

Communication from Public

Name: Francis Roth

Date Submitted: 12/09/2024 11:01 AM

Council File No: 21-1230-S5

Comments for Public Posting: I support Draft #3 of the CHIP Ordinance --Please approve Thank You, Francis Roth, 2311 Manning Ave

Communication from Public

Name: Roger J Withrington

Date Submitted: 12/09/2024 11:35 AM

Council File No: 21-1230-S5

Comments for Public Posting: I am writing to protect single-family neighborhoods throughout Los Angeles and in support of Draft #3 of the CHIP/Housing Element Rezoning ordinance without the Exhibit D “options” (Council File 21-1230-S5). The Planning Department, in its report, clearly states that they have identified enough opportunities throughout our city to rezone to meet the State’s mandate for housing without the need to rezone our single-family areas. It was shocking to learn that early estimates of opportunities throughout our city to rezone to meet the State’s mandate were incorrect by a factor of 2. The last-minute attempted addition of Exhibit D to insert options with no time for review is evidence of an unholy alliance of idealogues, investors and developers collaborating to re-zone R1 neighborhoods and hoping to keep their goals alive. Exhibit D is non-productive, would be ruinous to the city and would not resolve cost. Idealogues are misguided, and investors and developers' goal is to drive the cost up. Thank you (the department of City Planning and the Planning Commission) for your hard work, taking public input, crafting, and approving draft 3 without Exhibit D. You are doing the right thing: move on with CHIP draft 3 without exhibit D. Roger Wthrington

Communication from Public

Name: Stephen Rogers

Date Submitted: 12/09/2024 12:27 PM

Council File No: 21-1230-S5

Comments for Public Posting: I SUPPORT Draft #3 of the Housing Element CHIP Program that preserves single-family (R1) neighborhoods and OPPOSE any upzoning of R1 areas, such as the options listed in Exhibit D. Existing State and local density bonus incentive programs already provide real estate developers and investors with an array of tools they can use to boost profits. And - contrary to the messaging from YIMBY lobbying groups - there is an abundance of land in the city on which to build multi-family housing under current regulations. There is, therefore, no justification for sacrificing our single-family communities by allowing incongruous high-density development in R1 zones.

Communication from Public

Name: David T

Date Submitted: 12/09/2024 12:44 PM

Council File No: 21-1230-S5

Comments for Public Posting: I support the CHIP Ordinance as recommended by the CPC (City Planning Commission) and Council PLUM. I support Draft #3 of the Housing Element CHIP program that preserves R1 communities as approved by the PLUM Committee. I OPPOSE the addition of Exhibit D options to upzone R1 neighborhoods.

Communication from Public

Name: Grace T

Date Submitted: 12/09/2024 12:45 PM

Council File No: 21-1230-S5

Comments for Public Posting: As a lifetime resident of Los Angeles, I support the CHIP Ordinance as recommended by the CPC (City Planning Commission) and Council PLUM. I support Draft #3 of the Housing Element CHIP program that preserves R1 communities as approved by the PLUM Committee. I OPPOSE the addition of Exhibit D options to upzone R1 neighborhoods.

Communication from Public

Name: Tracy Lynch

Date Submitted: 12/09/2024 09:10 AM

Council File No: 21-1230-S5

Comments for Public Posting: I urge you to please protect our community and support the CHP draft #3 ordinance as recommended by the PLUM Committee (council file 21-1230-S5) The Planning Department has identified enough zoning capacity on our commercial corridors to meet the state mandate without the need to rezone single-family neighborhoods. This fact is supported by a letter from the State Housing and Community Development to Vince Bertoni dated 11/8/24, which states the Draft as written meets the HCD's requirements for approval. This will also revitalize commercial areas of our city and turn them into vibrant neighborhoods. Thank you for your consideration and support. Tracy Lynch Shadow Hills resident

Communication from Public

Name:

Date Submitted: 12/09/2024 08:07 AM

Council File No: 21-1230-S5

Comments for Public Posting: I am a lifelong Los Angeles resident having spent most of my life in the 90064 zip code. I am writing to support PLUM's recommendation in favor of the CHIP Draft # 3 without R1 upzoning. Further, I want to acknowledge the importance of the City and Council retaining ability to do local land use planning through community plans where upzoning decisions are best made. Thank you.

Communication from Public

Name:

Date Submitted: 12/09/2024 08:31 AM

Council File No: 21-1230-S5

Comments for Public Posting: I strongly support the CHIP Ordinance as recommended by the CPC (City Planning Commission) and Council PLUM Committee.

Communication from Public

Name: Mark

Date Submitted: 12/09/2024 09:56 AM

Council File No: 21-1230-S5

Comments for Public Posting: I support the CHIP Ordinance as recommended by the CPC (City Planning Commission) and Council PLUM Committee

Communication from Public

Name: Jairo J Angulo

Date Submitted: 12/09/2024 10:00 AM

Council File No: 21-1230-S5

Comments for Public Posting: I support the CHIP Draft #3 as recommended by the City Planning Commission. The City has already received confirmation that the State would certify this draft as written – without the need to upzone R1 properties. This is a win-win proposition - for the City and Residents.

