

## Communication from Public

**Name:** G. Greengard

**Date Submitted:** 11/14/2024 04:25 PM

**Council File No:** 21-1230-S5

**Comments for Public Posting:** I oppose expanding building incentives into R-1 areas. Every high resource area has corridors; there will be adequate high resource options with corridor density. Don't destroy existing and truly affordable housing in R-1 areas to make way for predominantly market-rate units.

## Communication from Public

**Name:** Deborah Mcmillan

**Date Submitted:** 11/14/2024 09:01 PM

**Council File No:** 21-1230-S5

**Comments for Public Posting:** Please do not put high rise apartments or condo's in Westchester Playa del Rey. We purchased our home to live in a single family home community years ago. Then the city allowed building contractor to build an apartment building on Manchester that shares an alley with us. The value of our single home dropped considerably because no one wants strangers staring into their yards and private living areas. Keeping shades down for orivacy makes the house dark and gloomy. Westchestary has sacrificed enough having the airport next door. Noise, pollution and gridlock is our communities daily experience. Adding more high rise housing just add to the negative impact. How about building in Pacific Palisades, Brentwood, Bel Air? They have excellent schools. Large streets beautiful parks and lots of parking. There are other areas to build other than Westchester Playa del Rey. We have sacrificed enough. Noise pollution, gridlock inferior schools iwe have given enough!

## Communication from Public

**Name:** Westside Village HOA

**Date Submitted:** 11/14/2024 12:35 PM

**Council File No:** 21-1230-S5

**Comments for Public Posting:** Our HOA, comprised of homeowners, condo owners and apartment tenants in our geographic boundaries, which constitutes a subarea of Palms, supports Draft #3 that is under consideration. Our community has TOC developments that have already been completed, or are in process, that added an additional 600+ units to an area that has only 1200 single family residences remaining. We are a historical area of Los Angeles: developed by Fritz Burns in the 1940s utilizing the "Heart of the Community" design that is taught in land planning courses. Our remaining residences are the some of the most affordable single family homes on the Westside, offering homeownership opportunities (historically) to low to middle class workers. Many homes have already built ADUs that are used for multiple generation living. We wish to preserve what little remains of our community, while also continuing to support density along our major corridors, as has been done on Overland Avenue and Sepulveda Blvd. Reasonable and smart planning can accommodate our RNHA requirements by directing development towards our transportation corridors and fostering multiple land uses, from single family residences, condominiums, small homes and apartments. Each has a place in our City and preservation of the most affordable single family homes must be part of that plan. Thank you, Westside Village HOA (a part of Palms)

## Communication from Public

**Name:** Valley Industry & Commerce Association

**Date Submitted:** 11/14/2024 09:51 AM

**Council File No:** 21-1230-S5

**Comments for Public Posting:** Dear Planning & Land Use Committee, On behalf of the Valley Industry and Commerce Association (VICA), we are writing to support the adoption of the Citywide Housing Incentive Program (CHIP) and offer recommendations to further strengthen its impact on housing production across Los Angeles. VICA represents diverse industries in the San Fernando Valley, many of whom are deeply affected by the city's housing shortage and affordability crisis. We are encouraged by CHIP's aim to serve as a comprehensive tool for housing production and appreciate that it incorporates provisions aligned with recommendations from key stakeholders, including VICA. We recognize the significant improvements CHIP brings, including its expanded density bonuses, streamlined ministerial approval pathways, and targeted incentives for mixed-income and affordable housing developments. These provisions position CHIP to enhance the city's Density Bonus and Transit Oriented Communities programs effectively.

- **Equal Incentives Across Programs:** Ensure that the Density Bonus program (DB) has comparable benefits to the Mixed-Income and Affordable Housing Incentive Programs (MIIP and AHIP), including access to three waivers before Expanded Administrative Review is required.
- **Increased FAR Incentives:** Adjust FAR limits in commercial and residential zones for Transit Oriented and Opportunity Corridor projects to ensure feasibility, increasing incentives to reflect the density needs of each area.
- **Unified Affordability Requirements:** Simplify the affordability requirements by removing the increased set-aside for higher market tiers, which could discourage development in those areas and shift projects to lower-income neighborhoods.

These recommendations will help ensure that CHIP remains a robust and feasible tool for advancing housing production goals citywide. We look forward to seeing CHIP adopted with these refinements, making Los Angeles a model for progressive housing development.



