, quality and production of housing, public transit access, open space, and jobs-production throughout the city. Affluent neighborhoods have been largely insulated from the demands for growth while communities of color have become dumping grounds for facilities not wanted anywhere else, such as freeways, airports and landfills. However, the biggest ramification of redlining is on housing. A majority of the land in the City is today subject to overlapping restrictions created piece by piece over time that work together to constrain housing supply, particularly affordable housing.

The housing crisis is Los Angeles' number one issue. It compromises our economic strength when a company's employees cannot afford to live here. It limits our ability to address our climate and sustainability goals if we cannot create areas that support transit. It threatens families with displacement and homelessness.

However, with the new Housing Element, and the reforms called for in CF: 20-1042\_(Martinez), we have an opportunity to assist in solving these issues by fixing our broken land use system. The City can become more affordable and equitable by creating vibrant and walkable communities near jobs and transit while respecting the character of our single family neighborhoods. This will allow Los Angeles to go from redlining to green and prosperous neighborhoods.

The City has made great strides in trying to tackle the affordable housing crisis through recent policies. This includes making it easier to build Accessory Dwelling Units (ADUs), affordable housing incentive programs, and Measure HHH among others. It also should be noted that the City's housing crisis is partially the result of State policies. This includes environmental reviews that make housing more expensive, Costa Hawkins and the Ellis Act which make it difficult to protect tenants, and the dissolution of Redevelopment Agencies which resulted in a dramatic cut in funding for affordable housing.

The Department of City Planning should be applauded for the incredible undertaking on the Housing Element up to this point. The Department has conducted a rigorous analysis of the City's existing capacity and outlined important programs for achieving our Regional Housing Needs Assessment (RHNA) target. It is a progressive first step and has been cited as being one of the best Draft Housing Elements in the State. However, the crisis facing Los Angeles requires bold action and this document can be further strengthened so that we can make Los Angeles a home for all.

### **Incentive Program**

Los Angeles has an abundance of land on commercial corridors where much of the city's new housing can be accommodated without disrupting existing single family neighborhoods. These streets are often served by rapid transit yet are composed of single story buildings or large parking lots, with severe height, density and Floor Area restrictions. In these areas it's not enough to simply add base incentives on existing zoning citywide. The Housing Element must identify these constrained zones and ensure that they have underlying capacity to support the mid-rise, mixed use corridors the City needs to create walkable and vibrant neighborhoods.

Program 48 in the Draft Housing Element calls for expanding the city's existing incentive programs such as Density Bonus and Transit Oriented Communities (TOC). These programs have resulted in many market rate and affordable housing units being built. The report on CF: 19-0416 (Cedillo) states that nearly 80% of all affordable units in high income areas were produced through these incentive programs.

However, the incentive programs have not had an equal impact on all neighborhoods. These programs should be modified so that they are tailored to the demographics and market conditions of the communities it is expanded in. In certain areas, affordable housing requirements should exceed the current TOC program standards. The type of affordable housing should also reflect

the need in that area. For example, in certain areas developments utilizing TOC have resulted in a net loss of affordable and larger size units.

The city also has a critical shortage of housing for families, seniors and the disabled population, new incentives should be included to build housing for these populations. The incentive concept should be further expanded to include upgrading infrastructure in neighborhoods where projects are built. This should include funding for first last mile improvements, streetscape infrastructure, transit demand management programs, open space, and overall mobility improvements.

The rezoning program should expand these incentive programs in the high and highest opportunity areas as defined by the California Tax Credit Allocation Committee (TCAC). This is an index and opportunity mapping tool to identify areas of high opportunity (labeled “Highest Resource” and “High Resource”) as well as areas of high segregation and poverty (labeled “High Segregation and Poverty areas”). It should also be expanded in other areas of the city, particularly along commercial corridors and areas that do not pose a displacement risk for existing tenants.

### **Rezoning Program**

Program 121 in the Draft Housing Element calls for a 219,732 unit rezoning program to accommodate our RHNA allocation of 456,643 units by 2029. However, Los Angeles’s housing deficit, particularly for affordable units, is estimated to be much higher than this number. The Draft Housing Element is also based on a rate of ADU production and completion of private development projects the city has not historically achieved. In order to ensure that Program 121 actually results in enough new construction to meet our RHNA allocation, we encourage Planning to adopt a rezoning target of 300,000 homes by 2029.

The rezoning program should focus on commercial cores and boulevards to ensure it does not impact existing neighborhoods and low income tenants in particular. The current rezoning analysis includes parcels that are currently occupied with housing covered under the Rent Stabilization Ordinance (RSO). Los Angeles desperately needs to create more housing, but this should not be done at the expense of low income Angelenos. We encourage Planning to incorporate the recommendations in CF: 21-0035 (Martinez) to ensure that if RSO buildings are redeveloped, each unit is replaced and the tenants are given the right to return. The Housing and Community Investment Department (HCID) and the Housing Authority of the City of Los Angeles (HACLA) should also seek to acquire RSO housing to bring it off the speculative market and ensure it stays affordable as called for in CF: 21-0046 (Martinez).

### **Removing Barriers to Housing Production**

Program 54 of the Draft Housing Element recommends modifying site plan review for 100% affordable projects. This could be further expanded to offer additional ministerial review processes for projects that include a minimum percentage of affordable units or ownership opportunities for low to moderate-income households.

Another major barrier to building housing are P, or Parking Zones. These zones have been declared antiquated by the Department yet they are still abundant along commercial corridors where new growth should be focused. Many of these streets have good transit access and are otherwise primed for appropriate redevelopment, such as Van Nuys Boulevard which will soon have a new light rail line. However, in many places the P Zones enshrine existing low density

land uses composed of single story shopping centers surrounded by a sea of surface parking Program 48 calls for allowing housing in P Zones through a new incentive program. P Zones should also be eliminated through Program 121 and have those zones permit uses consistent with the multi-family or commercial zone in proximity to the P-zoned lot, while still ensuring an appropriate buffer between abutting sensitive uses such as single family homes.

### **Expediting Affordable Housing:**

We strongly support expediting affordable and permanent supportive housing. One of the largest barriers for these projects is navigating between multiple city departments to gain approvals. The city must strengthen the communication and coordination between these departments and create an internal citywide system to expedite affordable and permanent supportive housing projects, such as those approved under CF: 21-0054 (de León).

Program 54 calls for expediting affordable housing projects. This program should also look at prioritizing the production of affordable housing on publicly-owned land particularly in high opportunity neighborhoods. It should also consider an affordable housing zoning overlay that would provide incentives for the creation of housing with a high level of affordability. This program should incorporate the goals of CF: 21-0658 (Raman). It should also incorporate the goals of CF: 21-0054 (Price) to create a tiered structure of processing, and expedite processing overall, for projects that create the largest amount of affordable or permanent supportive housing.

### **Missing Middle:**

Missing Middle housing is referenced in several work programs listed in the Draft Housing Element including Programs 59 and 64. This term does not refer to specific affordability requirements, but modest three to eight unit buildings. This type of housing is an important tool in building naturally affordable housing due to the fact that they are built on the same sized lot as a single family home allowing land costs to be distributed efficiently across multiple units. Historically, missing middle housing types such as bungalow courts provided affordable accommodations in neighborhoods across the city. Today, these structures are cherished for their charming architecture and human scale.

Missing Middle housing should become its own work program in the Housing Element. It should be a critical tool in the program to provide more housing in a way that is sensitive to neighborhood character. Since it is difficult to include onsite affordable housing in small scale developments, Planning should incorporate CF: 21-0037 (Martinez) to create an incentive program where these buildings pay into a rental assistance program on an annual basis through a covenant. The Program should also create pre-approved standard ADU, small-scale “missing middle” multifamily and small lot subdivision housing plans, allowing more family owned and small builders to receive a permit quickly if they use a pre-approved design which was called for by CF: 21-0061 (Blumenfield/de León). This program should also explore strategies for incentivizing homeownership for low and moderate-income families in these buildings.

### **Community Plan Updates:**

In the 20th century, land-use policies were introduced across the nation to facilitate the dispersal of households from crowded cities and encourage more property ownership. Underlying many of these laws, however, was a concerted effort to segregate households by race and ethnicity.

Historically redlined neighborhoods and the contours of segregation in our country remain as entrenched today as they were a hundred years ago. It is essential that the Planning Department

explore a new methodology as part of the Housing element update that ensures that equity is at the core of future land use considerations including the Citywide Community Plan Update Program to counter past injustices created by planning practices.

One way this new methodology can ensure that our land use planning creates opportunities for all Angeleno's is by ensuring that a diverse array of housing types and affordability levels are built in each neighborhood. Programs 49, 50, and 60 seek to create citywide growth targets and distribute them by Community Plan Areas. We are in strong support of Program 50 which calls for updating the Citywide Growth Strategy as part of an update to the Land Use Element to ensure that the growth and land use distribution strategy aligns with citywide goals around equity and sustainability.

These programs should enforce the Measure JJJ requirement that community plan updates do not reduce the capacity for creation and preservation of affordable housing or undermine California Government Code Section 65915 or any other affordable housing incentive program by requiring that all increases in allowable density and FAR be aligned with on-site affordable housing standards that meet or exceed TOC. The Community Housing Needs Assessment Process should be based upon citywide housing production goals and utilize a methodology that balances traditional factors such as job and transit access with a new prioritization for high opportunity areas, anti-displacement, healthy and affordable housing, and achieving housing opportunities at the deepest affordability levels.

We commend the work the Planning Department has done so far on the Draft Housing Element. We strongly recommend including these recommendations to create an even stronger plan for housing all Angelenos.

Sincerely,



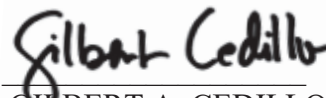
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NURY MARTINEZ  
Councilmember, 6<sup>th</sup> District



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MARQUEECE  
HARRIS-DAWSON  
Councilmember, 8<sup>th</sup> District



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GILBERT A. CEDILLO  
Councilmember, 1<sup>st</sup> District



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BOB BLUMENFELD  
Councilmember, 3<sup>rd</sup> District



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CURREN D. PRICE  
Councilmember, 9<sup>th</sup> District



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KEVIN DE LEON  
Councilmember, 14<sup>th</sup> District



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NITHYA RAMAN  
Councilmember, 4<sup>th</sup> District



Housing Element <housingelement@lacity.org>

# SCH # 2021010130, Los Angeles Citywide Housing Element 2021-2029 Update and Safety Element Update

3 messages

**Gibson, Emily@DOT** <Emily.Gibson@dot.ca.gov>  
To: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>  
Cc: "housingelement@lacity.org" <housingelement@lacity.org>

Wed, Sep 1, 2021 at 11:23 AM

Hello,

For your records, the attached letter is Caltrans District 7's response to the following project: **SCH # 2021010130, Los Angeles Citywide Housing Element 2021-2029 Update and Safety Element Update**. The Lead Agency under CEQA, which is the City of Los Angeles, is CC'ed on this email.

Please let me know if you have any questions or need anything else from me.

Best regards,

## Emily Gibson

Associate Transportation Planner, Local Development-Intergovernmental Review

Caltrans District 7, Los Angeles

Emily.Gibson@dot.ca.gov

Work Cell Phone: 213-266-3562

*Note: Due to COVID-19, I am teleworking.*

 **Response Letter\_GTS # 07-LA-2021-03661.pdf**  
130K

**OPR State Clearinghouse** <State.Clearinghouse@opr.ca.gov>  
To: "Gibson, Emily@DOT" <Emily.Gibson@dot.ca.gov>  
Cc: "housingelement@lacity.org" <housingelement@lacity.org>

Wed, Sep 1, 2021 at 11:40 AM

Hello,

Thank you for your submittal – the State Clearinghouse has received your comment.

**Olivia Naves** |she/her|

Assistant Planner – State Clearinghouse Unit

Governor’s Office of Planning and Research

1400 Tenth Street

Sacramento, CA 95814

[Quoted text hidden]

**Housing Element** <housingelement@lacity.org>  
To: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>  
Cc: "Gibson, Emily@DOT" <Emily.Gibson@dot.ca.gov>

Wed, Sep 1, 2021 at 2:31 PM

Hello,

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7 – Office of Regional Planning  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 266-3562  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life.*

Letter A-2

September 1, 2021

Cally Hardy  
City of Los Angeles  
Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

RE: Los Angeles Citywide Housing Element  
2021-2029 Update and Safety Element  
Update – Draft Environmental Impact  
Report (DEIR)  
SCH # 2021010130  
GTS # 07-LA-2021-03661

Dear Cally Hardy:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The project involves updates to the City of Los Angeles General Plan Housing Element and Safety Element, and a Rezoning Program for the creation of additional housing units. The Housing Element Update will further the goal of meeting the existing and projected housing needs of all family income levels of the community through the construction and operation of 420,327 housing units; provide evidence of the City’s ability to accommodate the Regional Housing Needs Assessment (RHNA) Allocation of 456,643 housing units through the year 2029; and identify a Rezoning Program that will create at least 219,732 housing units of new capacity by October 2024. This will accommodate both the City’s RHNA Allocation and target capacity of 486,379 housing units. The Safety Element Update will formally integrate related long-range planning efforts to ensure compliance with State law, including additions to goals, policies, and objectives to better address climate change; integration of updated background information and mapping; and incorporation and update of various programs. The project also involves a targeted update to the Plan for a Healthy Los Angeles to clarify that it is the City’s General Plan Element containing environmental justice goals and policies for the City, in compliance with Senate Bill 1000. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

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The project covers the City of Los Angeles, which includes several state facilities, such as the Interstate (I) 210, United States 101, State Route (SR) 134, SR-118, SR-170, I-405, I-10, I-110, I-105, I-5, and I-710. From reviewing the DEIR, Caltrans has the following comments.

The DEIR states that the VMT impacts of the new Housing Element and Safety Element, as well as the Rezoning Program, should be less than significant, but that future individual housing developments might result in significant Vehicle Miles Traveled (VMT). For these individual projects, Transportation Demand Management (TDM) programs may be used to reduce their VMT impacts to less than significant levels. Caltrans supports the use of TDM measures to decrease VMT. Implementing TDM strategies aligns with Caltrans’s mission is to provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability. Caltrans looks forward to reviewing the CEQA documents of future housing developments that emerge from these plan and program updates, and collaborating with

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the City of Los Angeles on identifying TDM strategies to limit VMT from these future projects.

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cont.

The DEIR also states that the Rezoning Program component of the project will prioritize opportunities for rezoning and development incentives in areas that are in Transit Priority Areas, near major job centers, and in higher resource areas. We also support this kind of prioritization, as it will result in limited project VMT.

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In addition, the DEIR states that build out of the RHNA may contribute to queuing on freeway off-ramps that lead to unsafe speed differentials. Since the Housing Element Update is programmatic and there is currently no specific information on where safety impacts may occur as a result of freeway off-ramp queuing, it is not possible to identify appropriate mitigation measures. Therefore, impacts related to highway safety would be significant and unavoidable. Caltrans agrees with this assessment, and the idea that the LADOT and Caltrans can identify specific queuing impacts and solutions on a case-by-case basis during individual housing project reviews. Potential solutions include additional TDM strategies and changes to the ramp terminal such as traffic signalization, signal phasing, or timing modifications. Thus, like our previous statement, Caltrans looks forward to coordinating with the City of Los Angeles during the CEQA review process on identifying strategies to limit queuing and safety issues from future housing developments that emerge from these plan and program updates.

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If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at [Emily.Gibson@dot.ca.gov](mailto:Emily.Gibson@dot.ca.gov), and refer to GTS # 07-LA-2021-03661.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

# Organization Comments



Housing Element <housingelement@lacity.org>

## LA City Housing Element - Comment Letter

**Housing Element** <housingelement@lacity.org>  
To: Anthony Dedousis <anthony@abundanthousingla.org>

Wed, Aug 18, 2021 at 5:35 PM

Anthony,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
[Planning4LA.org](http://Planning4LA.org)  
T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

On Wed, Jul 28, 2021 at 9:33 AM Anthony Dedousis <[anthony@abundanthousingla.org](mailto:anthony@abundanthousingla.org)> wrote:

Dear Mr. Bertoni and colleagues,

Hope your week is going well. I'm reaching out to [share a letter](#) from Abundant Housing LA and YIMBY Law regarding the City of Los Angeles' draft housing element.

We are supportive of the draft housing element's sophisticated, data-driven site inventory analysis, the detailed and objective assessment of fair housing issues in Los Angeles, and the recognition that significant upzoning will be needed to achieve the RHNA target. However, we wish to draw your attention to issues in the draft housing element's site inventory methodology, and to the lack of specificity in the proposed zoning and land use reform plan.

The attached letter contains a detailed explanation of where we view the City as having fallen short of HCD's standards and state law. Please let us know when you are available to discuss these concerns, and thank you for your consideration.

Regards,

Anthony

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**Anthony Dedousis**

Director, Policy and Research  
Abundant Housing LA  
515 S Flower Street, 18th Floor  
Los Angeles, CA 90071  
516-660-7402



July 27, 2021

Letter O-1

Mr. Vince Bertoni  
Director of Planning  
Los Angeles Department of City Planning  
200 North Spring Street  
Los Angeles, CA 90012

Dear Mr. Bertoni,

Thank you for the opportunity to comment on the process of updating the housing element of the City of Los Angeles' general plan. We are writing on behalf of **Abundant Housing LA** and **YIMBY Law** regarding the 6th Cycle housing element update. **Abundant Housing LA** is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis, and **YIMBY Law's** mission is to make housing in California more accessible and affordable through enforcement of state housing law. We support more housing at all levels of affordability and reforms to land use and zoning codes, which are needed in order to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity.

**That's why we've called for a housing element update that distributes the citywide 456,000-home RHNA goal, including 184,000 that are affordable to lower-income households, to each of Los Angeles' community plan areas in a fair, equitable way.** This requires high-opportunity neighborhoods to accommodate more housing opportunities, including those that have historically blocked new housing through exclusionary zoning. Additionally, as we plan for housing growth, there must be no conversion of wildlife habitat to housing.

Our organizations, together with a broad coalition of groups representing the policy, academic, environmental, business, social justice, and affordable housing communities, have engaged with the City on the housing element update through the process' inception in early 2020:

- [In January 2021, we wrote to recommend that](#), as part of the housing element update process and RHNA rezoning, the City set housing growth targets for each CPA, based on objective, quantifiable criteria like housing costs, median income, access to transit, proximity to job centers, access to parks and schools, patterns of historical exclusion and segregation, and environmental quality.
- In February, [we wrote to express our concern](#) that early drafts of the housing element update did not incorporate an equitable distribution approach to promoting housing growth.
- In April, the California Department of Housing and Community Development (HCD) issued [detailed guidelines](#) that clearly require cities to promote lower-income housing opportunities in high-opportunity neighborhoods, and defines quantitative benchmarks for assessing cities' AFFH compliance. This indicates that HCD intends to set the bar

high on AFFH compliance in housing element updates, as required under Assembly Bill 686.

- In June, [we wrote to express support](#) for the Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416) and the Report Relative to a City Zoning Code Update (CF 20-1042), and encouraged the City Council to incorporate major reforms into the housing element update.

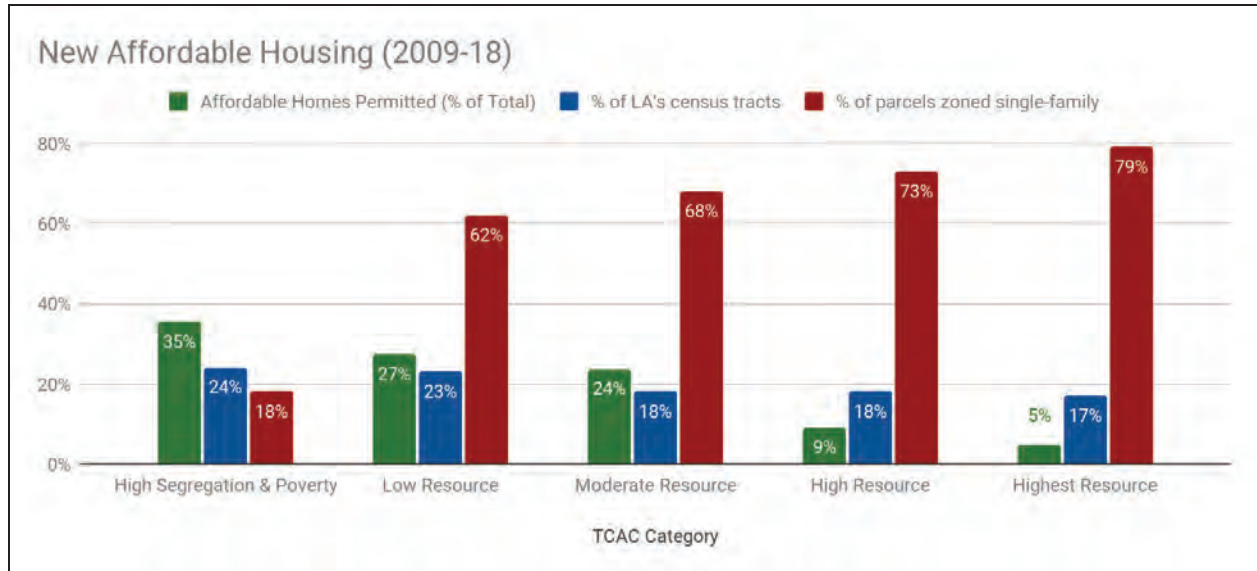
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cont.

We have reviewed the City’s draft Housing Element, as well as the Citywide Equitable Distribution of Affordable Housing and City Zoning Code Update Reports (“Fair Share Reports”), and **we are encouraged that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. In particular:**

- **The econometric approach to estimating the site capacity is outstanding.** The City’s collaboration with Turner Center economists and subject matter experts resulted in a rigorous, high-quality quantitative model that predicts each parcel’s likelihood of redevelopment, using a decade of parcel-level redevelopment data. This provides a fair estimate of the City’s current realistic capacity for new housing, demonstrating that Los Angeles will only build 10% of its RHNA target, or about 45,000 homes, in a “business as usual” scenario. This also recognizes that Assembly Bill 1397 (2017) requires cities to discount sites’ capacity by the sites’ probability of development during the planning period, as argued by [experts in housing element law](#).
- **The draft housing element provides a thorough, data-driven AFFH analysis of the site inventory.** This analysis, undertaken at the census tract level, assessed the likely neighborhood-level impacts of the site inventory. This demonstrated that, due to the geographic patterns of where today’s zoning allows (and forbids) multifamily housing, the site inventory’s development potential would not reduce (and might even increase) the concentration of lower-income households in low-resource areas, a clear AFFH violation. This analysis strengthens the case for focusing zoning and land use reforms in high-resource areas, to ensure that the housing element update reduces the citywide concentration of lower-income households in disadvantaged neighborhoods.
- **The Fair Share Reports provide data-driven evidence that Los Angeles’ zoning and land use regulations are a root cause of housing scarcity and high costs.** Using neighborhood and census tract level data, Planning and HCID illustrate that restrictive zoning, especially apartment bans, have discouraged housing production (both market-rate and subsidized) in Los Angeles’ higher-cost, supply-constrained neighborhoods. This has worsened patterns of income and racial segregation, and pushed low- and moderate-income households out of Los Angeles, with an especially negative impact on Los Angeles’ communities of color.
  - For example, between 2009 and 2018, just 14% of new affordable homes were permitted in high- and highest-resource census tracts, even though these areas make up 35% of the City’s total census tracts. This is because apartments are banned on 76% of the residential parcels in these well-resourced areas, a

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function of exclusionary zoning. By contrast, 35% of new affordable homes that were permitted during that time were located in census tracts with high segregation and poverty. These areas allow apartments on 82% of their residential parcels.<sup>1</sup>



- **The draft housing element proposes to accommodate 220,000 more homes (almost 50% of the total RHNA goal) by 2029 through rezoning and land use reform.** Both the draft housing element and Fair Share reports propose bold policy reforms that encourage equitable citywide housing supply growth, including:
  - An equitable distribution approach to the housing element's rezoning program, where the bulk of new housing opportunities, including affordable housing opportunities, would be promoted in high- and moderate-resource areas.
  - An expansion and possible merger of the City's Transit-Oriented Communities (TOC) and Density Bonus programs.
  - A Citywide Housing Needs Allocation Process/Targeted Fair Share Zoning Allocation formula that would guide a future Framework Element update and community plan updates.

**We thank the hardworking staff at Planning and HCID for taking these important steps towards a successful housing element update that provides long-awaited solutions to Los Angeles' housing shortage.**

**However, we still have serious concerns about the City's plan to meet its state-mandated RHNA targets.** Portions of the draft housing element contain major inconsistencies with HCD's instructions and the requirement that housing element updates affirmatively further fair housing under Assembly Bill 686, and does not provide a detailed, specific, and credible plan for

<sup>1</sup> [Report Relative to Citywide Equitable Distribution of Affordable Housing, May 2021, p. 12 and p. 14](#)

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implementation of a successful rezoning and land use reform program, as required under Government Code Section 65583(c).

**The following issues are of particular concern to us:**

***1. Portions of the Adequate Sites Inventory methodology are over-optimistic about the City's likely housing development potential without rezoning or major land use reforms. As a result, the housing element only proposes to accommodate 220,000 homes through rezoning, which would likely leave the City short of its RHNA goal.***

The draft housing element's analysis of the Adequate Site Inventory finds that the City's total development potential during the 6th cycle is 266,647 homes.<sup>2</sup> While the forecasts for Expected Unit Potential (44,832 homes), Public Land (7,314 homes), Warner Center Specific Plan (10,491 homes), and Project Homekey (4,600 homes) are well-grounded, the forecasts for Private Development Project completion, ADU production, and Public Land Programs are over-optimistic and likely to fall short in reality. Additionally, the proposed No Net Loss buffer is insufficient, and the Adequate Site Inventory includes parcels containing rent-stabilized units as potential redevelopment sites.

The Adequate Site Inventory therefore forecasts that an annual average of 33,331 homes will be permitted throughout the 6th cycle, **almost double the average number of homes permitted between 2017 and 2020 (about 17,800 homes).**<sup>3</sup> This suggests that many of the Adequate Site Inventory's assumptions are over-aggressive, and should be revised downwards.

**A. A buffer of at least 15-30% extra capacity for the lower-income RHNA targets is not included in the housing element site inventory.**

The No Net Loss law established by SB 166 (2017) requires adequate sites to be maintained at all times throughout the planning period to accommodate the remaining RHNA target **by each income category.**<sup>4</sup> If a jurisdiction approves a development on a parcel listed in the site inventory that will have fewer units (either in total or at a given income level) than the number of units (either in total or at a given income level) anticipated in the site inventory, then the jurisdiction must identify and make available enough sites to accommodate the remaining unmet RHNA target for each income category.<sup>5</sup>

If additional sites with adequate zoned capacity don't exist, then the jurisdiction must rezone enough sites to accommodate the remaining unmet RHNA target within 180 days. If the jurisdiction fails to accomplish this rezoning in the required period, then the consequences will include decertification of the housing element and potential state legal action. HCD

<sup>2</sup> Draft Housing Element, City of Los Angeles, pg. 4-6

<sup>3</sup> [HCD APR Dashboard](#), Units Permitted by Structure per Year, 2017-20

<sup>4</sup> HCD [No Net Loss Law Memo](#), pg. 1

<sup>5</sup> [HCD Site Inventory Guidebook](#), pg. 22

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recommends that “the jurisdiction create a buffer in the housing element inventory of at least 15-30% more capacity than required, especially for capacity to accommodate the lower income RHNA.”<sup>6</sup> **This is important because it ensures that adequate affordable housing capacity exists in the housing element through the 6th Cycle.**

The draft housing element claims to identify capacity for 486,379 housing units, only 7% higher than the RHNA goal of 456,643 homes. While this includes a 15% moderate-income buffer, only a 10% buffer is provided for the very low- and low-income RHNA targets. **This does not fulfill HCD’s recommendation to maintain a 15-30% capacity buffer at each income level,** giving the City inadequate margin in the event that a site intended for subsidized housing is developed with market-rate housing.

**Draft Housing Element No Net Loss Buffers**

Income Category	RHNA Target	Target Capacity	Buffer
Very Low Income	115,978	127,576	10%
Low Income	68,743	75,617	10%
Moderate Income	75,091	86,355	15%
Above Moderate Income	196,831	196,831	0%
<b>Total</b>	<b>456,643</b>	<b>486,379</b>	<b>7%</b>

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The January 2021 initial study **targeted a citywide capacity increase of 501,642 homes,** including an appropriate 25% buffer for the very low- and low-income RHNA targets (although no buffer was included for the moderate-income target). No explanation was provided for the draft housing element’s use of a 10% buffer for the very low- and low-income RHNA targets.

The housing element **should increase its very low- and low-income buffers back to 25%,** as provided for in the January initial study, while maintaining the proposed 15% moderate-income buffer. **This would result in a targeted citywide capacity increase of 514,088 homes, or a 13% overall buffer.** This is necessary to avoid violating the No Net Loss requirement and mid-cycle rezoning, a costly process in terms of time, money, and political will.

**Recommended No Net Loss Buffers**

Income Category	RHNA Target	Target Capacity	Buffer
Very Low Income	115,978	144,973	25%
Low Income	68,743	85,929	25%

<sup>6</sup> [HCD Site Inventory Guidebook, pg. 22](#)

Moderate Income	75,091	86,355	15%
Above Moderate Income	196,831	196,831	0%
<b>Total</b>	<b>456,643</b>	<b>514,088</b>	<b>13%</b>

**B. The housing element’s estimate of the likelihood that in-pipeline projects will be completed during the 6th cycle, based on historical data, is over-optimistic.**

HCD allows cities to count permitted or entitled units towards its 6th Cycle RHNA goals, on the grounds that some of these projects will be built during the 6th Cycle. However, the city must **realistically** estimate how many of these units will ultimately be built during the 6th Cycle, based on recent historical data. This is necessary because not every pending project gets approved, and not every approved project gets built.

The draft housing element forecasts that in-pipeline projects will **produce 144,070 homes during the 6th cycle**. This forecast multiplied the completion rates of pipeline development projects **since 2015** by the number of proposed units currently in-pipeline.<sup>7</sup>

**Draft Housing Element Pipeline Forecast**

Category	Units Proposed	% Units Expected to be Completed (based on 2015-19 data)	# Units Expected to be Completed
Active Planning Entitlements	175,907	53%	93,231
Approved Planning Entitlements with No Building Permit	72,537	58%	42,071
By-Right Building Permit Applications (Permit not Issued)	3,713	95%	3,527
Approved Building Permits with No Certificate of Occupancy	5,516	95%	5,240
<b>Total</b>	<b>257,673</b>	<b>56%</b>	<b>144,070</b>

However, this reflects a more aggressive set of assumptions relative to the January 2021 initial study, which used the completion rates of pipeline development projects **during 2018-19**.<sup>8</sup> No

<sup>7</sup> Draft Housing Element, City of Los Angeles, pg. 4-20

<sup>8</sup> [Initial Study, City of Los Angeles, pg. 16](#)

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clear justification was provided for using a five-year lookback period, rather than the initial approach of using the two-year lookback period, which likely better reflects current development conditions. Using the more current completion data, we forecast that 105,019 in-pipeline units, or 39,051 fewer than the housing element’s forecast, will be built during the 6th cycle.

**Recommended Housing Element Pipeline Forecast**

<b>Category</b>	<b>Units Proposed</b>	<b>% Units Expected to be Completed (based on 2018-19 data)</b>	<b># Units Expected to be Completed</b>
Active Planning Entitlements	175,907	37%	65,086
Approved Planning Entitlements with No Building Permit	72,537	45%	32,642
By-Right Building Permit Applications (Permit not Issued)	3,713	79%	2,933
Approved Building Permits with No Certificate of Occupancy	5,516	79%	4,358
<b>Total</b>	<b>257,673</b>	<b>41%</b>	<b>105,019</b>

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**The City should explain its rationale for using more aggressive assumptions to forecast in-pipeline production, or should update its pipeline analysis to align with the methodology in the January 2021 Initial Study.**

**C. The housing element did not use an HCD-recommended safe harbor methodology for forecasting future ADU production, nor does it provide for mid-cycle adjustments if ADU production falls short of projections.**

HCD has established two safe harbors for forecasting ADU production during the 6th Cycle<sup>9</sup>. One option (“Option #1”) is to project forward the local trend in ADU construction since January 2018. The other, for use when no other data is available (“Option #2”), assumes ADU production at five times the local rate of production prior to 2018. This ensures that ADU development estimates reflect actual on-the-ground conditions, maximizing the likelihood that ADUs will be built to the level forecasted in the housing element update.

<sup>9</sup> [HCD Site Inventory Guidebook, pg. 31](#)

The City issued permits for 4,646 ADUs in 2018, 4,766 ADUs in 2019, and 4,190 ADUs in 2020. Under HCD’s “Option #1”, the City would take the average of the ADU permitting trend between 2018 and 2020, and forecast that 4,534 ADUs will be permitted per year during the 6th Cycle. **This would allow for a total 6th cycle forecast of 36,272 ADUs.**

**The draft housing element counts 45,344 ADUs, or 5,668 ADUs per year, towards the City’s RHNA target.** The City argues that “based on current interest and demand for ADUs, and ongoing and planned future programs to promote ADU development in the City”, ADU permitting will increase 25% above the current annual average throughout the 6th cycle.<sup>10</sup> However, this contention is not supported by real-world data or other convincing evidence, and it seems unlikely that providing these relatively minor incentives will yield the forecasted outcome.

**The City must correct its calculation of the ADU safe harbor, and simply apply the average of annual ADU permits issued between 2018 and 2020, per HCD’s guidelines.**

**D. The site inventory counts 10,000 units of “equitable housing on public land” to be built by 2026, without adequately identifying funding sources and public resources to maximize the likelihood that these projects are actually built.**

Under state law, a housing element must affirmatively “[a]ssist in the development of adequate housing to meet the needs of extremely low, very low, low, and moderate-income households” (Gov’t Code 65583(c)(2)). Additionally, HCD’s AFFH Guidance Memo states that “The schedule of actions generally must (1) enhance the mobility of low-income and minority communities, (2) encourage the development of new affordable housing in high-opportunity areas, (3) protect existing residents from displacement, and (4) invest in disadvantaged places.”

Housing elements should use available public resources, including real estate transfer taxes and publicly owned land, in order to fund and encourage the preservation of existing affordable housing, potentially through a local Tenant Opportunity to Purchase Act, community land trusts, land banks, or assisting mission-driven nonprofits with acquisition of housing whose affordability covenants are close to expiration. This is important to ensure that lower-income households are able to maintain access to quality affordable housing options.

The draft housing element counts 10,000 units of “equitable housing” on 300 acres of public land towards the city’s Adequate Sites Inventory, explaining that the City recently received a Local Early Action Planning grant to support a program that would “streamline and scale up the production of affordable housing on public land” by 2027.<sup>11</sup>

However, acquiring and/or building 10,000 units of subsidized housing is an ambitious and expensive effort, and the LEAP grant alone is unlikely to provide enough funding to achieve this goal by the end of the 6th cycle, let alone 2027. By the City’s own admission, “The program is

<sup>10</sup> Draft Housing Element, City of Los Angeles, pg. 4-23

<sup>11</sup> Draft Housing Element, City of Los Angeles, pg. 4-25

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currently in the planning process, and no sites have been secured at this time.”<sup>12</sup> Additionally, similar recent efforts by the City have not delivered affordable units quickly, on budget, and at scale. Proposition HHH, which generated \$1.2 billion for supportive housing production in 2016, has suffered from significant cost overruns and delays. As a result, it has only delivered a handful of completed housing units, nearly five years after the approval of the bond.

While it’s certainly possible that the City’s equitable housing initiative will succeed, this outcome should not be treated as a sure thing. **Therefore, the City must exclude these units from the Adequate Sites Inventory.**

**E. The analysis of expected unit potential appears to include parcels containing rent-stabilized housing units.**

The draft housing element’s econometric analysis of expected unit potential estimated the redevelopment potential of nearly all parcels in the City. “An indicator for existing structures subject to the Los Angeles’ Rent Stabilization Ordinance” was included as an independent variable in the model<sup>13</sup>, suggesting that parcels containing rent-stabilized housing units were included in the analysis of the City’s current redevelopment potential.

We are concerned that including parcels containing rent-stabilized housing units will lead to the demolition of rent-stabilized buildings, causing displacement of lower-income renters. The realistic capacity anticipated on these sites should instead be achieved through rezoning of parcels that do not host rent-stabilized buildings.

**The econometric analysis should be updated to omit parcels containing rent-restricted and de facto affordable housing units, and the new forecast of expected unit potential be reported in the final version of the housing element.** This would be in keeping with Planning’s modifications to the original econometric analysis, which removed vacant parcels located in a Very High Fire Hazard Severity Zone and parcels containing restricted affordable units that are subject to a land use covenant.<sup>14</sup>

**Recommendation:**

We urge the City to update the Adequate Sites Inventory methodology to include more realistic assumptions about the City’s likely housing development potential without major land use reforms. **This would reduce the Adequate Sites Inventory’s realistic capacity from about 267,000 homes to roughly 208,000 homes, necessitating a new rezoning target of roughly 306,000 homes, in order to achieve a citywide target capacity increase of 514,000 homes.**

<sup>12</sup> Draft Housing Element, City of Los Angeles, pg. 4-25

<sup>13</sup> Draft Housing Element, Appendix 4.6, pg. 14

<sup>14</sup> Draft Housing Element, Appendix 4.6, pg. 29

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## Recommended updates to ASI methodology

	ASI Capacity	Rezoning	Total Target Capacity
<b>Draft Housing Element Target Capacity</b>	<b>267,000</b>	<b>219,000</b>	<b>486,000</b>
Increase to NNL buffer		+28,000	+28,000
Adjustment to pipeline forecast	-40,000	+40,000	
Adjustment to ADU forecast	-9,000	+9,000	
Omission of equitable housing proposal	-10,000	+10,000	
<b>Recommended Target Capacity</b>	<b>208,000</b>	<b>306,000</b>	<b>514,000</b>

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**2. The City’s proposal for zoning and land use reform lack specificity and detail, as well as a clear, rapid path to implementation. Without a firm, credible plan, the housing element will fail to adequately address the City’s housing shortage and fall short on AFFH compliance.**

AB 686 (2018) requires housing element updates to “affirmatively further fair housing”, which is defined as “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” The City must address the issue of residential segregation by accommodating the lower-income RHNA targets in a way that conforms with AFFH requirements.