Communication from Public

Name: Barry Livingston

Date Submitted: 12/09/2024 10:13 AM

Council File No: 21-1230-S5

Comments for Public Posting: I am opposed to the construction of multi-dwelling apartment buildings in our neighborhood, West Toluca Lake, CA 91602. We do not have a shortage of rental units in the San Fernando Valley. We have a shortage of AFFORDABLE rental units across the Valley and L.A. city proper. If apartment building area allowed to be built in our West Toluca, historically an R-1 Single Family zone, the rents will be set far above what the average renter can afford. Hence, nothing will be accomplished in easing this SUPPOSED rental shortage. Just to be clear, I am not opposed to the construction of new apartment buildings. They should be built in areas with already established apartment buildings. The competition between landlords would stabilize rents and perhaps even lower them if the supply in those areas is increased. I have been a resident and home owner in West Toluca Lake since 1977. I would like to see the character of this area of older homes (some as old as 100 years) to be maintained. Our infrastructure, also almost 100 hundred years old, cannot handle that strain that multiple-dwelling units would be on sewers, electrical and gas. To update these utilities would be a massive undertaking and cost prohibitive. It makes much more sense, again, to build in areas that were designed and already capable of handling an increase in demand. Sincerely, Barry Livingston

Communication from Public

Name: K.B.
Date Submitted: 12/09/2024 10:26 AM
Council File No: 21-1230-S5
Comments for Public Posting: I support the CHIP Ordinance as recommended by the CPC (City Planning Commission) and Council PLUM Committee. Thank you.

Communication from Public

Name:

Date Submitted: 12/09/2024 02:57 PM

Council File No: 21-1230-S5

Comments for Public Posting: The need for adequate housing is urgent and option 1 provides the best solution.

Communication from Public

Name: M. Nolan Gray

Date Submitted: 12/09/2024 03:23 PM

Council File No: 21-1230-S5

Comments for Public Posting: To the Los Angeles City Council, Please choose Option 1 for the proposed CHIP ordinance. Los Angeles is experiencing a housing crisis. As such, we need an all-hands-on-deck solution. That means Option 1. In my years living in Los Angeles, I have experienced this firsthand. I lived out of my car for a period, and even in the best of times, I have often spent over half of my income just making rent. Even now that I have a decent salary, I will have to leave the city if I ever want to become a homeowner. And hundreds of thousands of my neighbors have it even worse than me. Nearly every quarter that I helped teach classes at UCLA, I have had students who slept out of their cars, tripled up in bedrooms, or endured hour-long commutes. Down the street from my apartment, dozens of people will sleep out of tents under an overpass tonight. These people need homes. Voters have had enough of this always being called a "crisis," only for our politicians to opt for half-measures. Please choose Option 1. Sincerely, M. Nolan Gray Palms, Los Angeles

Communication from Public

Name: Will Wright

Date Submitted: 12/09/2024 03:29 PM

Council File No: 21-1230-S5

Comments for Public Posting: I encourage Los Angeles City Council (via an amendment) to create a simple, effective, equitable, and inclusive process that allows R1 neighborhoods the opportunity to opt-in to the provisions of CHIP. This way, if a neighborhood wants to leverage CHIP for its own benefit, then it has the power to do so.

Communication from Public

Name: Molly

Date Submitted: 12/09/2024 03:34 PM

Council File No: 21-1230-S5

Comments for Public Posting: To the Los Angeles City Council, I strongly encourage the City Council to amend the proposed CHIP Ordinance to include Exhibit D Option 1. A recent UCLA Lewis report indicates that the current draft CHIP ordinance will not deliver the 450,000 housing units mandated by state law, even under the most optimistic scenario. The only way to deliver on housing is to allow CHIP incentives to apply to single-family-zoned parcels. Choose Option 1, remove barriers to housing, and stem the tide of displacement. Urbanize LA reported in July that the City of LA had only permitted - not even produced - 9.2% of its RHNA targets through 2023. Moreover, permits were down 18.9% through the first half of 2024. The City Council needs to generate a lot more production, not just permits. Those who resist expanding the number of parcels eligible for programs under CHIP must understand that LA will not meet its RHNA obligations. Moreover, the benefits of eliminating barriers to housing are already apparent across the country — liberalization works! Minneapolis is a prime example: NPR reported in February that Minneapolis's zoning reforms led to a 1% increase in rental prices between 2017 and 2022, compared to 14% across the rest of the state. Closer to home, The Financial Times reported in October that the greater San Diego area experienced some of the fastest year-over-year rental declines in the country. This is not by accident – San Diego has been assertive in liberalizing height and FAR restrictions and in actually utilizing TOD and other incentives. This is a chance to expand opportunity for all Angelenos. Both the Brennan Center for Justice and the American Redistricting Project currently predict that California will lose four more seats in the House of Representatives, and four electoral college votes, during the 2030 U.S. Census and Reapportionment. This displacement is caused by the myriad of housing restrictions that were designed and implemented for exclusion and segregation. As trustee of Los Angeles's present and future, you can chart a new course for our city marked by freedom, fairness, and opportunity. City Planning has given you the tools to make low-density areas eligible for the CHIP incentives. YIMBY Los Angeles and its coalition partners have been strongly advocating for Option 1, which would maximize the ordinance's potential to deliver on LA's housing needs. While