November 14, 2024

Planning & Land Use Management Committee  
Los Angeles City Council  
200 N Spring Street  
Los Angeles, CA 90012

**Re: C.F. 21-1230-S5: Recommendations for the Citywide Housing Incentive Program**

Dear Planning & Land Use Committee,

On behalf of the Valley Industry and Commerce Association (VICA), we are writing to support the adoption of the Citywide Housing Incentive Program (CHIP) and offer recommendations to further strengthen its impact on housing production across Los Angeles. VICA represents diverse industries in the San Fernando Valley, many of whom are deeply affected by the city's housing shortage and affordability crisis. We are encouraged by CHIP's aim to serve as a comprehensive tool for housing production and appreciate that it incorporates provisions aligned with recommendations from key stakeholders, including VICA.

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These recommendations will help ensure that CHIP remains a robust and feasible tool for advancing housing production goals citywide. We look forward to seeing CHIP adopted with these refinements, making Los Angeles a model for progressive housing development.

A handwritten signature in black ink, appearing to read "Stuart Waldman", with a long, sweeping horizontal line extending to the right.

Stuart Waldman  
VICA President

## Communication from Public

**Name:** Chris Wilson

**Date Submitted:** 11/14/2024 10:00 AM

**Council File No:** 21-1230-S5

**Comments for Public Posting:** On behalf of the Los Angeles County Business Federation (BizFed) and the many organizations on this coalition letter, we submitted a letter in July 2024 to the Department of City Planning to offer recommendations on the prior version of the CHIP, based on technical guidance provided in partnership by Urban Land Institute Los Angeles' (ULI-LA) members who have unparalleled expertise and experience with planning, land use and development in LA. Our recommendations in that letter focused on key areas the CHIP could be amended to support the financial feasibility of projects and depoliticization of planning decisions in our city, ultimately with the goal of realizing the full potential of the CHIP to yield substantial new affordable and mixed-income housing across all of the city's neighborhoods, particularly in high-resource areas. Several of our most important recommendations were incorporated in the current version of the CHIP that has been presented to you. We appreciate the Department of City Planning incorporating many of our most important recommendations. We are writing to ask that you preserve these provisions as you consider and vote on the CHIP. Additionally, we suggest three additional areas that we believe the CHIP can further be refined to maximize the potential for the CHIP to produce new housing, ensuring its provisions yield financially feasible projects and that its approval pathways are clear, predictable and streamlined and protect against potential politicization of development. We recognize that the CHIP is a complex program that includes multiple incentive programs within it. It will serve as the successor to the most important housing production tools that currently exist in the city: the Density Bonus (DB) and the Transit Oriented Communities (TOC) programs. It will impact the entire city, and beyond this, there is a tight deadline for the CHIP to be enacted and useable by early next year or else the city will face significant consequences due to state law. We commend City Planning staff for the extensive outreach, genuine engagement and hard work they have done and continue to do to see through the adoption and implementation of the CHIP. The CHIP contains many strong features to support mixed-income and affordable growth in our city. For example, it (i) creates an incentive program for mixed-income development in commercial corridors, (ii) increases

density bonuses in the Mixed-Income Incentive Program (MIIP), (iii) established pathways for streamlined ministerial approvals for mixed-income and 100% affordable projects, (iv) enables development in P zones in some instances, and (v) incentivizes multi-bedroom units. Additionally, staff has modified the CHIP in the most recent version before you to further strengthen its potential. As such, we recommend preserving the following provisions: •Not counting above-ground parking count as floor area; •MIIP affordable set aside requirements in alignment with existing TOC requirements for lower market tiers; •Affordable Housing Linkage Fee exemption for projects that provide MIIP-level affordability set asides; •Project Review exemption for projects that provide MIIP-level affordability set asides; •More nuanced Environmental Protection Measures rather than the previously blunt approach to Environmental Consideration Areas; •Expanded Administrative Review as no longer appealable and with an optional hearing; •Allowing one waiver under the Affordable Housing Incentive Program (AHIP) through Expanded Administrative Review rather than discretionary review •Eliminating the potential for appeals for discretionary waiver cases at City Planning Commission; and •Enabling FAR and story incentives for projects Our coalition called for many of these provisions and we are grateful for their inclusion. They are crucial to creating the best framework for financially viable development to occur under the CHIP and to realize the outcomes envisioned by the CHIP. Relatedly, we also agree with the Department's findings that a 2-to-1 replacement requirement under the Resident Protections Ordinance (RPO) for units subject to the Rent Stabilization Ordinance (RSO) would not be economically feasible and would be a considerable barrier to the creation of the new housing at all income levels. We note that the RPO includes extensive resident protections for tenants in RSO buildings and that the 2:1 replacement requirement, in addition to impeding needed housing production, will not provide additional protection to those tenants. We believe these additional recommendations would build upon the most recent version of the CHIP and provide the robust tool that is needed to make significant progress on housing production. Again, we reiterate our gratitude to the Department of City Planning for heeding our prior recommendations. We welcome the opportunity to further discuss these concerns and recommendations. Thank you,