In April 2021, HCD issued an [AFFH Guidance Memo](#), which establishes a number of important principles for promoting fair housing, including:

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- A city’s AFFH analysis should reveal “current and historical spatial patterns of subsidized housing within and surrounding the jurisdiction, including emergency shelters, subsidized affordable housing, supportive housing, and usage of housing choice vouchers.”<sup>15</sup>
- The distribution of housing-element inventory sites with lower or moderate income capacity must not be skewed toward lower-income neighborhoods. To demonstrate that the site inventory furthers fair housing, the city must calculate the percentage of households at lower, moderate, and above-moderate income levels in each census tract or “block group” in the city, and then do the same for the lower, moderate, and above-moderate-income RHNA units assigned to the tract or block group. The share of lower-income RHNA units assigned to tracts (or block groups) with a higher-than-average share of lower-income households should be less than the current share of lower-income households in those tracts.<sup>16</sup>
- The housing element must benchmark the citywide distribution of household incomes against the distribution in the county or region, and state. The AFFH program of a city

<sup>15</sup> AFFH Guidance Memo, p. 46

<sup>16</sup> AFFH Guidance Memo, p. 47

with an above-average median income must break down barriers that keep lower income and minority households from accessing housing in the city.<sup>17</sup>

- “Goals, policies, and actions” to further fair housing must be “aggressively set to overcome ... contributing factors [to fair housing problems, and thus] to meet the ‘meaningful impact’ requirement in statute.”<sup>18</sup> The list of actions shall include concrete timeframes for implementation, measurable outcomes, explicit prioritization (“high,” “medium,” or “low”), and “must be created with the intention to have a significant impact, well beyond a continuation of past actions.”<sup>19</sup>
- “The schedule of actions generally must (1) enhance the mobility of low-income and minority communities, (2) encourage the development of new affordable housing in high-opportunity areas, (3) protect existing residents from displacement, and (4) invest in disadvantaged places.”<sup>20</sup>

**The draft housing element is therefore obligated to promote fair housing opportunities and undo patterns of segregation.** The City must follow HCD’s recommendation that cities distribute lower-income housing opportunities throughout the city, and recommends that cities first identify development potential for lower-income housing in high-opportunity neighborhoods.<sup>21</sup> **This would mean rezoning more parcels, including residential parcels currently zoned single-family only, to encourage enough housing growth to achieve the RHNA target.**

The City is also obligated to provide meaningful AFFH analysis, including evidence that its proposed distribution of lower-income housing opportunities would reduce the concentration of lower-income households in locations with an existing concentration of low- and moderate-income households. **HCD’s recent AFFH guidance makes it abundantly clear that this benchmark will be used to help determine AFFH compliance.**<sup>22</sup>

**Additionally, Government Code Section 65583(c) requires housing elements to include programs with concrete action steps to facilitate housing production.**<sup>23</sup> Per HCD’s [Housing Elements Building Blocks](#), “Programs must include specific action steps the locality will take to implement its policies and achieve its goals and objectives. Programs must also include a specific timeframe for implementation, identify the agencies or officials responsible for implementation, describe the jurisdiction’s specific role in implementation, and (whenever possible) identify specific, measurable outcomes.” Building Blocks lists definite time frames for implementation, demonstration of a firm commitment to implement the program, description of the local government’s specific role in program implementation, description of the specific action

<sup>17</sup> AFFH Guidance Memo, pp. 15, 32-34, 77

<sup>18</sup> AFFH Guidance Memo, p. 52

<sup>19</sup> AFFH Guidance Memo pp. 52, 71

<sup>20</sup> AFFH Guidance Memo, p. 54

<sup>21</sup> [HCD Site Inventory Guidebook, pg. 3](#)

<sup>22</sup> AFFH Guidance Memo, p. 47

<sup>23</sup> “The element shall contain all of the following: A program [or programs] that sets forth a schedule of actions during the planning period, each with a timeline for implementation, that may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives...”

steps to implement the program, and proposed measurable outcomes (e.g., the number of units created, completion of a study, development of a homeless shelter, initiation of a rezone program, preservation of at-risk units, etc.) as appropriate examples of concrete action steps.

The draft housing element and Fair Share Reports appropriately identify major governmental constraints that perpetuate housing scarcity, provide convincing evidence that restrictive zoning and land use rules are associated with a lack of affordable housing opportunities in high-resource neighborhoods, and propose a reasonable set of high-level policy solutions. **However, the draft housing element doesn't provide an appropriately specific rezoning, constraint removal, and overall land use reform program, nor is there a firm commitment to implementing specific policy measures to encourage strong housing growth citywide, particularly in high-resource neighborhoods.** The Goals section of the draft housing element frequently uses words like "plan", "explore", "consider", "examine", but contains very few firm commitments to action or implementation.

**Without a more detailed plan and a credible path to implementation by October 2024, the City will not achieve its RHNA target.** Additionally, the draft housing element's lack of specificity on a land use reform program makes it impossible to assess whether it, or the draft housing element altogether, complies with state AFFH law.

**We urge the City to provide a thorough, detailed plan for rezoning, constraint removal, and overall land use reform as part of the final version of the housing element update, including details on implementation.**

**A credible plan for equitably achieving the RHNA goal would include:**

**A. Committing to the creation of 306,000 new homes by 2029 through the housing element's rezoning and land use reform programs.**

The draft housing element's contention that the RHNA target can be achieved by only rezoning for 220,000 new homes is based on an overly optimistic assessment of the Adequate Sites Inventory. Committing to land use reforms that target the creation of 306,000 more homes by 2029 is necessary in order to meet the RHNA target.

This must include a firm commitment to increase Los Angeles' **realistic capacity** by 306,000 homes (i.e. increasing the city's zoned capacity enough to result in the production of 306,000 homes), not simply increasing the **theoretical zoned capacity** by 306,000 units. A parcel's maximum theoretical capacity is not the same as its realistic capacity. To draw a parallel to college admissions, when UCLA wants 2,000 students in its incoming class, they admit 4,000 students. Similarly, to achieve housing production targets, jurisdictions must increase zoned capacity well above the target number of new homes.

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State housing element law requires cities to target realistic capacity growth, not theoretical zoned capacity, in its rezoning program, just as it does for assessment of the site inventory.<sup>24</sup> Similarly, HCD instructs cities to “accommodate 100 percent of the shortfall of sites necessary to accommodate the remaining housing need for housing for very low- and low-income households during the planning period...” and that “Those sites must meet the adequate sites requirements in terms of the suitability and availability outlined above.”<sup>25</sup> This also would be in keeping with the draft housing element’s excellent model for assessing the City’s Expected Unit Potential, which recognizes that parcel-level estimates of likelihood of redevelopment are critical for accurately forecasting future housing production.

## **B. Implementation of a comprehensive Fair Share approach to the RHNA rezoning program, which would define “opportunity” holistically.**

CPA and/or neighborhood-level RHNA targets, including affordable housing growth RHNA targets, should be based on a formula that includes the following objective, numerical criteria:

- Housing costs
- Median income
- Access to transit
- Proximity to job centers
- Access to public resources (e.g. parks, schools)
- Patterns of historical exclusion and segregation
- Environmental quality

This would essentially merge the proposed Equitable RHNA Rezoning Program and Citywide Housing Needs Allocation Process/Targeted Fair Share Zoning Allocations methodologies, ensuring that a consistent set of standards would guide RHNA rezoning, a Framework Element update, expansion of TOC and the city Density Bonus program, and all future community plan updates. This would also ensure that a majority of new lower-income housing opportunities are accommodated in moderate-, high-, and highest-resource census tracts.

## **C. Increase affordable housing opportunities in high-opportunity neighborhoods.**

In order to meet HCD’s AFFH standards, the City’s housing element must reverse historic patterns of socioeconomic segregation by dismantling the barriers to housing opportunities for low- and moderate-income households in high-income neighborhoods. **Policies that would promote this outcome include:**

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<sup>24</sup> [Gov’t Code 65583\(c\)\(1\)](#): “The housing element program “shall ... (1) Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city’s or county’s share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning...” It is noteworthy that the same term, “accommodate,” is used in the statute to describe both what’s learned from the site capacity analysis, and what will be done through the rezoning.

<sup>25</sup> [HCD Site Inventory Guidebook, pg. 33](#)

- Rezoning parcels located near transit, job centers, schools, and parks in order to expand the supply of housing in the City’s highest-opportunity areas. This should include R1 zoned parcels where single-family detached homes are currently mandated by law.
- Significantly reducing the concentration of lower-income households in neighborhoods with high concentrations of low- and moderate-income households, in neighborhoods with high exposure to pollution, and in R/ECAPs.
- Identifying new funding sources and public resources to encourage the production of affordable housing, such a real estate transfer tax or congestion pricing.
- Exempting parcels containing rent-restricted and de facto affordable housing units from rezoning, in order to prevent lower-income renter displacement.
- Ensuring that “no net loss” provisions apply to parcels in the site inventory and rezoning program with a monitoring and implementation program.
- Prioritizing the production of affordable housing on publicly-owned land.
- Creating a 100% affordable housing zoning overlay that encompasses high-opportunity neighborhoods, including R1 zoned parcels.
- Implementation of stronger tenant protection policies, including expanded affordable unit replacement requirements (“no net loss”) for redevelopment of existing rental properties, a “right of return” after redevelopment at the same rent as before, and rental assistance during redevelopment.

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**D. Avoid relying on Community Plan updates for implementation of the RHNA rezoning program.**

Program 121 in the draft Housing Element states that “The Rezoning Program is anticipated to be implemented through a number of work efforts including updates to up to 16 Community Plans (four West LA plans and six SE/SW Valley plans, two Downtown plans, Boyle Heights, Hollywood, Harbor-Gateway and Wilmington), two Specific Plans (CASP and Slauson TNP) as well as at least one citywide ordinance that will create additional zoning capacity through an expansion of affordable housing incentive programs (Density Bonus Update).”

It is concerning that the City proposes to rely on Community Plan updates to achieve a significant portion of the RHNA rezoning program, since the Community Plan update process has a very poor track record of delivering strong housing growth. Recent Community Plan updates have suffered from years-long delays to develop and implement, often due to nuisance lawsuits from housing opponents (the Hollywood Community Plan update is a particularly salient example). Additionally, these updates often reflect the policy preferences of vocal housing opponents (e.g. the Westside Community Plan), rather than the broader community, which is why they generally do not meaningfully increase new housing opportunities. **Relying on a fundamentally broken process to achieve a rezoning program that must be implemented by October 2024 is a recipe for failure.**

The final Housing Element should report the increase in realistic capacity for housing (see Recommendation A) that would be created via the Downtown and Hollywood Community Plan updates, and should commit to achieving the remainder of the rezoning target through policy reforms that apply citywide (see Recommendations B, C, E, and G for examples).

**E. Expand and merge TOC and the city Density Bonus program.**

The City's successful TOC program has led to the production or proposal of [over 30,000 housing units](#), of which 21% are affordable to lower-income households. Expanding it to cover more transit-rich locations and locations with access to high-quality resources, jobs, and amenities would create even more affordable housing units in high-income neighborhoods. We are encouraged by the Housing Element and Fair Share Reports' support for expanding TOC and combining it with the City's Density Bonus Program.

Crucially, this expansion must include locations where apartments are currently banned, since TOC incentives currently do not apply to parcels where fewer than five units may be built. This significantly limits the effectiveness of the TOC program, and helps to explain why relatively few TOC units have been produced in the Westside and San Fernando Valley, where R1 zoning is particularly widespread.

**F. Update the Framework Element by 2024, in parallel with the RHNA rezoning, or consider abolishing the Framework Element altogether.**

The Framework Element, a strategy for long-term growth that influences future community plan and citywide element updates, is decades out of date. By relying on flawed and outdated forecasts of future neighborhood population growth, it effectively sets artificial caps on housing production in many neighborhoods, acting as a significant barrier to an equitable distribution of new housing opportunities citywide.

While the Housing Element and Fair Share Reports recognize the need for an updated Framework Element, they don't commit to a date by which to achieve this effort. Updating the Framework Element by 2024 is a necessary step towards implementation of a high-quality, comprehensive Fair Share approach to the RHNA rezoning program. Alternatively, the City should consider abolishing the Framework Element altogether, since it is optional and not required under state law.

**G. Implement a strong constraint removal program that would apply citywide.**

While the Housing Element and Fair Share Reports discuss at length the many governmental constraints that restrict housing production and foster housing scarcity and unaffordability, they lack a detailed, credible plan for constraint removal that would apply citywide, as required under California housing element law. **Policies that would promote constraint removal, housing supply growth, and greater housing affordability include:**

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- **End exclusionary zoning by legalizing 8 housing units on all residentially-zoned parcels, and by legalizing mid-rise and high-rise housing production on parcels near transit in high-resource areas where apartments are banned today.**
  - Legalizing denser housing on owner-occupied R1 parcels is especially important, given that the draft Housing Element’s rezoning program appears over-reliant on multifamily residential and commercial parcels that likely host rent-stabilized units (“More than 50% of lower income rezoning will occur on sites with exclusively residential uses or allowing 100% residential uses.”)<sup>26</sup> Senate Bill 10, if passed, would help to facilitate this local reform.
- **Eliminate on-site parking requirements, instead allowing property owners to decide how much on-site parking is necessary.**
- **Reduce restrictions on maximum height, floor-area ratio, unit size, and lot coverage.**
- **Raise the Site Plan Review threshold to 250 homes, and establish a fast by-right review process for all new multifamily and mixed-use buildings which meet the zoning law and the General Plan.**
- **Pre-approve standard ADU, small-scale “missing middle” multifamily and small lot subdivision housing plans, allowing developers to receive a permit quickly if they use a pre-approved design.**

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**H. Include a full list of parcels where the rezoning program will apply in the final version of the Housing Element update.**

The City’s final Housing Element should provide a full parcel-level dataset explaining where the proposed rezoning program would and would not apply, as well as summary statistics breaking out the number of homes in each income bucket accommodated in each neighborhood and by TCAC category of census tracts. This level of transparency is necessary to demonstrate that the City’s rezoning program appropriately meets the state’s AFFH requirements. This would also be in keeping with Los Angeles County’s housing element, which provided a complete list of parcels that would be rezoned in order to implement its rezoning program.

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The City of Los Angeles has a legal obligation to sufficiently plan to meet current and future residents’ housing needs, in a way that guarantees access to opportunity for Californians of all racial and ethnic backgrounds. The issues that we’ve highlighted above suggest that the City has not yet offered a credible plan for fulfilling this legal obligation. We urge you to actively embrace this opportunity to provide a variety of attainable housing options for the residents and workers of Los Angeles.

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<sup>26</sup> Draft Housing Element, pg. 6-84 and 6-85

Finally, state law imposes penalties on jurisdictions that fail to adopt a compliant 6th Cycle housing element update by October 15, 2021. On that date, noncompliant jurisdictions will forfeit the right to deny residential projects on the basis of local zoning, so long as projects include at least a 20% set-aside for below market-rate units or are 100% moderate-rate projects.<sup>27</sup> Noncompliant jurisdictions may also lose the ability to issue building permits, including permits for kitchen and bath renovations. Jurisdictions that want to maintain local control over new development should therefore plan to adopt a compliant housing element update on time.

In May, HCD [declined to certify San Diego's 6th Cycle housing element](#), on the grounds that it did not adequately meet the legal requirements to affirmatively further fair housing, and to demonstrate the likelihood of redevelopment of non-vacant sites. If San Diego does not meet these requirements by June 16, 2021, HCD will find the housing element out of compliance. This suggests that HCD will be bold in enforcing housing element law, and that the City risks rejection of its 6th Cycle housing element and decertification if it continues down this path.

We request the opportunity to meet with you and your colleagues to address the concerns raised in this letter. Thank you for your time and consideration.

Sincerely,

Leonora Camner  
Executive Director  
Abundant Housing LA

Sonja Trauss  
Executive Director  
YIMBY Law

CC: Jason Elliott, Senior Counselor to Governor Gavin Newsom  
Megan Kirkeby, Deputy Director, Housing Policy Development, HCD  
Melinda Coy, Land Use and Planning Manager, HCD  
Tyrone Buckley, Assistant Deputy Director of Fair Housing, HCD  
Paul McDougall, Housing Policy Development Manager, HCD

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<sup>27</sup> [California Government Code 65589.5\(d\)\(5\)](#).



Housing Element <housingelement@lacity.org>

## Fwd: Updated Housing Elements and Zoning Codes

**Housing Element** <housingelement@lacity.org>  
To: info@thetwohundred.org

Wed, Aug 18, 2021 at 5:29 PM

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

----- Forwarded message -----

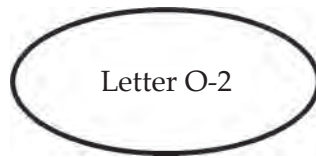
From: <info@thetwohundred.org>  
Date: Fri, Aug 6, 2021 at 4:50 PM  
Subject: Updated Housing Elements and Zoning Codes  
To: <mayor.helpdesk@lacity.org>, <vince.bertoni@lacity.org>

Hello,

Please see attached correspondence from The 200, a civil rights homeownership advocacy group. Replies and future correspondence can be directed to our Vice-Chair, Robert Apodaca, at [robert@thetwohundred.org](mailto:robert@thetwohundred.org).

Respectfully,

The 200 Coalition



August 6, 2021

Mayor Eric Garcetti  
The City of Los Angeles  
Delivered via email to mayor.helpdesk@lacity.org

Mr. Vince Bertoni  
Director of Planning  
The City of Los Angeles  
Delivered via email to vince.bertoni@lacity.org

Re: Updated Housing Elements and Zoning Codes Must Meet Regional Housing Needs Allocation (RHNA) Targets **and Comply with Federal and State Housing Laws Including** Attainable Homeownership, Authorizing Housing That is Affordable by Design Without Reliance on Lottery Outcomes and Taxpayer Subsidies, Affirmatively Further Fair Housing, and Ending Residential Racial Segregation

Dear Mayor Garcetti and Mr. Bertoni,

The Two Hundred is a civil rights homeownership advocacy group that was founded and remains comprised of veteran civil rights leaders, former legislators and cabinet secretaries, retired judges, and other diverse housing advocacy leaders. Many of us worked for our entire careers to enact federal and state fair housing laws to end agency “redlining” practices such as denying communities of color access to insured home mortgages and veterans’ loans, and promoting residential racial segregation through razing historic minority neighborhoods through “redevelopment” and siting freeways to protect “public harmony” by dividing our communities.

California’s severe housing shortage, and astronomical (and still-rising) housing prices, have undone decades of civil rights progress. As confirmed by scholars at UC Berkeley, residential racial segregation is worse in the Bay Area than it was before the enactment of civil rights reforms in the 1960s – a pattern repeated in wealthier counties statewide. <https://belonging.berkeley.edu/segregationinthebay> As we explain in our *Redlining* video, minority homeownership rates, which in the early part of this century had finally started to attain parity with white families who had access to government programs like federally-insured low cost mortgages, plummeted during the Great Recession of 2009. With the full support of regulatory agencies, as of 2010 lenders engaged in more than a decade of predatory loans and foreclosures that wiped out trillions of dollars of the multi-generational wealth that our communities had finally accumulated through homeownership. Our communities now stagger from housing costs that are so high the US Census Bureau has confirmed that our state has the highest poverty rate in the country! When added to the other high costs of living in California, including the highest electricity and gasoline prices of any state other than California, almost

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40% of our residents cannot reliably pay routine monthly expenses even after receiving public assistance to help buy food and medical care. [United Ways of California - The Real Cost Measure in California 2019 \(unitedwaysca.org\)](#) California leaders should not brag about creating Silicon Valley billionaires without also recognizing the crushing burdens of decades of hostility to starter homes and other housing needed by our communities, nor can California’s leaders lawfully hide behind unfunded rhetorical commitments to fund 100% “affordable” rental housing and again force our communities into segregated rental housing “projects.”

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We write because you have been entrusted with the decade’s most important housing task, which is assuring that your agency complies with civil rights housing laws and updates your General Plan and Zoning Code to accommodate your community’s share of new homes in compliance with your Regional Housing Needs Assessment (RHNA).

Both federal and state civil rights laws, as well as United States Supreme Court decisions, have long prohibited agencies from directing new “affordable” housing for lower income residents to a limited geographic subarea, and instead require the dispersal of new housing at all affordability levels throughout the community. In 2018, the California Legislature strengthened this longstanding civil rights requirement in AB 686 (effective January 1, 2019) which requires all public agencies to “affirmatively further fair housing” (AFFH) in California. As explained by the Housing and Community Development (HCD) agency, quoting from the new law, **“[p]ublic agencies must now examine existing and future policies, plans, programs, rules, practices, and related activities and make proactive changes to promote more inclusive communities.”** [AFFH / Fair Housing \(ca.gov\)](#)

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Before the AFFH was enacted in 2018, and based on a complex set of planning, zoning, and environmental laws, policies and principles, most California cities and counties did in fact adopt “policies, plans, programs, rules, practices and related activities” that constrain housing supplies, and raise housing prices so high that our hard working families – the majority of which now include members in our communities of color – can no longer afford to buy, and in many neighborhoods cannot even afford to rent, a home. These status quo housing policies result in unlawful racial segregation, and violate the affirmatively furthering fair housing laws. Our families, many of which are led by the essential workers each community relies on such as teachers, first responders, workers in construction, health care, hospitality, small business employees, and laborers – cannot and should not be asked to wait to have their name drawn in an “affordable” housing lottery, or wait for “magic money” to appear from the repeal of Proposition 13 (or capitalism). State and local agency actions violate civil rights laws, including California’s new AFFH, must stop – and housing production, of market-rate housing that can be purchased by median income families, must increase more than tenfold under the current RHNA cycle.

We hereby formally and respectfully request that these civil rights housing legal violations be corrected in your General Plan Housing Element and Zoning Code updates which feasibly, based on your median income families and your available funding resources today, plan for housing typologies and locations that meet your assigned RHNA targets. We identify below the worst offenders, and practical solutions, to assure that you do not adopt General Plan and Zoning Code updates that violate civil rights housing laws.

1. **Charging Country Club Initiation Fees for New Housing is Racist and Exclusionary**

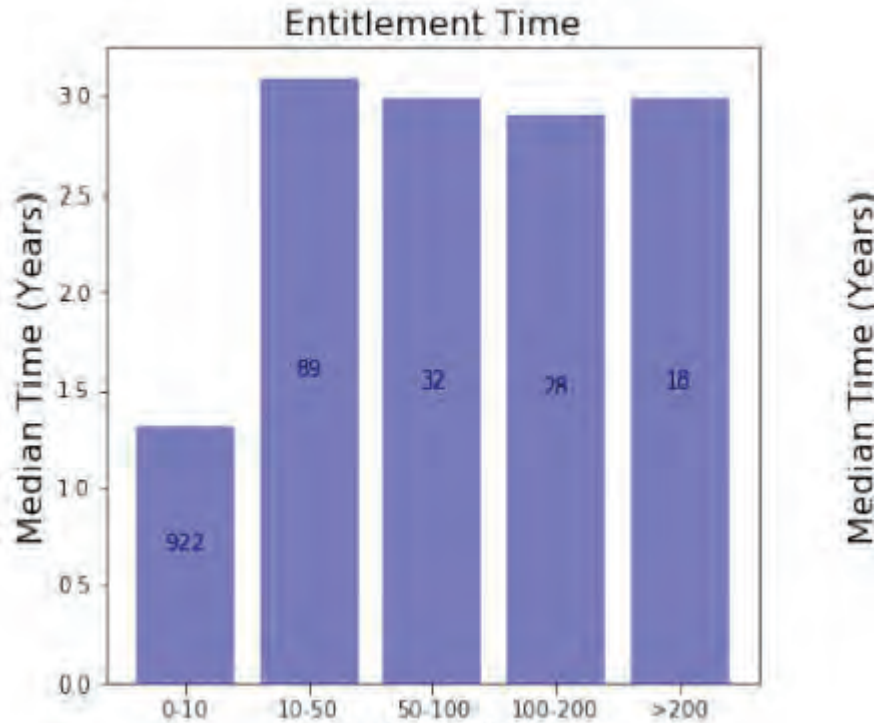
Country clubs often charge initiation fees of \$50,000 or more, with the express intent to select wealthier members and exclude “those people” who cannot afford steep fees. Many local agencies have imposed fees on new housing that wildly exceed even \$50,000, such as San Francisco which has charged fees of \$165,000 per apartment! While we appreciate that new homes need to pay for their “hard” infrastructure needs like water and sewage services, too many jurisdictions have allowed well-meaning special interests seeking additional funds for important local priorities like art, affordable housing, and recreational programs to pile these fees onto new housing rather than obtain funding (as or if needed by special assessments or taxes approved by existing residents) equitably, which means paid for equitably by the city’s existing (not just future) residents. As documented by UCB, excessive and wildly different housing development fees increase housing costs and decrease housing production and affordability – and these fees are passed along to new residents. [Development Fees Report Final 2.pdf \(berkeley.edu\)](#) Most cities and counties defend high fees on new housing with “nexus” studies, based on made-as-instructed reports prepared by consultants paid by cities. “Nexus” may pass constitutional muster, but violates civil rights housing laws by excluding housing – and “those people” (us) from your community.

***Civil Rights Compliant Solution to Exclusionary Fees:*** Residents of new housing should pay no more in fees than existing taxpayers. For example, if a city has 50,000 existing homes and a RHNA obligation to produce 5,000 more homes, housing fees should be capped at the levels paid by taxpayers. If existing city residential households subsidize arts program with \$500,000, residents of new housing should pay no more than the same share (\$100 per new home). If existing city residents contribute nothing to build affordable housing, then neither should residents of new housing: existing policies created the affordable housing shortage and crisis, and solving this problem on the backs of those shut out of the housing market creates an unfair, unlawful and racially discriminatory burden on new residents. Stop imposing discriminatory fees on new residents.

2. **Housing Delayed is Housing Denied.** While some jurisdictions have streamlined the housing project review and approval process, most have not. The two most commonly-identified delay factors in the housing project approval process are multi-step, multi-department review processes with no intra-agency deadlines or housing accountability production metrics, and the California Environmental Quality Act (CEQA) review process. As shown in Figure 1, in one recent study of the San Francisco entitlement process, all but the smallest (less than 10 units) took about three years to complete this combined bureaucratic and CEQA process.

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**Figure 1: Housing Project Entitlement/CEQA Process Time in San Francisco  
(by Project Size/Unit Count)**  
[Measuring the Housing Permitting Process in San Francisco - Turner Center  
\(berkeley.edu\)](#)



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A. **End Bureaucratic Delays to Housing Approvals.** Also as explained by UCB, “[t]he most significant and pointless factor driving up production costs was the length of time it takes to for a project to get through the city permitting and development process” which in turn caused even higher costs as projects stuck in bureaucratic review proceedings were required to repeatedly modify their projects to deal with the “additional hoops and requirements” that “pop up” at various stages of the permitting and development process.  
[San Francisco Construction Cost Brief - Turner Center January 2018.pdf \(berkeley.edu\)](#), p. 2.

***Civil Rights Compliant Solution to Housing Delays Caused by Bureaucrats.*** This too has a simple solution: prescribe, disclose, enforce, and publish outcomes of housing review and approval deadlines on every city department (and responsible unit within each department), and hold responsible managers in each department accountable in performance evaluations and promotion decisions to meeting (or beating) deadlines. This is a housing production accountability metric that should be expressly added to General Plan Housing Element implementation mandates.

B. **End Anti-Housing CEQA Abuse.** Before a misguided appellate court decision, issued without Legislative direction in 1984, CEQA did not apply to city and county approvals of housing that complied with General Plan and zoning ordinances. For several decades, however, increasingly fussy academics and planners insisted that zoning codes require a “conditional use

permit” (CUPs) even for code-compliant housing, to allow local agencies to apply a “we know it when we see it” open-ended level of discretion to allow, deny, or condition housing approvals – the same standard the Supreme Court applies to obscenity. In 1984, this CUP process – brought to us all by the same generation of planners that (obscenely) insisted on single-family only residential zoning and outlawed even duplexes that had previously been allowed and common throughout California – unleashed the full force of CEQA delays and lawsuits even on fully compliant housing in “infill” neighborhoods. [Friends of Westwood, Inc. v. City of Los Angeles \(1987\) :: California Court of Appeal Decisions :: California Case Law :: California Law :: US Law :: Justia](#) By 2008, housing had become the most frequent target of CEQA lawsuits – and the tool of choice for both those seeking to block housing and those seeking financial and other payoffs for threatening CEQA lawsuits. In one study of all anti-housing CEQA lawsuits in the Los Angeles region, for example, 14,000 housing units were targeted in CEQA lawsuits – 99% of which were located in existing urbanized areas (not “greenfields), 70% of which were located within ½ mile of transit, and 78% of which were located in the region’s whiter, wealthier, and environmentally healthier communities. [In the Name of the Environment Update: CEQA Litigation Update for SCAG Region \(2013-2015\) | Insights | Holland & Knight \(hklaw.com\)](#) Instead of facilitating housing near jobs and transit, CEQA had been distorted into this generation’s anti-housing, anti-“those people” (us) redlining tool of choice.

***Civil Rights Compliant Solution to Anti-Housing CEQA Abuse.*** *Under the Housing Accountability Act, cities and counties no longer have the discretion to disallow housing, require fewer units, or impose fees and exactions that make housing projects infeasible. Local control determines the allowable location and density of housing, but these cannot be “paper housing” that is never actually approved (or approved with feasible conditions). Only housing that causes a demonstrable and specific significant adverse consequence to human health or safety can be downsized, delayed, or conditioned with costly obligations.*

[Housing Accountability Act Technical Assistance Advisory](#) Housing Element implementation procedures should expressly acknowledge this state law as a prohibition on the local agency’s exercise of its discretion on any issue other than a demonstrable and specific adverse health or safety risk caused by the proposed housing project, and eliminate or limit subsequent CEQA review under conforming zoning requirements to prescribed objective health and safety standards specifically caused by the proposed housing project. As determined recently by the California Supreme Court, local government may still preserve exterior architecture and design review processes that do not create discretionary authority to add new conditions addressing CEQA topics. [McCorkle Eastside Neighborhood Group v. City of St. Helena :: 2019 :: California Courts of Appeal Decisions :: California Case Law :: California Law :: US Law :: Justia](#). Local General Plan and zoning codes following this recommendation avoid mandatory CEQA processing and litigation risks, and are a mandate – especially in the whiter, wealthier and healthier communities such as most of Marin County that have elevated their “no growth” environmentalism into open and flagrant racist conduct such as intentionally segregating its public schools by race. [First desegregation order in 50 years hits Marin schools - Los Angeles Times \(latimes.com\)](#)

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3. **Avoid Exacerbating Racial Segregation with Special Interest Demands that Retard Housing Production and Increase Housing Costs.** Increased production of housing that is affordable that working families can purchase has been repeatedly blocked by many California’s environmental organizations and their state agency allies. We and our families experience, and agree we should reduce, pollution – and we too enjoy and want to protect California’s spectacular natural resources. We also support California’s climate leadership, but do not agree that our working families and poor should be collateral damage in the state’s war on climate. Much as California led the nation in past decades in the involuntarily sterilization aimed primarily at women of color in the name of discredited “science,” and unleashed civic “redevelopment” schemes that wiped out once-thriving (and now forgotten) Black and Latino communities in the name of discredited economic theories, we now face demands that new housing consist of small rental apartments located near non-operating bus stops with rental rates of more than \$4000 per month to reduce “Vehicle Miles Travelled” (VMT). California leads the nation in buying, supporting, and ultimately mandating electric vehicles – but VMT housing policy is redlining, pure and simple.

The Southern California Association of Governments (SCAG), which includes 197 cities and 6 counties where collectively the majority of Californians live, was on the verge in 2020 of adopting a VMT-centric regional housing plan that prioritized agency-decreed VMT reductions above all other laws, including federal and state anti-discrimination and housing laws. Under this plan, which conflicted with and undermined almost all city and county General Plans by assuming the massive demolition of existing residential and commercial neighborhoods and replacement with high density apartment housing near planned bus routes, historical and existing residential racial discrimination was intentionally worsened. Figure 2, for example, shows where new housing in Long Beach should be located – noted with green dots in polygons called “Traffic Analysis Zones” (TAZ), which includes many of the most densely-populated, poorest neighborhoods in Long Beach – communities of color highly vulnerable to displacement and gentrification. The TAZ maps showing “red” dots or squares are dominated by single family residences, where even “infill” housing such as townhomes on former strip malls is excluded from SCAG’s VMT-reduction housing plan. The “no new housing” neighborhoods are far whiter, and far wealthier, than the neighborhoods slated to receive many thousands of new housing units in a haunting repeat of the “slum clearance” schemes that wiped out minority neighborhoods in years past.

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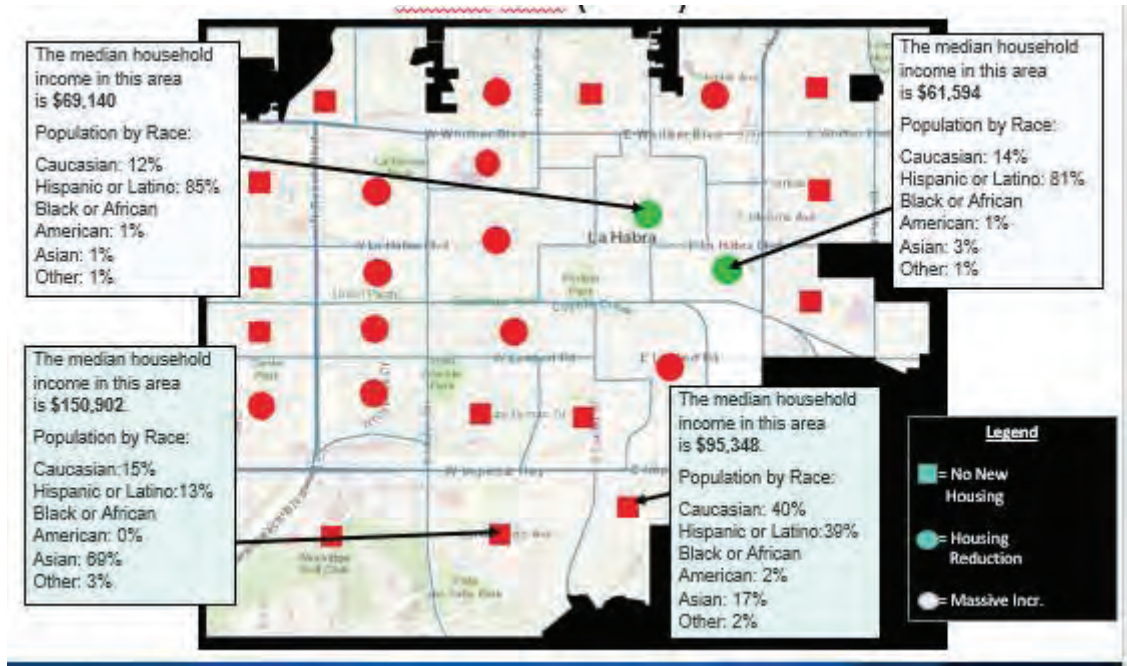
**Figure 2: Long Beach VMT Reduction Housing Plan (SCAG 2020)**



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When applied to smaller communities, such as the small town of La Habra in Orange County, SCAG’s VMT-reducing housing scheme was even more blatantly racist. As shown in Figure 3, SCAG decreed that housing belonged in the city’s two poorest TAZ zone neighborhoods – majority Latino – and excluded from the adjacent “nice” homes in nearby hills occupied primarily by Whites and Asians.