Option 1 is the best option, other options would be an improvement on the current restrictions. Councilmember Raman proposed a combination of Options 2 and 6, which would open up a large number of parcels for both mixed income and 100% affordable housing. We appreciate Councilmember Raman's courageous leadership on this issue. Do not be discouraged by loud minorities who benefit from the status quo. The people of Los Angeles need actual solutions to the housing crisis. We need to expand our economic base. We need to address our climate crisis head-on, not enforce more exclusionary single family zoning. The answer is growth. The answer is opportunity. The answer is allowing people to build the future they want. Let's set Los Angeles on course for both lower rents and economic prosperity. Choose Option 1.

Communication from Public

Name: Dan Silver

Date Submitted: 12/09/2024 03:35 PM

Council File No: 21-1230-S5

Comments for Public Posting: As a lifelong Angelean, I strongly encourage the City Council to amend the proposed CHIP Ordinance to include Exhibit D Option 1. A recent UCLA Lewis report indicates that the current draft CHIP ordinance will not deliver the 450,000 housing units mandated by state law, even under the most optimistic scenario. The only way to deliver on housing is to allow CHIP incentives to apply to single-family-zoned parcels. Choose Option 1, remove barriers to housing, and stem the tide of displacement. Urbanize LA reported in July that the City of LA had only permitted - not even produced - 9.2% of its RHNA targets through 2023. Moreover, permits were down 18.9% through the first half of 2024. The City Council needs to generate a lot more production, not just permits. Those who resist expanding the number of parcels eligible for programs under CHIP must understand that LA will not meet its RHNA obligations. Moreover, the benefits of eliminating barriers to housing are already apparent across the country — liberalization works! Minneapolis is a prime example: NPR reported in February that Minneapolis's zoning reforms led to a 1% increase in rental prices between 2017 and 2022, compared to 14% across the rest of the state. Closer to home, The Financial Times reported in October that the greater San Diego area experienced some of the fastest year-over-year rental declines in the country. This is not by accident – San Diego has been assertive in liberalizing height and FAR restrictions and in actually utilizing TOD and other incentives. This is a chance to expand opportunity for all Angelenos. Both the Brennan Center for Justice and the American Redistricting Project currently predict that California will lose four more seats in the House of Representatives, and four electoral college votes, during the 2030 U.S. Census and Reapportionment. This displacement is caused by the myriad of housing restrictions that were designed and implemented for exclusion and segregation. As trustee of Los Angeles's present and future, you can chart a new course for our city marked by freedom, fairness, and opportunity. City Planning has given you the tools to make low-density areas eligible for the CHIP incentives. YIMBY Los Angeles and its coalition partners have been strongly advocating for Option 1, which would maximize the ordinance's potential to deliver on LA's housing needs. While Option 1 is the best option, other options would be

an improvement on the current restrictions. Councilmember Raman proposed a combination of Options 2 and 6, which would open up a large number of parcels for both mixed income and 100% affordable housing. We appreciate Councilmember Raman's courageous leadership on this issue. Do not be discouraged by loud minorities who benefit from the status quo. The people of Los Angeles need actual solutions to the housing crisis. We need to expand our economic base. We need to address our climate crisis head-on, not enforce more exclusionary single family zoning. The answer is growth. The answer is opportunity. The answer is allowing people to build the future they want. Let's set Los Angeles on course for both lower rents and economic prosperity. Choose Option 1. Thank you

Communication from Public

Name: Mike Royce

Date Submitted: 12/09/2024 04:41 PM

Council File No: 21-1230-S5

Comments for Public Posting: To the LA City Council, There can be no doubt that we need more housing immediately. Please amend the proposed CHIP Ordinance to include Exhibit D Option 1. Thank you. ---Mike Royce

Communication from Public

Name: John Gregorchuk

Date Submitted: 12/09/2024 04:43 PM

Council File No: 21-1230-S5

Comments for Public Posting: I strongly encourage the City Council to 1) Support Exhibit D Option 1 to allow CHIP in single family zones across the entire city! 2) Resident Protection Ordinance makes Missing Middle housing financially impossible - The city needs to step up to help residents! City fees are over 20% the per unit cost for small projects - Do not put the cost of resident protections solely on new home construction! Thank you, John

Communication from Public

Name:

Date Submitted: 12/09/2024 06:03 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 should translate to more affordability of the resulting units. City planners confirm in their reports that we have enough supply along corridors to meet our statutory requirement. Every high resource area has corridors - there will be adequate high resource options with corridor density. Why destroy existing and truly affordable housing in R-1 to make way for predominantly market rate units?