Strengthening the Voice of Business



Craig Lawson & Co., LLC  
Land Use Consultants

November 13, 2024

Los Angeles City Councilmembers

200 North Spring Street  
Los Angeles, CA 90012

**Re: Citywide Housing Incentive Program**

Dear Councilmembers,

This coalition of the undersigned organizations represents thousands of individual and organizational members in Los Angeles who collectively advocate for greater housing production to address our region's severe housing affordability crisis, which is rooted in decades-long failure to build enough homes to meet the substantial need for housing. As a result of the housing shortage, Los Angeles has extremely unfavorable conditions for renters and aspiring homeowners. Among large cities in the United States, Los Angeles consistently has the highest levels of homelessness, rent burdened tenants, and overcrowding and the lowest rates of homeownership. As summarized in the City's Housing Element adopted in 2021:

"Angelenos pay more of their income on housing, live in more overcrowded conditions, and have the highest rates of unsheltered homelessness of any city in the country. Almost half of all households struggle to pay their rent and mortgage, with more than a third of renters spending half their paycheck on rent. . . . This shortage has developed primarily since the 1980s, as the population in Los Angeles grew much faster than the creation of new housing. Downzonings during this period limited the land area and intensities at which housing could be built."

Los Angeles needs to act with urgency and resolve to produce more housing at all income levels. United with this goal in mind, our coalition is focused on ensuring that the proposed Citywide Housing Incentive Program (CHIP) maximizes the potential for creating new housing in Los Angeles.

Our coalition submitted a letter in July 2024 to the Department of City Planning to offer recommendations on the prior version of the CHIP, based on technical guidance provided in partnership by Urban Land Institute Los Angeles' (ULI-LA) members who have unparalleled expertise and experience with planning, land use and development in LA. Our recommendations in that letter focused on key areas the CHIP could be amended to support the financial feasibility of projects and depoliticization of planning decisions in our city, ultimately with the goal of realizing the full potential of the CHIP to yield substantial new affordable and mixed-income housing across all of the city's neighborhoods, particularly in high-resource areas. Several of our most important recommendations were incorporated in the current version of the CHIP that has been presented to you.



**We appreciate the Department of City Planning incorporating many of our most important recommendations. We are writing to ask that you preserve these provisions as you consider and vote on the CHIP. Additionally, we suggest three additional areas that we believe the CHIP can further be refined to maximize the potential for the CHIP to produce new housing, ensuring its provisions yield financially feasible projects and that its approval pathways are clear, predictable and streamlined and protect against potential politicization of development.**

We recognize that the CHIP is a complex program that includes multiple incentive programs within it. It will serve as the successor to the most important housing production tools that currently exist in the city: the Density Bonus (DB) and the Transit Oriented Communities (TOC) programs. It will impact the entire city, and beyond this, there is a tight deadline for the CHIP to be enacted and useable by early next year or else the city will face significant consequences due to state law. We commend City Planning staff for the extensive outreach, genuine engagement and hard work they have done and continue to do to see through the adoption and implementation of the CHIP.