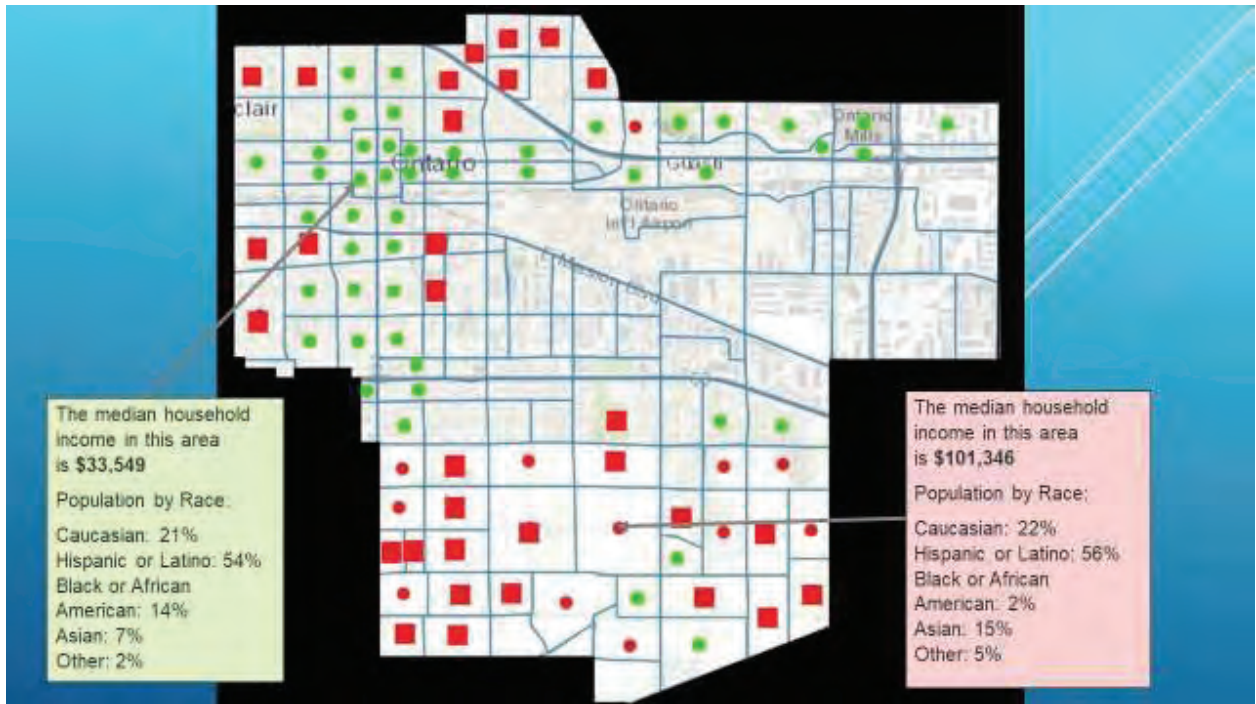
**Figure 3: La Habra VMT Reduction Housing Plan (SCAG 2020)**



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SCAG’s VMT-based housing plan would also have created new obstacles under CEQA even to the buildout of approved housing. Figure 4 shows Ontario, with new housing planned along a heavily-commercial freeway corridor (Interstate-10) that also has an express bus route, and along another bus route through existing poorer parts of the city that are also near a bus route. (The bus was not operating in 2020, during COVID, and had consistently low ridership even pre-COVID.) The SCAG VMT-based housing plan wanted no more housing built in southern Ontario, which is actually the best selling new community in all of California – with an affordable price for new homes, and a majority Latino and other minority new home purchasers.

**Figure 4: Ontario VMT Reduction Housing Plan (SCAG 2020)**



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To its credit, when SCAG realized the redlining consequences of its VMT-reduction housing plan, it disavowed the plan and forbade its use in any context (including RHNA and CEQA) in a Regional Council approval Resolution that recognized the “conflict” between California’s housing and climate goals. We can achieve climate goals without worsening racial segregation, demolishing disadvantaged communities (again), and ending attainable homeownership even within existing cities for the majority-minority families that have been shut out of the California homeownership market by catastrophic planning and policy decisions (many brought to us by the same advocates and bureaucrats who invented reducing VMT for electric cars as a “necessary” climate mandate) over the past two decades. In fact, the California Legislature has repeatedly declined to mandate reductions in VMT – and has repeatedly found that the housing crisis harms both existing California residents and exacerbates climate change by driving Californians to worse climate states like Texas to find a house they can afford to buy.

Although the VMT data is most accessible in the SCAG region of Southern California, it is critical that your agency recognize that this same discriminatory outcome occurs everywhere. In Figure 5, for example, we compare Oakland’s historic “redlining” maps where federal bureaucrats refused to approve low cost loans in Black neighborhoods and other communities of color (colored red) with the majority white communities where low cost mortgages were available (colored green and yellow). Oakland’s “low VMT” map (where housing is demanded by today’s special interests based on claimed climate “science”) is the redlined area of Oakland that has already lost much of its historic Black residents, businesses, and civic institutions – the remainder of which would be

wiped out by high density, transit-oriented housing near BART and bus lines. Oakland’s “high VMT” map, where housing should not be built, is those lush, wealthy, white, and historically segregated hills.

**Figure 5: Oakland Redlining and VMT Map Comparison**



Both the future of work, and the future of transportation, are in flux. Even before COVID, however, more people were working from home in the SCAG region than riding fixed-route public transit – with bus ridership suffering the most substantial declines. Fixed-route transit ridership plunged during COVID, and has not recovered. VMT has increased over the past month with the re-opening of the state, although peak hour volumes (and trip durations) have diminished. From remote work, to the explosion of new electric technologies for short-distance localized trips, to the massive expansion of app-based rides and carpools, it’s important to know what we don’t know – which is the future – and what we do know, which as UCLA’s transportation experts repeatedly confirmed, is that low income workers rely on low cost used personal vehicles instead of the bus: people can perform multiple trips (drop kids off at school before, carpool kids to soccer after school), and can reliably access more than twice as many jobs in less than half as much time. <https://www.its.ucla.edu/publication/transit-blues-in-the-golden-state-analyzing-recent-california-ridership-trends/>

There are two other inconvenient truth about this VMT-based housing policy civil rights violation.

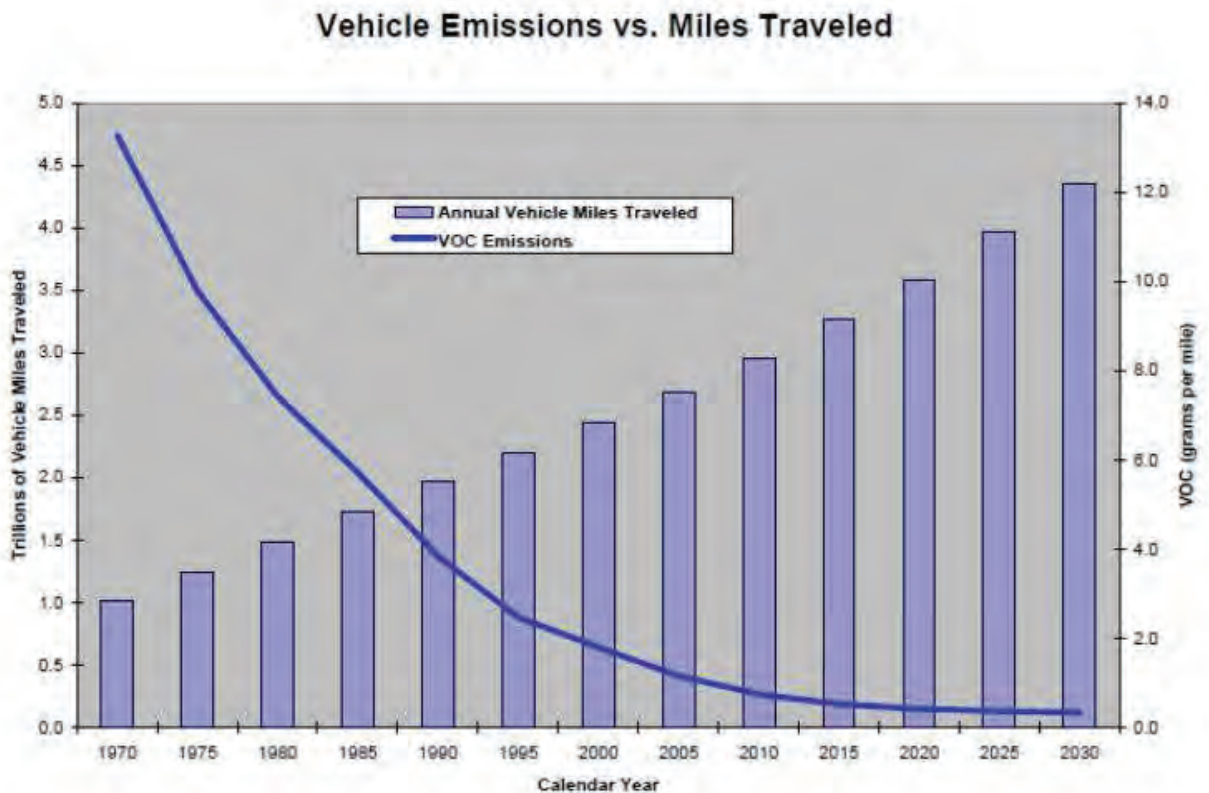
First, there are no proven, or effective, ways of “mitigating” VMT to “below the level of significance” demanded by the state’s CEQA lead agency, the Office of Planning & Research (OPR), for unsubsidized housing bigger than about 10 units that is located in a suburban scale existing community not served by high frequency transit. Using the methodology demanded by OPR, San Diego County calculated that the majority of the housing they have approved over the past decade – which helped meet their RHNA housing goals, and had been approved by state climate agencies – would have had significant unmitigated VMT impacts. Again using OPR-endorsed “mitigation” methodologies, for which there is insufficient evidence of effectiveness, San Diego County determined that VMT mitigation fees alone would add \$50,000 - \$690,000 *per housing unit*. San Diego County further acknowledged that it could not meet its RHNA

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obligation if this VMT scheme was enforced as proposed by OPR.  
<https://bosagenda.sandiegocounty.gov/cob/cosd/cob/doc?id=0901127e80d032bb>

Second, although the purported purpose of this VMT policy is to reduce greenhouse gases, there are many – many – alternatives to imposing a massive car tax on new housing that are more effective at reducing GHG without engaging in racially discriminatory housing policies. When smog was first identified as a problem in Los Angeles during World War II, initially scientists speculated it was a poison gas attack by the Japanese – only to later learn that smog was domestically produced by our own activities. When the Clean Air Act was passed in 1972, the same no growth special interests initially demanded that that cars and other smog sources be banned, but as shown in Figure 6 we instead banned lead in gas, and used catalytic converters and now clean engine/fuel mandates to cut vehicular emissions by more than 98% while VMT – cars driven by actual people to actual jobs etc. – rose steadily alongside population and employment, as reported by President Obama in 2016:

**Figure 6: Reduction in Tailpipe Emissions from Vehicles (line) v. Increase in Vehicle Miles Travelled from Population/Job Growth (bar columns)**



***Civil Rights Solution to Special Interest Exclusionary Housing VMT Scheme: Comply with Civil Rights Housing Laws including Affirmatively Furthering Fair Housing.***  
*The current housing emergency, which disproportionately harms our communities, is not the appropriate forum to “experiment” with a housing density scheme dependent on fixed-route bus ridership and high density, high cost rental housing. Housing locations,*

*densities, and typologies need to match the needs of our communities, including respecting – not just paying lip service – to racial equity and housing civil rights laws we helped enact to create equitable access to the American Dream of homeownership. We have sued the state agencies responsible for this VMT scheme, and the state has been unsuccessful in dismissing our civil rights claims – while engaging in years-long stall tactics like forcing us to file a Public Records Act lawsuit for VMT documents they attempted to hide (a lawsuit we won). VMT is simply a measure of the transportation options – even of 100% clean vehicles – available in a community. It must now be studied under CEQA (at least until our lawsuit is resolved), but it should not distort your Housing Update to worsen residential racial segregation, shield majority-white wealthy neighborhoods from housing in violation of the AFFH laws, and again wipe out our communities in unfunded displacement schemes.*

4. **Paper Zoning for Economically Infeasible Housing is Illegal and Racist.** Partly in response to no growth anti-homeownership schemes like VMT, and partly because existing laws requiring that housing meet the actual needs of actual Californians alive today have become as routinely ignored by academics and bureaucrats as civil rights laws, some cities may be tempted to “solve” for RHNA allocations by assuming that mid-rise and high rise apartments costing in excess of \$4000 in monthly rent for even for one-bedroom units are lawful housing compliance pathways under RHNA. In fact, because that rental rate – and other real life obstacles to lower cost condo development – are entirely unaffordable to median income households, a Housing Element update that assume high cost higher density product types that cost more than 2.5 times more to build than single family homes, duplexes and townhomes as even admitted by an overly-optimistic UCB study that demanded an “all-infill” higher density housing future for California is a violation of housing civil rights law. (<https://www.next10.org/publications/right-housing> ) The same study also acknowledged that to accommodate what has only grown to ever more severe housing unit shortfalls, “tens or even hundreds of thousands of single family homes” would need to be demolished to make way for the new high density units. We have seen these academic conclusions before, and we have seen the horrendous outcome of targeting the least expensive – aka neighborhoods housing people of color – and thus least costly/most profitable housing demolition/expensive new housing scheme. What is astounding is how often, whether in the name of openly racist segregation goals, or veiled “public harmony” goals, or “urban revitalization” double-speak, and now special interest NIMBY environmentalism, overwhelmingly white academics, bureaucrats, and hired gun consultant “experts,” keep finding new ways to destroy our communities and deprive our people of the right to achieve the American Dream of homeownership.

These same “experts” have now inserted yet another poison pill into state housing law, which is that when property designated in a General Plan for housing includes economically infeasible higher densities – which in most communities includes even mid-rise six story structures over podium parking – is approved for lower density economically feasible housing types like townhomes, local governments must transfer the unbuilt infeasible units to a different property that must accept even higher densities than included in the General Plan Housing Element update. Because the impacts of that receiving site’s additional spillover housing itself triggers CEQA, an applicant for an economically feasible housing project must also assume the cost, schedule, and litigation burdens of CEQA compliance for whatever unrelated receiving housing site is designated by the city – at an unknown point in the process – to add more density than

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allowed in the General Plan Housing Element. Housing Elements that assume non-existent conditions (e.g., repeal of Proposition 13, end of capitalism, vast new tax revenues dedicated to missing middle housing to fund the millions of additional housing units, etc.) are illegal, as are Housing Elements that prescribe economically infeasible higher density housing and fail to plan for the vast majority of “missing middle” and “affordable” housing required by RHNA, are illegal. The San Francisco Bay Area has led the state in assuming that \$4000 per month high rise apartments will be financially feasible in suburbs where median incomes can pay \$1500 for housing – or \$2000 per month for a mortgage. This “paper zoning” of high rise transit-oriented neighborhoods at every bus stop has resulted in a massive out-migration of higher paid Bay Area workers to Stockton and the Central Valley, Salinas and the South Bay, and Sacramento and beyond – which in turn results in unattainable housing prices for those with local jobs in those areas. This paper zoning academic fiction, pursued for more than two decades by some “woke” Bay Area “experts” alongside “urban limit lines” and “ecosystem service taxes” paid by urban residents to non-profit “stewards” of natural lands, is the modern day form of Jim Crow strategies to deprive the hard working families in our communities access to attainable homeownership.

***Civil Rights Solution to Paper Zoning for Infeasible Housing.*** *Just don't do it. Townhomes, stacked flats, quadplexes, garden clusters, and small lot homes are just some of the many examples of lower cost housing that once dominated the “starter” housing market before academics, planners, and special interest no-growthers decided they could intentionally create a housing crisis and nobody would notice because the people most harmed don't earn enough to donate to political campaigns. Housing densities, and locations, need to be designed for the people who need housing. “Move-up” housing for higher income families forced to rent or spend four times more for a home than they would spend in a neighboring state is also needed. General Plan Housing Element updates should include in the disadvantaged community/environmental justice analysis housing affordability criteria to designate housing typologies, densities, and locations, as well as expedited approval processes, to make new housing needed to meet RHNA targets “affordable by design” so that median income families without taxpayer subsidies or winning lottery tickets can buy a home. As recognized by the Legislature itself, solving the housing crisis will help achieve California's climate targets by keeping our families here, in new housing that is hugely more energy efficient, and climate friendly, than existing housing or housing built in our competitor states like Texas, Arizona and Nevada. The more new housing (and people) your agency plans for, the lower your per capita greenhouse gas emissions – a feasible, just, and civil rights compliant outcome that will actually help achieve California (and global) climate goals.*

When longtime civil rights champion Amos Brown was recently asked whether “the Bay Area is a safe haven for Black people and other people of color” he was unambiguous: “No. . . Since 1970, we have lost Black people who were pushed out of this city. The 70's Black population was between 15-16%. Well now it's down to about 4%. That didn't happen by accident and it wasn't just economics. This happened because of public policy.”

<https://www.sfchronicle.com/lift-every-voice/article/Amos-Brown-16219697.php>

Beyond the COVID pandemic, 2020 brought us yet another year of race riots and yet another round of rhetoric about the need to “address” the new race avoidance buzzwords of

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diversity and inclusion. The time for rhetoric around housing justice should have ended before it started, and we thought for sure was made illegal with the 1960s civil rights laws. We were wrong: as Mr. Brown reports, “public policy” keeps shoving our communities out of neighborhoods that become desirable to white families. Stop it. Just stop it. Comply with civil rights laws, comply with RHNA, and plan for housing that can be purchased by median income households – not just for low income and homeless families, and not just for the wealthy. Housing experts like to call us the “missing middle” – we aren’t missing at all. We just aren’t being seen by housing “experts” and bureaucrats and special interests who get paid by the wealthy to advocate full-time while members of our communities hold down the essential jobs that make communities work. In fact, some sneeringly dismiss us entirely by concluding the “ship has sailed” on homeownership – and yep, communities of color weren’t allowed on the ship, and then got tossed off it with predatory foreclosures, but that’s just too bad we should wait for our lottery ticket to come in and move back into the projects if or when they are ever built.

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cont.

**Systemic discrimination doesn’t happen by accident – it happens because of bad policy**

Come to your senses. Plan housing for people. Welcome us to your communities, not just to work but to live. Let’s restore our common love for California and build those diverse and inclusive communities your agency, and its advisors and consultants, have been talking about since our country’s racial reckoning last year. Do the right thing, and adopt the right Housing Element and Zoning Code updates.

4

Please contact me at [robert@thetwohundred.org](mailto:robert@thetwohundred.org) if you’d like to discuss any of this further. We can sue – and we have and will continue to sue to enforce civil rights housing laws – but doing right is by far the cheaper, faster, easier, and just pathway to doing your share to solve the housing crisis.

We look forward to hearing back from you at your earliest convenience.

Respectfully,



Robert Apodaca  
Vice-Chair and Director of Public Policy  
The Two Hundred  
[www.thetwohundred.org](http://www.thetwohundred.org)



Housing Element <housingelement@lacity.org>

**Regarding City of LA Rezoning Program (CF: 20-1042) - Letter from ACT-LA**

Laura Raymond <lraymond@allianceforcommunitytransit.org>

Thu, Aug 19, 2021 at 1:25 PM

To: vince.bertoni@lacity.org, Matthew Glesne <matthew.glesne@lacity.org>, Housing Element <housingelement@lacity.org>, ann.sewill@lacity.org

Cc: "Alfonso Directo Jr." <adirecto@allianceforcommunitytransit.org>

Dear Vince, Matt, Ann and the Housing Element team,

Good afternoon, I hope this finds you well.

We continue to appreciate the opportunity to engage in the Housing Element update and will be sending further comments on the full draft Housing Element in the coming weeks.

Given City Council's action this week on the Rezoning Program, our coalition is submitting the attached letter first, with initial recommendations regarding this Program. We hope to further engage as this Program is developed.

Best,

Laura

--

**Laura Raymond** (she/her)

Director | Alliance for Community Transit - Los Angeles

cell: (646) 344-0381

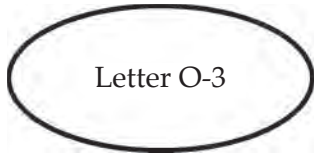
website: [www.allianceforcommunitytransit.org](http://www.allianceforcommunitytransit.org)

 **ACT-LA Letter on LA City's Rezoning Program - 2021-0819.pdf**  
168K



August 19, 2021

Vince Bertoni, Director  
Los Angeles City Planning  
200 North Spring Street  
Los Angeles, CA 90012



**RE: Rezoning Program in the draft Housing Element (CF: 20-1042)**

Dear Director Bertoni,

The Alliance for Community Transit - Los Angeles (ACT-LA) is a county-wide coalition of 41 organizations working on the forefront of racial, environmental, and economic justice. Our coalition members include tenants' rights organizations, affordable housing developers, workers' centers, public interest law firms, and public health advocates, among many others. Thanks to our coalition's diversity, we view housing policy through an intersectional lens. Our mission is to uplift communities—through affordable housing opportunities, good jobs and access to high quality public transit—as the Southland transforms into a more sustainable region. Given our commitment to equity, we believe that low-income communities and communities of color must be centered in decisions that seek to transform our neighborhoods.

1

Communities that we represent have borne the heaviest toll from generations of failed land use policy and environmental injustice, including redlining and exclusionary zoning. We feel housing justice for our communities means that your department should engage with our communities in a way that centers their concerns with the draft Housing Element and the Rezoning Program as these new policies and programs are revised, finalized, and implemented. In addition, the Rezoning Program should also materially benefit our communities by resulting in more and better housing opportunities from our community's point of view.

We appreciate [Council President Martinez's letter \(dated August 13, 2021\)](#), which was co-authored with six of her Councilmember colleagues and issued to your department, detailing their commitment to equitable distribution of housing throughout LA. We appreciate that many of our coalition's recommendations were included in the Council President's letter, but we write to emphasize the ongoing need to tie on-site affordable housing requirements to rezoning. This fundamental approach would help our city meet the scale of affordable housing needed at this moment in our city's history. Our coalition's top three recommendations to the Rezoning Program are as follows.

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1. Design the Housing Element's Rezoning Program to include on-site affordable housing requirements that exceed TOC program standards on every site that is rezoned, and include displacement avoidance and protection measures such as excluding tenant-occupied sites from rezoning. The Rezoning Program should require progressive



tiers of affordability for increasingly higher density development. The Rezoning Program should be limited to high and highest opportunity areas of Los Angeles. The City should simultaneously invest public dollars in community-led planning, affordable housing opportunities and housing stability programs, and other community-serving, health-promoting strategies to protect and uplift residents living in historically disinvested areas and areas that are susceptible to gentrification.

2. Expand the City's affordable housing incentive programs to create mixed-income and 100% affordable housing in communities in the California Tax Credit Allocation Committee (TCAC) high and highest opportunity areas, while subtracting census tracts that have a displacement risk.
3. Enforce the Measure JJJ requirement that community plan updates do not reduce the capacity for creation and preservation of affordable housing or undermine California Government Code Section 65915 or any other affordable housing incentive program by requiring that all increases in allowable density and FAR be aligned with on-site affordable housing standards that meet or exceed TOC. The Community Housing Needs Assessment Process should be based upon citywide housing production goals and utilize a methodology that balances traditional factors such as job and transit access with a new prioritization for high opportunity areas, anti-displacement, healthy and affordable housing, and achieving housing opportunities at the deepest affordability levels.

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cont.

We appreciate your consideration and are looking forward to ongoing engagement with your department as our city's Rezoning Program and Housing Element is finalized and implemented.

Sincerely,

The ACT-LA Coalition

CC:

Ann Sewill, General Manager, HCIDLA

Housing Element Team Email: [HousingElement@lacity.org](mailto:HousingElement@lacity.org)

Matt Glesne, Senior City Planner, LA City Planning



Housing Element <housingelement@lacity.org>

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## 2021 - 2029 Housing Element Update

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**President of RVNC** <rampartvillage@gmail.com>

Fri, Aug 20, 2021 at 2:26 PM

To: Vince Bertoni <vince.bertoni@lacity.org>

Cc: housingelement@lacity.org, craig.bullock@lacity.org, Ronald Reece <roneereecervnc@gmail.com>, David Rockello <rockello@gmail.com>

Vincent P. Bertoni, AICP, Director  
Los Angeles Department of City Planning

Dear Mr. Bertoni:

Please find attached for your consideration the Rampart Village Neighborhood Council's comments on the 2021 - 2029 Housing Element Update.

Thank you.

*Diversity Is Our Strength!*

*Philip Armstrong, President*

*Rampart Village Neighborhood Council*

*155 N. Occidental Blvd. Suite 236*

*Los Angeles, CA 90026*

*(o) 213.568.3086*

*(c) 213.275.9322*

*[www.RVNC.org](http://www.RVNC.org)*

*f: [realRVNC](#)*

- Immediate life threatening police, fire or medical emergency: **9-1-1**
- Parking enforcement (blocked driveway, parking violation, locate impounded vehicle): **213-485-4184**
- Police non-emergency: **877-ASK-LAPD (877-275-5273)**
- Sanitation (missed trash pick-up, broken container): **800-773-2489**
- Traffic control (signal light out): **213-485-4184**
- Dept. of Water & Power: **800-342-5397**
- Other City issues: **3-1-1**



**8.17.2021RVNCComments.pdf**

744K



Housing Element <housingelement@lacity.org>

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## 2021 - 2029 Housing Element Update

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Housing Element <housingelement@lacity.org>

Fri, Aug 20, 2021 at 3:18 PM

To: President of RVNC <rampartvillage@gmail.com>

Thank you for sharing your thoughts on the draft plan. Your comments will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.



LOS ANGELES  
CITY PLANNING

**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750

Los Angeles, CA. 90012

[Planning4LA.org](http://Planning4LA.org)

T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

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## Comments on 2021 - 2029 Housing Element Update

Philip Armstrong, President | Ronee Reece, Vice President  
Lara Morrison, Treasurer | Rachel Day, Secretary  
Raquel Valencia, At-Large Rep | Quazi Huda, Community Interest Rep  
Vacant, Community Based Org Rep | Rick Shumacher, Business Rep  
Charlie Cea, Student Youth Rep



Date: August 17, 2021  
To: Vincent P. Bertoni, AICP, Director  
Los Angeles Department of City Planning  
From: Rampart Village Neighborhood Council  
Subject: 2021 - 2029 Housing Element Update

The Rampart Village Neighborhood Council (RVNC), at its duly noticed General Board meeting on August 17, 2021, considered on its agenda, Item VII(I):

- Propose changing the draft 2021 – 2029 Housing Element Update to incorporate the goal of 100 percent retention of affordable housing units showing as expiring.
- In Chapter 6 of the draft Housing Element, consider proposal to revise Policy 4, Shared Equity Models for Goal 2 and 4, on page 6-16, so that instead of “study barriers to the greater utilization of shared ownership models,” the objective would be to “implement the greater utilization of shared ownership models” since ample evidence is available to support the use of shared ownership models.

In considering these proposals, the RVNC relied on the following information:

- The Housing Element Update is the vehicle for the City to set targets over an 8-year period for construction of new housing, including affordable housing (for very low income, low income, and moderate income levels) and market rate or “above moderate income level” housing as well as to document the preservation of existing affordable housing.
- In the prior 8-year period (2013 - 2021), as of the 2020 Annual Element Progress Report, the City of Los Angeles achieved 34% of the RHNA (Regional Housing Needs Assessment) for very low income, 30% of the RHNA for low income, 6% of the RHNA for moderate income, and 298% of the RHNA for above moderate income (market rate) housing based on information provided in the 2020 Annual Element Progress Report.
- As for the next 8 years (2021 - 2029), the following information is provided on pages 20 and 21 of the Executive Summary of the Draft Housing Element: “While the RHNA allocation suggests that almost 260,000 units affordable to households earning less than 120% AMI will be needed, it is anticipated that approximately 51,000 affordable units may be constructed within the eight year RHNA period at this range (about 20% of the target). This is a reflection that total housing needs for lower and moderate income households greatly exceeds the ability to meet those needs with existing financial resources and incentive programs.”

- Between October 1, 2011 and September 30, 2021, there were 4,406 housing units located in 225 projects whose affordability restrictions expired or were terminated (“Units Expired in the Last 10 Years” on page 3 of Appendix 2.2). Table 2.2.2 in Appendix 2.2 of the draft Housing Element Update provides information on the cost to preserve at risk units. Table 2.2.1 in Appendix 2.2 puts the cost of acquisition and rehabilitation of existing affordable units at \$465,000 per unit compared to the cost of new construction at \$571,000 per unit.

On July 25, 2021, at a duly noticed meeting of the RVNC Public Safety, Housing & Transportation Committee, after consideration and having provided an opportunity for public comment, the Committee voted (3-0 with one absent) in favor of agendaizing to propose changing the draft 2021 – 2029 Housing Element Update to incorporate the goal of 100 percent retention of affordable housing units showing as expiring.

After consideration and having provided an opportunity for public comment, the RVNC General Board voted in favor of the motion (6-1 with one absent) to *support*:

- Incorporating the goal of 100 percent retention of affordable housing units showing as expiring; and
- Implementing the greater utilization of shared ownership models.

Please notify the RVNC of any future meetings and/or hearings on this item.

Sincerely,

Rampart Village Neighborhood Council

Cc: Housing Element Team (housingelement@lacity.org)  
Craig Bullock, CD13 Planning Director  
Los Angeles Neighborhood Council Coalition



Housing Element <housingelement@lacity.org>

letter from del rey homeowners association

2 messages

President DRRRA <president@delreyresidentsassn.org>  
To: HousingElement@lacity.org

Wed, Sep 1, 2021 at 10:31 AM

please confirm receipt of email.

--

Elizabeth Layne, President



**DRRA Housing\_Safety Comment Letter 08262021.pdf**  
1278K

Housing Element <housingelement@lacity.org>  
To: President DRRRA <president@delreyresidentsassn.org>

Wed, Sep 1, 2021 at 2:40 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]



EMAIL TO: [HousingElement@lacity.org](mailto:HousingElement@lacity.org)

USPS TO: Cally Hardy, City Planning Associate  
City of Los Angeles Department of City Planning  
200 North Spring Street, Room 75  
Los Angeles, CA 90012

8/26/2021

Re: ENV-2020-6762-EIR  
Draft Environmental Impact Report for the  
Updates to the Housing Element and the Safety Element

Dear Ms. Hardy:

The Del Rey Residents Association (DRRA) is a 501(c)(4) social welfare organization that represents the interests of the residents of Del Rey. Thank you for the opportunity to comment on the Housing and Safety Elements.

**BACKGROUND**

Del Rey has about 35,000 residents in an area of Los Angeles bounded by Lincoln Blvd., Washington Blvd., Culver City and Jefferson Blvd. It is transected by THREE creeks: Ballona Creek, Centinela Creek and the Sepulveda Channel.

The federal Army Corps of Engineers, the Los Angeles County Dept of Public Works and the City of Los Angeles all have different responsibilities for the creeks.

**SAFETY ELEMENT**

The Safety Element must address the evacuation problems we face during power failures or as a result of floods, fires or earthquakes.

Del Rey is in a flood plain.

In earlier years—long before modern development and density—LA experienced catastrophic floods. The year 1862 was the largest flood in recorded history for the area.<sup>1</sup>

In the 1938 flood, the Los Angeles River was flowing at about 99,000 cubic feet per second. Our Ballona Creek is a tributary. It is unlikely that the levees will withstand a major flood.

<sup>1</sup>

The Great Flood of 1862 was caused by a series of powerful storms that began over the Pacific Ocean. These storms were so strong because local temperatures were higher than normal—the winter of 1862 was unusually warm in California. ... The higher temperatures caused more ocean water to evaporate into the air. -- Regents University of California

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We wrote about our flood concerns in [our Ballona Comment letter](#) during the process of the State's proposed restoration of the Ballona Creek Wetlands.

The 2018 Local Hazard Mitigation Plan (LHMP) does not include a flood map (Figure 10-7 on page 10-14 is missing). It lists nineteen flood-related issues on page 10-40 (see attached). What is the current status of each of these flood-related issues? Have any of them been satisfactorily addressed? Does the City's Flood Map include Del Rey and the Ballona Wetlands?

Del Rey lies within a Tsunami Zone.

Because of the creeks (Centinela Creek enters Ballona Creek at the peninsula known as Bird Island) Del Rey has a number of cul-de-sac streets. As a result, there are few north-south or east-west traffic corridors. We are left to count on the 405 freeway to accommodate an evacuation. What safety plans are in place to accommodate such an evacuation, and how are they communicated to local residents?

Del Rey adjoins the gas storage fields and related facilities in the Ballona Wetlands.

Our gas storage concerns have been previously documented in [our Ballona Comment letter](#).

It has been six years since the Aliso Canyon gas incident. What is the plan for ensuring the safety of our community and preventing a similar incident? How will the community be kept informed during a disaster, and educated in advance? Which pages in the 2018 LHMP address the specific concerns related to gas storage in the Ballona Wetlands?

#### HOUSING ELEMENT

The housing element must face the reality that up-zoning and density building will not alleviate homelessness. It is a specious theory for many reasons, and one this group has written about many times.

We agree with funding permanent supportive housing and programs that keep people from falling into homelessness. We disagree that up-zoning/increased density is the way to accomplish this goal.

In the Housing Element and the Safety Element, please include the comments and concerns specified in our Comment Letter on the Community Plan dated September 14, 2020.

#### TIMING

The Housing Element Update is required to be adopted by October 15, 2021, and to remain in effect through October 2029; the draft EIR Inventory of Properties has yet to specify the parcels for rezoning.

This Housing update is being reviewed before the Planning Department has even completed its update of the Palms/Mar Vista/Del Rey Community Plan.

There remain many issues of unintended consequences that should be addressed in the Housing Element, including the effects of COVID-19 on housing needs,



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infrastructure adequacy, existing zoning and allotment of new units, traffic, parking, overcrowding, and general quality of life.

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#### CALCULATION OF REQUIRED HOUSING UNITS

The Housing Element should include an assessment of the number of units already allowed by the City's existing zoning. Rezoning a site does not mean it will be built; instead, it may encourage developers to wait for the next Housing Element when the State may allow projects with ever increasing height and density. The existing 'allowance' from prior re-zoning should be available to offset the 'shortfall' from prior years.

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Per the Initial Study, the current calculation of the required RHNA includes not only the current eight-year projection (as in prior cycles) but also 100% of the cumulative shortfall from prior years. This is the first Housing Element that this calculation is in effect; instead of putting 100% of the shortfall into this cycle, the shortfall should be spread over several cycles.

Please contact us if there are any questions about our comments. This process will have a critical and ongoing impact on our community.

Our Land Use committee drafted this letter, and it was approved by our Board at its meeting on Monday, August 30, 2021.

Regards,

Elizabeth Campos Layne  
President, Del Rey Residents Association

cc:

Representative Karen Bass  
Representative Ted Lieu [Lieu.staff@mail.house.gov](mailto:Lieu.staff@mail.house.gov)  
State Senator Ben Allen  
State Assemblymember Autumn Burke  
State Assemblymember Isaac Bryan  
County Supervisor Holly Mitchell [asargsyan@bos.lacounty.gov](mailto:asargsyan@bos.lacounty.gov)  
Councilmember Mike Bonin [councilmember.bonin@lacity.org](mailto:councilmember.bonin@lacity.org)  
Vishesh Anand [vishesh.anand@lacity.org](mailto:vishesh.anand@lacity.org)  
Del Rey Neighborhood Council [board@delreync.org](mailto:board@delreync.org)



Post Office Box 661450 – Los Angeles, CA 90066  
[www.delreyhome.org](http://www.delreyhome.org)

September 14, 2020

VIA E-MAIL and U.S.P.S.  
[planning.thewestside@lacity.org](mailto:planning.thewestside@lacity.org)

Westside Community Plans  
Los Angeles City Planning  
200 N. Spring St., Room 750  
Los Angeles, CA 90012

To the Westside Community Planning Group:

Thank you for this opportunity to comment on the Draft Land Use Concepts for the Mar Vista/Palms/Del Rey Westside Community Plan (Draft Concepts).

The Del Rey Residents Association (DRRA) is a 501(c)(4) social welfare organization that represents the interests of the residents of Del Rey. Our comments follow.

#### General Comments

1. Many aspects of these Draft Concepts were developed before the COVID-19 pandemic began. We believe that the pandemic will continue to impact people's willingness to live and work in enclosed spaces. The current Draft Concepts are based upon an underlying belief that increasing density in a community is a good thing that will result in lower housing prices. We disagree, and believe that the update of the Community Plan needs to be prepared with the following points in mind:
  - a. As more people work at home, there will be greater demand for housing that includes a yard or easy access to a park or recreation center that is not being used as a homeless shelter.

- b. If people are less willing to use public transit because it may expose them to infection, the idea of allowing higher densities near transit lines that operate every 15 minutes makes less sense.
  - c. Del Rey is only 2.45 square miles in size, and we do not want tall buildings to be built along all of our major streets (Lincoln Blvd., Washington Blvd., Sepulveda Blvd., Jefferson Blvd., Centinela Avenue, Inglewood Blvd). It will segment the community and make us feel as if we are being boxed-in.
  - d. Any planned density increases need to be planned in conjunction with the City's Infrastructure Plan (which is more than a decade out of date), the Housing Element (which is currently being updated), and the Regional Housing Needs Assessment (which calls for housing construction that could occur with no need for a change in our current zoning).
  - e. Pushing new, multi-family housing into already built-out neighborhoods near transit without (1) providing additional open space and recreational opportunities, (2) addressing climate issues such as heat islands created when buildings replace trees, and (3) ensuring sufficient infrastructure will exacerbate inequities in quality of life issues for new and existing residents. Additional residential densification in Del Rey must be very limited.
2. We agree that the Del Rey community needs to have housing that is accessible for low income residents, but we believe that using "density bonuses" for the construction of affordable units is the wrong way to achieve that goal. It has been our experience that developers take advantage of "density bonuses" to break through height and setback requirements without addressing the infrastructure needs that result from increased density (roads, parking, parks, libraries, utilities, etc.) The addition to a development of "affordable housing" units, through State mandates and incentives, must not result in building heights that would be overly tall for the existing community. This requires a reduction of the proposed height limits so that even with affordable housing, the final height and shape of each project will not be out of character for the neighborhood.
3. We also recognize that slums are created when all of the low income housing is built in one area. Del Rey is fortunate to have a number of 100% affordable complexes - Mar Vista Gardens, two complexes built by Thomas A. Safran and Associates, a PATH building, at least five buildings operated by Venice Community Housing Corporation - dispersed throughout the area. We also have numerous "community care facilities" and "co-living" projects that affect the community's infrastructure needs, but these pockets of residential density are not shown anywhere in the Draft Plan and need to be identified in that draft.