Communication from Public

Name: Catherine Lacey Dodd

Date Submitted: 12/09/2024 06:11 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 Catherine

Communication from Public

Name: Catherine Lacey Dodd

Date Submitted: 12/09/2024 06:11 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 Catherine

Communication from Public

Name: Carol E Wong

Date Submitted: 12/09/2024 06:21 PM

Council File No: 21-1230-S5

Comments for Public Posting: As a constituent of CD11, I am against including R-1 as a part of the CHIP

Communication from Public

Name: G. Greengard

Date Submitted: 12/09/2024 06:37 PM

Council File No: 21-1230-S5

Comments for Public Posting: I oppose expanding building incentives into R-1 neighborhoods. Concentrating density along our corridors allows economies of scale by developers, that hopefully will translate to more affordability of the resulting units. Keep single-family residential neighborhoods as they are. Thank you.

Communication from Public

Name: Kathy M Van Ness

Date Submitted: 12/09/2024 06:51 PM

Council File No: 21-1230-S5

Comments for Public Posting: I oppose expanding building incentives into R-1 Affordability Talking Points Vancouver has already demonstrated that densifying residential neighborhoods does not make housing more affordable; show me one city where this plan already worked before we undertake some big experiment in LA. Why blight our mature R-1 with high-rises when that will result in so few affordable units? State law already allows ADUs and 4 units on R-1 lots and that hasn't resulted in any relevant measure of affordability. High rises with so few required affordable units won't help either. Concentrating density along our corridors allows our cash-strapped city to concentrate infrastructure improvements on more focused areas Concentrating density along our corridors allows economies of scale by developers that will hopefully translate to more affordability of the resulting units Equity & Justice Talking Points The developer interests focus on these talking points a lot. It's not fair that everybody doesn't get to live at the beach. It's not fair that "nobody" can afford to live in single family homes. R-1 is exclusionary. You get the point. But there are other fairness issues that don't get talked about enough and are perpetuated by allowing high rises in low rise R-1 neighborhoods: Incentivizing apartments in R-1 makes it easier for Angelenos to get trapped in permanent renter status, while simultaneously depleting our starter home inventory (developers buy the cheapest homes to destroy) Middle class and working class families invested life savings and emotional energy into their homes - how can city leadership even think about destroying these neighborhoods without a robust citywide discussion with adequate outreach to build awareness? Focusing densification in a narrower area (corridors, not R-1) makes it easier for communities to dialogue on how to make the focused area more just and resident-friendly, including adding new single-family and townhome starter units as part of the corridor mix Why would young people ever invest in buying homes if their investment can be tanked with random high rises next door? R-1 density development is designed to trap people into permanent renter status Public transportation is on the corridors, not in the R-1 neighborhoods. We shouldn't incentive density in locations that will require cars (or cause people to even want cars) Starter homes are hard to come by, but we can add starter townhomes to corridor

mixes to incentivize blending high rises with surrounding R-1 Families are running out of options - new high rises are primarily studios and 1-beds. Where are families supposed to live, especially multi-generational families? Every high resource area has corridors. There will be plenty of high resource options with corridor density Supply Talking Points Supply is an important topic because we have zoning mandates from the State and if we don't meet them, there are dire consequences. The other side likes to argue that R-1 constitutes 72% of available land in the city, conveniently ignoring that half of that land is not available for density for a variety of reasons (fire zones, slide zones, etc). But regardless of how much land R-1 units utilize, the bottom line is that there is still enough capacity along the corridors to meet our crazy state mandates. The talking points: City planners confirm in their reports that we have enough supply along corridors to meet our statutory requirements Every high resource area has corridors - there will be adequate high resource options with corridor density Why destroy existing and truly affordable housing in R-1 to make way for predominantly market rate units? Adaptive reuse units are on the corridors. We should be incentivizing reuse

Communication from Public

Name: Jamie Apodaca

Date Submitted: 12/09/2024 07:38 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. I am in favor of AFFORDABLE HOME OWNERSHIP. To continue to force high-rise apartments into R-1 neighborhoods prohibits destroys affordable single-family homes that would allow residents of Los Angeles financial independence at some point. As it is, you are sentencing people to becoming lifelong renters, subject to ever-rising rents.

Communication from Public

Name: Christopher K. Tokita

Date Submitted: 12/09/2024 08:02 PM

Council File No: 21-1230-S5

Comments for Public Posting: To the Los Angeles City Council, I strongly urge the Council to amend the draft Citywide Housing Incentive Program (CHIP) ordinance to adopt Exhibit D Option 1, as supported by Abundant Housing LA and a coalition of over 60 civic organizations. This change would allow CHIP incentives to apply to single-family-zoned parcels, a necessary step to meet LA's state-mandated housing target of 450,000 units and address our city's housing crisis. As someone born and raised in Los Angeles, I've seen how the housing shortage has pushed neighbors into homelessness and driven families out of the communities they love. Now, as a new father to a baby girl, I feel the weight of decisions like this one. The choices you make will shape the future of Los Angeles—not just for today, but for the next generation. My daughter and all of LA's children deserve a city where they can thrive, where housing is affordable, and where every neighborhood offers opportunity and equity. While the draft CHIP ordinance includes positive components, such as streamlining approval processes and opening parking zones for housing development, it falls far short of what is needed. The single-family exemption is a fatal flaw that limits housing growth, perpetuates patterns of segregation, and reinforces inequitable land use policies. Without expanding CHIP eligibility to single-family parcels, the ordinance will not achieve its goal of equitable and abundant housing across all neighborhoods. Cities like Minneapolis and San Diego have shown that liberalizing housing policies works. Minneapolis's zoning reforms curbed rental price growth, and San Diego's proactive incentives have led to some of the fastest rental declines in the country. Los Angeles must follow suit by allowing new housing opportunities in single-family zones. City Planning has provided several options in Exhibit D. Option 1 is the most effective choice, unlocking the greatest number of parcels and maximizing the ordinance's potential to meet our housing needs. If Option 1 is not adopted, I also support a combination of Options 2 and 6, as proposed by Councilmember Raman, to open up more parcels for both mixed-income and affordable housing. I stand in solidarity with Abundant Housing LA and its coalition partners in calling for bold action. This decision carries immense meaning for the future of our city and its children. You have the power to build a Los