The CHIP contains many strong features to support mixed-income and affordable growth in our city. For example, it (i) creates an incentive program for mixed-income development in commercial corridors, (ii) increases density bonuses in the Mixed-Income Incentive Program (MIIP), (iii) established pathways for streamlined ministerial approvals for mixed-income and 100% affordable projects, (iv) enables development in P zones in some instances, and (v) incentivizes multi-bedroom units. Additionally, staff has modified the CHIP in the most recent version before you to further strengthen its potential. **As such, we recommend preserving the following provisions:**

- **Not counting above-ground parking count as floor area;**
- **MIIP affordable set aside requirements in alignment with existing TOC requirements for lower market tiers;**
- **Affordable Housing Linkage Fee exemption for projects that provide MIIP-level affordability set asides;**
- **Project Review exemption for projects that provide MIIP-level affordability set asides;**
- **More nuanced Environmental Protection Measures rather than the previously blunt approach to Environmental Consideration Areas;**
- **Expanded Administrative Review as no longer appealable and with an optional hearing;**
- **Allowing one waiver under the Affordable Housing Incentive Program (AHIP) through Expanded Administrative Review rather than discretionary review;**
- **Eliminating the potential for appeals for discretionary waiver cases at City Planning Commission; and**
- **Enabling FAR and story incentives for projects with 10% of total units set aside for multi-bedroom units (instead of 20% proposed in prior versions).**

Our coalition called for many of these provisions and we are grateful for their inclusion. They are crucial to creating the best framework for financially viable development to occur under the CHIP and to realize the outcomes envisioned by the CHIP.

**Relatedly, we also agree with the Department's findings that a 2-to-1 replacement requirement under the Resident Protections Ordinance (RPO) for units subject to the Rent Stabilization Ordinance (RSO) would not be economically feasible and would be a considerable barrier to the creation of the new housing at all income levels.** We note that the RPO includes extensive resident protections for tenants in RSO buildings and that the 2:1 replacement requirement, in addition to impeding needed housing production, will not provide additional protection to those tenants.

Beyond preserving the provisions outlined above, we offer three additional areas the CHIP can be further strengthened:

**1. Provide the DB Program with the Same Level of Benefits as the MIIP and AHIP Programs.**

The DB program is one of our most effective tools for mixed-income housing production yet, under the CHIP, it is at a great disadvantage compared to the MIIP and AHIP. As proposed, DB projects requesting a single waiver are precluded from using the Expanded Administrative Review procedure. In addition, MIIP and AHIP receive more incentives than a typical DB project. The on-menu FAR bonus is substantially less than that of the MIIP and AHIP.

For DB projects in the CHIP, the on-menu FAR incentive for projects in C zones has been retained as the greater of (i) the density bonus percentage (not to exceed 35%), or (ii) 3.0, but only if the project is within one-half mile of a Major Transit Stop. (See *proposed* LAMC 12.22.A.37(f)(2)(ii).) This requirement to be within one-half mile of a Major Transit Stop is redundant with the Transit Oriented Incentive program and will force many projects to seek off-menu incentives for FAR, especially considering that projects can now receive up to 100% density bonus under state law. Without adequate available FAR, the additional density cannot be achieved under the on-menu alternative. The density bonus law has proven to one of the City's most important tools for producing mixed-income housing and, due to our housing crisis, it should be expanded substantially.

Finally, the DB program allows 3 Public Benefit Options (childcare facility, commercial project providing off-site affordable units, and multi-bedroom unit). In contrast, the MIIP and AHIP provide 7 different Public Benefit Options. The severity of the housing crisis requires an "all hands on deck" approach and the DB program should not be restricted.

**Recommendation:** As noted below, the DB program should be afforded (i) up to 3 waivers before Expanded Administrative Review is not available, and (ii) up to five Additional Incentives or one off-menu incentive. The on-menu FAR should be increased to at least 4.5 for both C and multi-family R zones, and without a requirement for proximity to a Major Transit Stop. In addition, the DB program should include the same 7 Public Benefit Options as the other CHIP programs and have the same on-menu FAR incentive.

**2. Increase the FAR Incentives and Waivers for Transit Oriented and Opportunity Corridor Projects.**

The CHIP presents an excellent opportunity to expand the existing TOC program to maximize its potential for producing mixed-income housing. However, the FAR incentives are too low to be effective in optimizing the construction of projects using Type IIIA (i.e., wood frame construction with fire rated improvements on a reinforced concrete podium also known as "5 over 2") over Type I construction mid-rise buildings.