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4. In June 2011, the Planning Department participated in a “visioning session” concerning Del Rey’s “Area H” (between Ballona Creek and Jefferson Blvd.). The top responses to the Questionnaire at that time were as follows:
- a. What is your vision for your neighborhood? Greater sense of community/community identity; More “walkable”/pedestrian friendly.
  - b. What do you consider to be the biggest land use challenge(s) in your neighborhood? Playa Vista and associated density/traffic; traffic and congestion.
  - c. What do you consider the biggest strength(s) of your neighborhood? Neighborhood unity/sense of community; Proximity to LAX/beaches/freeways, etc.
  - d. Do you have any specific suggestions for improving your neighborhood? Increase “walkability.”
  - e. Please provide us with some specific examples of areas, projects, resources that you consider a real strength/asset in your community that you would like to see preserved, maintained or further improved. Ballona corridor/wetlands.
  - f. What city services...would you like to see provided and/or policies and programs promoted in your neighborhood that you think are currently missing? Develop parks/community gardens.

It is clear from these responses that “walkability” is important, and yet most of the new projects in Del Rey, particularly in the Glencoe-Maxella area, have been designed to be inward-facing, providing almost no interface with the neighborhood and failing to foster a sense of community outside of each project.

5. The Community Plan also needs to acknowledge and accept the importance of “Location, Location, Location.” Del Rey is desirable because it is close to the ocean, and it is criss-crossed by three creeks -- Ballona Creek, Centinela Creek, the Sepulveda Channel. That desirability means that housing in Del Rey is going to be less affordable than in other communities, and Del Rey is never going to be the same as a community in the San Fernando Valley or the Inland Empire. The Community Plan should reflect Del Rey’s uniqueness.
6. The three creeks also create challenges when it comes to emergency preparedness. If Del Rey were to experience a major flood, earthquake, or manmade disaster, it would be difficult for Del Reyans to evacuate. The Community Plan and the Mobility Plan have been developed separately, but they need to be considered together. When the Community Plan allocates additional density to an area, it

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needs to consider how those residents are going to enter and leave the area, particularly in an emergency.

7. The key to any Community Plan is that it will be enacted as a City ordinance, and it must be enforceable. The amount of discretion granted to the Planning Department must be tightly circumscribed so there is no perception that developers can obtain variances if they are willing to pay the right price.

### Concept Plan Elements

1. Marina Marketplace:

The Concept Plan sanctions a project (Paseo Marina; Case No. ENV-2016-3343-EIR) that potentially allows development of a project that has been overwhelmingly rejected by the community due to its height, residential density, reduced commercial space, lack of automobile parking, and lack of open space.

It is already difficult for Del Reyans to cross Lincoln Blvd. to access the amenities in Marina del Rey, and the proposed Paseo Marina project would make it even more difficult for residents to move back and forth between Marina del Rey and Del Rey.

The community is adamant about retaining Marina Marketplace primarily as a neighborhood-friendly retail commercial center with added open space that provides pathways for the public throughout and integrates the project with the neighborhood. To retain the local character, the height must be limited to no higher than that of currently existing adjacent properties, not including the Stella apartment building. The Stella development was granted a 'Zone change' to exceed the allowable height by at least 20 feet. It also includes a Q condition that restricts any further development on the remaining portion of that parcel. This exception to the pre-existing height limit must not be used to justify any future height limits. We also request that the Q condition be integrated into the Community Plan. The Concept Plan picture shows a project that would cut off the project from the neighborhood. The DRRA asks that the Marina Marketplace redevelopment be required to provide at least as much ground level local retail commercial space as currently exists and require public pathways and open space.

2. New Low and Medium Residential:

Several neighborhoods in Del Rey are proposed for Low or Medium Residential designation, allowing for duplexes, triplexes, fourplexes, courtyard apartments, bungalow courts, townhomes and even large scale multi-family buildings. The proposed neighborhoods currently are predominantly single family residential. Most of the lot sizes are 5,000 sq.ft. or smaller and simply cannot support

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cont.

increased density. Moreover, because these lots are small, increasing building footprints will mean that trees will be removed. Studies show that a smaller tree canopy leads to higher temperatures, with known health and environmental risks. Allowing multiple units will encourage developers to acquire multiple lots and drastically change the character of these neighborhoods. New multi-unit buildings will dwarf the existing small, mostly single-story bungalow homes and will deprive them of light, air and open space. Moreover, these streets cannot accommodate more parking. A large number of residents already use garage space for storage or other non-car uses and park their cars on the street, or they drive work trucks or sport utility vehicles that do not fit into existing garage spaces. Further, the retail businesses and restaurants on Washington Blvd. and Centinela Avenue do not have sufficient parking, and the overflow goes to the very blocks that are proposed for Low Residential. Residents have already obtained restricted parking on many of these streets. Though these blocks are close to bus lines, the vast majority of residents have private cars. Increased density will exacerbate the problem.

3. Centinela and Inglewood Neighborhood Villages:

We support the establishment of neighborhood villages on Centinela Avenue and Inglewood Blvd. as depicted in the plan. We agree with the plan's goal of establishing maximum commercial tenant sizes to encourage small independent businesses, and prohibiting uses that do not support walkability. We object to allowing development with heights over 2 stories, however. We are seeking to transform Centinela Ave into the Heart of Del Rey via the Great Streets program. This area should reflect our unique identity and stand as a special place to be protected as a community resource. We would like to create design guidelines to guide development and preservation activities within the Centinela Ave and the Inglewood Blvd areas.

4. Traffic:

The impacts of private car transportation on the environment and housing needs are all very significant, valid concerns, but the burden cannot be placed on a few who happen to live within a block of a bus line. Many of the residents of the Low Residential blocks have lived in their homes for decades. Their small homes have a lower environmental footprint than large homes on large lots that consume more energy, water for lawns and pools and furniture to fill the rooms. The very small benefit of crowding more residences into these areas and hoping that some of the

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residents will use a bus for most of their transportation is far outweighed by the harm it will cause to the people living there.

In addition, plans for “transit-oriented development” fail to accommodate the residents who live within one-half mile of a street served by transit, but who cannot use public transit because the routes do not take them where they need to go, or they need to transport goods or people who are mobility-challenged and unable to use public transit.

5. Lincoln Boulevard:

Lincoln Boulevard north of the Ballona Wetlands should **not** be designated a Regional Center, and there should **not** be a Regional Center located in or adjacent to the protected wetlands. As a main north-south vehicle route through the westside and Santa Monica to LAX, Lincoln Boulevard is already beyond its vehicle capacity. Traffic congestion is a nightmare, particularly during the summer tourist season (before COVID-19). Soon, the redeveloped Cedars Sinai Hospital will begin to draw more patients and visitors. Redevelopment of large-scale residential projects in the Glencoe-Maxella Specific Plan area and Marina del Rey without traffic mitigation continue to exacerbate the dire traffic conditions. A Regional Center would make traveling along Lincoln Boulevard intolerable and should not be part of the Community Plan until a breakthrough traffic reduction system, such as a center lane light rail route, is in place.

6. Ballona Wetlands Ecological Buffer:

The DRRA agrees with the proposal to apply specific design standards and buffer zones for properties adjacent to the Ballona Creek Bike Path and the Ecological Reserve. We recognize the need for cyclists and pedestrians to connect from Sepulveda Blvd. along Centinela Avenue and Inglewood Blvd. to the Ballona Bike Path, and from the Ballona Bike Path north to UCLA and Santa Monica, perhaps along McLaughlin Avenue and Beethoven Avenue. However, we do not support expanded access to the ecological reserve itself. The reserve should be maintained as open space for non-human species with as little human activity as possible.

7. Mar Vista Gardens:

The DRRA supports preserving Mar Vista Gardens as legacy garden style apartments for low income housing. However, this property is not considered architecturally or historically significant nor a prime example of Planning for its period. Therefore, the preservation of the buildings as they are designed should

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cont.

not be required or even encouraged.

8. Open Space / Public Space:

Del Rey lacks a public meeting space. There are very few government/public or civic buildings, and those that exist (schools and LAPD Pacific Division) do not provide easy access for indoor community meetings or nighttime gatherings. Ideally, the City would acquire property (or use a portion of the LAPD lot) to develop a large public meeting space that is accessible directly from a public way, has adequate parking for meeting attendees and which enhances the neighborhood character and usability. Additionally, Marina Marketplace must incorporate such a space.

The entire length of the Culver Boulevard Bike Path should be called out in the Community Plan as important open space for the community.

Area C of the Ballona Wetlands and the Tule Wetlands should be zoned Open Space, not agricultural.

9. Hybrid Industrial Live/Work - Area H:

Area H was one of few light industrial areas on the Westside. Like the others, it has been slowly changing character, and now includes schools, residences, several medical facilities, office and storage buildings. Each non-industrial development begets more. It will not be long until there are no industrial businesses left if the area is designated Hybrid Industrial Live/Work. In addition, the multiple cul-de-sacs and Ballona Creek are barriers that must be considered when planning for this area. Further, building heights should be determined by the Floor-to-Area Ratios and not the heights of nearby buildings.

10. Del Rey Beethoven Island:

Del Rey Beethoven Island, known in the community as Bird Island, is a vital stopover for creek birds and supports the open vista corridor of the Ballona Creek environment. Because it is so small, any development is problematic, even with additional ecological design standards. This property should revert to its previous zoning as open space.

11. Hybrid Industrial (Jobs Emphasis) - Mesmer Triangle:

The DRRA supports retaining the Mesmer Triangle as an industrial hub but opposes heights ranging from 6-8 stories. The area of mostly one or two-story local businesses is unique on the westside of Los Angeles. The small-size, older

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cont.

buildings provide space for small, local businesses. Allowing mid-high rises will completely change the character of the area and likely push out these businesses. Densification in this area should be prohibited. Restoration and reuse of existing buildings should be required.

12. Neighborhood Villages:

The DRRA supports neighborhood villages and suggests that more be added to the plan in existing commercial and mixed-use locations; these must be subject to height limits as stated above.

Missing Information

1. The available draft does **not** include sufficient information on:
  - a. The expected impact of additional development on traffic and related parking.
  - b. Additional open space in the form of parks available to all residents (that is, not including 'open space' available only to residents of a particular development).
  - c. Projections for student population and school requirements.
  - d. Expected housing requirements for specific areas. The only information available was for the City of Los Angeles in its entirety.
  - e. For Development guidelines, the Concepts contain height information but not density/other limits.
  - f. Future changes in demand for particular types of housing and working locations as a result of COVID.
  - g. Projected needs for electricity and internet connectivity as we transition away from fossil fuels.
  
2. The draft does not provide a tactical plan to eliminate homelessness while maintaining the quality of life for the non-homeless residents.

Sincerely,

*Maureen Madison*

Maureen Madison, President  
Del Rey Residents Association

6  
cont.

Westside Community Planning Group  
DRRA Comments re Draft Concepts  
September 14, 2020

Cc via email:  
Diego Janacua  
Kinikia Gardner  
Mike Bonin  
Len Nguyen  
Vishesh Anand  
Del Rey Neighborhood Council Board



Housing Element <housingelement@lacity.org>

## Brentwood Community Council Public Impact Statement

2 messages

**Bisnoff Email** <bisnoff@gmail.com>

Mon, Sep 6, 2021 at 8:00 PM

To: Len Nguyen <len.nguyen@lacity.org>, cpc@lacity.org, Housing Element <housingelement@lacity.org>

Dear City Planning, Housing Element and CD11 Staff:

Please find the attached Housing Element public comment from the Brentwood Community Council regarding the City's Draft Housing Element and EIR for 2022-2029.

While we discuss in detail all related issues in the attached letter, the summary comments are as follows:

*The Housing Element Update, and the Draft EIR, need to be amended, in particular: (i) incorporate the 2020 census data, (ii) reflect the allocated upzoning locations, and (iii) address associated environmental impacts with this information reflected in each of the 35 separate Community Plan areas, with the public being offered the opportunity to make comment once there is information available that provides an accurate picture of the impacts of the Housing Element Update by each Community Plan area.*

*We further request that the City prioritize the implementation of surplus City property in facilitating the absorption of the additional housing inventory projected to be needed under RHNA prior to allocating additional housing units to private property. This use of surplus City property is particularly important in addressing the more affordable forms of housing, as the costs of real estate present its own challenge in developing affordable housing, while the City has the luxury of being able to assist in achieving affordability.*

Many thanks  
Michelle Bisnoff

*Michelle A. Bisnoff*

*Chair, BCC*

*Commissioner, City of Los Angeles Innovation and Performance Commission & Chair, Fund Committee*

*Board Member, Los Angeles County Animal Care Foundation*



**Housing Element Update Draft EIR Comment Letter-File Submitted Letter BCC Executed.pdf**

162K

**Housing Element** <housingelement@lacity.org>

Tue, Sep 7, 2021 at 3:41 PM

To: Bisnoff Email <bisnoff@gmail.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team



LOS ANGELES  
CITY PLANNING

**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750

Los Angeles, CA. 90012

Planning4LA.org

T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]



September 6, 2021

**VIA E-MAIL**

Letter O-6

housing.element@lacity.org.  
Attention: Cally Hardy, City Planning Associate

City Planning Commission  
[cpc@lacity.org](mailto:cpc@lacity.org)

[len.nguyen@lacity.org](mailto:len.nguyen@lacity.org)  
CD11 Planning

*RE: Comments to the Draft Housing Element 2021-2029 Update (“**Draft HE**”) and the Draft EIR prepared by City of Los Angeles Department of City Planning 200 North Spring Street, Room 750 Los Angeles, California 90012 prepared with the assistance of Rincon Consultants, Inc. 250 East 1st Street, Suite 1400 Los Angeles, California 90012 July 2021 (the “**Draft EIR**”)*

Members of the Housing Element and City Planning Staffs::

The Brentwood Community Council (“**BCC**”) is the broadest-based Brentwood community organization, representing approximately 36,000 stakeholders of the community, including homeowner associations, multi-family residential dwellers, business organizations, schools, religious groups, volunteer service groups, public safety, and environmental organizations. The BCC wishes to submit the following comments concerning the Draft EIR for the Draft HE and Safety Element Update, as well as the Draft HE and the Safety Element Updates. These comments are based upon a review by the BCC Land Use Committee (Committee), other interested members of the BCC and members of the Brentwood community at large.

1

*The Draft EIR is deficient as the Draft Housing Element Update is Missing Critical Data*

Without certain missing information sufficiently in advance of the deadline for comments, the process relating to the Housing Element Update is fatally flawed and adoption of the Update would be unlawful. The current draft Housing Element Update, as posted on the City of Los Angeles Department of Planning website, is still missing Appendix 4.7, the list of Candidate Sites for upzoning. The EIR is necessarily and fatally deficient in that it is unable to examine environmental impacts in response to the actual allocation of the 219,732 additional residential units among the various neighborhoods of Los Angeles. While in the abstract one can likely conclude that, within the City of Los Angeles, 219,732 additional residential units could be absorbed City-wide, it is an equally likely conclusion that all additional units could not be located in any one specific neighborhood, and answers will vary as additional units are assigned to specific areas. Accordingly, we object to the current Draft EIR and ask that the City ensure that the Draft EIR be revised once the allocation of the additional residential units is made.

2

In addition, both the draft Housing Element Update and the Draft EIR are missing 2020 census data information. The housing needs are based on projections missing critical data that would allow for a more accurate analysis as to projected needs. Population increase is assumed, while we saw a decrease in population and the loss of a Congressional seat. While the Draft EIR, working with artificially high numbers, may provide a conservative review of environmental impacts in the aggregate, the Draft Housing Element is providing for an housing increase, and related upzoning, that may be entirely unnecessary. Moreover, when we both don't have the information as to where upzoning will occur, we combine it with upzoning beyond what is required, and we have no control over what "upzoned" properties are actually developed, the Draft Housing Element may be creating a situation where one or another community ends up bearing an unreasonable share of increased density, with the Draft EIR not addressing the impacts of the upzoning by Community Plan, and the Draft EIR's mitigation measures only applying to those developments requiring discretionary approvals, which do not apply once a property is upzoned. At a minimum, the application of the Draft EIR mitigation measures need to apply not just where discretionary approvals are required, but need to apply on each parcel that is upzoned to accommodate the RHNA allocation, as, but for the upzoning, any project using the density afforded by upzoning would have previously been a project requiring discretionary approvals.

3

*The Housing Element Update should be adjusted to account for actual additional residential units needed.*

The Housing Element Update works off an assumed number of needed additional units as mandated by the State of California, and then unnecessarily increases that number. The Housing Element Update indicates that, to ensure that sufficient capacity exists in the Housing Element to accommodate the RHNA throughout the planning period, the draft plan sets a target capacity (or buffer) that is 10% higher than the RHNA for lower income units, and 15% higher than the RHNA for moderate income units. This results in a target capacity for the Adequate Sites Inventory and Rezoning Program of 486,379 units. Conversely, most local jurisdictions challenged the State's target numbers and worked to reduce their required zoning increase. For all the same reasons and concerns that the EIR is being prepared, because an increase in residential units of this magnitude will have environmental impacts, the City of Los Angeles should be working off the actual allocation of 456,643, rather than the 486,643. The analysis demonstrates that, during the 6th cycle, the City has an anticipated unit potential of 266,647 units. As a result, the Plan identifies a need for a Rezoning Program to accommodate 219,732 units. When reduced by the potential additional capacity already existing, the additional housing unit capacity to be created would only be 189,996.

4

As mentioned above, we believe the number of additional units that must be added to by way of upzoning is artificially high. In addition, we note that the Housing Element did not count any existing undeveloped site in a VHFHSZ as a potential site for any by-right development. [We do not necessarily oppose existing by-right development, particularly replacement of single family housing that was lost/damaged due to a fire, that complies with all necessary mitigation measures when developing in VHFHSZs. Counting such units in the mix may increase the amount of potentially available sites for housing, thereby reducing the number of units needed to be made available through upzoning.][Alternative: We note this approach because we believe there is a critical thought process

5

underlying the assumption.] What is absolutely critical is that no increased density be assigned to any parcels located in VHFHSZs as part of the Zoning program to accommodate the additional housing capacity)]. We believe that such a policy would be a natural extrapolation of the City’s approach to the Housing Element Update by not counting any existing vacant parcel of land in a VHFHSZ. The Housing Element Update should be modified to make clear that no upzoning will occur in VHFHSZs

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cont.

Regardless of the correct number, the timeline as laid out in the Executive Summary of the Housing Element Update indicates that: the “shortfall must be accommodated by a Rezoning Program, which must be adopted by October 2024.” As stated in the prior section, the EIR is wholly inadequate if it is analyzing an increase in zoning (and impact on an area) without having the actual upzoning data.

6

With respect to the Draft EIR Sections, we offer the following comments, concerns and observations:

Draft EIR Elements:

4.9 Land Use and Planning – As we had commented in our comments to the Initial Study (“IS”) outlining the scope of the EIR, we believe it is imperative that this section analyze the impacts of the Housing Element Update upon each of the City’s 35 separate Community Plan areas. However, the draft EIR analyzes the impact of the Housing Element Update only upon the General Plan itself, and concludes there are no significant impacts. City-wide, that is likely a rational conclusion; but the impact of the Housing Element Update will be based squarely upon where increased density is assigned in each separate Community Plan Area, which plan areas vary quite significantly from one another. Moreover, and as noted at the outset of this comment letter, the absence of the specific allocation of the additional housing units renders the Draft EIR and its conclusion meaningless.

7

In addition, the Draft EIR assumes that “the Rezoning Program would be subject to applicable City regulations, environmental review processes, and RCM.” (Draft EIR at 4.9-29). However, if the increased density is accomplished by way of upzoning specific parcels, no EIR will be required when those parcels are developed, as the increased density was awarded “by right” with the upzoning. This assumption in the Draft EIR needs to be clarified and explained if there is subsequent CEQA protection available to the community, or the statement needs to be stricken with the effect of upzoning specifically and objectively analyzed.

8

4.10 Noise – The Draft EIR does analyze the impact of construction noise resulting from development of projects that are authorized through the Housing Element Update, and offers mitigation measures for projects requiring discretionary approval (4.10-35). Again, this application of mitigation measures begs the question as to how this will be implemented when the increased zoning is assigned – once specific parcels are upzoned to allow for increased housing units, how will the mitigation measures apply, as it is found that there is an impact requiring mitigation, but the consequence of upzoning is that the project is “by right,” and not “discretionary.” The Draft EIR needs to address not just discretionary” projects, but all projects that result or benefit from the assignment of increased housing capacity.

9

The Draft EIR assumes that the increased housing density will be in areas with rich transportation offerings, and therefore there is no analysis of the noise impact related to increased traffic. However

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without the actual allocation of the housing units, and transportation rich areas being only one or several preferred areas for increased density, it is not reasonable to assume that noise resulting from increased traffic need not be analyzed.

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cont.

4.11. Population and Housing – The Draft EIR and the Housing Element Update are both admittedly working with inaccurate population data as they state that the 2020 census information is not yet available. However, it seems that such data is available, and the Draft EIR should be updated and re-circulated as a draft for public comment with such data. In that regard, this referenced section of the Draft EIR could objectively and thoroughly assess the issues by being updated with more relevant and specific data. That data, once obtained, needs to be further analyzed by each separate Community Plan area as previously noted in our comment letter to the IS. Further, the application of the Housing Element Update to each Community Plan area must be done so on a consistent basis for all Community Plan areas – the process must not proceed differently in different Communities merely because the City has chosen to update the Community Plans of certain areas prior to the Community Plans of other areas.

11

#### 4.12. Public Services –

Fire – Without the allocation of increased housing, and therefore potential development, within each Community Plan Area, and with the single most important aspect of delivery on fire protection is the proximity of the responding fire station to the fire in question, the Draft EIR is not able to provide meaningful analysis of the increased burden on existing fire safety measures or on sufficient mitigation measures in terms of needs of actual fire response units and locations. Further, the City’s adoption of the Housing Element Update and the Safety Element Update cannot proceed without the Reports called for by City Council’s adoption of the Motion in CF 20-1213 relating to the inter-relationship of evacuation routes and increased development.

12

Police – the Draft EIR concludes that, even with mitigation efforts, there will be significant adverse impacts on police protection. The Draft EIR then goes on to indicate that individual projects could have various safety measures required by Building and Safety, but actual mitigation measures are only offered for projects involving more than 10 acres or 300 units (these projects will be the exception, with the norm being small urban infill projects based on development opportunities). The Draft EIR needs to re-analyze the issue of police protection and offer mitigation measures on a per project basis, rather than assume that in issuing building permits, safety concerns will be taken into account and addressed in the permitting process. A listing of safety measures should be developed and offered as a mitigation measure.

13

Schools – The Draft EIR briefly analyzes the impact of construction of additional school facilities that may be required as a result of the increased density that will be created by construction of additional single and multi-family housing, and concludes that such school construction will not result in significant impacts. However, the Draft EIR does not address the differing impacts within our City of the ability of schools to handle increased enrollment, particularly by Community Plan area. Construction takes time, and may lag well behind enrollment demand. There is no analysis offered as to potential existing capacity, or room for growth within a campus. The EIR must analyze and disclose not only the impact of additional school construction, but also the impact on the education system if housing and population in

14

an area significantly precedes in time the likely construction of additional school facilities in a reasonable time.

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cont.

#### 4.13. Recreation

The Draft EIR's conclusion is that there will be significant and unavoidable impacts on the City's park system, with overuse and degradation of existing parks due to increased housing creating increased demand on an already overtaxed parks system. The City has previously altered and expanded the radius in which Quimby funds can be deployed, resulting in the potential for funds to be used at a great distance from where the increased density is occurring. The Draft EIR should consider, as a mitigating measure, whether decreasing the radius for the deployment of Quimby funds would be a helpful mitigation measure.

15

#### 4.14. Transportation –

The Draft EIR's analysis respecting the impact of the Housing Element Update on transportation relies upon the following:

“A large portion of the anticipated housing capacity is expected to be located within Transit Oriented Communities Areas, which are defined as the half-mile radius around a Major Transit Stop. Based on the estimated capacity of 266,647 units, and the total target capacity of 486,379 units, the Housing Element finds a need for a Rezoning Program for the creation of 220,000 additional units of capacity. The Rezoning Program, which would need to be completed by 2024, will likely be accomplished through updates to the City's Community Plans (Land Use Element), an update to the City's Density Bonus program, targeted zone changes, updates to specific plans and overlays, or other zoning ordinances. These programs would likely identify opportunities for rezoning or development incentives in areas that are located in a Transit Priority Area, near major job centers, neighborhood services and amenities, and particularly in higher resource areas shown in Figure 3-5 to provide the most equitable distribution of housing opportunities.” (Draft EIR at 4.14.-52).

16

The Housing Element Update needs to identify the precise locations for upzoning, and the Draft EIR updated, to react to and address the actual impacts based on the facts, rather than assuming the “likely” scenarios.

As elsewhere throughout the EIR, the mitigation measures are suggested (i) for addressing the temporary impacts of construction, which is helpful, but does not address the permanent impacts of increased construction, and (ii) for “discretionary” projects only, which misses the point that the Housing Element Update will upzone properties, making such projects be “by right,” and not subject to the mitigation measures, even though it is the project(s) creating the need for the mitigation measures.

17

The Draft EIR does not address transportation issues that would be exacerbated in communities with pre-existing intersections with “D” or “F” ratings, as for which no mitigation measures would be sufficient. The Draft EIR needs to identify those neighborhoods whose traffic conditions are already at

18

unacceptable levels of service and address how those neighborhoods are to accommodate increased density when they are not accommodating existing density. At a minimum, the EIR must analyze and disclose those intersections that would become “F” rated as a result of upzoning, particularly during peak traffic hours. For example, if much of the City’s roads and traffic intersections came to a gridlocked standstill as a result of increasing housing, the conclusion cannot be that the housing must be created – no matter what. There must be some point where the City becomes unlivable according to generally accepted standards.

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cont.

#### 4.16 Utilities and Service Systems -

The Draft EIR does not address the quality of the utility infrastructure system within the City of Los Angeles, or identify those areas within the City of Los Angeles where the infrastructure is not accommodating its existing usage and experiences regular lapses in service, whether from water main breaks or power outages. Nor does the Draft EIR study utility infrastructure by Community Plan area. These deficiencies must be corrected in the Draft EIR so that there is meaningful information to utilize in the determination of the locations for upzoning – or a plan on the part of the City to upgrade such utilities and service systems prior to any such upzoning.

19

#### 4.17. Wildfire –

We appreciate the Draft EIR recognized comments received with respect to the IS and addressed wildfire to the extent it did. We also note that the Draft EIR states that “Under the Housing Element Update, the Rezoning Program will prioritize areas near transit, jobs, and in High and Very High Resource Areas; however, no rezones within environmentally sensitive areas such as the SRA and VHFHSZs are proposed.” (Draft EIR4.17-36) We concur that it would be problematic to have any upzoning occur in VHFHS zones or in SRAs. We have not been able to identify the specific language in the Housing Element Update that ensures no rezones within SRAs or VHFHSZs will occur. If the statements are within the Housing Element update, then it is critical that this aspect of the Draft Housing Element remain the same, and that no upzoning is assigned to any property within the City of Los Angeles located in any of these areas. If the concept is not expressly articulated in the Housing Element Update, it should be. Should any increased density be assigned to a property in a VHFHS zone or in an SRA through the zoning program, then the Draft EIR would have to re-analyze wildfire in that context.

20

With respect to the Safety Element update, it mentions several fire safety hazards but applies no safety related restrictions to mitigate these hazards. Due to the lack of evacuation routes, additional density in fire zone areas with only 1 route of egress has been life threatening for many California communities. A responsible policy prohibiting further density in State designated VHFHSZ (fire zone) areas, including ADU's, should be enacted, excluding by right zoning. Due to the high fire potential of adding frequent traffic to State-designated VHFHSZ, non-residential development should be specifically prohibited in such fire zone areas unless it is by right zoning as of August 31, 2021.

21

We further note these issues:

- a. 50% of the land mass in Brentwood is located in a Very High Fire Hazard Severity Zone
- b. Brentwood is subject to recurrent wildfires

22

- c. Steep canyon and hillside areas in Brentwood make fighting fires dangerous and/or difficult from the ground and in winds over 40 miles per hour, inaccessible by fixed wing and rotary firefighting aircraft
- d. High above-ground power lines and narrow evacuation routes in Brentwood increase the dangers associated with wildfires
- e. In an area with significant levels of construction, the danger of construction-related fire is likely to increase, amplified by the increase of associated traffic that limits both the effectiveness of firefighting and the availability of evacuation routes
- f. Long Emergency Response Vehicle Times
- g. Densification of residential parcels only would increase the dangers listed above

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cont.

## 6. ALTERNATIVES

The Draft EIR did not, as one of its alternatives, discuss how preparing the Draft EIR by Community Plan Area would lead to different, and we believe, better informed results. The Draft EIR also did not address how the preparation of the Draft EIR would lead to different, and we believe, better informed results if the preparers had the actual upzoning information available to factor into their analysis.

23

In addition, we are concerned that neither the Draft EIR, nor the Draft Housing Element Update, address the sequence of the completion of the Housing Element in 2021 while the Draft EIR and Draft Housing Element both presently have missing materials and are necessarily deficient; the preparation and completion of a rezoning program is required by 2024, which would be implemented through the Community Plan Update process, some of which Community Plans are well on their way to completion, while others have not started, and the Housing Element Update intends to provide for upzoning for in excess of what is required, which no means to facilitate actual usage in any area – so some areas may be exceptionally burdened if upzoning (including the “buffer amount”) is acted upon in certain areas, but not in others.

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***In conclusion, the Housing Element Update, and the Draft EIR, need to be amended as described above, including, in particular, to: (i) incorporate the 2020 census data, (ii) reflect the allocated upzoning locations, and (iii) address associated environmental impacts with this information reflected in each of the 35 separate Community Plan areas, with the public being offered the opportunity to make comment once there is information available that provides an accurate picture of the impacts of the Housing Element Update by each Community Plan area. We further request that the City prioritize the implementation of surplus City property in facilitating the absorption of the additional housing inventory projected to be needed under RHNA prior to allocating additional housing units to private property. This use of surplus City property is particularly important in addressing the more affordable forms of housing, as the costs of real estate present its own challenge in developing affordable housing, while the City has the luxury of being able to assist in achieving affordability.***

25

Respectfully submitted,

[Housing.Element@lacity.org](mailto:Housing.Element@lacity.org)

attn: Cally Hardy, City Planning Associate

September 6, 2021

page 8

*Michelle A. Bisnoff*

Michelle Bisnoff

Chairperson

Brentwood Community Council



Housing Element &lt;housingelement@lacity.org&gt;

## Fwd: Comment Letter: Draft Housing Element 2021-2029 update & Draft EIR

2 messages

**info@pacpalicc.org** <info@pacpalicc.org>  
To: housingelement@lacity.org

Tue, Sep 7, 2021 at 11:33 AM

Please see message below and attached letter.

Best regards,

Christina Spitz  
Secretary  
Pacific Palisades Community Council  
[www.pacpalicc.org](http://www.pacpalicc.org)

**From:** <info@pacpalicc.org>

**To:** <housing.element@lacity.org>, <cally.hardy@lacity.org>, <cpc@lacity.org>

**Cc:** <davidcard22@gmail.com>, <dkaplan6@gmail.com>, <rgcohen@aol.com>, <johnpadden@kw.com>, Joanna Spak <jlspak@yahoo.com>, <ppfriends3@hotmail.com>

**Sent:** 9/7/2021 11:28 AM

**Subject:** Comment Letter: Draft Housing Element 2021-2029 update & Draft EIR

To: Dept. of City Planning/attn. Cally Hardy  
and City Planning Commission:

Please see attached comment letter from Pacific Palisades Community Council regarding the above matter.

Thank you.

Best regards,

Christina Spitz  
Secretary  
Pacific Palisades Community Council  
[www.pacpalicc.org](http://www.pacpalicc.org)

 **PPCC Comment Letter Housing Element DEIR.pdf**  
310K

**Housing Element** <housingelement@lacity.org>  
To: info@pacpalicc.org

Tue, Sep 7, 2021 at 4:45 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012

Planning4LA.org

T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

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PACIFIC PALISADES

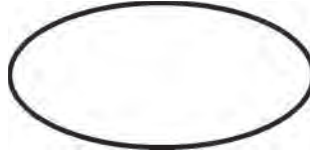
COMMUNITY COUNCIL

September 7, 2021

City of Los Angeles, Department of City Planning (DCP)  
Attention: Cally Hardy, City Planning Associate  
Via email to: [housing.element@lacity.org](mailto:housing.element@lacity.org)

and

Los Angeles City Planning Commission  
Via email to: [cpc@lacity.org](mailto:cpc@lacity.org)



Re: Comments on the Draft Housing Element 2021-2029 Update (“Draft HE”) and the Draft EIR prepared by City of Los Angeles Department of City Planning with the assistance of Rincon Consultants, Inc. July 2021 (the “Draft EIR”)

DCP and Planning Commission:

Pacific Palisades Community Council (“PPCC”) is the broadest-based Palisades community organization, representing approximately 25,000 stakeholders. PPCC submits the following comments concerning the Draft EIR for the Draft HE and Safety Element Update, as well as the Draft HE and the Safety Element Updates. These comments are based upon a review of the documents by the PPCC Executive Committee and by the concerns and positions stated in PPCC’s February 12, 2021 comment letter.<sup>1</sup>

Our comments are also based on the letter submitted on September 6, 2021 in this matter by Brentwood Community Council (BCC) (9/6 BCC Letter).<sup>2</sup> Brentwood is a community to the immediate east of Pacific Palisades. We share a community plan – the Brentwood-Pacific Palisades Community Plan (BPPCP) – and we also share common concerns related to wildfire and evacuation hazards.

Specifically, PPCC shares the following concerns and comments as expressed in the 9/6 BCC letter:

- The concerns expressed in the comments under the heading “The Draft EIR is deficient as the Draft Housing Element Update is Missing Critical Data.”
- The concerns expressed under the heading “Draft EIR Elements: 4.9. Land Use and Planning.”

We note that the BPPCP has not been scheduled for an update yet; we are still completely unaware of the City’s land use and zoning plans for our area.

- The concerns expressed under the heading “Draft EIR Elements: 4.11. Population and Housing.”
- The concerns expressed under the heading “Draft EIR Elements: 4.12. Public Services – Fire.”
- The concerns expressed under the heading “Draft EIR Elements: 4.17. Wildfire.”

In this regard, we appreciate that the Draft EIR expressly recognizes comments previously submitted by PPCC with respect to wildfire impacts. We also appreciate the following statement: “Environmentally sensitive areas,

<sup>1</sup> <http://pacpalicc.org/wp-content/uploads/2021/02/PPCCHousing-Element-Comment-Letter.pdf>.

<sup>2</sup> [https://drive.google.com/drive/folders/1FW1Zq\\_nSUI1c3MGqUh3AhKJuwFO3uTr](https://drive.google.com/drive/folders/1FW1Zq_nSUI1c3MGqUh3AhKJuwFO3uTr)

including Very High Fire Hazard Severity Zones (VHFHSZ) and areas vulnerable to sea level rise, will be excluded from the Rezoning Program, even if they have overlap with the above-described growth areas and higher resource areas.”

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cont.

We reiterate that 100% of Pacific Palisades is within the Very High Fire Hazard Severity Zone (VHFHSZ). Pacific Palisades otherwise shares the same conditions noted in issues b) – g) under the heading “4.17. Wildfire” of the 9/6 BCC Letter.

We further agree with the concluding sentences of the 9/6/21 BCC Letter, regarding prioritizing the use of surplus City property for affordable housing,

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For all of these reasons, we respectfully submit that Pacific Palisades should be excluded from the Rezoning Program.

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Thank you for your consideration and attention to our comments and concerns.

Sincerely,

Executive Committee, Pacific Palisades Community Council

David Card, Chair

Christina Spitz, Secretary

David Kaplan, Vice-Chair

John Padden, Organization Representative (P.R.I.D.E.)

Richard G. Cohen, Treasurer

Joanna Spak, Elected Representative (Area 1; Castellammare, Paseo Miramar)



Letter O-8

Housing Element <housingelement@lacity.org>

Re: "The Livable Communities Initiative" - Submission for Public Comment - 2021-29 Los Angeles Housing Element

3 messages

Matthew Glesne <matthew.glesne@lacity.org> Tue, Sep 7, 2021 at 2:56 PM
To: Tony Gittelsohn <tonygittelsohn@gmail.com>, Housing Element <housingelement@lacity.org>
Cc: Blair Smith <blair.smith@lacity.org>, Lindsay Sturman <lindsay.sturman@gmail.com>, Jennifer Levin <jentwelve@gmail.com>, helen eigenberg <hm.eigenberg@gmail.com>

Thank you Tony. I am Ccing this to our official Housing Element comment email (housingelement@lacity.org) to make sure it is reflected in the record. Really appreciate the thoughts and work reflected here.

Matt

On Tue, Sep 7, 2021 at 1:03 PM Tony Gittelsohn <tonygittelsohn@gmail.com> wrote:
Sept. 7, 2021

Mr. Matthew Glesne,
Senior City Planner
Mr. Matthew Glesne,
Senior City Planner
Ms. Blair Smith,
City Planner
Citywide Policy Planning Department

Dear Matthew Glesne and Blair Smith,

Pursuant to our conversation with you, we wish to submit, for public comment, the attached proposal, The Livable Communities Initiative, that we urge be included as a Program in the 2021-29 Housing Element.

We are affiliated with a coalition of approximately 2,700 concerned homeowners, renters and Los Angelenos deeply engaged in local, grassroots community organizing. The name of our coalition is Hang Out, Do Good. As part of our work, our Housing Committee is extremely focused on the lack of sufficient, equitable affordable housing in our own communities, and throughout Los Angeles (city and county).

To address this urgent crisis, we have engaged in lengthy conversations with our own members, and with our neighbors, and with a vast array of housing experts, academics, city planners and affordable housing developers, to craft The Livable Communities Initiative (LCI).