Angeles where families like mine—and future generations—can stay, grow, and thrive. I urge you to adopt a CHIP ordinance that includes single-family parcels and makes every neighborhood part of the solution. Sincerely, Christopher K. Tokita Los Angeles, CA 90025

Communication from Public

Name:

Date Submitted: 12/09/2024 08:35 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.

Communication from Public

Name: Patricia Lamkie
Date Submitted: 12/09/2024 10:16 PM
Council File No: 21-1230-S5
Comments for Public Posting: I urge you to support Drat #3 without the Exhibit D "options" that would open up single-family neighborhoods to development.
Patricia Lamkie 1408 N Orange Gr Ave 90046 Spaulding Square

Communication from Public

Name:

Date Submitted: 12/09/2024 10:24 PM

Council File No: 21-1230-S5

Comments for Public Posting: I oppose expanding CHIP builder incentives into R-1 zones. Under what authority or Constitutional Law are the City Council allow to create & approve CHIP and thus allow builders to override the current Building & Safety regulation specifying what can be built on a R-1 zone lot ? What is the current Building & Safety regulation, process, and cost for an owner or builder to change a R-1 zone lot to a R-2, or R-3 lot ?

Communication from Public

Name: John Marcelletti

Date Submitted: 12/09/2024 10:28 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:

Date Submitted: 12/09/2024 11:10 PM

Council File No: 21-1230-S5

Comments for Public Posting: I oppose expanding building incentives into R-1 family-friendly neighborhoods. 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: Christophe LaBelle

Date Submitted: 12/09/2024 11:11 PM

Council File No: 21-1230-S5

Comments for Public Posting: I urge the City Council to choose Option 1 and amend the proposed CHIP Ordinance so that CHIP incentives apply to single-family-zoned parcels. Los Angeles needs to create as many housing opportunities as possible, in order to support both the availability and affordability of places to live in the city. This will not only address the housing and homelessness crises that we face, but also the climate change and transportation challenges that impact the City and its residents. Please incorporate Option 1 into an amended CHIP ordinance. It is feasible, necessary and urgent to do so.

Communication from Public

Name: Joshua Seawell

Date Submitted: 12/09/2024 11:16 PM

Council File No: 21-1230-S5

Comments for Public Posting: I encourage the Council to make desperately needed investments in housing and housing affordability in LA — this means Option 1 — especially in the wake of the UCLA study showing that our current path will fail to produce needed housing units / RHNA goals. Building more housing of all kinds in all neighborhoods will help us be a more prosperous, less segregated city with fewer people forced out of their homes due to inability to make rent. Please take action and help make this city all it can be.

Communication from Public

Name: Tara Hitchcock

Date Submitted: 12/09/2024 02:04 PM

Council File No: 21-1230-S5

Comments for Public Posting: To Whom It May Concern, I urge the City Council to approve draft #3 of the CHIP program (as approved by the CPC and Council PLUM Committee) that preserves R1 neighborhoods without blanket upzoning and oppose the adoption of any of the options provided in Exhibit D. Please do not unnecessarily destroy our community of single family home when there are so many other sensible options that will still achieve the objectives of more affordable housing, which we all support. The worst consequence of a blanket upzoning of R1 neighborhoods, as proposed in the Single-Family Considerations, is that this approach allows developers and speculators to cherry pick where new density goes – rather than having deliberate planning done at the Community Plan level where it belongs. This city needs thoughtful planning that takes the best interest of its inhabitants into account. Mixing single family homes with six-story apartment buildings without thoughtful planning will have the unintended effect of damaging stable neighborhoods throughout the city. If a percentage of single-family homes in an identified community plan area need to be upzoned, then the process of upzoning must be done in an open, organized and transparent manner with the result being specific blocks and/or areas to be upzoned in an orderly manner (and where best serviced by infrastructure) – not by opening up communities to opportunistic developers who are not planners and whose goals do not include the planning of livable, sustainable, viable communities. They are in business to generate profit. It is the City's duty to create a framework that balances all interests and does not abandon its responsibility to current and future residents to ensure that livable communities are the end result of the Housing Element program – not the production of housing alone. Please be purposeful and thoughtful in the changes and planning of this city. Best, Tara Hitchcock

Communication from Public

Name: Sharon E. Farb

Date Submitted: 12/09/2024 09:22 PM

Council File No: 21-1230-S5

Comments for Public Posting: I strongly 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 Many thanks and all my best,
Sharon E Farb