For Transit Oriented Incentive projects, the maximum FAR in C zones ranges between 3.25 in Tier 1 to 4.65 in Tier 3 and in multifamily R zones the FAR increases between 40% and 45%. For projects in the Opportunity Corridor Incentive areas, the FAR in the C zones ranges between 4.5 and 4.8 and in R zones the FAR increases are between 45% and 60%. These FARs are too low, particularly in light of the density bonuses ranging between 100% and 120% in the Transit Oriented Incentive areas and the unlimited density in the Opportunity Corridors, and will limit the feasibility of some projects. In addition, the CHIP reconfigures the geography of the four tiers in the TOC, eliminating Tier 4 and expanding Tier 1 and constricting Tiers 2 and 3. (*Proposed* LAMC, Tables 12.22.A.38(e)(2) and 12.22.A.38(f)(2).)

In addition, for Transit Oriented and Opportunity Corridor projects, the use of more than one waiver precludes ministerial review and instead requires City Planning Commission (CPC) review. In most cases, due to the Housing Accountability Act and state density bonus law, the CPC will not have the discretion to disapprove the projects. Besides, waivers of development standards are ministerial in nature and are routinely handled administratively.

**Recommendation:** For Transit Oriented Incentive projects, the FARs in Tiers 1 through 3 should be increased further. The FAR in C and R zones should be increased to at least 4.5 in Tier 1, 5.0 in Tier 2 and 5.5 in Tier 3. In the Opportunity

Corridor program, the FAR in the C and R zones should be increased to at least 4.5 in OC-1 and to at least 5.5 in OC-2 and OC-3. Any project under the Transit Oriented or Opportunity Corridor program should be able to use up to 3 waivers and be eligible for Expanded Administrative Review.

**3. Eliminate the Increases in the MIIP's Affordability Requirements in the High Medium and High Market Tiers.**

The CHIP creates a two-tiered structure for affordability requirements in the MIIP programs. For the projects in the High Medium and High Market Tiers under the Linkage Fee ordinance, the CHIP increases the set asides for the Transit Oriented Incentive and Opportunity Corridor Incentives by at least 30%. For example, the CHIP increases the ELI set aside to 11% in Tier 1 (from 8%), 12% in Tier 2 (from 9%), and 13% in Tier 3 (from 10%). (*proposed* LAMC, Tables 12.38.A(c)(3)(iii)). These increases will pose significant financial feasibility challenges for projects, prevent some projects from being developed and may inadvertently push development into lower-income neighborhoods.

**Recommendation:** Revise the Transit Oriented Incentive and Opportunity Corridor programs to a single tier system by eliminating the increased affordability requirements for the High Medium and High Market Tiers in their entirety.

We believe these additional recommendations would build upon the most recent version of the CHIP and provide the robust tool that is needed to make significant progress on housing production. Again, we reiterate our gratitude to the Department of City Planning for heeding our prior recommendations. We welcome the opportunity to further discuss these concerns and recommendations.

Sincerely,



Nella McOske President &  
CEO Central City  
Association



Corey Smith  
Executive Director Housing  
Action Coalition



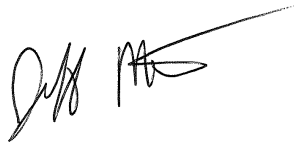
Maria S. Salinas  
President & CEO  
Los Angeles Area Chamber of Commerce



Annette Wu, AIA  
2024 President, AIA Los Angeles  
Principal, NAC Architecture



Jessica Hencier Project  
Manager  
Craig Lawson & Co., LLC



Jeff Montejano  
CEO  
Building Industry Association of Southern California, Inc.



Tracy Hernandez  
BizFed Founding CEO  
Los Angeles County Business Federation



Alex Melendrez  
LA Organizing Manager  
YIMBY Action

## Communication from Public

**Name:** CHIP Coalition  
**Date Submitted:** 11/14/2024 10:00 AM  
**Council File No:** 21-1230-S5  
**Comments for Public Posting:** Please see updated coalition letter attached.



Strengthening the Voice of Business



November 13, 2024

Los Angeles City Councilmembers

200 North Spring Street  
Los Angeles, CA 90012

**Re: Citywide Housing Incentive Program**

Dear Councilmembers,

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**Relatedly, we also agree with the Department's findings that a 2-to-1 replacement requirement under the Resident Protections Ordinance (RPO) for units subject to the Rent Stabilization Ordinance (RSO) would not be economically feasible and would be a considerable barrier to the creation of the new housing at all income levels.** We note that the RPO includes extensive resident protections for tenants in RSO buildings and that the 2:1 replacement requirement, in addition to impeding needed housing production, will not provide additional protection to those tenants.