The Livable Communities Initiative (LCI) is a combination of existing LA City goals and programs, explicitly stated throughout the 2021-2029 Housing Element, but one that holistically addresses equitable and affordable housing, mobility and transit justice, and climate, as one idea, rather than piecemeal. LCI grew out of a collaboration between housing activists and mobility, bike, and transit activists; we found that by linking the issues of housing equity and mobility together, we created a virtuous cycle in which the collective vision had much greater impact than each component part--at the same time, we have crafted a comprehensive approach to equitable affordable housing, based on the City's Equitable Distribution Plan (May 21, 2021) that Affirmatively Furthers Fair Housing (AFFH), ensuring that high-opportunity neighborhoods provide a fair share of affordable housing. By adding affordable housing in job-rich, transit-rich and amenity-rich neighborhoods, Los Angeles can reverse the pressures that create displacement and gentrification in under-resourced communities.

The core of the LCI is to address our housing crisis by upzoning under-utilized commercial arterials to 3-5 stories while simultaneously transforming the street: slowing the cars, adding wide sidewalks, a tree canopy, al fresco dining, bike lanes, and fast and frequent transit -- making it a "Complete Street." By

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combining affordable housing and equitable distribution -- with mobility, safe bike lanes, and a low car/slow car streets -- we can create a linear version of what is called the "15 Minute City": smaller, livable communities where everything an individual needs--access to jobs, schools and amenities--is no more than 15 minutes away, by bike, walking, or mass transit. A city that can and should be accessed, and enjoyed, by Los Angelenos of *all* income levels.

Los Angeles has hundreds of miles of down-zoned commercial arterials -- Pico, Venice, Western, Westwood Blvd, to name just a few. By creating **LCI Zones**, allowing for streamlined "gentle density" development, the LCI will give all Angelenos, at all socioeconomic income levels, a safe and dignified way to live in LA without requiring a car. We believe there is a huge untapped demand for beautiful low-car streets with affordable, equitable housing, bike lanes, fast transit and amenities.

As the City of LA embarks on a three-year re-zoning for 300,000 new units of housing, the LCI would give *every* Angeleno the option to live affordably and sustainably, with safe and convenient transportation options, in *every* neighborhood in Los Angeles.

The draft language of the **Livable Communities Initiative** is attached. We urge that it be included as its own Program in the **2021-2029 Los Angeles City Housing Element**.

Thank you so much,

Lindsay Sturman & Tony Gittelson  
The Livable Communities Initiative

Jennifer Levin & Helen Eigenberg  
Co-Founders  
[Hang Out, Do Good](#)

Louis Abramson  
Chair, Homelessness Committee  
Central Hollywood Neighborhood Council  
(Signing on behalf of himself)

Gerhard Mayer  
[GGLO](#)  
Architect and Urbanist

Patricia Bijvoet  
Landscape Architect and Urban Planner  
UPLA Studio

Terenig Topjian  
Founder, [Have A Go](#)  
haveago.city

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cont.



**Matthew Glesne**  
Preferred Pronouns: He, Him, His  
Senior City Planner  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-2666



**Tony Gittelson** <tonygittelson@gmail.com>

Tue, Sep 7, 2021 at 4:19 PM

To: Matthew Glesne <matthew.glesne@lacity.org>

Cc: Housing Element <housingelement@lacity.org>, Blair Smith <blair.smith@lacity.org>, Lindsay Sturman <lindsay.sturman@gmail.com>, Jennifer Levin <jentwelve@gmail.com>, helen eigenberg <hm.eigenberg@gmail.com>

Thank you so much, Matt!

We look forward to continuing the conversation, and thank you for your guidance on this.

All best,

Tony

Tony Gittelson  
Los Angeles, CA  
Tel. (323) 938-5535  
Cell (213) 400-1494  
[TonyGittelson@gmail.com](mailto:TonyGittelson@gmail.com)

[Quoted text hidden]


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**Matthew Glesne** <matthew.glesne@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Tue, Sep 7, 2021 at 4:51 PM

[Quoted text hidden]

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 **Livable Communities Initiative (LCI) - DRAFT - Sept. 7 2021.pdf**  
63K

## Housing Element Program Proposal: "Livable Communities Initiative"

### 129. The Livable Communities Initiative (NEW)

Goal #: 3, 2, 1, 4, 5

Lead Agencies: DCP, HACLA, LAHD, LAHSA, LA METRO, LA DOT

Funding Source: General Fund, Addtl Funding From Existing Programs  
Falling Within the Scope of the "Livable Communities Initiative"

**Objective:** Falling within the purview of Program 121 (RHNA Re-Zoning) and Program 123 (Assessment of Fair Housing), the **Livable Communities Initiative (LCI)** will create a Program to advance a holistic concept of livable, healthy, and sustainable communities along the City's transit-rich corridors. Expanding the successful TOC model, under the additional RHNA Re-Zoning Plan (2021-24), LCI creates a program, primarily along commercial and underdeveloped industrial corridors in High Opportunity areas, that utilizes higher-density mixed-use, mixed-income housing and a variety housing typologies, including: microunits, row houses, perimeter housing block surrounding green space, shared housing models (including boarding house and dorm-style living), and other contextual Los Angeles typologies for a diverse, mixed socio-economic status community which includes 20% - 100% affordable housing.

#### **TEXT**

Falling within the purview of Program 121 (RHNA Re-Zoning) and Program 123 (Assessment of Fair Housing), the **Livable Communities Initiative (LCI)** will create a Program to advance a holistic concept of livable, healthy, and sustainable communities along the City's transit-rich corridors. Expanding the successful TOC model, under the additional RHNA Re-Zoning Plan (2021-24), LCI creates a program, primarily along commercial and under-developed industrial corridors in High Opportunity areas, that utilizes higher-density mixed-use, mixed-income housing and a variety housing typologies, including: microunits, row houses, perimeter housing block surrounding green space, shared housing models (including boarding house and dorm-style living), and other contextual Los Angeles typologies for a diverse, mixed socio-economic status community which includes 20% - 100% affordable housing.

The goal of the Livable Communities Initiative (LCI) is to develop a variety of innovative Affordable Housing models--creating smaller holistic communities within the larger City--that will promote gentle-density, sustainable, livable, walkable and

bikeable neighborhoods, with access to transit, jobs and amenities, including: tree-lined, shaded streets and small public spaces; reduced car traffic; safe protected bike lanes; and increased bus frequency (where applicable). These contained, well-planned holistic communities address every policy goal in the Housing Element: facilitating housing production that results in more equitable and affordable options by creating both affordable rental units, and affordable homeownership models, across all levels of affordability (Goal 1,2 and 4); creating healthy, livable, sustainable communities that improve the lives of all Angelenos (Goal 3); fostering racially and socially inclusive neighborhoods that correct the harms of historic racial, ethnic and social discrimination; Affirmatively Furthering Fair Housing (AFFH), especially in High Opportunity Areas; creating Affordable Homeownership opportunities as a strategy to increase wealth building for communities of color (Goals 1, 2 and 4); and, as LCI is scaled-up, it will add significantly to the permanent housing stock, relying in large part on private funding (for low-income and moderately low-income groups), which frees up public resources for Permanent Supportive Housing, proven strategies for reducing homelessness (Goal 5).

To facilitate the Livable Communities Initiative (LCI), within all LCI-designated zones, the TOC program will be expanded to provide zoning bonuses and increased density (for multi-family housing); streamlined permitting, "zero fee permitting" (where possible), and ministerial approval for housing that is from 20-100% affordable; eliminate parking requirements and utilize parking maximums (with exceptions, including ADA); and utilize as necessary deed-restricted covenants to insure sufficient affordable housing is created across all four levels of affordability (Extremely Low Income, Very Low Income, Low Income, and Moderate AMI). LCI will promote both affordable rental housing, as well as an affordable homeownership model, under Policy Objective 2.2.1 and 2.2.3 and Housing Element Programs 1, 2, 4, and 90. The location and size of the zones will be determined by data collection from partner organizations in order to serve all households who wish to participate.

The LCI will be a collaboration between housing and transportation agencies, including LADOT, Metro, StreetsLA, and DCP to create safe bikeable, walkable neighborhoods, using data and proven models, such as the five principles of the CROW Design Manual for Bicycle Traffic (Cohesion, Directness, Safety, Comfort, Attractiveness). StreetsLA will oversee the urban and landscape design for sustainable, livable, healthy streets and housing - including shade trees, low-car streets to alleviate air pollution, noise pollution, and create safety for vulnerable populations from fast moving vehicles (seniors, ADA, hearing and vision impaired, children), community-enhancing spaces such as al fresco dining and parklets, interior courtyards that have been shown to improve mental health outcomes and foster community (Goal 2, 3 and 4). Under Programs 12, 16, 58, 59, 62 and 78, the

Mayor's Office and LACP, HCID, HACLA, and related agencies, will create and implement design standards to enhance the quality of housing (Goal 2).

All of the policy objectives described in the Livable Communities Initiative derive entirely from Programs contained in the current Housing Element. LCI falls primarily under the scope of three *new* Program Elements: **Program 121 - The RHNA Re-Zoning** (which has a three-year horizon); **Program 124 - Affirmatively Furthering Fair Housing**; and **Program 125** that expands **Transit Oriented Communities**. Together these three plans, and the related Housing Programs cited below, describe the scope of LCI and address every housing creation policy goal contained in the 2021-2029 Housing Element, including:

Affordable housing production; zoning reform; the expansion of TOC's; density bonuses and other innovative and adaptive housing models; integrating RHNA targets into local Community Plans; developing commercial corridors and residential areas off commercial corridors; rapidly accelerating affordable housing production via permitting streamlining; design innovation; creating livable, sustainable and healthy communities; and affirmatively furthering fair housing (AFFH) and housing equity across all of Los Angeles.

Other specific Housing Programs (listed below), all contribute to the Livable Communities Initiative, under the following headings:

Affordable Housing Creation: Program 4,6,7,10 (seniors), 14, 15, 16, 18, 20, 24, 30, 46, 48, 49, 50, 60, 61, 65, 66, 80, 81, 107, 115, 125, 126

Funding Programs: Program 4,6,10 (linkage fee-*new*),18,20,30,41, 66, 126

Re-Zoning, Density Bonuses, TOC expansion: Program 7, 48, 49, 50, 60, 61, 62, 81, 115, **124, 125**, 126

Streamlining: Program 16, 37, 54, 55, 57, 60, 62, 115

Parking Requirements: 21, 65

Urban Design & Innovation: 12, 13, 16, 21, 58, 59, 62, 78

Sustainability and Livability: Program 9, 14, 24, 59, 65, 73, 78, 79, 124

Affordable Homeownership Models & CLT's: Program 1, 2, 4, 90

Monitoring: Program 47

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cont.



Education: Program 67, 120

"No Net Loss" Programs: 28, 29, 124

AFFH and Housing Equity: Program 7, 10(seniors), 15, 24, 30, 41, 48, 90, 92, 99, 107, 124, 126

Reducing Homelessness\*: Program 92, 99, 107

\* The intent of LCI is to significantly increase affordable housing production across LA, and in so doing, directly reduce homelessness--these highlighted programs in the Housing Element specifically address housing and homelessness.



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cont.



Housing Element &lt;housingelement@lacity.org&gt;

## Fwd: Comments on City of LA's Housing and Safety Element Update DEIR

2 messages

**Flora Melendez** <flora.melendez@lacity.org>

Wed, Sep 8, 2021 at 8:17 AM

To: Housing Element <housingelement@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>, Cally Hardy <cally.hardy@lacity.org>

Cc: Arthi Varma <arthi.varma@lacity.org>, Nicholas Maricich <nicholas.maricich@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie



**Flora (Angie) Melendez**

Pronouns: she/hers/her

Executive Administrative Assistant III

**Los Angeles City Planning**

200 N. Spring St., Suite 525C

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-1271 | F: (213) 978-1275

E: flora.melendez@lacity.org



----- Forwarded message -----

From: **Elizabeth Reid-Wainscoat** <ereidwainscoat@biologicaldiversity.org>

Date: Tue, Sep 7, 2021 at 4:37 PM

Subject: Comments on City of LA's Housing and Safety Element Update DEIR

To: Vince Bertoni <vince.bertoni@lacity.org>

Cc: mayor.helpdesk@lacity.org <mayor.helpdesk@lacity.org>, councilmember.buscaino@lacity.org <councilmember.buscaino@lacity.org>, councilmember.blumenfield@lacity.org <councilmember.blumenfield@lacity.org>, councilmember.bonin@lacity.org <councilmember.bonin@lacity.org>, gilbert.Cedillo@lacity.org <gilbert.Cedillo@lacity.org>, councilmember.harris-dawson@lacity.org <councilmember.harris-dawson@lacity.org>, councilmember.Krekorian@lacity.org <councilmember.Krekorian@lacity.org>, paul.koretz@lacity.org <paul.koretz@lacity.org>, councilmember.lee@lacity.org <councilmember.lee@lacity.org>, councilmember.martinez@lacity.org <councilmember.martinez@lacity.org>, councilmember.ofarrell@lacity.org <councilmember.ofarrell@lacity.org>, councilmember.price@lacity.org <councilmember.price@lacity.org>, councilmember.rodriguez@lacity.org <councilmember.rodriguez@lacity.org>, councilmember.raman@lacity.org <councilmember.raman@lacity.org>, councilmember.wesson@lacity.org <councilmember.wesson@lacity.org>, Councilmember.kevindeleon@lacity.org <Councilmember.kevindeleon@lacity.org>, lauren.faber@lacity.org <lauren.faber@lacity.org>

Dear Mr. Bertoni,

On behalf of the Center for Biological Diversity, I am submitting these comments on the Draft Program Environmental Impact Report for the City of Los Angeles' Housing and Safety Element Updates.

You can access our references via this [folder](#).

Please confirm that you have received our comments and are able to access the references at the link provided.

Thank you for the opportunity to submit comments. Please add the Center to your notice list for all future actions associated with the Update and do not hesitate to contact us if you have any questions.

Sincerely,

Elizabeth

Elizabeth Reid-Wainscoat (she/her)  
Urban Wildlands Campaigner  
CENTER *for* BIOLOGICAL DIVERSITY  
660 S. Figueroa Street #1000  
Los Angeles, CA 90017  
Cell: (831) 428-3312  
[ereidwainscoat@biologicaldiversity.org](mailto:ereidwainscoat@biologicaldiversity.org)

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 **CommentLetter\_City of LA Housing Element\_2021-09-07.pdf**  
397K

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**Housing Element** <housingelement@lacity.org>  
To: [ereidwainscoat@biologicaldiversity.org](mailto:ereidwainscoat@biologicaldiversity.org)

Wed, Sep 8, 2021 at 9:04 AM

Thank you for your email. Your comments and attachments have been received and filed.

Regards,  
The Housing Element Team



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
[Planning4LA.org](http://Planning4LA.org)  
T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]



September 7, 2021

*Sent via email*

Mr. Vince Bertoni  
Director of Planning  
Los Angeles Department of City Planning  
200 North Spring Street  
Los Angeles, CA 90012  
[vince.bertoni@lacity.org](mailto:vince.bertoni@lacity.org)

**Re: City of Los Angeles' General Plan Housing Element 2021-2029 and Safety Element Updates**

Dear Mr. Bertoni,

These comments are submitted on behalf of the Center for Biological Diversity (“Center”) regarding the Housing Element 2021-2029 and Safety Element Updates’ (“Update”) Draft Environmental Impact Report (DEIR). We have reviewed the DEIR and Update and provide these comments for consideration to the City of Los Angeles Planning Department (“Planning”).

We support all the goals of the Update. We understand that solving the affordable housing crisis will require innovative solutions that provide a wide range of housing types to meet the needs of current and future residents, including extremely low, very low, and low income households. Ensuring those most at risk are given options within their means is critical to tackling the affordable housing crisis. We also strongly support initiatives that build communities with equitable access to employment opportunities, services, and amenities. Too often, ostensibly affordable housing is provided outside the urban core. This results in unequitable access to public services, as well as the personal expenses required to commute to job centers and schools. Furthermore, these housing options are often near known pollution sources like freeways, or vulnerable to other hazards like wildfire.

While we are happy to see that the Rezoning Program excludes areas “within environmentally sensitive areas such as the SRA and VHFHSZs,” we would like to encourage the City to use this Update as an opportunity to ensure *all* future developments reflect these smart growth principles. Beyond the human impact, sprawl development significantly impacts native biodiversity and destroys our natural lands. Mayor Eric Garcetti’s Green New Deal envisions a more sustainable city that protects the environment, reduces greenhouse gas emissions, and provides equal access for all communities to open space. As the City works towards ensuring affordability and protecting communities against displacement, the Center

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urges for a more comprehensive approach to growth that addresses community health as well as the needs of wildlife and habitats that are removed, fragmented, and degraded by sprawl development.

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cont.

Overall, the Center’s comments can be summarized by the following:

- In alignment with the **General Plans’ Policy 1.1.5** (“Reduce potential risk hazards due to natural disaster to the greatest extent feasible”) as well as the **Update’s Policy 3.3.2** (“Establish plans, incentives, and development standards that eliminate or minimize disaster risk and promote positive health outcomes for communities most at risk”) and the **Update’s Program #53, Disaster Resilience and Recovery** (“Explore ways to amend codes in very high fire hazard severity zones and other hazard areas to better protect life and safety”)
  - The Update should prohibit or limit new residential development in very high and high wildfire hazard severity zones
  - The Update should require developers to provide proof of the availability of private insurance for the prospective property for all hazards, including wildfire, before a permit to build is approved
  - The Update should include programs for home-hardening against wildfire
- In addition, to align with the **Update’s Program #73, Housing and Ecology** (“Develop and implement design standards that foster ecological diversity in the City's hillsides, riverine and coastal areas, open spaces and Significant Ecological Areas through programs including the Wildlife Pilot Study and Ridgeline Protection Ordinance”)
  - The Update should also require adoption of the Wildlife Ordinance by the end of 2021.
- For the **Update’s Program #121, RHNA Re-zoning**, we support *Livable Communities Initiative*’s proposal to “up-zone under-utilized commercial arterials to 3-5 stories while simultaneously transforming the street--slowing the cars, adding wide sidewalks, al fresco dining, bike lanes, and fast and frequent transit -- making it a Complete Street.”
- We strongly oppose the **Update’s Program #55 Implement CEQA Streamlining Measures** (“Create necessary policies and procedures to facilitate streamlining efforts. Develop templates for such streamlining tools as SCEAs and SCPEs. Aim to make more projects that achieve Citywide Housing Priorities to be exempt from or receive CEQA streamlining”)

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More detailed comments are provided below.

**I. Wildfire poses a significant threat to the region and the City’s stated commitments to addressing the climate crises, protecting habitat, safeguarding human health and increasing access to open space.**

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According to a report from Governor Gavin Newsom’s Office, construction of more homes in the wildland-urban interface is one of the main factors that “magnify the wildfire threat and place substantially more people and property at risk than ever before” (Governor Newsom’s Strike Force, 2019). Syphard et al. (2019) found that housing and human infrastructure in fire-prone wildlands are the main drivers of fire ignitions and structure loss. This is not new

information; scientists have been reporting it for many years in scientific, peer-reviewed journals, and firefighters have observed it.

As outlined in the Center’s recent report, *Built to Burn*<sup>1</sup>, increasing housing development in high fire-risk wildlands is putting more people in harm’s way and contributing to a dramatic increase in costs associated with fire suppression and damages. Next 10 and UC Berkeley’s recent report, *Rebuilding for a Resilient Recovery: Planning in California’s Wildland Urban Interface*<sup>2</sup>, likewise found that state and local land use policies are increasing the economic and human cost of wildfire by encouraging rebuilding in the high risk-wildland urban interface instead of focusing development away from fire-prone areas. Sprawl developments with low/intermediate densities extending into habitats that are prone to fire have led to more frequent wildfires caused by human ignitions, like power lines, arson, improperly disposed cigarette butts, debris burning, fireworks, campfires, or sparks from cars or equipment (Balch et al., 2017; Bistinas et al., 2013; Keeley et al., 1999; Keeley & Fotheringham, 2003; Keeley & Syphard, 2018; Radeloff et al., 2018; Syphard et al., 2007, 2012, 2019). Human-caused fires account for 95-97% of all fires in Southern California’s Mediterranean habitats (Balch et al., 2017; Syphard et al., 2007). In some Southern California counties, Keeley and Syphard (2018) found that human ignitions were responsible for 98-100% of fires between 1919-2016. Leapfrog developments in high fire-prone areas have the highest predicted fire risk (Syphard et al. 2013), and multiple studies indicate that developments with low/intermediate-density clusters surrounded by fire-dependent vegetation (*i.e.*, grasslands, chaparral, scrub) in areas with a history of fires have the highest chances of burning (Bistinas et al., 2013; Syphard et al., 2012, 2013, 2019). The Update, as currently drafted, could result in the placement of more homes, infrastructure, roads, and communities in high fire-prone areas that have burned in the past and will inevitably burn again.

By placing people in fire-prone areas, the induced sprawl perpetuated by the Update would increase the number of potential ignition sources, and therefore the risk of wildfires occurring. In addition, power lines and electrical equipment are a significant source of human-caused ignitions (Keeley & Syphard, 2018). The 2017 Thomas Fire, 2017 Tubbs Fire, 2018 Camp Fire, and 2018 Woolsey Fire were found to have been caused by electrical transmission lines and electrical equipment, and the 2019 Kincade Fire is suspected to have been caused by power lines as well. Placing homes and people in high fire-prone areas would only increase the potential likelihood of these ignition sources, as has been documented in multiple scientific studies (Balch et al., 2017; Bistinas et al., 2013; Keeley et al., 1999; Keeley & Fotheringham, 2003; Keeley & Syphard, 2018; Radeloff et al., 2018; Syphard et al., 2007, 2012, 2019).

Although public utilities companies (*i.e.*, PG&E and Southern California Edison) are altering operations in the form of power outages and blackouts during extreme weather conditions (Callahan et al., 2019; Fry, Dolan, et al., 2019; Krishnakumar et al., 2019), wildfires can still spark and spread quickly towards homes, as evidenced by the wildfires in Moraga

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<sup>1</sup> Tiffany Yap, et al, *Built to Burn: California’s Wildlands Developments Are Playing With Fire* (Feb. 2021), available at <https://www.biologicaldiversity.org/programs/urban/pdfs/Built-to-Burn-California-Wildfire-Report-Center-Biological-Diversity.pdf>.

<sup>2</sup> Next 10 and UC Berkeley, *Rebuilding for a Resilient Recovery: Planning in California’s Wildland Urban Interface* (June 2021), available at <https://www.next10.org/sites/default/files/2021-06/Next10-Rebuilding-Resilient-Final.pdf>.

(Hernández et al., 2019) and Saddleridge/Sylmar (Fry, Miller, et al., 2019). And the power outages themselves disproportionately burden our most vulnerable communities, including the elderly, poor, and disabled (Chabria & Luna, 2019), and can cause traffic jams and collisions (CBS San Francisco, 2019). Michael Wara, Director of the Climate and Energy Policy Program and a senior research scholar at the Stanford Woods Institute for the Environment, estimated that PG&E’s power outage in Northern and Central California could have an economic impact of \$2.5 billion in losses, with most of the burden on businesses (Callahan et al., 2019). It is clear that placing more homes in known fire-prone areas and wind corridors is irresponsible and can lead to deadly and costly consequences.

In addition, such sprawl developments disrupt the natural fire regime and lead to a dangerous feedback loop of deadly fires and habitat destruction. Native California habitats are adapted to infrequent (every 30 to 150 years or more), large, high-intensity crown fire regimes (Keeley & Fotheringham, 2001). However, if these regimes are disrupted, the habitats become degraded (Keeley, 2005, 2006; Syphard et al., 2018). When fires occur too frequently, type conversion occurs and the native shrublands are replaced by non-native grasses and forbs that burn more frequently and more easily, ultimately eliminating native habitats and biodiversity while increasing fire threat over time (Keeley, 2005, 2006; Safford & Van de Water, 2014; Syphard et al., 2009, 2018). This could have serious consequences for special-status species in the region that rely on these native habitats for survival, like California red-legged frogs and Least Bell’s vireos. In addition, large-scale landscape changes due to vegetation-type conversion from shifts in natural fire regimes could impact wide-ranging species like mountain lions (Jennings, 2018), whose populations are already struggling in the area due to lack of connectivity and genetic isolation (Dellinger, 2019; Gustafson et al., 2018).

Furthermore, this increase in wildfire results in higher frequency and toxicity of smoke exposure to communities in and downwind of the fires. This can lead to harmful public health impacts due to increased air pollution not only from burned vegetation, but also from burned homes, commercial buildings, cars, etc. Buildings and structures often contain plastic materials, metals, and various stored chemicals that release toxic chemicals when burned, such as pesticides, solvents, paints, and cleaning solutions (Weinhold, 2011).

Increased fire frequency due to human activity and ill-placed developments lead to increased occurrences of poor outdoor and indoor air quality from smoke (*e.g.*, Phuleria et al. 2005), which can have public health effects. Hospital visits for respiratory symptoms (*e.g.*, asthma, acute bronchitis, pneumonia, or chronic obstructive pulmonary disease) and cardiovascular symptoms have been shown to increase during and/or after fire events (Delfino et al., 2009; Künzli et al., 2006; Liu et al., 2015; Rappold et al., 2012; Reid et al., 2016; Viswanathan et al., 2006). Children, elderly, and those with underlying chronic disease are the most vulnerable to the harmful health effects of increases in wildfire smoke. The EIR does not include sufficient analysis of the RTP/SCS’s potential impacts of increased smoke exposure due to increased human-caused ignitions.

Finally, the DEIR does not adequately consider the impacts on firefighters and first responders of the growth induced by the Update in high fire-prone natural areas subject to intermittent wildfires. Adding more development to these wild areas will necessitate significant

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firefighting costs from both state and local authorities. Cal Fire is primarily responsible for addressing wildfires when they occur, and its costs have continued to increase as wildfires in the wildland urban interface have grown more destructive. During the 2017-2018 and the 2018-2019 fiscal years, Cal Fire’s fire suppression costs were \$773 million and an estimated \$635 million, respectively (Cal Fire, 2019). Note that this does not include the cost of lives lost, property damage, or clean up during these years, which is estimated to be billions of dollars. The vast majority of wildfires in southern California are caused by humans (Balch et al., 2017; Keeley & Syphard, 2018), and inducing sprawl development in high fire hazard areas will increase the frequency and likelihood of such fires (Radeloff et al., 2018; Syphard et al., 2012, 2013, 2019). The City of LA should not be approving an Update that will induce unsustainable sprawl in high fire-prone areas and burden future generations of California with the costs of defending and recovering even more cities from dangerous blazes.

According to Captain Michael Feyh of the Sacramento Fire Department, California no longer has a fire season (Simon, 2018); wildfires in California are now year-round because of increased human ignitions in fire-prone areas. Emergency calls to fire departments have tripled since the 1980s (Gutierrez & Cassidy, 2018), and firefighters (and equipment) are being spread thin throughout the state. Firefighters often work 24- to 36-hour shifts for extended periods of time (often weeks at a time), and they are being kept away from their homes and families for more and more days out of the year (Ashton et al., 2018; Bransford et al., 2018; Del Real & Kang, 2018; Gutierrez, 2018; Simon, 2018). In addition, the firefighting force often must rely on volunteers to battle fires year-round.

The extended fire season is taking a toll on the physical, mental, and emotional health of firefighters, as well as the emotional health of their families (Ashton et al., 2018; Del Real & Kang, 2018; Simon, 2018). The physical and mental fatigue of endlessly fighting fires and experiencing trauma can lead to exhaustion, which can cause mistakes in life-or-death situations while on duty, and the constant worry and aftermath that family members endure when their loved ones are away working in life-threatening conditions can be harrowing (Ashton et al., 2018). According to psychologist Dr. Nancy Bohl-Penrod, the strain of fighting fires without having sufficient breaks can impact firefighters’ interactions with their families, their emotions, and their personalities (Bransford et al., 2018). There have also been reports that suicide rates and substance abuse have been increasing among firefighters (Greene, 2018; Simon, 2018). This is not sustainable.

Given the well-known impacts of siting new development in fire-prone areas, the Update’s Policy 3.3.2 (“Establish plans, incentives, and development standards that eliminate or minimize disaster risk and promote positive health outcomes for communities most at risk”) should include a policy prohibiting new discretionary residential development in very high and high fire hazard severity zones or state responsibilities areas. At a minimum, to preserve public health and the environment and consistent with the principles in the CEQA Guidelines, Policy 3.3.2 should prohibit such development if there is substantial evidence in the record that the development will:

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- a. expose people or structures, including existing and nearby communities, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires;
- b. substantially impair an adopted emergency response plan or emergency evacuation plan;
- c. due to slope, prevailing winds, and other factors, exacerbate wildfire risks, including risk of ignition and/or spread, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
- d. require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
- e. expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Moreover, Policy 3.3.2 should require that during the entitlement process for a new development of 5 units or more in a very high or high fire hazard severity zone or state responsibility area, the applicant must provide sufficient documentation that (1) private insurance currently exists that will insure the proposed homes for all hazards, including wildfire; or (2) the applicant must provide a plan and adequate funding to self-insure them.

Any new development in a very high or high fire hazard severity zone has the potential to cause a significant impact, as described in the numerous scientific studies referenced in the Wildfire Report. In addition, as the Wildfire Report notes, even homes built to current standards still are not fireproof, and more human activities and infrastructure have the potential to cause additional unintentional ignitions. Therefore, it is imperative that **this Update include restrictions for new development in these wildfire hazard severity zones, and at a minimum, ensure that these new properties will be able to obtain insurance on the private market before they are built because homeowners deserve this security in their investment.**

## **II. Home-hardening existing communities should be a central component of the Update’s Objective 3.3 “Promote disaster and climate resilience in citywide housing efforts”**

For homes already in high fire-risk areas, home-hardening is important to minimize the chances of human ignitions and fire spread. It is estimated that more than 2 million homes are located in high fire-risk areas (Verisk, 2020). Investing resources primarily in fire suppression without adequately addressing the human-related cause of the fires will not reduce wildfire losses (Stephens et al., 2009). State funds must be equitably distributed to retrofit existing communities in fire-prone areas to reduce the chances of unintentional ignitions and minimize spread should a fire ignite.

**The Update’s proposed policy 3.3.5, which would identifying funding and other resources to support the retrofitting of existing buildings to improve resilience and health, should provide a plan for specific retrofits including:**

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1. Ember-resistant vents;
2. Fire-resistant roofs;
3. Irrigated defensible space within 100 feet of structures;
4. External sprinklers with an independent water source; and
5. Clean energy microgrids including rooftop solar

Although such features do not make homes fireproof, they have been shown to either reduce a community risk of ignition and/or improve the chances of structure survival in fires (Syphard et al., 2014, 2017). For example, external sprinklers with an independent water source have been proven to reduce flammability of structures (California Chaparral Institute, 2018). Although external sprinklers are not required by law, water-protected structures are much less likely to burn compared to dry structures, thus the Update should find funding streams for all development currently in wildfire zones and require implementation for all new development. In addition, local solar power paired with batteries could reduce power flow (and therefore reduce extreme temperatures) in electricity lines, which would reduce the need for power outages during extreme weather conditions and provide power for communities when outages are necessary (A. Lee, 2019). Michael Wara argues that solar power and batteries for homes and “microgrids” linking business districts would help make communities in high fire risk areas safer because it would provide backup power for medical devices, refrigerators, and the internet to run while allowing the main power grid to get shut down (Wara, 2018).

The city must also engage, prepare and train homeowners to harden their homes, reduce the risk of fire ignitions and spread, and be ready to safely defend their homes or evacuate early when needed (Stephens et al., 2009). As communities rebuild from recent wildfire destruction, now is the time to instill a culture of coexistence with wildfire. The City of LA can help our region meet this crucial challenge. Strong land use policies that consider the city’s diverse fire history and ecology will help improve our relationship with wildfire and ensure a safer and healthier future for both humans and wildlife.

### **III. Protecting wildlife connectivity in the region is essential to preserving native biodiversity, mitigating against the climate crisis and prioritizing human health.**

Roads and development create barriers that lead to habitat loss and fragmentation, which harms native wildlife, plants, and people. As barriers to wildlife movement, poorly-planned development and roads can affect an animal’s behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function (Brehme et al., 2013; Ceia-Hasse et al., 2018; Haddad et al., 2015; Marsh & Jaeger, 2015; Mitsch & Wilson, 1996; Trombulak & Frissell, 2000; van der Ree et al., 2011). For example, as noted above, habitat fragmentation from roads and development has been shown to cause mortalities and harmful genetic isolation in mountain lions in southern California (Ernest et al., 2014; Riley et al., 2014; Vickers et al., 2015), increase local extinction risk in amphibians and reptiles (Brehme et al., 2018; Cushman, 2006), cause high levels of avoidance behavior and mortality in birds and insects (Benítez-López

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et al., 2010; Kantola et al., 2019; Loss et al., 2014), and alter pollinator behavior and degrade habitats (Aguilar et al., 2008; Goverde et al., 2002; Trombulak & Frissell, 2000). Habitat fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes (Damschen et al., 2019). The authors conclude that efforts to preserve and enhance connectivity will pay off over the long-term (Damschen et al., 2019). In addition, connectivity between high quality habitat areas in heterogeneous landscapes is important to allow for range shifts and species migrations as climate changes (Cushman et al., 2013; Heller & Zavaleta, 2009; Krosby et al., 2018). Loss of wildlife connectivity decreases biodiversity and degrades ecosystems. Unfortunately, it does not appear that the DEIR includes any such analysis.

Edge effects of development in and adjacent to open space will likely impact key, wide-ranging predators, such as mountain lions and bobcats (Crooks, 2002; Delaney et al., 2010; J. S. Lee et al., 2012; Riley et al., 2006; Smith et al., 2015, 2017; Vickers et al., 2015; Wang et al., 2017), as well as smaller species with poor dispersal abilities, such as song birds, small mammals, and herpetofauna (Benítez-López et al., 2010; Cushman, 2006; Kociolek et al., 2011; Slabbekoorn & Ripmeester, 2008). Limiting movement and dispersal can affect species' ability to find food, shelter, mates, and refugia after disturbances like fires or floods. Individuals can die off, populations can become isolated, sensitive species can become locally extinct, and important ecological processes like plant pollination and nutrient cycling can be lost. Negative edge effects from human activity, such as traffic, lighting, noise, domestic pets, pollutants, invasive weeds, and increased fire frequency, have been found to be biologically significant up to 300 meters (~1000 feet) away from anthropogenic features in terrestrial systems (Environmental Law Institute, 2003)

The EIR must also consider corridor redundancy (*i.e.* the availability of alternative pathways for movement) because it allows for improved functional connectivity and resilience. Compared to a single pathway, multiple connections between habitat patches increase the probability of movement across landscapes by a wider variety of species, and they provide more habitat for low-mobility species while still allowing for their dispersal (Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008). In addition, corridor redundancy provides resilience to uncertainty, impacts of climate change, and extreme events, like flooding or wildfires, by providing alternate escape routes or refugia for animals seeking safety (Cushman et al., 2013; Mcrae et al., 2008; Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008).

Corridor redundancy is critical when considering the impacts of climate change on wildlife movement and habitat connectivity. Climate change is increasing stress on species and ecosystems, causing changes in distribution, phenology, physiology, vital rates, genetics, ecosystem structure and processes, and increasing species extinction risk (Warren et al., 2010). A 2016 analysis found that climate-related local extinctions are already widespread and have occurred in hundreds of species, including almost half of the 976 species surveyed (Wiens, 2016). A separate study estimated that nearly half of terrestrial non-flying threatened mammals and nearly one-quarter of threatened birds may have already been negatively impacted by climate change in at least part of their distribution (Pacifci et al., 2017). A 2016 meta-analysis reported that climate change is already impacting 82 percent of key ecological processes that

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form the foundation of healthy ecosystems and on which humans depend for basic needs (Scheffers et al., 2016). Genes are changing, species' physiology and physical features such as body size are changing, species are moving to try to keep pace with suitable climate space, species are shifting their timing of breeding and migration, and entire ecosystems are under stress (Cahill et al., 2012; Chen et al., 2011; Maclean & Wilson, 2011; Parmesan, 2006; Parmesan & Yohe, 2003; Root et al., 2003; Warren et al., 2010).

In addition, riparian ecosystems have long been recognized as biodiversity hotspots performing important ecological functions in a transition zone between freshwater systems and upland habitats. Many species that rely on these aquatic habitats also rely on the adjacent upland habitats (*e.g.*, riparian areas along streams, and grassland habitat adjacent to wetlands). In fact, 60% of amphibian species, 16% of reptiles, 34% of birds and 12% of mammals in the Pacific Coast ecoregion depend on riparian-stream systems for survival (Kelsey and West 1998). Many other species, including mountain lions and bobcats, often use riparian areas and natural ridgelines as migration corridors or foraging habitat (Dickson et al, 2005; Hilty & Merenlender, 2004; Jennings & Lewison, 2013; Jennings & Zeller, 2017). Additionally, fish rely on healthy upland areas to influence suitable spawning habitat (Lohse et al. 2008), and agricultural encroachment on these habitats and over-aggressive removal of riparian areas have been identified as a major driver of declines in freshwater and anadromous fish (*e.g.*, Stillwater Sciences 2002; Lohse et al. 2008; Moyle et al. 2011). Therefore, buffers that allow for connectivity between the aquatic resource and upland habitat is vital for many species to persist.

It is estimated that 90-95% of historic riparian habitat in the state has been lost (Bowler, 1989; Riparian Habitat Joint Venture, 2009). Using 2002 land cover data from CalFire, the Riparian Habitat Joint Venture estimated that riparian vegetation makes up less than 0.5% of California's total land area at about 360,000 acres (Riparian Habitat Joint Venture, 2004). This is alarming because riparian habitats perform a number of biological and physical functions that benefit wildlife, plants, and humans, and loss of what little is left will have severe, harmful impacts on special-status species, overall biodiversity, and ecosystem function. California cannot afford to lose more riparian corridors.