Communication from Public

Name: Nancy Luca

Date Submitted: 12/09/2024 09:29 PM

Council File No: 21-1230-S5

Comments for Public Posting: I strongly oppose expanding building incentives into R-1. Concentrating density along our corridors allows economics of scale by developers that will hopefully translate to More affordability of the resulting units. Thanks , Nancy Luca

Communication from Public

Name:

Date Submitted: 12/09/2024 10:05 PM

Council File No: 21-1230-S5

Comments for Public Posting: My husband and I are writing to urge members of the City Council to support Draft #3 of the CHIP Ordinance without Exhibit D options to upzone R1 neighborhoods. The State would certify this draft as written without the need to upzone R1 properties. We ask that members of the City Council approve the CHIP Ordinance as passed by PLUM. It is very important that the City and Council retain ability to do local land use planning through Community plans where zoning decisions are best made. Regards, Margaret Healy, board member of WSSM HOA Charles Healy

Communication from Public

Name: Ron Prasanna
Date Submitted: 12/09/2024 05:09 PM
Council File No: 21-1230-S5

Comments for Public Posting: TO CITY ATTORNEY AND TRACY PARK (CD11) : PLEASE ISSUE A MOTION IN THE CITY COUNCIL MEETING FOR CHIP ORDINANCE ON DEC 10 2024 TO REMOVE THE EXTREME DENSITY DISPARITY FOUND IN 2300 WEST BLOCK WELLESLEY AND 2200 EAST BLOCK CARMELINA. THE 25 OWNERS IN WELLESLEY AND CARMELINA REQUEST OUR CITY COUNCIL MEMBER TRACY PARK (CD11) TO ISSUE A MOTION TO REMOVE THE DISPARITY IN DENSITY, FAR AND HEIGHT DISPARITY AT THESE BLOCKS AND *** INCREASE DENSITY, HEIGHT AND FAR *** IN THESE BLOCKS TO BE UNIFORM WITH THEE SURROUNDING AREA. PROVIDE MORE UNIFORM DISTRIBUTION OF DENSITY, FAR AND HEIGHT. CPC-2024-387-CA POLICY 4.1.5 INSTRUCTS TO ACHIEVE A UNIFORM DISTRIBUTION. *THREE OPTIONS* PPROVIDED ELOW

The CHIP Ordinance has allowed for the much needed upzoning to Los Angeles to relieve Housing Crisis, provide Affordable housing at High Opportunity Areas near Transit. But the application of the CHIP ordinance results in Disparities in Density, Height and FAR in certain areas. There are many pockets in Los Angeles which are within ½ mile from Metro Rail and close to two or more Rapid Buses, which have underlying zoning of R2 and RD. With the 2019 Expo-Line Transit Neighborhood Plan, Several hundred lots which were R1s were upzoned to R3 and RAS4s, but R2s were exempted from upzoning. Then in just 5 years, the CHIP ordinance Further disproportionately upzones R3s and RAS4s, without similarly upzoning R2s. This results in lots with just 10 unit density to be across and behind the streets from a 140 unit density, and associated Height and FAR.

A case study is at 2300 W Block Wellesley, where just 5 lots in a neighborhood of over 200-250 lots with 140 unit density, were left at 10-16 unit density creating large disparity. The West LA PLUM called this ‘a creation of an Island’ and voted to upzone these 5 lots to be equal to surrounding area. The West LA Neighborhood Council Voted to upzone these 5 lots also. While R2s were surrounded by R1 (1 unit density) prior to 2019 Expo Line Transit Neighborhood Plan, after applying CHIP, the R2s are now surrounded by 140 unit density. Thus the Disparity. This Disparity was Presented to the City Planning and also added as a public comment at the CPC Council meeting Sept 26 2024, along with proposals to reduce Disparity and equal to surrounding area. But the City Planning Proposal has not changed in this regard and does not disparity aforementioned and being presented to Los Angeles PLUM meeting November 19, 2024.

CD11 Traci Park’s deputies agree with the glaring disparity, and in their meeting with City Planning, the City Planning advised to 1) apply for a zone change (\$30,000 to \$35,000) or 2) work with Planning the west side update (estimated 2027 or further). Atleast 3 years out, if nor more. One CD11 Deputy described this Disparity as a ‘donut hole’ and offered to work to bring uniformity. We request Los Angeles PLUM take up the challenge and remove the ‘Island’/Donut’ Disparity. 3 proposals are included here as a starting point. We request CD11 Councilwoman Traci Park to withhold her vote until the Disparity to her constituents are addressed.

Proposal #1: Include a language in Opportunity Corridor Transition area to include “.....on streets where low scale neighborhood is not available within 750 feet of Opportunity corridor, the transition shall be stepped down in Density, height and FAR evenly towards the lowest available scale neighborhood allowed within 750 feet of Opportunity Corridor...”