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For DB projects in the CHIP, the on-menu FAR incentive for projects in C zones has been retained as the greater of (i) the density bonus percentage (not to exceed 35%), or (ii) 3.0, but only if the project is within one-half mile of a Major Transit Stop. (See *proposed* LAMC 12.22.A.37(f)(2)(ii).) This requirement to be within one-half mile of a Major Transit Stop is redundant with the Transit Oriented Incentive program and will force many projects to seek off-menu incentives for FAR, especially considering that projects can now receive up to 100% density bonus under state law. Without adequate available FAR, the additional density cannot be achieved under the on-menu alternative. The density bonus law has proven to one of the City's most important tools for producing mixed-income housing and, due to our housing crisis, it should be expanded substantially.

Finally, the DB program allows 3 Public Benefit Options (childcare facility, commercial project providing off-site affordable units, and multi-bedroom unit). In contrast, the MIIP and AHIP provide 7 different Public Benefit Options. The severity of the housing crisis requires an "all hands on deck" approach and the DB program should not be restricted.

**Recommendation:** As noted below, the DB program should be afforded (i) up to 3 waivers before Expanded Administrative Review is not available, and (ii) up to five Additional Incentives or one off-menu incentive. The on-menu FAR should be increased to at least 4.5 for both C and multi-family R zones, and without a requirement for proximity to a Major Transit Stop. In addition, the DB program should include the same 7 Public Benefit Options as the other CHIP programs and have the same on-menu FAR incentive.

**2. Increase the FAR Incentives and Waivers for Transit Oriented and Opportunity Corridor Projects.**

The CHIP presents an excellent opportunity to expand the existing TOC program to maximize its potential for producing mixed-income housing. However, the FAR incentives are too low to be effective in optimizing the construction of projects using Type IIIA (i.e., wood frame construction with fire rated improvements on a reinforced concrete podium also known as "5 over 2") over Type I construction mid-rise buildings.

For Transit Oriented Incentive projects, the maximum FAR in C zones ranges between 3.25 in Tier 1 to 4.65 in Tier 3 and in multifamily R zones the FAR increases between 40% and 45%. For projects in the Opportunity Corridor Incentive areas, the FAR in the C zones ranges between 4.5 and 4.8 and in R zones the FAR increases are between 45% and 60%. These FARs are too low, particularly in light of the density bonuses ranging between 100% and 120% in the Transit Oriented Incentive areas and the unlimited density in the Opportunity Corridors, and will limit the feasibility of some projects. In addition, the CHIP reconfigures the geography of the four tiers in the TOC, eliminating Tier 4 and expanding Tier 1 and constricting Tiers 2 and 3. (*Proposed* LAMC, Tables 12.22.A.38(e)(2) and 12.22.A.38(f)(2).)

In addition, for Transit Oriented and Opportunity Corridor projects, the use of more than one waiver precludes ministerial review and instead requires City Planning Commission (CPC) review. In most cases, due to the Housing Accountability Act and state density bonus law, the CPC will not have the discretion to disapprove the projects. Besides, waivers of development standards are ministerial in nature and are routinely handled administratively.

**Recommendation:** For Transit Oriented Incentive projects, the FARs in Tiers 1 through 3 should be increased further. The FAR in C and R zones should be increased to at least 4.5 in Tier 1, 5.0 in Tier 2 and 5.5 in Tier 3. In the Opportunity



Corridor program, the FAR in the C and R zones should be increased to at least 4.5 in OC-1 and to at least 5.5 in OC-2 and OC-3. Any project under the Transit Oriented or Opportunity Corridor program should be able to use up to 3 waivers and be eligible for Expanded Administrative Review.

**3. Eliminate the Increases in the MIIP's Affordability Requirements in the High Medium and High Market Tiers.**

The CHIP creates a two-tiered structure for affordability requirements in the MIIP programs. For the projects in the High Medium and High Market Tiers under the Linkage Fee ordinance, the CHIP increases the set asides for the Transit Oriented Incentive and Opportunity Corridor Incentives by at least 30%. For example, the CHIP increases the ELI set aside to 11% in Tier 1 (from 8%), 12% in Tier 2 (from 9%), and 13% in Tier 3 (from 10%). (*proposed* LAMC, Tables 12.38.A(c)(3)(iii)). These increases will pose significant financial feasibility challenges for projects, prevent some projects from being developed and may inadvertently push development into lower-income neighborhoods.