A literature review found that recommended buffers for wildlife often far exceeded 100 meters (~325 feet), well beyond the largest buffers implemented in practice (Robins, 2002). For example, Kilgo et al. (1998) recommend more than 1,600 feet of riparian buffer to sustain bird diversity. In addition, amphibians, which are considered environmental health indicators, have been found to migrate over 1,000 feet between aquatic and terrestrial habitats through multiple life stages (Cushman, 2006; Fellers & Kleeman, 2007; Semlitsch & Bodie, 2003; Trenham & Shaffer, 2005). Accommodating the more long-range dispersers is vital for continued survival of species populations and/or recolonization following a local extinction (Cushman, 2006; Semlitsch & Bodie, 2003). In addition, more extensive buffers provide resiliency in the face of climate change-driven alterations to these habitats, which will cause shifts in species ranges and distributions (Cushman et al., 2013; Heller & Zavaleta, 2009; Warren et al., 2011). This emphasizes the need for sizeable riparian and upland buffers around streams and wetlands in and adjacent to any project included in the Update, as well as connectivity corridors between heterogeneous habitats. The EIR must adequately assess and mitigate impacts to local, regional, and global wildlife movement and habitat connectivity.

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In short, the DEIR’s biological resources section fails to offer any real protections for wildlife connectivity. **The Center urges the City to revise the Update and DEIR to include a goal to develop and adopt the Wildlife Ordinance by the end of 2021. A draft of the ordinance has already been prepared by Planning, and a strong final ordinance must be adopted as soon as possible.**

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In addition to the scientific evidence provided above, the City has a legal obligation under state law to protect endangered or threatened animal populations, and not approve projects or plans that may jeopardize the survival of such populations. The mountain lions of the Santa Monica mountains and San Gabriel mountains are provisionally listed under the California Endangered Species Act and are presently at risk of extinction, primarily due to loss of habitat connectivity and open space caused by poorly sited development and lack of wildlife crossings (Gustafson et al. 2018; Benson et al. 2016; Benson et al. 2019). The City has an obligation not to push this population closer to extinction by allowing further degradation of existing wildlife corridors through poorly planned development. Because the Update provides a plan to accommodate new development in mountain lion habitat and connectivity areas, it must analyze and fully mitigate the impacts of such development.

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#### **IV. Re-zoning should be transit-oriented and invest in “Complete Streets” as outlined by the Livable Communities Initiative**

The Livable Communities Initiative (LCI) is a combination of existing LA City programs that equitably address housing, mobility, and climate simultaneously. It grew out of a collaboration between housing activists and mobility, bike, and transit activists that found by addressing the two issues of housing and mobility together, the result had a broader appeal, including with groups who have historically fought housing.

The core of the LCI is to address our affordable housing crisis by up-zoning under-utilized commercial arterials to 3-5 stories while simultaneously transforming the street—slowing the cars, adding wide sidewalks, al fresco dining, bike lanes, and fast and frequent transit—making it a Complete Street. By combining affordable housing with mobility, safe bike lanes, and a low car/slow car street, we can create a linear version of the 15 Minute Cities.<sup>3</sup> LA has hundreds of miles of downzoned commercial arterials including Pico, Venice and Westwood Blvd. The LCI will give Angelenos a safe and dignified way to live in LA without a car. A car-free livable street is not for everyone, but as one survey showed, 50% of Americans want to live in a walkable neighborhood and 63% of Millennials would prefer to live where they don’t need a car. We believe there is a huge untapped demand for beautiful low-car streets with affordable housing, bike lanes, fast transit and lots of amenities. This is especially true in job-rich, transit-rich, amenity-rich neighborhoods which have historically prevented the construction of affordable housing, leading to gentrification and displacement in low-income communities and communities of color. As the city of LA embarks on re-zoning for 220,000 new units of

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<sup>3</sup> Congress for the New Urbanism (CNU). “Defining the 15-minute city.” Accessed September 7, 2021. <https://www.cnu.org/publicsquare/2021/02/08/defining-15-minute-city>

housing, the LCI would give every Angeleno the option to live affordably and sustainably with safe and convenient transportation options.

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**V. CEQA streamlining harms communities and perpetuates historical discriminatory planning practices**

The Update’s Program #55 aims to “create necessary policies and procedures to facilitate streamlining efforts” and “develop templates for such streamlining tools as SCEAs and SCPEs to make more projects that achieve Citywide Housing Priorities be exempt from or receive CEQA streamlining.” As outline in the California Environmental Justice Alliance’s “Environmental & Housing Justice Policy Platform,”<sup>4</sup> historic and present-day discriminatory planning decisions perpetuate inappropriate land use patterns and have led to higher concentrations of toxic and polluting land uses in and near low-income communities and communities of color. Poor planning decisions are further exacerbated by the fact that municipal codes, permit conditions, and other land use standards are not routinely or equitably enforced for these communities. In addition, state agencies and local entities responsible for cleaning up and remediating toxic sites have a well-documented history of failing to fulfill their duty to protect communities from hazardous waste. CEQA is one of the few tools that disadvantaged communities have to be aware of and fight back against housing being located next to polluting developments, such as light and heavy industrial facilities, oil and gas operations, recycling and manufacturing facilities, and warehouses with heavy truck traffic. The law’s robust environmental review process can require site specific analysis and additional soil sampling to verify site safety. It is also critical that housing is built on sites that are healthy and suitable for housing development. Exempting projects from CEQA without adequate safeguards could allow homes to be built on toxic and polluted land without appropriate public participation, impact analysis and disclosure, and mitigation. **We therefore strongly oppose the Update’s Program #55, Implement CEQA Streamlining Measures, and recommend that it be removed from the Update.**

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<sup>4</sup> California Environmental Justice Alliance. “Environmental & Housing Justice Policy Platform.” Accessed September 7, 2021. <https://calgreenzones.org/platform-for-environmental-housing-justice/>

## VI. Conclusion

The Center urges the Update to include policies that restrict new development in wildfire hazard severity zones as well as adopt the Wildlife Ordinance by the end of 2021. In addition, the EIR must include an assessment of the significant impact of wildfire to human health and wildlife and include science-based mitigation efforts to minimize this threat. Prohibiting new development in wildfire zones would prioritize human health and safety as well as the protection of the City's biodiversity.

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Thank you for your consideration of these comments.

Sincerely,



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Housing Element <housingelement@lacity.org>

## Housing Element DEIR Comment Letter

2 messages

**Kimberly Christensen** <kimwncseat4@gmail.com>

Tue, Sep 7, 2021 at 5:01 PM

To: HousingElement@lacity.org

Cc: Terri Tippit <westsidenc@ca.rr.com>

Please find attached the Westside Neighborhood Council's letter on the Housing Element Update.

Please confirm receipt.

Kimberly Christensen, AICP  
Westside Neighborhood Council

 **WNC letter Housing Element 2021 Update and Safet Element Update DEIR commens.09.7.2021.signed.doc.**  
pdf  
397K

**Housing Element** <housingelement@lacity.org>

Tue, Sep 7, 2021 at 5:06 PM

To: Kimberly Christensen <kimwncseat4@gmail.com>

Cc: Terri Tippit <westsidenc@ca.rr.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750

Los Angeles, CA. 90012

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For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

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September 7, 2021

City of Los Angeles Department of City Planning  
Attn: Cally Hardy, City Planning Associate  
221 North Spring Street, Room 750  
Los Angeles, CA 90012  
Via email: [HousingElement@lacity.org](mailto:HousingElement@lacity.org)

**RE: Los Angeles Citywide Housing Element 2021-2029 Update and Safety Element Update – Draft EIR**

**Case Nos. ENV-2020-6762-EIR;  
CPC-2020-1365-GPA; and  
CPC-2021-5499-GPA**

**State Clearinghouse No. 2021010130**

Dear Ms. Hardy:

The Westside Neighborhood Council (WNC) reviewed and considered the Draft Environmental Impact Report (DEIR) for the DEIR for the Citywide Housing Element 2021-2029 Update and Safety Element Update. The WNC's comments are provided below

We request that the following issue areas as discussed below be addressed further in the DEIR. Additionally, we have the following general concerns about the Housing Element Update process and preparation of the DEIR.

We believe that the entire Housing Element and draft EIR process has been grossly out of compliance with State laws (both CEQA and Planning laws relating to General Plans). The process has not been transparent with the public and City stakeholders. We have repeatedly asked for information from the City regarding population projections, housing demand, and the candidate sites information through the course of the Housing Element Update process. The WNC adopted a motion at its August 12, 2021 meeting asking for the missing sections of the Housing Element (including the Candidate Sites maps) and for the City to ask the

State to extend the deadline for the Housing Element Update process to allow adequate time to complete the draft Housing Element and Safety Element Updates, Draft EIR, and to allow appropriate public participation in the process. CEQA is integral to agency decision making as discussed in Public Resources Code Section 21006. When the Housing Element Updates is not released in its entirety and with one of the most significant pieces of information relevant to the CEQA process and adequate review of all required issue areas. We believe that recirculation of the DEIR will be required because additional analysis will be required.

The draft Housing Element was released on July 1, 2021. However, Appendix 4.1 (Housing Sites Adequacy analysis) and Appendix Section 4.7 (Candidate Sites Map) were missing when it was released. Appendix 4.1 it was incomplete when it was released. The EIR was released on July 22, 2021 with the public comment period closing on September 7, 2021. How can the Draft EIR possibly be complete, thorough and accurate in its analysis when the Candidate Sites Map information has not been released yet? It was not available before the Draft EIR was completed and released to the public. Appendix 4.1 regarding the adequacy of housing sites analysis was not prepared and released publicly before the Draft EIR was completed and released to the public for comment. The required 45-day public comment period is closing before the Appendix 4.7 Candidates Sites information is even released. The comment period for the DEIR should be extended and the DEIR should be recirculated because it analyzed a document (the Housing Element) that was not even complete.

Additionally, it came to our attention on September 4, 2021 that Appendix 4.1 had finally been added and the posted Housing Element had been modified. We received notice from the City that the public comment period for the Housing Element was being extended from September 9 2021 to September 22, 2021 in fact because there had been changes to the Housing Element.

No summary of the changes to the Housing Element have been provided to the public. The notice indicated that two public hearings would be held on September 21, 2021 (the day before written public comments are due) and on September 22, 2021 (just hours before written public comments are due). Additionally, the notice indicated that the first part of each hearing would be to explain the changes to the Housing Element to the public. If the public is not provided the information and not told what the changes are until the meeting, how is that due process and how is the public supposed to have the time to evaluate the new information and provide comment within a matter of hours?

This violates the entire purpose of the requirements to provide adequate opportunity for the public to participate in the General Plan Update process. While California Government Code Section 65355 requires that a legislative body hold at least one public hearing prior to adopting an amendment to a General Plan, the purpose of the public hearing is to allow the public to participate and provide informed input to the

1  
cont.

2

deliberations on the proposed amendment to the General Plan. The City has failed that test when the entire document is still not even available for review.

2  
cont.

### **General Comments**

Page 4-2 refers to a 1-10 units as a single-family residential project. One unit is a single-family residential use. Two to ten units are a multi-family residential project. This discussion should be revised and clarified as the wording is confusing.

3

What was the criteria used in selecting the 54 sample projects to be used in the EIR analysis? How did you determine that these projects would be a representative sample? They seem to be primarily located in Downtown Los Angeles.

4

### **Aesthetics**

The Aesthetics Section does not discuss or analyze impacts based upon goals, policies and objectives of all the Community Plans and requirements of the Neighborhood Oriented Districts such as those on Pico and Westwood. These should be included in the EIR analysis. The EIR should be evaluating impacts based upon all Community Plans and not just the Downtown Plan.

5

### **Air Quality Impacts**

The threshold of significance of 462 of single-family residential units 612 multi-family residential units, or some combination before mitigation is required per Air Quality mitigation measure 4.2-2(b) is incredibly high before mitigation is required to implement TDM measures in housing development projects. The City should require TDM measures such as bike sharing and electrical vehicle charging station infrastructure among other at a much lower threshold to reduce Air Quality impacts and GHG impacts. Waiting to exceed air quality attainment levels in the SCAQMD basin when there are already existing air quality issues is bad public policy regardless of the CEQA impact threshold levels.

6

### **Cultural Resources**

The City of Los Angeles has very limited protections of historic resources even in HPOZ's. Housing development "by right" should not destroy, remove or compromise the historic integrity of a historic resource. Additional mitigation measures can and should be added that require protections of designated historic resources.

7

### **Land Use**

4.1-12 does not address NOD's and that they have provisions for ground floor level retail.

8

The EIR does not address heightened impacts if housing is concentrated

9

only in certain parts of the City (High and Very High Resource Areas (HRA's and VHRA's)) and are not distributed throughout the City.

9

cont.

How will Objective 4.3 be met to conserve the scale and character of residential neighborhoods and make the compatible to the surrounding area in High and VHRA's? (see discussion on page 4.9-20).

10

How can adequate mitigation measures be developed for impacted areas without analyzing the candidate site maps?

11

### **Recreation**

The DEIR concludes that the impacts to recreation are significant and unavoidable. It is true that the City is woefully deficient in meeting all the minimum thresholds for acreage per thousand residents whether it be community parks, regional parks, local parks or pocket parks. Deficiencies are further exacerbated by heavy concentration of the City's recreation resources primarily in the less densely populated areas of the City such as the Santa Monica Mountains and northern part of the City (e.g. the San Fernando Valley) and the greatest deficiencies in the western, central and eastern part of the City where much of the High and Very High Resource Areas are proposed. The significant and unavoidable impacts should not be made worse by not including meaningful mitigation in the DEIR that can be incorporated as requirements for housing development. First, further development of housing should not eliminate existing parks. Second, incorporation of recreational amenities should be encouraged on-site for smaller housing projects and required for larger housing projects to lessen the impacts to existing parks and recreation facilities. This should be separate from development impact/Quimby fees. LAMC Section 21.10.3 requirement of a construction parks fee per dwelling unit of \$200 per residential unit is woefully inadequate to provide any meaningful amount of recreation/open space per resident.

12

### **Transportation**

Threshold Impact 4.14-4 (see page 4.14-74) only addresses impacts to emergency access during construction. No analysis has been provided regarding permanent operational impacts for emergency access. Mitigation Measure MM4.14-1 does not address operational impacts to inadequate emergency access. An assessment needs to be conducted regarding operational impacts to emergency access. We believe that if housing is concentrated solely in High or Very High Resource Areas that there may be significant impacts to emergency access during operational conditions. Many areas of Los Angeles including the Westside of Los Angeles have streets that have limited accessibility because of at-grade transit (light rail) line crossings with streets and restricted intersection turning movements for vehicles that impact access by police and fire services. Examples in West Los Angeles include at-grade crossings of the Exposition line with streets at Barrington, Military, Westwood and Overland Avenues. An example of restricted vehicle turning movements occur at Exposition and Westwood Boulevards. There are many other

13

locations on other light rail lines as well throughout the City of Los Angeles. This needs to be studied in the Draft EIR.

13  
cont

### **Utilities and Service Systems**

We have concerns that demands on water could exceed the supply considering the unusually high and repeated levels of drought that California and other Western states have been experiencing. The historically low levels of Lake Mead and the Colorado River and other water sources are real. The projected demands and supply per the city's Urban Water Management Plan do not seem to account for these unprecedented reductions to water supply based upon climate change. We believe that more conservative analysis is required. The DEIR states that the impact is less than significant. However, we believe that the water supply will be impacted at a greater level than analyzed with continued extreme drought conditions. Furthermore, the water quality is more impacted the lower the reservoirs become. This issue should have further analysis.

14

### **Other CEQA Considerations**

On Page 5-2, the DEIR asserts that new technologies or systems will emerge that will further reduce the City's reliance on nonrenewable resources and then concludes that the Housing Element Update would not involve a wasteful or inefficient manner in use of natural resources even though consumption of natural resources in the City would increase due to development associated population increases. This is a false assumption as future possible advances in technology are not known at this time and cannot be assumed for this analysis. Even if some improvements in technology will be made in the future, the City of Los Angeles is still adding 375,431 new residents, 109,966 new households, 128,921 new jobs (per Table 4-3 of this DEIR) and 456,643 new residential units per the requirements of RHNA for the planning period ending in 2029 as specified on Page 4-16 of the DEIR. This analysis should be revised.

15

### **Closing Comments**

We appreciate consideration and response to the comments raised in this letter relating to the sufficiency of the Draft EIR. We have additional comments that we were not able to complete prior to the September 7<sup>th</sup> deadline. We will submit an additional letter with those comments as the comment period for the DEIR should be extended considering the incompleteness of the draft Housing Element that was released.

16

Please keep us informed of future meetings and hearings associated with this matter during all phases of future consideration.

Please do not hesitate to contact us with any questions.

Sincerely,

*Terrí Tippit*

---

Terri Tippit, Chair  
Westside Neighborhood Council

*Kimberly Christensen, AICP*

---

Kimberly Christensen, Land Use Committee Co-Chair  
Westside Neighborhood Council

Cc: Councilman Paul Koretz, CD5 ([paul.koretz@lacity.org](mailto:paul.koretz@lacity.org))  
Daniel Skonick, Planning Deputy, CD5 ([daniel.skolnick@lacity.org](mailto:daniel.skolnick@lacity.org))  
Angel Izard, District Deputy, CD5 ([angel.izard@lacity.org](mailto:angel.izard@lacity.org))

# Individual Comments



Housing Element <housingelement@lacity.org>

**Fw: [ANGELES-ENVIRO-JUSTICE] Fwd: Notice of Availability of Draft EIR for Updates to Housing Element and Safety Element / Aviso de Disponibilidad del borrador del Informe de Impacto Ambiental para las actualizaciones del Elemento de Vivienda y del Elemento de Seguridad**

2 messages

Thu, Jul 22, 2021 at 7:02 PM

[Redacted]

Although reference is made to DEIR, the plan update linked to this page is not an EIR, draft or otherwise. Please provide the DEIR separate from the Updated Plan element - specifically Safety Element.

1

So initial comments is that the Safety Element DEIR is totally inadequate and incomplete.

2

Dr. Tom Williams

----- Forwarded Message -----

**From:** [Redacted]  
**To:** "angeles-enviro-justice@lists.sierraclub.org" <angeles-enviro-justice@lists.sierraclub.org>  
**Sent:** Thursday, July 22, 2021, 05:27:36 PM PDT  
**Subject:** [ANGELES-ENVIRO-JUSTICE] Fwd: Notice of Availability of Draft EIR for Updates to Housing Element and Safety Element / Aviso de Disponibilidad del borrador del Informe de Impacto Ambiental para las actualizaciones del Elemento de Vivienda y del Elemento de Seguridad

Hello everyone,

Here is the info on the Draft EIR Updates to the Housing Element and Safety Element for the City of Los Angeles.

The deadline to submit comments is 5:00 pm, Thursday, September 7.

Yvonne

Sent from my iPhone

Begin forwarded message:

**From:** Los Angeles City Planning <housingelement@lacity.org>  
**Date:** July 22, 2021 at 8:50:32 AM PDT  
**To:** [Redacted]  
**Subject:** Notice of Availability of Draft EIR for Updates to Housing Element and Safety Element / Aviso de Disponibilidad del borrador del Informe de Impacto Ambiental para las actualizaciones del Elemento de Vivienda y del Elemento de Seguridad  
**Reply-To:** housingelement@lacity.org



*Para español siga hacia abajo.*

## Interested Parties,

This email is to inform you of the Notice of Availability (NOA) for the Draft Environmental Impact Report (EIR) prepared for the Updates to the Housing Element and the Safety Element. These documents are being prepared by Los Angeles City Planning as part of the [Plan to House LA](#) and [Safety Element Update](#).

The NOA and Draft EIR materials are now available on Los Angeles City Planning's [website](#).

Beginning today, City Planning is accepting comments on the Draft EIR. **The Draft EIR comment period will close at 5:00 p.m. on Tuesday, September 7, 2021.**

If you wish to submit comments on the Draft EIR, please submit your written comments (including a name, contact information, and the following file number ENV-2020-6762-EIR) during the comment period, via mail or e-mail to the following addresses:

**Cally Hardy** | City Planning Associate  
City of Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

**E-mail**  
[HousingElement@lacity.org](mailto:HousingElement@lacity.org)

Beyond the DEIR comment period, general public comments on the plan drafts are also welcome until the Plan is adopted by City Council.

## Partes Interesadas,

Este correo electrónico es para informarle del Aviso de Disponibilidad (NOA por sus siglas en inglés) para el Borrador del Informe de Impacto Ambiental (EIR por sus siglas en inglés) preparado para las Actualizaciones del Elemento de Vivienda y del Elemento de Seguridad. Estos documentos están siendo preparados por el Departamento de

Planeación de la Ciudad de Los Ángeles como parte del [Plan de Vivienda y Elemento de Seguridad](#).

Los materiales del NOA y el Borrador del EIR ya están disponibles en el [sitio web](#) del Departamento de Planeación de la Ciudad de Los Ángeles (en inglés). El [Aviso de Disponibilidad](#) (el NOA) está disponible en español.

Empezando hoy, el Departamento de Planeación está aceptando comentarios sobre el Borrador del EIR. **El período de comentarios del Borrador del EIR se cerrará a las 5:00 p.m. del martes 7 de septiembre de 2021.**

Si desea enviar comentarios sobre el Borrador del EIR, por favor envíe sus comentarios por escrito (incluyendo su nombre, información de contacto, y el siguiente número de archivo ENV-2020-6762-EIR) durante el período de comentarios, por correo o vía correo electrónico a las siguientes direcciones:

**Cally Hardy | City Planning Associate**  
City of Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

**Correo Electrónico**  
[HousingElement@lacity.org](mailto:HousingElement@lacity.org)

Comentarios públicos generales sobre los borradores de los planes también son bienvenidos hasta que sean adoptados por el Concejo de la Ciudad.

## LOS ANGELES CITY PLANNING

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Los Angeles City Planning | [200 N. Spring St](#), Room 525, Los Angeles, CA 90012

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[Update Profile](#) | [Constant Contact Data Notice](#)

Sent by [housingelement@lacity.org](mailto:housingelement@lacity.org) powered by



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To unsubscribe from the ANGELES-ENVIRO-JUSTICE list, send any message to [ANGELES-ENVIRO-JUSTICE-signoff-request@lists.sierraclub.org](mailto:ANGELES-ENVIRO-JUSTICE-signoff-request@lists.sierraclub.org), or visit [Listserv online](#). Listserv users can [sign in](#) online to [manage subscriptions](#), [personalize delivery options](#), and view [message archives](#). To create an account or reset your password, [click here](#). Listserv [policies](#) may apply.

**Housing Element** <housingelement@lacity.org>

Fri, Jul 23, 2021 at 9:05 AM

To: [REDACTED]

Dr. Williams,

Yesterday's email includes a link to the webpage containing the DEIR materials. For your convenience, here is the link directly: [https://planning.lacity.org/development-services/eir/Housing-Element\\_2021-2029\\_Update\\_Safety-Element\\_Update\\_deir](https://planning.lacity.org/development-services/eir/Housing-Element_2021-2029_Update_Safety-Element_Update_deir)



LOS ANGELES  
CITY PLANNING

**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750

Los Angeles, CA. 90012

[Planning4LA.org](http://Planning4LA.org)

T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

# Housing Element 2021-2029 Update, DEIR Comments, ENV-2020-6762-EIR

2 messages

[Redacted] >  
To: housingelement@lacity.org  
[Redacted]

Tue, Sep 7, 2021 at 9:41 AM

Dear Ms. Hardy,

I'd like to submit the attached comments on the Housing Element Update DEIR.

Could you please send a brief response to confirm you received this?

Thanks,

Casey Maddren

 **Housing Element EIR Comments Maddren FINAL COMPLETE.pdf**  
1084K

Housing Element <housingelement@lacity.org>  
[Redacted]

Tue, Sep 7, 2021 at 3:56 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

9/7/2021

City of Los Angeles Mail - Housing Element 2021-2029 Update, DEIR Comments, ENV-2020-6762-EIR

[Quoted text hidden]

September 6, 2021

Cally Hardy, City Planning Associate  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: Housing Element 2021-2029 Update, EIR Comments  
Case Nos.: ENV-2020-6762-EIR; CPC-2020-1365-GPA; CPC-2021-5499-GPA

Dear Ms. Hardy,

I would like to submit the following comments on the EIR for the 2021-2029 Housing Element Update. I believe there are serious deficiencies in the EIR that must be addressed before it's adopted. Please see my detailed comments below.

Thanks for your help.

Sincerely,

[Redacted signature]

## **COMMENTS ON THE 2021-2029 HOUSING ELEMENT UPDATE E.I.R.**

### **UTILITIES AND SERVICE SYSTEMS**

#### **Wastewater & Stormwater**

The EIR provides an overview of the city's wastewater treatment facilities, and concludes that the creation of over 400,000 new housing units would have no significant impact. However, in light of the recent crisis at the Hyperion Water Treatment Plant, it seems important to question the authors' claims.

On page 4.16-2, under Environmental Setting, Wastewater, we find the following description of the Hyperion Sanitary Sewer System:

*"The Hyperion Sanitary Sewer System is the largest of the City's three sanitary sewer systems. An average wastewater flow rate of approximately 300 million gallons per day (mgd) is treated by the system, which includes the Donald C. Tillman Water Reclamation Plant and the Los Angeles-Glendale Water Reclamation Plant and has a peak wet weather capacity of 800 mgd. The Donald C. Tillman Water Reclamation Plant services the area between Chatsworth and Van Nuys in the San Fernando Valley. The Los Angeles-Glendale Water Reclamation Plant is located in the San Fernando Valley and services the communities in east San Fernando Valley that are both within and outside of the City limits. Approximately 60 mgd is treated at Donald C. Tillman and Los-Angeles Glendale Water Reclamation Plants. All other flows in the system, and the biosolids from the Donald C. Tillman and Los-Angeles Glendale Water Reclamation Plants*

*which are returned to the collection system, are treated at the Hyperion Water Reclamation Plant (HWRP) located in Playa Del Rey (LADPW 2017a)."*

Without question Hyperion is the largest of the city's wastewater treatment systems, serving Central LA, South LA and the San Fernando Valley. For this reason it is deeply troubling that the Hyperion Treatment Plant in Playa Del Rey was recently overwhelmed with a massive flow of debris which left it severely damaged.

*L.A. water recycling imperiled after beach sewage spill, hurting drought conservation, LA Times, August 11, 2021*  
<https://www.latimes.com/california/story/2021-08-11/water-recycling-impaired-by-hyperion-sewage-disaster>

*"Problems at a Los Angeles sewage treatment plant that caused a massive spill into Santa Monica Bay last month have severely reduced the region's water recycling ability, forcing officials to divert millions of gallons of clean drinking water at a time of worsening drought conditions, The Times has learned."*

It is disturbing enough that this calamity has drastically reduced the Hyperion Plant's recycling capability. It is even more disturbing that, in spite of the EIR's claims that there are 30 automatic "real time" flow monitors and 74 additional "near time" monitors located within the system, the Bureau of Sanitation apparently was unaware of the approach of this massive flow of debris. It gets worse. At the time of this writing, almost two months after the July 11, 2021 incident, the Bureau of Sanitation has been unable to explain what happened.

Given these facts, we must take another look at the thresholds of significance: Impacts would be significant if implementation of the Housing Element Update would:

- *Threshold 4.16-1: Require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects*
- *Threshold 4.16-2: Require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects*
- *Threshold 4.16-3: Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments*

In asking whether the construction of over 400,000 new housing units would trigger these thresholds, we must keep in mind:

- *The Hyperion Plant is the terminus for the city's largest sewer system, serving Central LA, South LA and the San Fernando Valley.*
- *The Hyperion Plant has been severely damaged, and the City of LA has not given any timeline for restoring the Hyperion Plant to full capability.*
- *Almost two months after the event, the City of LA has been unable to provide an explanation as to how this massive flow of debris arrived at the Hyperion Plant.*

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cont.

With these facts in mind, we must question the EIR's description of a highly sophisticated, carefully monitored system that is capable of handling all existing wastewater flows, plus the additional wastewater produced by over 400,000 new residential units.

In light of this recent, catastrophic event, which occurred after the preparation of the EIR, we must ask if the assertion that there would be no significant impacts with regard to wastewater is credible. The EIR should be revised to provide a more accurate picture of Hyperion's current and long-term treatment capabilities.

### **Water Supply & Facilities**

With regard to water usage, the Initial Study asks:

*Would the project:*

*a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

*b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

*c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

While the EIR says that the Project could have potentially significant impacts in all three of these areas, the chapter Utilities & Service Systems ultimately finds that impacts in these areas would be less than significant. To reach this conclusion, the EIR references LA City's 2020 Urban Water Management Plan (UWMP).

Page 4.16-47 states that:

*To determine demand on water facilities and water supply for Thresholds 4.16-4 and 4.16-5, demand from build out of the RHNA is determined based on the physical connection of 420,327 housing units to the City's potable water supply system, and applicable utility rates per type of housing unit included in the LADWP 2020 UWMP. Long range water demand forecasts in the 2020 UWMP are based on SCAG growth projections for the 2020-2045 RTP/SCS, which projects increases in housing to address the housing shortage in Southern California and a related reduction in persons per household. Therefore, per the 2020 UWMP, per unit water demand is forecast to decline over time. This is consistent with RHNA assumptions, in which full build-out of the RHNA units would foreseeably reduce the average utility rate per housing unit. [Emphasis added.]*

The 2020 UWMP also says that its demographic projections are based on SCAG data. On page 1-6 it states:

*Demographic projections were provided for the LADWP service area by MWD, which received projected demographic data from Southern California Association of Governments (SCAG).*

What is bewildering is that the Housing Element states that RHNA Allocations are based on SCAG projections, and the 2020 UWMP states that its housing data is based on SCAG projections, but the results they come up with are wildly different.

In the chapter on Utilities & Service Systems, the EIR states that of the RHNA Allocation of 456,643 units, 420,327 units will be physically connected to the City's potable water supply system. But while the EIR references the City of LA's 2020 Urban Water Management Plan (UWMP), the City's RHNA Allocation is far beyond the housing projections given by the UWMP.

Under Demographics and Climate, on page ES-5 of the Executive Summary, the UWMP states:

*The total number of housing units increased from 1.10 million in 1980 to 1.44 million in 2020, representing an average annual growth rate of 0.8 percent.*

In Exhibit ES-C, Demographic Projections for LADWP Service Area, the UWMP makes the following projection for the year 2030:

	<u>2030</u>
Single-Family	639,280
Multi-Family	969,198
<b>Total</b>	<b>1,608,479 [sic]</b>

2  
cont.

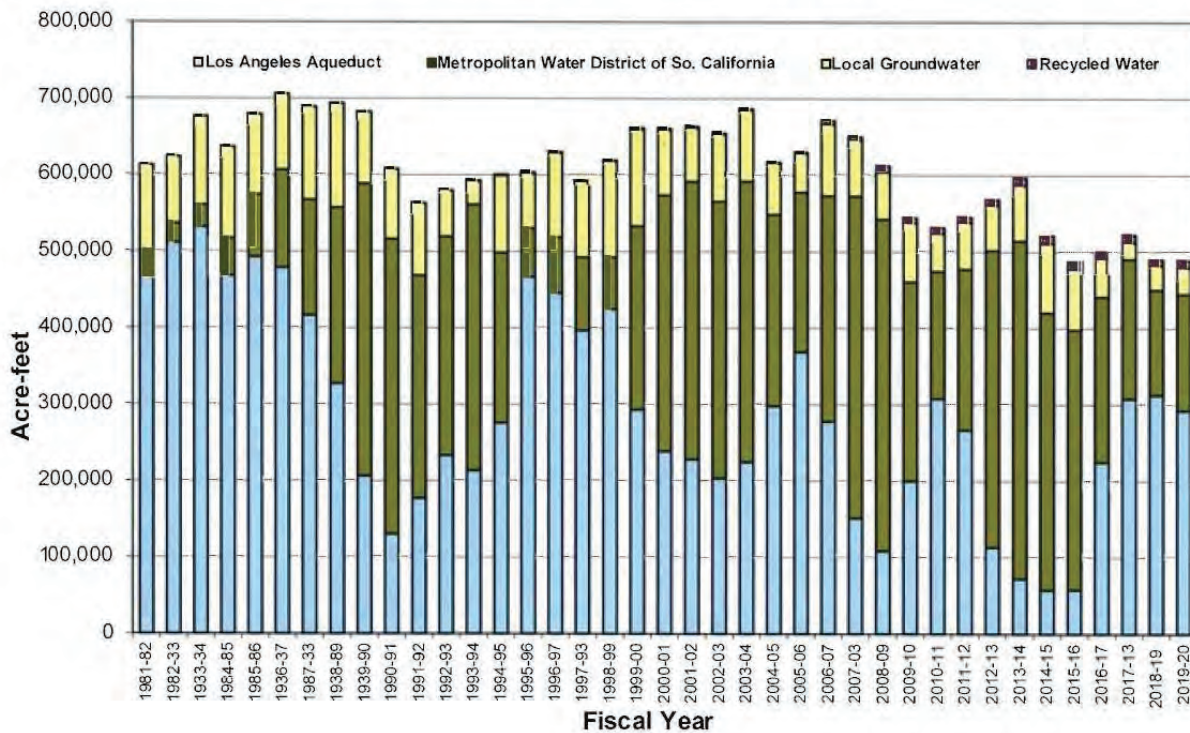
To find net growth projected by the UWMP, we subtract the estimate of 2020 housing units from the 2030 projection:

1,608,479	
- 1,440,000	
<b>168,479</b>	<b>Net growth in housing units per 2020 UWMP</b>

This shows that the growth projected for the year 2030 by the UWMP is far below the 420,327 units assessed by the Housing Element by 2029. **The UWMP's calculations regarding projected water usage by 2030 are based on a net gain of 168,479 new units. The Housing Element's 2029 projection is about 2.5 times that number.** Based on the UWMP's water supply projections, the Housing Element claims that there will be ample water to serve new customers even with the addition of new housing to comply with the RHNA Allocation. But the UWMP's projections are based on very optimistic assumptions regarding both future water deliveries, future conservation and future stormwater capture.

It's important to remember LA has limited groundwater resources, which are already compromised by contamination. The city imports most of its water from sources outside its boundaries, including the State Water Project, the LA Aqueduct and the Colorado River. On page ES-3 of the UWMP, Exhibit ES-B gives a breakdown of the resources we've drawn on since 1981.

Exhibit ES-B  
LADWP Historical Water Supply from FY 1981/82 to 2019/20



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cont.

The graph clearly shows that in recent years the city has relied heavily on deliveries from the LA Aqueduct, while percentages from groundwater and the MWD have been sharply reduced. However, based on current conditions and future projections, it's questionable whether the city can rely on similar deliveries from the LA Aqueduct.

For context, please see this excerpt from page 7 of the May 2021 report from the CA LAO's Office, [What Can We Learn From How the State Responded to the Last Major Drought?](https://lao.ca.gov/reports/2021/4429/learn-from-last-drought-051321.pdf)

<https://lao.ca.gov/reports/2021/4429/learn-from-last-drought-051321.pdf>

**Update on Current Conditions**

**State Is Experiencing Another Multiyear Dry Period**

California experienced below average precipitation in 2020—receiving only roughly 60 percent of the rain and snow that falls in a normal year. So far, 2021 is shaping up to be even drier. As of May 10, 2021, precipitation levels were tracking at 48 percent of average for the year in the Northern Sierra region, 49 percent in the mid-Sierra San Joaquin region, and 36 percent further south in the Tulare Basin region. At this point in the “water year” (which measures precipitation from October through September each year), 2020-21 represents the third driest year on record, with little chance of significant additional precipitation on the horizon until the fall. Current snowpack levels are roughly 9 percent of normal for this time of year for the Northern and Central Sierra regions, and only 4 percent of normal for the Southern Sierra. Moreover, all of

3

*the major reservoirs across the state currently contain less water than historical average levels this date, with the two largest—Shasta and Oroville—at 56 percent and 50 percent of average levels, respectively. In many of the state’s major rivers—including the Feather and American Rivers, and the inflow into Shasta Lake—current flow rates are currently tracking below the runoff levels for the same date in 2014 and 2015.*

Please also see this excerpt from the Union of Concerned Scientists Climate Hot Map.

Union of Concerned Scientists, Climate Hot Map

<https://www.climatehotmap.org/global-warming-locations/hetch-hetchy-ca-usa.html>

*Meeting California's growing demand for water from the Sierra Nevada mountains can be a challenge as global warming further reduces snowpack. That decline is likely to affect both the timing and availability of water for drinking, agriculture, and recreation.*

- *The Sierra snowpack provides natural water storage equal to about half the capacity of California's major human-made reservoirs. Earlier spring runoff typically means a longer dry season and reduced water resources in summer.*
- *By the 2020s, loss of snowpack in the Sierras and Colorado River basin is likely to threaten more than 40 percent of Southern California's water supply.*
- *If our heat-trapping emissions continue to rise unabated, California is projected to face critically dry years up to 50 percent more often, and decreases in water for crops and livestock of 40-50 percent.*

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cont.

With Sierra Nevada snowpacks already in decline, and projected to decline further, it seems likely that the City will not be able to rely on deliveries from the LA Aqueduct to the same degree that it has in years past.