Proposal #2: Afford same proximity rights to Transit Oriented Incentive Areas, as afforded to Opportunity Corridor area: “...properties are abutting, across the street or alley, or having a common corner with a site eligible for Opportunity Corridor Incentives and Transit Oriented Area Incentives shall also be eligible for the Opportunity Corridor Incentives and Transit Oriented Area Incentives equal to the ones abutting, across the street or alley, or having a common corner. as described in paragraph (f) below for the Opportunity Corridor and Table Table 12.22 A.38(e)(2) for Transit Oriented Incentive Areas...”

Proposal #3: In T-2 and T-3 Transit Oriented Areas in High opportunity areas, REMOVE the following Exception: “ Exceptions a) Sites with Maximum Allowable Residential Density of less than 5 units shall be eligible for the following Density Bonuses: i. T-1 : 60% ii. T-2: 70% iii. T-3: 80%

Sean's Email and query.

Hi Ron,

We were able to connect with Planning staff to discuss your inquiry. They advised that there were two main pathways to reach your goal:

In short, the pathways are (1) to apply for a zone change or (2) to continue to work with the [+Planning the Westside](#) team, with whom we are told you have had some engagement.

If you have any questions, please let me know and we would be happy to discuss on a call.

All the best,
Sean

Zone Change Application:

\$35,000-40,000

→ **Can the City Planning Waive or refund these fees?**

Historical Density at 2300 W Block Wellesley

Density Analysis at 2300 W Block Wellesley show irrational allocation of density over the years

- While 2300 W Block Wellesley has been R2 Multi-family zoned for over 80 years, with surrounding R1 lots,
- All surrounding R1 Single family zoned lots have been upzoned to 5 unit multi-family lot with Expo Line Transit Neighborhood Plan in 2019
- And those new Multi-family lots are again given Unlimited Density (limited by FAR) 140 units with CHIP re-zoning. CHIP is also considering upzoning new R1 lots (base < 5) !!
- Why are historically R2 Multi-family zoned lots not preferred to provide higher density and increase Disparity ? There might be other areas in the city with Disparity.
- **Proposal to remove disparity CITYWIDE** : Include a language in Opportunity Corridor Transition area to include “.....on streets where low scale neighborhood is not available within 750 feet of Opportunity corridor, the transition shall be stepped down in Density, height and FAR evenly towards the lowest available scale neighborhood allowed within 750 feet of Opportunity Corridor..’

1936-2018

2300 W Block Wellesley was R2 **Multi-family** zoned for over 80 years.

	West Centinela (HI)	East Centinela	West Wellesley	East Wellesley	West Amherst	East Amherst	Bundy West	Bundy East
2200 BLOCK	4	8	8	8	1	1	1	1
	4	4	1	1	1	1	1	1
	4	4	1	1	1	1	1	1
	4	4	1	1	1	1	1	1
	4	4	1	1	1	1	1	1
	4	4	1	1	1	1	1	1
	4	4	1	1	1	1	1	1
	4	4	1	1	1	1	1	1
	4	4	1	1	1	1	1	1
	4	4	1	1	1	1	1	1
	4	4	1	1	1	1	1	1
	4	4	1	1	1	1	1	1
	4	4	1	1	1	1	1	1
2300 BLOCK	4	8	2	1	1	1	1	1
	4	8	2	1	1	1	1	1
	4	8	2	1	1	1	1	1
	4	8	2	1	1	1	1	1
	4	8	2	1	1	1	1	1
PICO Blvd N	26	26	26	26	26	26	26	26
PICO Blvd S	26	26	26	26	26	26	26	26

All lots in Yellow were R1 Single Family Zoning for over 80 years

2019: Expo Line Transit Neighborhood Plan excluded R2s, but all R1s in the area upzoned to 9 (R3-EC1200) and 26 units per lot (RAS 4)

2300 W Block Wellesley
R2 **Multi-family**
Excluded from
upzoning.

	West Centinela (HI)	East Centinela	West Wellesley	East Wellesley	West Amherst	East Amherst	Bundy West	Bundy East
2200 BLOCK	4	8	8	8	26	26	26	26
	4	4	9	9	9	9	26	26
	4	4	9	9	9	9	26	26
	4	4	9	9	9	9	26	26
	4	4	9	9	9	9	26	26
	4	4	9	9	9	9	26	26
	4	4	9	9	9	9	26	26
	4	4	9	9	9	9	26	26
	4	4	9	9	9	9	26	26
	4	4	9	9	9	9	26	26
	4	4	9	9	9	9	26	26
	4	4	9	9	9	9	26	26
2300 BLOCK	4	8	2	9	9	9	26	26
	4	8	2	9	9	9	26	26
	4	8	2	9	9	9	26	26
	4	8	2	9	9	9	26	26
	4	8	2	9	9	9	26	26
	4	8	8	8	8	8	26	26
PICO Blvd N	26	26	26	26	26	26	26	26
PICO Blvd S	26	26	26	26	26	26	26	26

All lots in Yellow were **Single Family** upzoned from R1 to R3 – EC1200 and RAS 4

With TOC:
R3-EC1200 -> $5 * 1.7 = 9$ units

RAS 4 -> $15 * 1.7 = 26$ units

R2 -> Remained SAME

➤ West LA PLUM called this a creation of an 'island'
➤ Voted to **Upzone equal to** surrounding area

2025: CHIP Ordinance upzones 2300 W Block Wellesley, but upzones surrounding significantly higher to levels of Disparity.