**Recommendation:** Revise the Transit Oriented Incentive and Opportunity Corridor programs to a single tier system by eliminating the increased affordability requirements for the High Medium and High Market Tiers in their entirety.

We believe these additional recommendations would build upon the most recent version of the CHIP and provide the robust tool that is needed to make significant progress on housing production. Again, we reiterate our gratitude to the Department of City Planning for heeding our prior recommendations. We welcome the opportunity to further discuss these concerns and recommendations.

Sincerely,



Nella McOske President &  
CEO Central City  
Association



Corey Smith  
Executive Director Housing  
Action Coalition



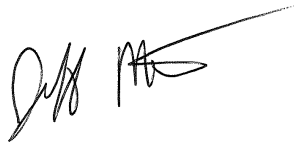
Maria S. Salinas  
President & CEO  
Los Angeles Area Chamber of Commerce



Annette Wu, AIA  
2024 President, AIA Los Angeles  
Principal, NAC Architecture



Jessica Hencier Project  
Manager  
Craig Lawson & Co., LLC



Jeff Montejano  
CEO  
Building Industry Association of Southern California, Inc.



Tracy Hernandez  
BizFed Founding CEO  
Los Angeles County Business Federation



Alex Melendrez  
LA Organizing Manager  
YIMBY Action

## Communication from Public

**Name:** Sandra Osmond  
**Date Submitted:** 11/14/2024 11:49 AM  
**Council File No:** 21-1230-S5  
**Comments for Public Posting:** “I support the Draft #3 of the Housing Element/CHIP Ordinance, as presented by the Planning Department, without regard to the Exhibit D “options” that would open up single-family neighborhoods to rezoning. The Planning Department in its report clearly states that they have found enough zoning in other areas to meet the State’s mandate for housing without the need to rezone our single-family areas.”

## Communication from Public

**Name:** Sean Riley

**Date Submitted:** 11/14/2024 04:37 PM

**Council File No:** 21-1230-S5

**Comments for Public Posting:** I oppose expanding building incentives into R-1 Concentrating density along our corridors allows economies of scale by developers that will hopefully translate to more affordability of the resulting units. Thank you.

## **Communication from Public**

**Name:** Brady Collins  
**Date Submitted:** 11/14/2024 04:09 PM  
**Council File No:** 21-1230-S5  
**Comments for Public Posting:** See attached.



Date: November 14, 2024

Re: Citywide Housing Incentive Program :Council File: 21-1230-S5; and Resident Protections Ordinance: 21-1230-S8

Dear Los Angeles City Council Members,

I submit this letter on behalf of KIWA regarding the Citywide Housing Incentive Program, 21-1230-S5 and the Resident Protections Ordinance 21-1230-S8. KIWA is an active member of the ACT-LA Coalition and we strongly support the coalition's work to address housing and displacement. While we commend the updates that strengthen tenant protections in the RPO we encourage you to implement the following:

Citywide Housing Incentive Program (CHIP) Recommendations

**Adopt "Option 1" of the LA City Planning Department's "Exhibit D- Single Family Considerations"**<sup>1</sup>

Excluding single family zoned parcels upholds and maintains exclusionary zoning. This will limit the effectiveness of the MIIP to affirmatively further fair housing, and undermine the goal of increasing affordable housing opportunities in neighborhoods with greater resources. The City's wealthiest and most privileged areas, R1 zones in high and highest opportunity areas, should not remain off-limits to mixed-income and affordable development. Exhibit D, Option 1 would allow the MIIP program to be used on sites in high-opportunity neighborhoods, and expand the sites in high-opportunity neighborhoods eligible for AHIP incentives. If coupled with deeper affordability requirements discussed below, Option 1 offers the potential to meaningfully increase access to affordable housing in high opportunity areas and reduce development pressure on sites where low-income renters live today, affirmatively furthering fair housing. The City should not acquiesce to exclusionary attitudes about housing development to maintain a status quo that was shaped through racial animus. We urge the Council to adopt Option 1 in combination with the deeper affordability requirements discussed below.