The UWMP’s assessment of future water supplies is also undermined by unforeseen recent events that occurred after it was prepared. Water levels at Hoover Dam/Lake Mead have fallen faster than anyone expected, indicating that Southern California will be forced to accept a reduced allocation from the Colorado River. See this excerpt from the LA Times:

*‘Unrecognizable.’ Lake Mead, a lifeline for water in Los Angeles and the West, tips toward crisis, LA Times, July 11, 2021*

<https://www.latimes.com/world-nation/story/2021-07-11/lake-mead-hoover-dam-drought-nevada-arizona-california>

*“Next month, the federal government expects to declare its first-ever shortage on the lake, triggering cuts to water delivered to Arizona, Nevada and Mexico on Jan. 1. If the lake, currently at 1,068 feet, drops 28 more feet by next year, the spigot of water to California will start to tighten in 2023.”*

Immediately following the declaration of a shortage by the Bureau of Reclamation, the MWD issued a water supply alert:

*Metropolitan Declares Water Supply Alert in Response To Severe Drought*

<https://www.mwdh2o.com/newsroom-press-releases/metropolitan-declares-water-supply-alert-in-response-to-severe-drought/>

And the recent calamity at the Hyperion Treatment Plant has sharply reduced its ability to provide recycled water.

*L.A. water recycling imperiled after beach sewage spill, hurting drought conservation, LA Times, August 11, 2021*

<https://www.latimes.com/california/story/2021-08-11/water-recycling-impaired-by-hyperion-sewage-disaster>

While the UWMP did assume reduced deliveries of water imports, it was prepared before recent developments at Lake Mead and the Hyperion Treatment Plant. The Housing Element EIR chapter Utilities & Service Systems relies heavily on the UWMP for its projections. Because the UWMP was prepared before these previously unforeseeable events and does not reflect their impact on water supply, the EIR's assumptions related to future water supplies cannot be considered reliable.

### **Solid Waste**

It's not surprising that the EIR relegates the discussion of solid waste to the appendix containing the Initial Study. The City's record on solid waste is appalling. Worse, the City refuses to even acknowledge its failures in this area, and instead continues to make false claims based on old data to support its environmental assessments.

The Initial Study asks:

- *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The EIR concludes that the construction of over 400,000 new units would have a less than significant impact. Unfortunately, the EIR's findings in this regard cannot be considered credible. On page 137 of the Initial Study, the authors state the following:

*The City has enacted numerous waste reduction and recycling programs in order to comply with the California Integrated Waste Management Act (AB 939), which require every city in California to divert at least 50 percent of its annual waste by the year 2000, and be consistent with AB 341, which sets a 75 percent recycling goal for California by 2020. As tracked by the City's Zero Waste Progress Report, the City achieved a landfill diversion rate of 76.4 percent as of 2012 (City of Los Angeles Sanitation 2013). The City of Los Angeles has also prepared a Solid Waste Integrated Resources Plan (SWIRP), which contains long-term goals, objectives and policies for solid waste management for the City. It specifies that the City's Zero Waste goal is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 (LASAN 2013).*

One might first ask why the EIR cites data from 2012 to support its claims about diversion to recycling. The City is nowhere near the claimed 76.4% rate of diversion to recycling. It's likely that the reason the City uses data from nine years ago is that it actually has no idea how much solid waste is currently being diverted to recycling. In July of this year I submitted a PRA

request asking for data on the RecyclA program's rate of diversion to recycling for the years 2019 and 2020. [See Exhibit A.] I received the following response:

*City does not currently have the percentage of material diverted for 2019 or 2020.*

Since 2012, significant changes have occurred with regard to solid waste disposal. Up until 2018, the City had been shipping most of its recyclable materials to China, but China has largely closed its doors to imported waste. When exports to China ceased, this created a glut of recycling materials in California, driving down prices for recyclables and resulting in the closure of many recycling companies. Faced with this crisis, in 2019 the City amended the contracts it had entered into with waste haulers participating in the RecyclA program, reducing the targets for diversion to recycling. The details can be obtained by referring to the following contract amendment between the City and Athens Services.

**CONTRACT NO. C-128879-1  
FIRST AMENDMENT TO PERSONAL SERVICES CONTRACT BETWEEN  
THE CITY OF LOS ANGELES AND ARAKELIAN ENTERPRISES, INC. DBA ATHENS  
SERVICES**

On pages 14 and 15 the amendment states:

*For the first disposal reduction assessment period ending at 60 months following the START OF SERVICE only (January 31, 2023), the DISPOSAL TARGET percentage (as a percentage of annual disposal compared to adjusted baseline tonnage) for 2022 (as set forth in APPENDIX A) increased by ten percentage points or 65 percent, whichever is greater, shall be used to determine whether LIQUIDATED DAMAGES shall be assessed. Failure to meet the aforementioned Disposal Targets shall result in LIQUIDATED DAMAGES of \$50,000 for the first 1,000 tons, and \$5,000 for every 100 tons thereafter. For the second disposal reduction assessment period ending at 84 months following the START OF SERVICE (January 31, 2025), the DISPOSAL TARGET percentage (as a percentage of annual disposal compared to adjusted baseline tonnage) of 45 percent shall be used to determine whether LIQUIDATED DAMAGES shall be assessed.*

Similar language is included in all 2019 contract amendments signed with waste haulers participating in the RecyclA program.

In other words, the waste hauler agrees that it will not dispose of more than 65% of solid waste collected in landfills through 2023, and then agrees that it will not dispose more than 45% of solid waste collected in landfills through 2025. If the City were to achieve the goal of 45% solid waste disposal in landfills, it would be in compliance with AB 939. However, in light of the response to my PRA request, we must ask where this data will come from. Will the City be monitoring compliance? No, the waste haulers will be monitoring themselves. The following language appears on page 12 of the amendments:

#### **5.10.4 CONTRACTOR RESPONSIBLE FOR DISPOSAL**

*The CONTRACTOR shall track all materials that are collected, processed, and disposed throughout the term of the AGREEMENT including but not limited to enable measurement of diversion performance. The CONTRACTOR shall be responsible for monitoring the success of their Diversion Programs and the reduction of disposal tonnage throughout the term of the AGREEMENT.*

The City has no data on diversion to recycling because the City doesn't collect any data. They leave it to the private waste haulers, who face financial penalties for failing to meet targets, to monitor their own performance.

The EIR's claim that the City will achieve a rate of 90% diversion to recycling by 2025 is not credible. Furthermore, the City is currently NOT diverting 50% of solid waste to recycling and therefore, contrary to the EIR's assertion, not in compliance with the requirements of AB 939.

The vast majority of new multi-family units created pursuant to the RHNA Allocation will be served by RecyclLA, which serves all commercial and large multi-family residential structures. Based on the above, it is clear that the EIR's claim that there will be no significant impact is not supported by substantial evidence. In fact, it's not supported by any evidence at all.

The City will claim that there is still no significant impact, since the City has adequate landfill capacity to handle the increase in solid waste. However, landfills are a significant source of GHG emissions. Please see the following section from the City's Solid Waste Integrated Resources Plan:

#### *1.2.2.2 Greenhouse Gas Emissions Reductions*

*The waste sector in the U.S. emitted approximately 100 million metric tons of carbon dioxide equivalent emissions in 2012, which represents the sixth-largest generator in the industry sector. [...] Landfills are the third-largest source of generated methane emissions in the U.S. and contributed approximately 17.5 percent of the total U.S. emissions of generated methane in 2011.*

Based on the evidence cited above, it is clear that the EIR fails to adequately assess the impacts of the Housing Element with regard to solid waste.

4  
cont.

cmaddren@gmail.com

---

**From:** publicrecords@lacity.org <support@nextrequest.com>  
**Sent:** Tuesday, July 27, 2021 8:05 AM  
**To:** [REDACTED]  
**Subject:** [External Message Added] City of Los Angeles public records request #21-6204

-- Attach a non-image file and/or reply ABOVE THIS LINE with a message, and it will be sent to staff on this request. --

City of Los Angeles Public Records

**A message was sent to you regarding  
record request #21-6204:**

**REQUEST FOR DOCUMENTS - UNDER THE PUBLIC RECORDS  
ACT**

In reply to your request of July 23, 2021, for Next Request #  
21-6204.

LA Sanitation has information that is responsive to your  
request.

In 2019 there was 1,519,976 tons of solid waste collected for  
disposal through the recycLA program. In 2020 there was  
1,298,289 tons of solid waste collected for disposal through  
the recycLA program. City does not currently have the  
percentage of material diverted for 2019 or 2020.

This request is now completed and will be closed.

Respectfully,

LA Sanitation and Environment

**View Request 21-6204**

<https://lacity.nextrequest.com/requests/21-6204>



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Housing Element <housingelement@lacity.org>

## Plan to house LA

2 messages

**George Papanikolas** [redacted]  
To: housingelement@lacity.org

Thu, Jul 22, 2021 at 9:30 AM

I would like to see the city build a lot more housing, taller housing, there is no reason why everything should be limited to five stories. If we allow it more developments that are sky high skyscrapers then we can have more open space and parks. Please illuminate height restrictions so that we can build a lot more units on each property rather than being limited to 5-8 stories.

1

George Papanikolas  
[redacted]

**Housing Element** <housingelement@lacity.org>  
To: George Papanikolas [redacted]

Wed, Jul 28, 2021 at 8:42 AM

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.



**Housing Element Staff**  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

### Resubmitting Comment on Housing Element Update

2 messages

[Redacted]

Thu, Jul 22, 2021 at 2:03 PM

To: HousingElement@lacity.org

To whom it concerns:

First, I want to say I applaud the City of LA for tackling this multi-faceted way of seeking to fulfill housing needs of Angelenos going forward, to create a more equitable and sustainable solution to housing.

Recently, I've read that in some communities there are development organizations buying up large numbers of properties sold at auction, by \$1 "bidding up", thereby gaining ability to lot-split while also adversely influencing and depressing real estate values of neighboring properties. If this is taking place in Los Angeles, especially where seniors and/or persons of color have invested their lives and limited wealth, I am very concerned for how we are to preserve and protect such communities and homeowner/residents going forward.

1

The document titled "DRAFT 2021-2029 Housing Element" [accessed under link: "What does the plan do?"] includes under subsection "Key Objective and Policy Changes" of section "Preventing Displacement and Ensuring Housing Stability" the following statement:

"Protect communities, especially communities of color, from predatory lending, land acquisition, speculative real estate transactions (Policy 2.2.5)".

How might above-captioned Policy 2.2.5 be implemented/"enforced" to ensure this objective is met? Thank you.

Respectfully submitted,

Janis

Janis Hatlestad

[Redacted]

Updated to add reference file number:  
ENV-2020-6762-EIR

Housing Element <housingelement@lacity.org>

To: [Redacted]

Wed, Jul 28, 2021 at 8:37 AM

Thank you for this comment and question.

There are many ways we believe the plan addresses protecting the most vulnerable - please see the "Key Programs" in the section of the document you referenced, as well as under *Advancing Racial Equity & Access to Opportunity*.

Please also know that the next Draft in we will release in September will explicitly link each Policy to specific Programs to help readers better connect the dots.

Regards,

The Housing Element Team



**Housing Element Staff  
Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org

T: (213) 978-1302



For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]



Letter I-5

Housing Element <housingelement@lacity.org>

Re: Notice of Availability of Draft EIR for Updates to Housing Element and Safety Element / Aviso de Disponibilidad del borrador del Informe de Impacto Ambiental para las actualizaciones del Elemento de Vivienda y del Elemento de Seguridad

Housing Element <housingelement@lacity.org>

Wed, Jul 28, 2021 at 11:47 AM

To: [Redacted]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards, The Housing Element Team



Housing Element Staff Los Angeles City Planning

200 N. Spring St., Room 750 Los Angeles, CA. 90012 Planning4LA.org T: (213) 978-1302



For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.

On Thu, Jul 22, 2021 at 2:14 PM <[Redacted]> wrote:

What's at stake? How can an ordinary Angeleno make sense of this? Like for instance, can we raise our public voice to be clear that residents should not be able to purchase a \$35 placard from LADOT that serves as an exclusive license to use the public road way. This planning element, that owners can purchase adjacent roadway for below market prices, thereby pushing Angelenos into a ticketing trap... is not equity oriented. It's appalling. For shame! I suggest that Seleta Reynolds hold a public hearing with Vince Bertoni on this subject, before EIR deadline in September. Thank you. Eric Preven

1

-----Original Message-----

From: Los Angeles City Planning <housingelement@lacity.org>

To: [Redacted]

Sent: Thu, Jul 22, 2021 8:50 am

Subject: Notice of Availability of Draft EIR for Updates to Housing Element and Safety Element / Aviso de Disponibilidad del borrador del Informe de Impacto Ambiental para las actualizaciones del Elemento de Vivienda y del Elemento de Seguridad



*Para español siga hacia abajo.*

## Interested Parties,

This email is to inform you of the Notice of Availability (NOA) for the Draft Environmental Impact Report (EIR) prepared for the Updates to the Housing Element and the Safety Element. These documents are being prepared by Los Angeles City Planning as part of the [Plan to House LA](#) and [Safety Element Update](#).

The NOA and Draft EIR materials are now available on Los Angeles City Planning's [website](#).

Beginning today, City Planning is accepting comments on the Draft EIR. **The Draft EIR comment period will close at 5:00 p.m. on Tuesday, September 7, 2021.**

If you wish to submit comments on the Draft EIR, please submit your written comments (including a name, contact information, and the following file number ENV-2020-6762-EIR) during the comment period, via mail or e-mail to the following addresses:

**Cally Hardy** | City Planning Associate  
City of Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

**E-mail**  
[HousingElement@lacity.org](mailto:HousingElement@lacity.org)

Beyond the DEIR comment period, general public comments on the plan drafts are also welcome until the Plan is adopted by City Council.

## Partes Interesadas,

Este correo electrónico es para informarle del Aviso de Disponibilidad (NOA por sus siglas en inglés) para el Borrador del Informe de Impacto Ambiental (EIR por sus siglas en inglés) preparado para las Actualizaciones del Elemento de Vivienda y del Elemento de

Seguridad. Estos documentos están siendo preparados por el Departamento de Planeación de la Ciudad de Los Ángeles como parte del [Plan de Vivienda y Elemento de Seguridad](#).

Los materiales del NOA y el Borrador del EIR ya están disponibles en el [sitio web](#) del Departamento de Planeación de la Ciudad de Los Ángeles (en inglés). El [Aviso de Disponibilidad](#) (el NOA) está disponible en español.

Empezando hoy, el Departamento de Planeación está aceptando comentarios sobre el Borrador del EIR. **El período de comentarios del Borrador del EIR se cerrará a las 5:00 p.m. del martes 7 de septiembre de 2021.**

Si desea enviar comentarios sobre el Borrador del EIR, por favor envíe sus comentarios por escrito (incluyendo su nombre, información de contacto, y el siguiente número de archivo ENV-2020-6762-EIR) durante el período de comentarios, por correo o vía correo electrónico a las siguientes direcciones:

**Cally Hardy | City Planning Associate**  
City of Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

**Correo Electrónico**  
[HousingElement@lacity.org](mailto:HousingElement@lacity.org)

Comentarios públicos generales sobre los borradores de los planes también son bienvenidos hasta que sean adoptados por el Concejo de la Ciudad.

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Housing Element <housingelement@lacity.org>

**Wisdom From: Katrina Jenkins**

2 messages

**Katrina Jenkins**

To: housingelement@lacity.org, mayor.garcetti@lacity.org

Thu, Jul 22, 2021 at 9:13 PM

I wanted to comment of the LA City Planning Forum. Housing is one of the largest issues in LA County. I'm glad that I participated in the forum because it drew a light on the issues I wanted to address. Let me just say, you all are doing an awesome job with the limited area you are trying to establish.

My input would be to maximize the area that's being developed. The only way to do that is to build going up. Example: parking structure underneath, business structures at street level, housing units and then green deal projects on top ( community gardens/ roof top playgrounds). Projects on the roof tops should have conservation built in, Example: recycled parts in the construction and recycled water ways.

As for our homeless with mental health issues, they will need housing units with built in supports. They're should be a live-in Social Worker on these sites. They will need someone certified to juggle their individual needs. Community and Activity Rooms / Outdoor Exercise equipment and sitting areas, as they promote mental health wellbeing. Perhaps you can offer FREE housing to the Social Workers to draw them into these type of housing structures. Most importantly the zoning laws for assisting them will need to be re-written to allow the support first.

Truely we are our brothers keeper.❤️

It can be done! Stay encouraged... This is a huge undertaking.

Katrina Jenkins 🙌

**Housing Element** <housingelement@lacity.org>

To: Katrina Jenkins Cc: mayor.garcetti@lacity.org

Wed, Jul 28, 2021 at 8:55 AM

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org

T: (213) 978-1302



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8/19/2021

[Quoted text hidden]

City of Los Angeles Mail - Wisdom From: Katrina Jenkins



Housing Element <housingelement@lacity.org>

**Hi from pb.....7/23 What happened to FEMA involvement..... Notice of Availability of Draft EIR for Updates to Housing Element and Safety Element / Aviso de Disponibilidad del borrador del Informe de Impacto Ambiental para las actualizaciones del Elemento de Vivienda y del Elemento de Seguridad**

2 messages

[Redacted]  
to: housingelement@lacity.org

Fri, Jul 23, 2021 at 12:08 PM

in protecting LA river from FLOODING ? we were told "mandatory" flood insurance would be required for new home owners & that FEMA was now in the insurance business....90039 my hood was one of the areas....big meetings, plans Brace & Boldt programs now nothing ??? typical of how LA drops the ball on PLANS!.....and again WHAT ABOUT BOW TIE PARK the dump site that should be better planned, this has been going on for 20 years since I lived here .

----- Original Message -----  
From: Los Angeles City Planning <housingelement@lacity.org>

To: [Redacted]  
Subject: Notice of Availability of Draft EIR for Updates to Housing Element and Safety Element / Aviso de Disponibilidad del borrador del Informe de Impacto Ambiental para las actualizaciones del Elemento de Vivienda y del Elemento de Seguridad  
Date: Thu, 22 Jul 2021 11:50:24 -0400 (EDT)



Para español siga hacia abajo.

Interested Parties,

This email is to inform you of the Notice of Availability (NOA) for the Draft Environmental Impact Report (EIR) prepared for the Updates to the Housing Element and the Safety Element. These documents are being prepared by Los Angeles City Planning as part of the [Plan to House LA](#) and [Safety Element Update](#).

The NOA and Draft EIR materials are now available on Los Angeles City Planning's [website](#).

Beginning today, City Planning is accepting comments on the Draft EIR. **The Draft EIR comment period will close at 5:00 p.m. on Tuesday, September 7, 2021.**

If you wish to submit comments on the Draft EIR, please submit your written comments (including a name, contact information, and the following file number ENV-2020-6762-EIR) during the comment period, via mail or e-mail to the following addresses:

**Cally Hardy** | City Planning Associate  
City of Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

**E-mail**  
[HousingElement@lacity.org](mailto:HousingElement@lacity.org)

Beyond the DEIR comment period, general public comments on the plan drafts are also welcome until the Plan is adopted by City Council.

## Partes Interesadas,

Este correo electrónico es para informarle del Aviso de Disponibilidad (NOA por sus siglas en inglés) para el Borrador del Informe de Impacto Ambiental (EIR por sus siglas en inglés) preparado para las Actualizaciones del Elemento de Vivienda y del Elemento de Seguridad. Estos documentos están siendo preparados por el Departamento de Planeación de la Ciudad de Los Angeles como parte del [Plan de Vivienda y Elemento de Seguridad](#).

Los materiales del NOA y el Borrador del EIR ya están disponibles en el [sitio web del Departamento de Planeación de la Ciudad de Los Angeles](#) (en inglés). El [Aviso de Disponibilidad](#) (el NOA) está disponible en español.

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Si desea enviar comentarios sobre el Borrador del EIR, por favor envíe sus comentarios por escrito (incluyendo su nombre, información de contacto, y el siguiente número de archivo ENV-2020-6762-EIR) durante el período de comentarios, por correo o vía correo electrónico a las siguientes direcciones:

**Cally Hardy** | City Planning Associate  
City of Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

**Correo Electrónico**  
HousingElement@lacity.org

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**Housing Element** <housingelement@lacity.org>

To: [Redacted]

Wed, Aug 18, 2021 at 6:08 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org

T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]



Letter I-8

Housing Element <housingelement@lacity.org>

Housing Element Feedback (ENV-2020-6762-EIR)

Housing Element <housingelement@lacity.org>  
To: Brian Trautman <[redacted]>

Wed, Jul 28, 2021 at 11:43 AM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team



Housing Element Staff  
Los Angeles City Planning

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

On Fri, Jul 23, 2021 at 8:10 PM Brian Trautman <[redacted]> wrote:  
ENV-2020-6762-EIR

Hi!

I'm heartened by the good work that LA County has done on their housing element. In order to assure affordable housing for everyone, we need to ensure adequate housing availability.

We need to ensure our policies don't just serve people already lucky enough to own property in LA county, but renters and potential new residents as well.

Thank you!

Brian Trautman  
[redacted]



Letter I-9

Housing Element &lt;housingelement@lacity.org&gt;

## Re: Notice of Availability of Draft EIR for Updates to Housing Element and Safety Element / Aviso de Disponibilidad del borrador del Informe de Impacto Ambiental para las actualizaciones del Elemento de Vivienda y del Elemento de Seguridad

Wed, Jul 28, 2021 at 9:04 AM

Reply-to: [REDACTED]  
To: "housingelement@lacity.org" <housingelement@lacity.org>

OK, great. When will Reynolds and Bertoni address the strategy of selling the public right of way to home owners at the cost of workers and visitors?

Please add this as well:

Bonin starts every meeting with Seleta Reynolds, the General Manager of the Los Angeles Department of Transportation (LADOT), by presenting a verbal report relative to the Department's on-going activities.

And he goes out of his way to offer recognition for Department employees for outstanding service ticketing the public.

The use of parking permit districts by municipalities have been upheld through the Supreme Court since 1977: [Arlington County Board v. Richards](#).

Ripe for a challenge or settled law is always a tough call. One thing was very clear, Mike Bonin was a believer.

Despite no coherent strategy -- because if you push every car out of one neighborhood, it will obviously land in an adjacent one -- Bonin will be remembered as Field Marshal committed to bringing the relief.

Like a modern-day General Lucius Dubignon Clay, The Great **Uncompromiser** -- a decedent of Henry Clay, the U.S. senator from Kentucky -- Bonin was beyond dedicated.

Clay orchestrated the Berlin Airlift (1948–1949) when the USSR blockaded West Berlin. Aircrews from the American, British, French, Canadian, Australian, New Zealand, and South African air forces flew over 200,000 sorties in one year, providing necessities such as fuel and an astonishingly high carbohydrate-loaded menu of relief food:

646 tons of flour and wheat, 3 tons of fresh yeast for baking, 180 tons of dehydrated potatoes, 125 tons of cereal, with limited protein representing 109 tons of meat and fish, 64 tons of fat, 10 tons of cheese.

A mere 11 tons of coffee, but airlifts can be really exhausting. It was a miraculous and filling accomplishment.

Bonin was bringing a different kind of relief.

He was bringing the diligent wiring up of every neighborhood in the city to prevent even the possibility of outsiders, no matter how need, from parking on the public roadway.

At City Council, Mike Bonin was advocating #DoNoHarm. But up in Transportation and Public Safety, they were banging out 50 to 55 smart boots a day and on one day applied 81 smart boots.

1

With the vigor of Dr. Fauci promoting vaccination, Mike Bonin pushed through 247 roadway closures often consisting of hundreds of spaces during 2017, 2018, and six months of 2019. . .that's 247 in 30 months = 8 per month or 2 per week.

As an example, the Preferential Parking District (PPD) No. 276 in the Studio City Area in Council District Two is comprised of about 30 blocks. A block is defined as a street segment between two intersecting streets. Between 300 and 600 spaces.

So if we take an average of 500 spaces x 247 restrictions\* = 123,500 spaces!

The Bonin Carlift was a breathtaking nose to the grindstone campaign to rescue NIMBY residents from Angelenos desperate to park.

And why? "The increase goes from \$78 to \$250 for the first violation, \$500 for a second violation within 12 months, and \$1,000 for the third violation within 12 months, and increased late penalties."

Bonin was committed to bringing parking restrictions citywide, of every conceivable variety. . .along with Avak he would agendize dozens and dozens and dozens. . .relative to prohibiting the parking of vehicle, prohibit the stopping, standing, or parking vehicles that are in excess of 22 feet in length or over 7 feet in height, parking of vehicles advertising the private sale of those vehicles.

The people had never seen anything like it because they were mostly squirrelled away in committee.

During all of his relief work, Bonin still found time to falsely tag a civil rights advocate as a racist. . . offering ear plugs for public comments.

Check embarrassing video of Lady Gaga's "A Million Reasons" playing over the life in pictures that he tagged a racist, while his BFF from the StreetsBlogLA was reduced to tears.

The Mayor said and you can be sure that Mike Bonin concurs, "I didn't declare wars that brought people back with PTSD; I haven't been putting people into prisons for years; I didn't declare the drug war; I haven't been in charge of the foster care system."

No, but you both made it harder for the folks who have it hardest.

Not everyone agrees, if one person is hurting. . .we are all hurting. Standing in solidarity, when one person is grieving, we're all grieving.

Bonin is "closing and fencing" but he's still way better than Buscaino!

[Quoted text hidden]

1  
cont.



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Thomas Szelazek [redacted]
Reply-To: [redacted]
To: vince.bertoni@lacity.org

Wed, Jul 28, 2021 at 2:01 PM

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. By creating a thorough quantitative model that estimates sites' likelihood of redevelopment, Planning has provided a fair estimate of the City's current realistic capacity for new housing and acknowledged that Los Angeles will only achieve 10% of its RHNA target in a "business as usual" scenario. The draft housing element also proposes creating over 220,000 homes through rezoning and other land use reforms, particularly in high-resource areas that have accommodated little new housing in recent years. All of this represents significant progress.

Now, additional bold action and specific implementation measures are needed to make the housing element update successful. I urge the City to:

- Target the creation of 300,000 new homes through rezoning and land use reforms.
-Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
-Increase affordable housing opportunities in high-opportunity neighborhoods.
-Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
-Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Thomas Szelazek using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Thomas Szelazek
[redacted]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:10 AM

Hope all is well.

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Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302

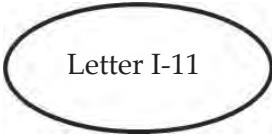


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8/19/2021

City of Los Angeles Mail - Please commit to reform housing now!

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Brennan Lawson [redacted]
Reply-To: [redacted]
To: vince.bertoni@lacity.org

Wed, Jul 28, 2021 at 2:01 PM

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Brennan Lawson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Brennan Lawson
[redacted]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:11 AM

Dear Brennan,

Hope all is well.

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[Quoted text hidden]



Letter I-12

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Anthony Castelletto
Reply-
To: vince.bertoni@lacity.org

Wed, Jul 28, 2021 at 2:02 PM

Dear Director of City Planning Vince Bertoni,

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Personally sent by Anthony Castelletto using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Anthony Castelletto

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:11 AM

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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Chase Engelhardt
Reply-To: [redacted]
To: vince.bertoni@lacity.org

Wed, Jul 28, 2021 at 2:02 PM

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Personally sent by Chase Engelhardt using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Chase Engelhardt
[redacted signature]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:12 AM

Dear Chase,

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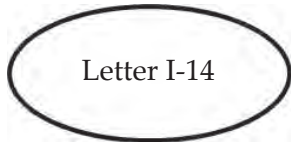
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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Jennifer Martinez [redacted]
Reply [redacted]
To: vince.bertoni@lacity.org

Wed, Jul 28, 2021 at 2:06 PM

Dear Director of City Planning Vince Bertoni,

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Personally sent by Jennifer Martinez using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jennifer Martinez



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:12 AM

Dear Jennifer,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Colleen OBrien [redacted]

Wed, Jul 28, 2021 at 2:06 PM

To: vince.bertoni@lacity.org

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Personally sent by Colleen OBrien using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Colleen OBrien



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:13 AM

Dear Colleen,

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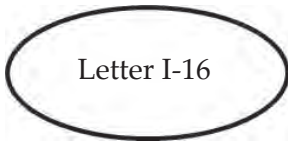
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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Mark S. and Marsha Novak [redacted]

Wed, Jul 28, 2021 at 2:08 PM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Mark S. and Marsha Novak using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Mark S. and Marsha Novak



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:13 AM

Dear Mark and Marsha,

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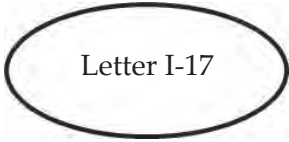
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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Chad Stinson [redacted]

Wed, Jul 28, 2021 at 2:11 PM

To: vince.bertoni@lacity.org

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Personally sent by Chad Stinson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Chad Stinson



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:14 AM

Dear Chad,

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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Sarah Back [redacted]

Wed, Jul 28, 2021 at 2:16 PM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Sarah Back using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Sarah Back [redacted]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:53 AM

Hello Sarah,

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Best,



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[Quoted text hidden]



Letter I-19

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Stanley Johnson [redacted]

Wed, Jul 28, 2021 at 2:20 PM

To: vince.bertoni@lacity.org

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Personally sent by Stanley Johnson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Stanley Johnson

[redacted signature]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:53 AM

[redacted]

Hello Stanley,

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[Quoted text hidden]



Letter I-20

Housing Element &lt;housingelement@lacity.org&gt;

## Please commit to reform housing now!

2 messages

Golden Bachelder [REDACTED]

Wed, Jul 28, 2021 at 2:29 PM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. By creating a thorough quantitative model that estimates sites' likelihood of redevelopment, Planning has provided a fair estimate of the City's current realistic capacity for new housing and acknowledged that Los Angeles will only achieve 10% of its RHNA target in a "business as usual" scenario. The draft housing element also proposes creating over 220,000 homes through rezoning and other land use reforms, particularly in high-resource areas that have accommodated little new housing in recent years. All of this represents significant progress.

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- Target the creation of 300,000 new homes through rezoning and land use reforms.
- Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
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Personally sent by Golden Bachelder using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Golden Bachelder

Housing Element &lt;housingelement@lacity.org&gt;

Tue, Aug 3, 2021 at 11:52 AM

Hello Golden,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

Best,



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
[Planning4LA.org](#)  
T: (213) 978-1302



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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Andrew Silver [redacted]
Reply- [redacted]
To: vince.bertoni@lacity.org

Wed, Jul 28, 2021 at 2:40 PM

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Today the City Council approved revisions to LAMC 41.18. The city must now to the hard work of creating affordable housing.

Now, additional bold action and specific implementation measures are needed to make the housing element update successful. I urge the City to:

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-Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
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Personally sent by Andrew Silver using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andrew Silver
[redacted]

Housing Element <housingelement@lacity.org>
To: Andrew Silver [redacted]

Tue, Aug 3, 2021 at 11:51 AM

Hello Andrew,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,
Housing Element Staff
Los Angeles City Planning
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Los Angeles, CA. 90012
Planning4LA.org



T: (213) 978-1302



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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Elizabeth Sroka [redacted]

Wed, Jul 28, 2021 at 2:44 PM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Elizabeth Sroka using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Elizabeth Sroka



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:50 AM

To: [redacted]

Hello Elizabeth,

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Best,



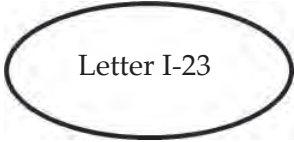
Housing Element Staff Los Angeles City Planning

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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Rafael Sands [redacted]

Wed, Jul 28, 2021 at 2:48 PM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Rafael Sands using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Rafael Sands



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:50 AM

To: [redacted]

Hello Rafael,

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Best,



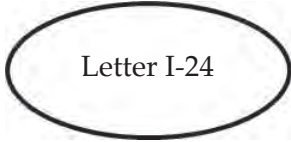
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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Alec Mitchell [redacted]

Wed, Jul 28, 2021 at 2:52 PM

To: vince.bertoni@lacity.org

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Personally sent by Alec Mitchell using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Alec Mitchell



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:49 AM



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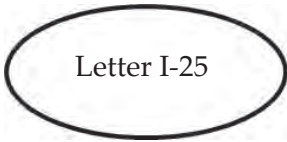
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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Chelsea Bangasser [redacted]

Wed, Jul 28, 2021 at 3:05 PM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Chelsea Bangasser using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Chelsea Bangasser



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:46 AM



Hello Chelsea,

Hope all is well.

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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Chelsea Byers [redacted]

Wed, Jul 28, 2021 at 3:19 PM

To: vince.bertoni@lacity.org

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Personally sent by Chelsea Byers using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Chelsea Byers



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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Greg Chasen [redacted]
Reply-To: [redacted]
To: vince.bertoni@lacity.org

Wed, Jul 28, 2021 at 3:36 PM

Dear Director of City Planning Vince Bertoni,

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Personally sent by Greg Chasen using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Greg Chasen
[redacted]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:45 AM

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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Marcus Owens [redacted]
Reply-To: [redacted]
To: vince.bertoni@lacity.org

Wed, Jul 28, 2021 at 4:03 PM

Dear Director of City Planning Vince Bertoni,

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Personally sent by Marcus Owens using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Marcus Owens
[redacted]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:45 AM

Hello Marcus,

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[Quoted text hidden]



Letter I-29

Housing Element &lt;housingelement@lacity.org&gt;

## Please commit to reform housing now!

2 messages

Babak Mozaffari

Wed, Jul 28, 2021 at 4:19 PM

Reply- [REDACTED]  
To: vince.bertoni@lacity.org

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The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Babak Mozaffari using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Babak Mozaffari

[REDACTED]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:44 AM

To: Babak M [REDACTED]

Hello Babak,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,



LOS ANGELES  
CITY PLANNING

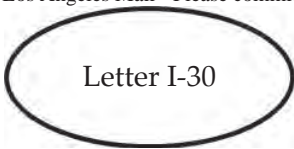
**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
[Planning4LA.org](#)  
T: (213) 978-1302



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Housing Element <housingelement@lacity.org>

**Please commit to reform housing now!**

2 messages

**Kyle Chrise**  
Reply-  
To: vince.bertoni@lacity.org

Wed, Jul 28, 2021 at 4:37 PM

Dear Director of City Planning Vince Bertoni,

More housing: Let's get this done!

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. By creating a thorough quantitative model that estimates sites' likelihood of redevelopment, Planning has provided a fair estimate of the City's current realistic capacity for new housing and acknowledged that Los Angeles will only achieve 10% of its RHNA target in a "business as usual" scenario. The draft housing element also proposes creating over 220,000 homes through rezoning and other land use reforms, particularly in high-resource areas that have accommodated little new housing in recent years. All of this represents significant progress.

Now, additional bold action and specific implementation measures are needed to make the housing element update successful. I urge the City to:

- Target the creation of 300,000 new homes through rezoning and land use reforms.
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The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Kyle Chrise using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Kyle Chrise  
[Redacted Signature]

**Housing Element** <housingelement@lacity.org>  
[Redacted Name]

Tue, Aug 3, 2021 at 11:43 AM

Hi Kyle,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,



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**Los Angeles City Planning**  
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Los Angeles, CA. 90012  
[Planning4LA.org](http://Planning4LA.org)

T: (213) 978-1302



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[Quoted text hidden]



Letter I-31

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Bruce Van Voorhis [redacted]

Wed, Jul 28, 2021 at 5:36 PM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Bruce Van Voorhis using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Bruce Van Voorhis

[redacted signature]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:28 AM

Hello Bruce,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,



Housing Element Staff Los Angeles City Planning

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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Tom Vosburgh [redacted]

Wed, Jul 28, 2021 at 5:55 PM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Tom Vosburgh using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Tom Vosburgh



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:25 AM

Hello Tom,

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Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,



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[Quoted text hidden]



Letter I-33

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Michael Hayes [redacted]
Rep [redacted]
To: vince.bertoni@lacity.org

Wed, Jul 28, 2021 at 6:16 PM

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Michael Hayes using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Michael Hayes

[redacted signature]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:24 AM

Hi Michael,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,

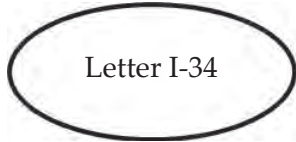


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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Mehnaaz Chowdhury [redacted]
Reply-[redacted]
To: vince.bertoni@lacity.org

Wed, Jul 28, 2021 at 6:25 PM

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Mehnaaz Chowdhury using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Mehnaaz Chowdhury
[redacted]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:23 AM

Hello Mehnaaz,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,

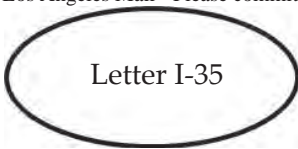


Housing Element Staff
Los Angeles City Planning
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Planning4LA.org
T: (213) 978-1302



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Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Tanya Lebeck [redacted]

Wed, Jul 28, 2021 at 7:19 PM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles.

We need to fix our city's affordable housing shortage. To do this we need to create at least 456,000 new homes by 2029, including at least 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

Planning has provided a fair estimate of the City's current realistic capacity for new housing and acknowledged that Los Angeles will only achieve 10% of its RHNA target in a "business as usual" scenario. The draft housing element proposes creating over 220,000 homes through rezoning and other land use reforms, particularly in high-resource areas that have accommodated little new housing in recent years. All of this represents significant progress.

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Personally sent by Tanya Lebeck using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Tanya Lebeck



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:22 AM



Hello Tanya,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,



Housing Element Staff Los Angeles City Planning

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[Quoted text hidden]



Letter I-36

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Ben Creed [redacted]
Reply-To: [redacted]
To: vince.bertoni@lacity.org

Wed, Jul 28, 2021 at 8:15 PM

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Ben Creed using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Ben Creed
[redacted]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:20 AM

Hello Ben,

Hope all is well.

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Best,

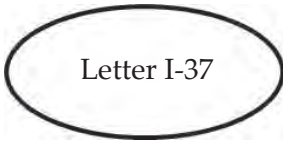


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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Eddie Isaacs [redacted]

Wed, Jul 28, 2021 at 9:19 PM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Eddie Isaacs using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Eddie Isaacs



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:12 AM

Hello Eddie,

Hope all is well.