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<sup>1</sup><https://planning.lacity.gov/odocument/6c6197bb-626e-456e-ae0a-75403bc73b56/EXHIBIT%20D-%20Single-Family%20Considerations.pdf>

**Encourage deeply affordable units by expanding ALI, ELI, VLI incentives**

Rents in Moderate Income units are not affordable to the nearly two-thirds of renter households in Los Angeles that are low income or below. By definition, these units are for households *above* the median income. Housing incentives in the MIIP should focus on producing housing at rents where the need is greatest. The mixed affordability option for the Transit Oriented Incentive Areas and Opportunity Corridor Incentive 2 Areas should be amended to focus on deeply affordable housing.<sup>2</sup> The requirement for Moderate Income housing in Higher Opportunity Areas should be removed and replaced with an increased requirement for Acutely and Extremely Low Income housing. The mixed affordability requirement in Moderate and Lower opportunity areas should be adjusted to require a portion of the affordable units be affordable to acutely low income households. Additionally, under the current draft for Opportunity Corridor Transition Area Incentives, developers have no incentive to include any units at the ALI, ELI or VLI level. Projects using this incentive in the CT-1A area are only required to include one MI unit. In the CT-1B, CT-2, and CT-3 areas, developers are unlikely to include any VLI units because the incentive is available to projects with the same number of higher-rent LI units. Therefore, the VLI menu option is an empty promise. For this program to truly advance the City's obligation to affirmatively further fair housing, the affordability requirements for Opportunity Corridor Transition Area Incentives should be amended to replace the MI option with deeper affordability. To be eligible for this incentive, projects should be required to include at least one ALI, ELI, or VLI unit.<sup>3</sup>

**Require robust environmental study and public participation before approving projects on sites with heightened environmental justice concerns**

The CHIP ordinance requires that projects seeking the MIIP or AHIP incentives complete a Phase I Environmental Site Assessment, and a Phase II assessment if warranted, if the project is proposed on a site with heightened environmental risks. We support this policy and also believe additional measures are necessary. Current toxic site lists (such as DTSC's Cortese List and Envirostor) are incomplete and do not identify all the brownfields that exist. To address deficiencies in existing data and harness local knowledge, we recommend a community meeting of people living in the neighborhood for projects proposed in areas

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<sup>2</sup> See Table 12.22 A. 38(c)(3)(iv) on page 57 of Exhibit A. 1.

<sup>3</sup> See Table 22.22. A. 38(c)(3)(v) on page 57 of Exhibit A. 1.



that score at the 80th percentile and above on CalEnviroScreen 4.0. The community meeting would be a non-CEQA, non-voting meeting to collect information from community members about historical uses of the site that may otherwise not show up through traditional data searches used during the Phase I process, as described above, and minimize environmental harms in vulnerable areas.

Resident Protections Ordinance Recommendations:

**Strengthen replacement by requiring 2:1 replacement of demolished RSO units**

Too often, new housing projects demolish existing below-market rent stabilized housing and create only a few more affordable units than the number of units demolished. In fact, the AECOM analysis revealed that mixed-income RSO development projects between 2020-2023 demolished 1,091 RSO units and produced only 1,161 affordable units - a net increase of only 70 protected units<sup>4</sup>. It is clear that development incentives need to change. Increasing the replacement requirement to require that RSO units be replaced with affordable covenanted units at a 2:1 ratio will steer modest development away from sites with large numbers of RSO units and ensure projects provide a net increase in affordable housing.

We encourage you to adopt these recommendations in order to ensure both the RPO and the CHIP equitably shape the future of affordable housing and communities in the City of Los Angeles.

Sincerely,

A handwritten signature in black ink that reads "Alexandra Suh". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Alexandra Suh  
Executive Director

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<sup>4</sup> 3 See page 9 of "Potential Impact of 1:1 RSO-Affordable Replacement Requirement" in [Appendix 3](#).



## Communication from Public

**Name:** Sean McMillan

**Date Submitted:** 11/14/2024 02:29 PM

**Council File No:** 21-1230-S5

**Comments for Public Posting:** Preserving the history, the infrastructure and quality of life for the SFR zoning is paramount to health and safety of existing stakeholders, homeowners and renters in these old established neighborhoods, such as the Westwood Gardens Civic Association area of Rancho Park. I urge the City Council to protect and preserve these type of neighborhoods and support the development of under utilized commercially zoned areas.