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Best,



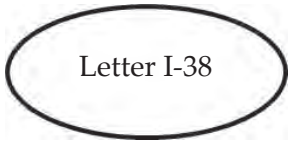
Housing Element Staff Los Angeles City Planning

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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Terence Heuston [redacted]
Reply-[redacted]
To: vince.bertoni@lacity.org

Thu, Jul 29, 2021 at 5:37 AM

Dear Director of City Planning Vince Bertoni,

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Personally sent by Terence Heuston using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Terence Heuston
[redacted]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:03 AM

Hello Terence,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,

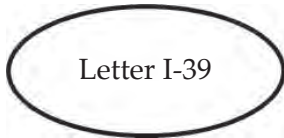


Housing Element Staff
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302



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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Mary Rose Fissinger
Reply-To:
To: vince.bertoni@lacity.org

Thu, Jul 29, 2021 at 7:21 AM

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. By creating a thorough quantitative model that estimates sites' likelihood of redevelopment, Planning has provided a fair estimate of the City's current realistic capacity for new housing and acknowledged that Los Angeles will only achieve 10% of its RHNA target in a "business as usual" scenario. The draft housing element also proposes creating over 220,000 homes through rezoning and other land use reforms, particularly in high-resource areas that have accommodated little new housing in recent years. All of this represents significant progress.

Now, additional bold action and specific implementation measures are needed to make the housing element update successful. I urge the City to:

- Target the creation of 300,000 new homes through rezoning and land use reforms.
-Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
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Personally sent by Mary Rose Fissinger using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Mary Rose Fissinger

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 11:02 AM

Hello Mary,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,



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T: (213) 978-1302



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[Quoted text hidden]



Letter I-40

Housing Element &lt;housingelement@lacity.org&gt;

## Please commit to reform housing now!

2 messages

Steven Guerry

Thu, Jul 29, 2021 at 8:05 AM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I was a resident of Los Angeles from 2004 to 2020. I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Steven Guerry using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Steven Guerry

Housing Element &lt;housingelement@lacity.org&gt;

Tue, Aug 3, 2021 at 11:00 AM

Hello Steven,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
[Planning4LA.org](#)  
T: (213) 978-1302



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[Quoted text hidden]



Letter I-41

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Carey Bennett [redacted]
Reply- [redacted]
To: vince.bertoni@lacity.org

Thu, Jul 29, 2021 at 8:40 AM

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Carey Bennett using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Carey Bennett
[redacted]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:58 AM

Hi Carey,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,



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Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Jessamyn Prince [redacted]
Reply-To: [redacted]
To: vince.bertoni@lacity.org

Thu, Jul 29, 2021 at 8:43 AM

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Jessamyn Prince using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jessamyn Prince
[redacted]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:57 AM

Hello Jessamyn,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,

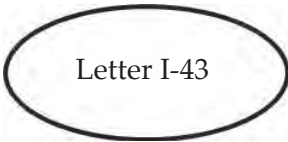


Housing Element Staff
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302



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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

4 messages

Nicholas Burns III
Reply-
To: vince.bertoni@lacity.org

Thu, Jul 29, 2021 at 9:32 AM

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Nicholas Burns III using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nicholas Burns III

Vince Bertoni <vince.bertoni@lacity.org>
To: Flora Melendez <flora.melendez@lacity.org>

Thu, Jul 29, 2021 at 10:38 AM

[Quoted text hidden]

--



Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: vince.bertoni@lacity.org



**Flora Melendez** <flora.melendez@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Thu, Jul 29, 2021 at 10:39 AM

----- Forwarded message -----

From: **Nicholas Burns III** <[REDACTED]>  
Date: Thu, Jul 29, 2021 at 9:32 AM  
Subject: Please commit to reform housing now!  
To: <vince.bertoni@lacity.org>

[Quoted text hidden]

--

~ Angie



**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant III  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



**Housing Element** <housingelement@lacity.org>  
[REDACTED]

Tue, Aug 3, 2021 at 10:56 AM

Hello Nicholas,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,

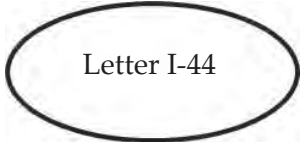


**Housing Element Staff**  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Catherine Fabre [redacted]
Reply- [redacted]
To: vince.bertoni@lacity.org

Thu, Jul 29, 2021 at 10:48 AM

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Catherine Fabre using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Catherine Fabre
[redacted]

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:56 AM

Hello Catherine,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,



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[Quoted text hidden]



Letter I-45

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

3 messages

Aleli Valencia
Reply-
To: vince.bertoni@lacity.org

Thu, Jul 29, 2021 at 11:05 AM

Dear Director of City Planning Vince Bertoni,

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Personally sent by Aleli Valencia using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Aleli Valencia

Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:54 AM

Hi Aleli,

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[Quoted text hidden]

postmaster@lacounty.gov <postmaster@lacounty.gov>  
To: housingelement@lacity.org

Tue, Aug 3, 2021 at 10:54 AM

**Delivery has failed to these recipients or groups:**

[REDACTED]

A communication failure occurred during the delivery of this message. Please try resending the message later. If the problem continues, contact your helpdesk.

The following organization rejected your message: [BL0GCC02FT004.mail.protection.outlook.com](mailto:BL0GCC02FT004.mail.protection.outlook.com).

**Diagnostic information for administrators:**

Generating server: ITSSDDCHYB04.HOSTED.LAC.COM

[REDACTED]

[BL0GCC02FT004.mail.protection.outlook.com](mailto:BL0GCC02FT004.mail.protection.outlook.com)  
Remote Server returned '550 5.4.1 All recipient addresses rejected : Access denied. AS(201806271) [[BL0GCC02FT004.eop-gcc02.prod.protection.outlook.com](mailto:BL0GCC02FT004.eop-gcc02.prod.protection.outlook.com)]'

**Original message headers:**

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X-IronPort-RemoteIP: 209.85.210.52  
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X-IronPort-Reputation: 2.7  
X-IronPort-Listener: IncomingMail  
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by esa17.hc4088-88.iphmx.com with ESMTP/TLS/ECDHE-RSA-AES128-GCM-SHA256; 03 Aug 2021 10:54:42 -0700  
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Tue, 03 Aug 2021 10:54:41 -0700 (PDT)
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X-Google-Sender-Delegation: wajjha.ibrahim@lacity.org
From: Housing Element <housingelement@lacity.org>
Date: Tue, 3 Aug 2021 10:54:30 -0700
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To: [REDACTED]
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Return-Path: housingelement@lacity.org
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(UTC)
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Detected%%TransportVersioned.DPW-Forward-OneDrive-From-NoReplySharepoint%%TransportVersioned.DCERT
- Sent in error (Outside)%%TransportVersioned.DCERT - Sent in error
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Final-Recipient: [REDACTED]  
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----- Forwarded message -----  
 From: Housing Element <housingelement@lacity.org>  
 [REDACTED]  
 Cc:  
 Bcc:  
 Date: Tue, 3 Aug 2021 10:54:30 -0700  
 Subject: Re: Please commit to reform housing now!  
 [REDACTED]

**CAUTION: External Email. Proceed Responsibly.**

Hi Aleli,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

Best,



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

On Thu, Jul 29, 2021 at 11:05 AM Aleli Valencia [REDACTED] wrote:

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. By creating a thorough quantitative model that estimates sites' likelihood of redevelopment, Planning has provided a fair estimate of the City's current realistic capacity for new housing and acknowledged that Los Angeles will only achieve 10% of its RHNA target in a "business as usual" scenario. The draft housing element also proposes creating over 220,000 homes through rezoning and other land use reforms, particularly in high-resource areas that have accommodated little new housing in recent years. All of this represents significant progress.

Now, additional bold action and specific implementation measures are needed to make the housing element update successful. I urge the City to:

- Target the creation of 300,000 new homes through rezoning and land use reforms.
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The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Aleli Valencia using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Aleli Valencia





Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Bob C [redacted]

Thu, Jul 29, 2021 at 11:10 AM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Bob C using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Bob C



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:51 AM



Hello Bob,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,



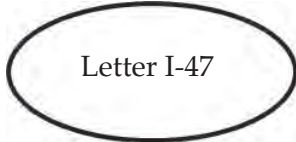
Housing Element Staff Los Angeles City Planning

200 N. Spring St., Room 750 Los Angeles, CA. 90012 Planning4LA.org T: (213) 978-1302



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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Marek Slipski [redacted]

Thu, Jul 29, 2021 at 11:14 AM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Marek Slipski using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Marek Slipski



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:50 AM

Hi Marek,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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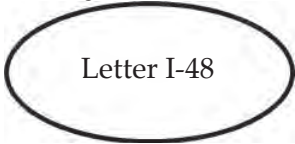


Housing Element Staff
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Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302



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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Tommy Atlee [redacted]

Thu, Jul 29, 2021 at 11:33 AM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Tommy Atlee using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Tommy Atlee



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:48 AM



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Hope all is well.

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Best,



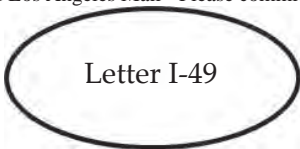
Housing Element Staff  
Los Angeles City Planning

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T: (213) 978-1302



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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Elisa Visick [redacted]

Thu, Jul 29, 2021 at 11:52 AM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Elisa Visick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Elisa Visick



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:47 AM



Hello Elisa,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,



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Los Angeles City Planning

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Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

3 messages

Daniel Poineau
Reply-
To: vince.bertoni@lacity.org

Thu, Jul 29, 2021 at 1:06 PM

Dear Director of City Planning Vince Bertoni,

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Personally sent by Daniel Poineau using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Daniel Poineau

Vince Bertoni <vince.bertoni@lacity.org>
To: Flora Melendez <flora.melendez@lacity.org>

Thu, Jul 29, 2021 at 1:10 PM



Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: vince.bertoni@lacity.org



[Quoted text hidden]

**Housing Element** <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:46 AM

To: [REDACTED]

Hello Daniel,

Hope all is well.

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Thank you,



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CITY PLANNING

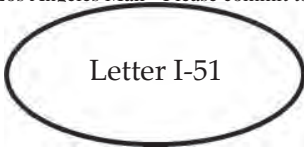
**Housing Element Staff**  
**Los Angeles City Planning**

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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Kevin Zelaya [redacted]

Thu, Jul 29, 2021 at 1:11 PM

To: vince.bertoni@lacity.org

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Personally sent by Kevin Zelaya using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Kevin Zelaya



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:46 AM

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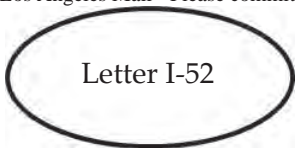
Housing Element Staff Los Angeles City Planning

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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

**Please commit to reform housing now!**

2 messages

**Jeffrey White**  
Rep [redacted]  
To: vince.bertoni@lacity.org

Thu, Jul 29, 2021 at 1:22 PM

Dear Director of City Planning Vince Bertoni,

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Personally sent by Jeffrey White using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Jeffrey White  
[redacted]

**Housing Element** <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:45 AM

Hello Jeffrey,

Hope all is well.

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Best,



**Housing Element Staff**  
**Los Angeles City Planning**  
  
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Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Sarah Kate Levy [redacted]

Thu, Jul 29, 2021 at 1:37 PM

To: vince.bertoni@lacity.org

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Personally sent by Sarah Kate Levy using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Sarah Kate Levy



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:42 AM

Hi Sarah,

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Housing Element Staff Los Angeles City Planning

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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Mark Larson [redacted]

Fri, Jul 30, 2021 at 9:00 PM

To: vince.bertoni@lacity.org

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Personally sent by Mark Larson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Mark Larson



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:38 AM

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For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.

Best,



Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302



8/19/2021

City of Los Angeles Mail - Please commit to reform housing now!

For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

4 messages

Ann Bickerton [redacted]
Reply- [redacted]
To: vince.bertoni@lacity.org

Fri, Jul 30, 2021 at 2:44 PM

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. By creating a thorough quantitative model that estimates sites' likelihood of redevelopment, Planning has provided a fair estimate of the City's current realistic capacity for new housing and acknowledged that Los Angeles will only achieve 10% of its RHNA target in a "business as usual" scenario. The draft housing element also proposes creating over 220,000 homes through rezoning and other land use reforms, particularly in high-resource areas that have accommodated little new housing in recent years. All of this represents significant progress.

Now, additional bold action and specific implementation measures are needed to make the housing element update successful. I urge the City to:

- Target the creation of 300,000 new homes through rezoning and land use reforms.
-Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
-Increase affordable housing opportunities in high-opportunity neighborhoods.
-Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
-Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Ann Bickerton using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Ann Bickerton
[redacted]

Vince Bertoni <vince.bertoni@lacity.org>
To: Flora Melendez <flora.melendez@lacity.org>

Fri, Jul 30, 2021 at 2:51 PM

[Quoted text hidden]
--



Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: vince.bertoni@lacity.org



**Cally Hardy** <cally.hardy@lacity.org>  
To: Housing Element <housingelement@lacity.org>

Mon, Aug 9, 2021 at 9:13 AM

----- Forwarded message -----

From: **Susan Wong** <susan.s.wong@lacity.org>  
Date: Wed, Aug 4, 2021 at 7:46 AM  
Subject: Fwd: Please commit to reform housing now!  
To: Cally Hardy <cally.hardy@lacity.org>

Hi Cally,

This comment was sent to us in error.

Susan



**Susan Wong**  
City Planner  
**Los Angeles City Planning**  
200 N. Spring St., Room 667  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1472 | F: (213) 978-1477



----- Forwarded message -----

From: **Flora Melendez** <flora.melendez@lacity.org>  
Date: Fri, Jul 30, 2021 at 5:36 PM  
Subject: Fwd: Please commit to reform housing now!  
To: Planning Ridgelines <planning.ridgelines@lacity.org>

----- Forwarded message -----

From: **Ann Bickerton** <[REDACTED]>  
Date: Fri, Jul 30, 2021 at 2:45 PM  
Subject: Please commit to reform housing now!  
To: <vince.bertoni@lacity.org>

[Quoted text hidden]

--

~ Angie



**Flora (Angie) Melendez**  
Pronouns: she/hers/her  
Executive Administrative Assistant III  
**Los Angeles City Planning**  
200 N. Spring St., Suite 525C  
Los Angeles, CA 90012  
Planning4LA.org  
T: (213) 978-1271 | F: (213) 978-1275  
E: flora.melendez@lacity.org



--

**Cally Hardy** (she/her/hers)



City Planning Associate  
**Los Angeles City Planning**  
200 N. Spring St., Room 750  
Los Angeles, CA 90012  
Planning4LA.org  
(213) 978-1643



---

**Housing Element** <housingelement@lacity.org>  
To: [REDACTED]

Wed, Aug 18, 2021 at 4:17 PM

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Verity Freebern [redacted]
Reply: [redacted]
To: vince.bertoni@lacity.org

Sat, Jul 31, 2021 at 9:28 AM

Dear Director of City Planning Vince Bertoni,

I'm writing to express my outrage about the most recent city council decision to criminalize poverty. The council's majority vote to reinstate the no-lie law is shameful and inhumane. It must not be allowed to happen.

Additionally, I support a strong, transformative housing element update for LA.

I urge the City to:

- Target the creation of 300,000 new homes through rezoning and land use reforms.
-Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
-Increase affordable housing opportunities in high-opportunity neighborhoods.
-Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
-Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Verity Freebern using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Verity Freebern



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:37 AM

Hello Verity,

Hope you're well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.

Best,



Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302



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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Zennon Ulyate-Crow [redacted]

Sat, Jul 31, 2021 at 10:47 AM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. By creating a thorough quantitative model that estimates sites' likelihood of redevelopment, Planning has provided a fair estimate of the City's current realistic capacity for new housing and acknowledged that Los Angeles will only achieve 10% of its RHNA target in a "business as usual" scenario. The draft housing element also proposes creating over 220,000 homes through rezoning and other land use reforms, particularly in high-resource areas that have accommodated little new housing in recent years. All of this represents significant progress.

Now, additional bold action and specific implementation measures are needed to make the housing element update successful. I urge the City to:

- Target the creation of 300,000 new homes through rezoning and land use reforms.
- Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
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The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Zennon Ulyate-Crow using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely, Zennon Ulyate-Crow



Housing Element <housingelement@lacity.org>

Tue, Aug 3, 2021 at 10:23 AM

Hi Zennon,

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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Best,



Housing Element Staff Los Angeles City Planning

200 N. Spring St., Room 750 Los Angeles, CA. 90012 Planning4LA.org T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]



Letter I-58

Housing Element &lt;housingelement@lacity.org&gt;

## Chapter 2 Constraints/Housing Element Suggestions

Wed, Aug 4, 2021 at 6:47 PM

To: housingelement@lacity.org  
Cc: matthew.glesne@lacity.org

Hi Housing Element Folks,

Constraints preventing expeditious housing development include the post-approval plan check, condition clearance, and covenant acquisition process. Chapter 2 of the draft Housing Element must better address removal of these constraints that result in months' long delays after a housing development project is approved. Some post-approval delays are a result of items, such as:

- Post-approval second guessing of entitlements/project details after approval. After approval, plan check staff will second guess and re-interpret zoning provisions applicable to projects that the Planning Department already approved; any interpretation of code provisions, compliance with requirements needs to happen during the entitlement process when the City processes the application. Aside from Housing Accountability Act requirements (for those projects subject to it) that prevent the City from identifying late inconsistencies, the late-hit review causes massive uncertainty, drives up costs, and takes a significant amount of time to resolve. This should be addressed.
- Post-approval covenant acquisition. We have run into issues with Recreation and Parks, in particular (but with an assist from the City Attorney's office), not issuing draft covenants for review and execution to effectuate park fee credits. I have one project where we are waiting more than eight months for RAP staff to even provide a draft of a required covenant for review. This is resulting in fees increasing substantially, creation of uncertainty, and massive delay – and we haven't even negotiated the covenant yet. There is no justification why the draft covenant and the terms going into the covenant cannot be prepared concurrent with the project approval instead of after the fact, especially since the open space areas were clearly and unambiguously identified during the entitlement process. This is a significant issue. Similarly, the HCID affordability covenant includes items not found in City codes and also is a late hit. There is no reason why many, if not, most of all the terms cannot be implemented via set ordinance or prepared concurrent with project approval instead of after the fact. These are two examples of real world constraints that impede the development of housing, increase costs, and create massive uncertainty. I imagine that land use professionals working in the City have many similar or other examples showing how the City's current post-approval covenant approval process majorly constrains housing development.
- City not accepting plan check drawings electronically or approving drawings electronically. Aside from bringing the City plan check process into the 21<sup>st</sup> Century more than twenty years late, this could save considerable time and expense by not having to produce paper, replicate and deliver paper copies.

I look forward to seeing the revised draft Housing Element addressing and helping to remove these constraints with real reform efforts so that the City can produce and lower the cost of housing.

Thank you,

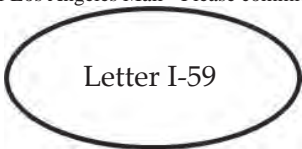
**Ryan Leaderman** | [REDACTED]



---

[Add to address book](#) | [View professional biography](#)





Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Shenette Holman [redacted]

Sun, Aug 8, 2021 at 3:46 PM

Reply-[redacted]

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

Hello, my name is Shenette Holman and I'm urging you to please fix our city's affordable housing shortage. As a mother of four children my family and I had housing in the past. Now that my two oldest children are grown and are out in the world creating their own lives it's just my two youngest children and I.

My two youngest children have really been resilient by dealing with being homeless during this pandemic and school closures. I truly feel as if my children have suffered enough and deserve a home to continue to strive for excellence in.

My children are really good children that deserve more than I could ever give them. During the pandemic their grades did slip but that was due to not having housing, getting sufficient internet and computer access. I can't begin to explain how difficult it was to charge all these various electronics while the world was shutdown. Yet, I do care about my children and their education. Now I'm pleading with you to please do your part and help not just my family but the many families who are in the same boat.

You do believe that all human beings deserve adequate housing right ? Especially our children. Below is the standard message that we are encouraged to send. You can choose to read it or not the choice is yours. With that being said when it comes to affordable housing you can chose to fix the city's lack of affordable housing issue or you could choose to not fix it and continue to let the homeless population grow and be criminalized.

Thank you,

Shenette H.

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Shenette Holman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,  
Shenette Holman

[redacted signature block]

Housing Element <housingelement@lacity.org>

Wed, Aug 18, 2021 at 4:16 PM

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



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[Quoted text hidden]



Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

3 messages

Joann Gioia [redacted]

Thu, Sep 2, 2021 at 1:10 PM

To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

Hi:

I am writing to tell you to please ignore Abundant Housing's suggestions for the Los Angeles City Housing Element. Abundant Housing has no right to tell the City or the residents of Los Angeles how they should run or live in their City. There is no need to allow duplexes to be built on lots zoned single family. The Los Angeles City Council was correct in opposing SB 9 and SB 10. These bills will destroy Los Angeles. The City of Los Angeles needs to have a balance of single and multi family homes. Only the City of LA and residents of LA can decide where it is best to allow density. Please do not listen to the YIMBYS, they are pushing high density everywhere. If a person purchased a home that is zoned R1 that home should remain R1. It is illegal to change zoning after a purchase has been made without the approval of the residents that change will involve. Let's work on the housing element together and keep the YIMBYs (Abundant Housing ) out of it.

1

Sincerely, Joann Gioia



Vince Bertoni <vince.bertoni@lacity.org>

Thu, Sep 2, 2021 at 1:12 PM

To: Flora Melendez <flora.melendez@lacity.org>



Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: vince.bertoni@lacity.org



[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Tue, Sep 7, 2021 at 2:20 PM

To: Joann Gioia [redacted]

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

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**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

**ENV-2020-6762-EIR**

2 messages

**Bill Cotter** [redacted]  
To: housingelement@lacity.org

Sun, Sep 5, 2021 at 3:11 PM

There are so many things wrong with this “plan” it’s hard to know where to start.

Let’s eliminate zoning, fill the city with apartment buildings even though we don’t have water or power for what we have today, then not require the homeless to do anything to address the core of their problems. We have EMPTY BEDS now because people CHOOSE to stay on the street. Get them help for their addictions and illnesses, please – covering the city in apartment houses is NOT going to address these issues. I’m sure it will enrich your developer buddies big time though.

For those considering this “plan” – are you ready to have the house next door torn down and be replaced by a multi-story building full of untreated addicts? That’s what this plan espouses.

**Housing Element** <housingelement@lacity.org>  
To: Bill Cotter [redacted]

Tue, Sep 7, 2021 at 3:08 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]



Letter I-62

Housing Element &lt;housingelement@lacity.org&gt;

## File Number ENV-2020-6762-EIR

2 messages

**Anna Berberian** [REDACTED]

Sun, Sep 5, 2021 at 3:33 PM

To: housingelement@lacity.org

Good afternoon,

My name is Anna Berberian and I am writing to you as a concerned citizen and taxpayer living in the City of L-A that is tired of being held hostage in her neighborhood by the homeless population that is comprised of criminals and drug addicts. Enough is enough.

What exactly is the reasoning beyond the harebrained idea of Housing First DOES NOT REQUIRE ENTERING A TREATMENT PROGRAM even though they will OFFER the services but addicts don't have to take them? Mayor Garcetti took over Petit Park Rec Center to house chronic homeless during covid which left us with "housing resistant" drug users, drug sellers, and unstable mentally ill people walking in our streets today.

When you help the ROOT CAUSES of substance abuse and severe mental health problems, many homeless can become welcome and productive members of society, and the community will feel supportive of helping. The community voted for Prop HHH because they wanted to help people but they need the right kind of help! Putting these individuals within residential communities without proper mental health care puts the community at risk just like allowing drunk drivers on the road.

Housing the homeless is important, but homeless people have different reasons for being homeless. Putting law-abiding individuals in low-income housing in the area is not a problem. But putting drug abusers and mentally ill who constantly disturb the community while leaving their taxpayer provided Housing First home is a big problem for nearby residents. This city has refused to address the root cause of many homeless.

It is irresponsible to leave UNTREATED individuals in Tiny Homes, apartments or on the streets in our communities. It threatens the well-being of the community. Long-term in-patient rehabilitation needs to occur away from residents-not at casual sober-living type homes where they allow people to wander away and continue to do drugs. Some people may need locked mental health treatment to keep them and the community safe. Los Angeles is terribly short on mental beds compared to other major cities.

In addition, zoning laws and regulations were made for good reason. The rules cannot be arbitrarily lifted to permit harm to society because LA politicians believe they cannot solve the massive addiction/mental illness crises. The general population would not have a NIMBY attitude if their safety and well-being were not threatened. Substance abuse, erratic behaviors, petty theft to support bad habits, public nuisance, and vandalism are crimes that add up to a poor quality of life. This does not bode well for a healthy society.

Thank you

Sent from my iPhone

**Housing Element** <housingelement@lacity.org>

Tue, Sep 7, 2021 at 3:12 PM

To: Anna Berberian [REDACTED]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
 Los Angeles, CA. 90012  
 Planning4LA.org

T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]



Housing Element <housingelement@lacity.org>

**ENV 2020-6762- EIR**

2 messages

**Angiee Suarez** [redacted]  
To: housingelement@lacity.org

Sun, Sep 5, 2021 at 5:34 PM

Cally Hardy,

I am a resident in North Granada Hills and urge to please aid us with the homelessness issue here. Please do not put tiny homes, etc in this community where we have schools, parks, etc. Without addressing the mental Health Of the people experience in homelessness. We have been ravaged in this community by a sudden surge in population since the pandemic started. These individuals that were sent to our community from other areas have severe mental issues and drug issues that have not been resolved and therefore allowing them to be put into homes in our neighborhood close to churches schools etc. has already proven to be very ineffective and harmful to our children and the residents.

Please think of our children and what they have already seen. Naked women and men offering them sex while they walk to school, crack pipes and drug paraphernalia being thrown at them on sidewalks  
To name a few.

-Angela M. Suarez

Sent from my iPhone

**Housing Element** <housingelement@lacity.org>  
To: Angiee Suarez [redacted]

Tue, Sep 7, 2021 at 3:14 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



For more information on the Plan to HouseLA visit our [website](#), and/or join our [listserv](#) (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]

1



Letter I-64

Housing Element <housingelement@lacity.org>

ENV-2020-6762-EIR Comments

2 messages

Lisa K. Carothers [redacted]

Sun, Sep 5, 2021 at 7:24 PM

To: "housingelement@lacity.org" <housingelement@lacity.org>

To: Cally Hardy

Regarding: ENV-2020-6762-EIR

From: Lisa Carothers [redacted]

Please see my comments below. I am angry that a survey went and it's too late for me to respond and I barely received notice about the ability to add my comments to the city's plan to resolve the unhoused situation.

- Regarding Policy 5.1.5 - Reduce zoning and other regulatory barriers to the placement and operation of housing and services for the unhoused.

**NO! Not unless you make it mandatory for people to receive mental health treatment! We cannot have those who have erratic and often drug-seeking behaviors placed in our community! The citizens have a right to know who their neighbors are and not risk the often poor oversight that goes along with facilities.**

- Regarding Policy 5.1.4. - Implement a housing-first approach and coordinate service provision(Policy 5.1.4 )

**NO! Housing First isn't safe for the homeless who are mentally ill or on drugs nor is it safe for the community! We have too many housing-resistant who roam the streets stealing, throwing bottles at citizens, doing drugs in broad daylight, and dropping drug paraphernalia all over the place. We are tired of the rampant codependency by the LA City Government where these sick people are permitted to traumatize the neighborhoods instead of being placed in treatment facilities where they get immediate help for their drug problem.**

**Stop and look at the ROOT CAUSE! Stop asking the sick people if they want help and just make them take it! They aren't in their right minds due to drugs yet you expect a sane response from them? I'm angriest at the politicians and the City department heads who are so grossly irresponsible.**

**You don't allow often dangerous people to roam the streets looking for another fix when they should be inside seeing psychiatrists, social workers, and attending 12-step types of programs in addition to medication to stabilize moods and prevent psychosis.**

- Regarding Policy 5.1.4 - Identify and remove barriers to permitting, preserving, and expanding licensed community care facilities

**NO! Not unless you make it mandatory for people to receive mental health treatment! We cannot have those who have erratic and often drug-seeking behaviors placed in our**

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**community! The citizens have a right to know who their neighbors are and not risk the often poor oversight that goes along with facilities. They need guarded facilities while detoxing to keep ALL citizens safe.**

- Regarding Program 116 - Adopt amendments to zoning code to remove restrictions for health-based residential facilities

**NO! Again, not unless you make it mandatory for people to receive mental health treatment! We cannot have those who have erratic and often drug-seeking behaviors placed in our community! The citizens have a right to know who their neighbors are and not risk the often poor oversight that goes along with facilities.**

- Regarding Program 115 - Adopt amendments to zoning code to facilitate by-right siting of shelter and transitional housing facilities

**NO! Again, not unless you make it mandatory for people to receive mental health treatment! We cannot have those who have erratic and often drug-seeking behaviors placed in our community! The citizens have a right to know who their neighbors are and not risk the often poor oversight that goes along with facilities.**

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cont.

**Housing Element** <housingelement@lacity.org>  
To: "Lisa K.Carothers" [REDACTED]

Tue, Sep 7, 2021 at 3:16 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team



**Housing Element Staff**  
**Los Angeles City Planning**

200 N. Spring St., Room 750  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 978-1302



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Housing Element <housingelement@lacity.org>

**Comment on ENV-2020-6762-EIR**

2 messages

**Ann Dorsey** [redacted]

Sun, Sep 5, 2021 at 8:21 PM

To: "housingelement@lacity.org" <housingelement@lacity.org>

To Whom It May Concern:

I am writing to submit a comment on file number ENV-2020-6762-EIR.

Although there may be a need for increased housing at all income levels, Los Angeles has to find a way to meet AFORDABLE housing needs. This must be a priority, or the homelessness situation will only get worse.

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Thank you,

Ann Dorsey



**Housing Element** <housingelement@lacity.org>

Tue, Sep 7, 2021 at 3:18 PM

To: Ann Dorsey [redacted]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team



**Housing Element Staff**  
**Los Angeles City Planning**

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Housing Element <housingelement@lacity.org>

ENV-2020-6762-EIR

2 messages

Winifred Powelliption [redacted]  
To: housingelement@lacity.org

Mon, Sep 6, 2021 at 9:02 AM

Housing first does not demand that a treatment program be entered, offering this service is not enough, addicts will refuse and have refused. Petit park is overrun with drug addicts and mentally unstable people who have made it dangerous to live around this park. Garcetti took over Petit Rec Center to house chronic homeless and left us with drug dealers, addicts and mentally unstable individuals who resist housing. Dealing with the root causes is vital and should putting those who are not in treatment into communities is putting us in danger. Low income housing for law abiding people is welcomed but not drug abusing individuals who will put the community at risk. Long term rehabilitation needs to occur away from family homes, where older families live or young people are living not at casual sober living houses in our communities where they are free to leave and continue to do drugs. The mentally ill need to be where they are treated and not a danger to themselves or the community.

Zoning laws and regulations were made with good reason. To arbitrarily lift them will cause harm to families who live in these areas and only benefits developers. Leave our zoning laws alone. Families have worked hard to afford the American dream and you want to wipe that away with new zoning laws, not to mention the extra power and water needed for apartment buildings when California is having great difficulty supplying those homes and apartments now. Parking and traffic on top of that. More buses is not the answer. Our quality of life is going down hill fast and it seems that our elected officials, at ever level, to not care.

Marie Lipton  
[redacted]  
ENV-2020-6762-EIR  
Sent from my iPhone

Housing Element <housingelement@lacity.org>  
To: Winifred Powelliption [redacted]

Tue, Sep 7, 2021 at 3:20 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team



**Housing Element Staff**  
**Los Angeles City Planning**

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Housing Element <housingelement@lacity.org>

(no subject)

2 messages

Jennifer Cox [redacted]  
To: housingelement@lacity.org

Tue, Sep 7, 2021 at 10:28 AM

File Number: ENV-2020-6762-EIR  
ATTN: Cally Hardy, City Planning Associate, City of Los Angeles Department of City Planning

In response to the survey regarding The Plan to House L.A., as a homeowner in the city I have substantial concerns and objections to this plan. Please do not change zoning for the operation of housing and services for the unhoused. My community is already suffering from increased crimes, violence and vandalism.

The unhoused that were brought to my community during the start of the COVID pandemic have been constantly using drugs in the open on our streets and in our parks, attacking residents and businesses, made the sidewalks impassable and have been terrorizing us.

Please provide long term care facilities, rehab and mental health.

Thank you,  
Jennifer Cox, resident  
[redacted]

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Housing Element <housingelement@lacity.org>  
To: Jennifer Cox [redacted]

Tue, Sep 7, 2021 at 4:40 PM

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,  
The Housing Element Team



**Housing Element Staff**  
**Los Angeles City Planning**

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Letter I-68

Housing Element &lt;housingelement@lacity.org&gt;

**file number ENV-2020-6762-EIR**

2 messages

**Monica Dragavon** [REDACTED]

Tue, Sep 7, 2021 at 4:53 PM

To: "housingelement@lacity.org" &lt;housingelement@lacity.org&gt;

TO:

Cally Hardy, City Planning Associate, City of Los Angeles Department of City Planning  
file number ENV-2020-6762-EIR

Dear Ms. Hardy,

I am concerned with and oppose the components and explain reasons below:

- Reduce zoning and other regulatory barriers to the placement and operation of housing and services for the unhoused.(Policy 5.1.5 )
- Implement a housing-first approach and coordinate service provision(Policy 5.1.4 )
- Identify and remove barriers to permitting, preserving, and expanding licensed community care facilities(Policy 5.1.5)
- Adopt amendments to zoning code to remove restrictions for health-based residential facilities(Program 116)
- Adopt amendments to zoning code to facilitate by-right siting of shelter and transitional housing facilities(Program 115)

Housing First DOES NOT REQUIRE ENTERING A TREATMENT PROGRAM. Even though they may OFFER services, addicts don't have to take them. When Mayor Garcetti took over Petit Park Rec Center to house chronic homeless during covid, it left behind "housing resistant" drug users, drug sellers, and unstable mentally ill people who moved to the area and still continue to cause repeated problems. This particular group of transients has attracted gangs and drug users/sellers to the area. Housed or unhoused, nobody wants to live near this.

When you help the ROOT CAUSES of substance abuse and severe mental health problems, many homeless can become welcome and productive members of society, and the community will feel supportive of helping. The community voted for Prop HHH because they wanted to help people, but they need the right kind of help! Housing First was NOT written in measure HHH. People did not vote for that. Housing active substance abusers/chronic mentally ill individuals in residential communities without proper long-term rehab/mental health care beforehand, puts the entire community at risk. We do not allow drunk drivers on the road due to poor judgement so why place similar poor judgement individuals, due to illicit drug use/chronic mentally ill, to present poor judgment and harm to the community daily?

Don't risk our quality of life by building housing for untreated individuals in residential/local business areas! If they choose to continue to use drugs and the State choses to enable them, do so without harming the rest of us. Data has shown that Housing First is more successful with housing individuals-NOT with treatment. I have gone as far as requesting data from the Mayor's office, but they would not provide as "it was complicated." What is not complicated, is the data I have found which shows there is no increase in addicts getting clean with Housing First. Don't rezone; put Housing First for active abusers where it will not be a problem or health or safety risk to others.

Housing is important, but it is irresponsible to house UNTREATED individuals in Tiny Homes, apartments or on the streets in our communities. It threatens the well-being of any community. Long-term in-patient rehabilitation needs to occur away from residents-not at casual sober-living type homes where they allow people to wander away and continue to do drugs. Although some of these facilities are run well, unfortunately there has not been enough oversight at some of these money mills. Plus, when you allow business to purchase residential properties to use as money-making businesses, they can afford to purchase high which brings the comps and cost of housing high and out of reach to regular individuals looking to buy their first home, but now out of reach. Like Air BNB, your use of these half-way homes are part of the problem to affordable real estate.

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In addition, some people may need lock-up mental health treatment to keep them and the community safe. Los Angeles is terribly short on mental beds compared to other major cities. Please open up a state run facility! Work of changing mental illness laws for the sake of those who have already refused the offered apartment and ended up dying on the streets. It was NOT a housing problem in Granada Hills, but mental illness that the individual did not realize they had and died on the sidewalk. To be clear: she was offered her own apartment, refused, died. Outreach had been by multiple times and offered her an apartment. Please add more beds to mental facilities so more people can be helped-LA is sorely lacking compared to other major cities.

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cont.

In addition, zoning laws and regulations were made for good reason. The rules cannot be arbitrarily lifted to permit harm to society because LA politicians believe they cannot solve the massive addiction/mental illness crises. The general population would not have a NIMBY attitude if their safety and well-being were not threatened. Substance abuse, erratic behaviors, petty theft to support bad habits, public nuisance, and vandalism are crimes that add up to a poor quality of life. This does not bode well for a healthy society. The City should not be allowed to put society at risk. After treatment, let's hope they are ready to start over with community support!

To be clear, although I am opposed to any re-zoning, my comments above are not in reference to low income housing, but specifically to Housing First situations with untreated individuals detailed above. For low income housing, I believe this can be done by other means rather than changing rezoning codes and thus, the character of a neighborhood. Why change the essence of a community? We can create low income housing without the rezoning. Los Angeles is following San Francisco with the overpriced, unaffordable housing and it's not right. People of all income levels need to live in a safe and clean community. I have ideas if you care.

Monica Dragavon

[Redacted]

file number ENV-2020-6762-EIR

**Housing Element** <housingelement@lacity.org>

Tue, Sep 7, 2021 at 5:00 PM

To: Monica Dragavon [Redacted]

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,

The Housing Element Team



LOS ANGELES  
CITY PLANNING

**Housing Element Staff**  
**Los Angeles City Planning**

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Los Angeles, CA. 90012  
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