2300 W Block Wellesley was R2 to 10-16 units with CHIP's CT-2, CT-3, but transitions into a 140 unit lot.

Units/lot calculation:
 $6250 \times 4.5 / 200 = 140$ units

*200 sqft is minimum DU size

	West Centinela (HI)	East Centinela	West Wellesley	East Wellesley	West Amherst	East Amherst	Bundy West	Bundy East
2200 BLOCK	187	187	187	187	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
	187	140	140	140	140	140	140	140
2300 BLOCK	187	140	10	140	140	140	140	140
	187	140	16	140	140	140	140	140
	187	140	16	140	140	140	140	140
	187	140	16	140	140	140	140	140
	187	140	16	140	140	140	140	140
PICO Blvd N	187	140	140	140	140	140	140	140
PICO Blvd S	187	140	140	140	140	140	140	140

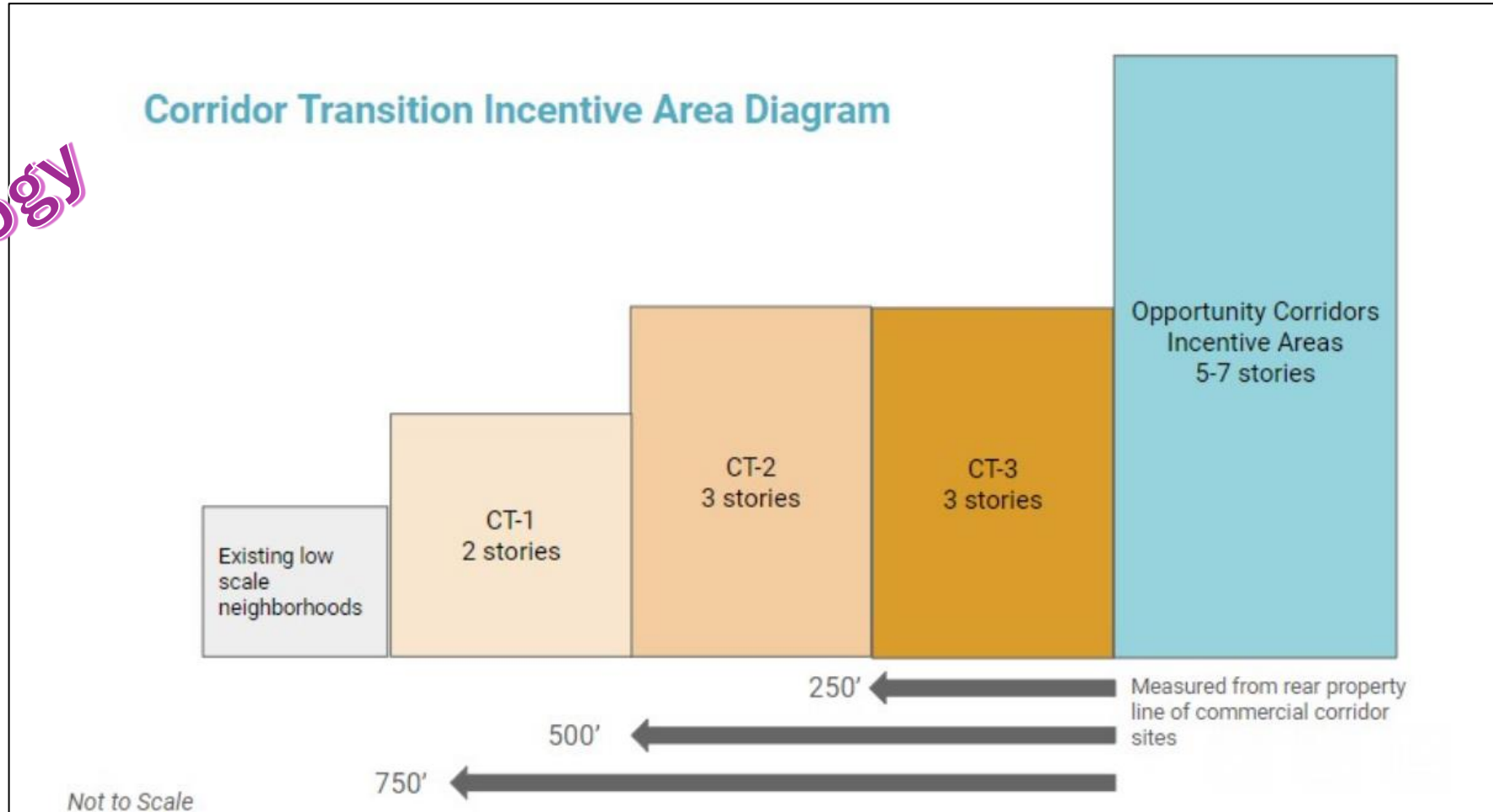
All lots around upzoned to disproportionally UNLIMITED densities (limited by FAR ~ 140 + units)

→ Request 2300 W Block also be upzoned equally for uniformity using the Corridor Transition Opportunity Area CT-3, CT-2.

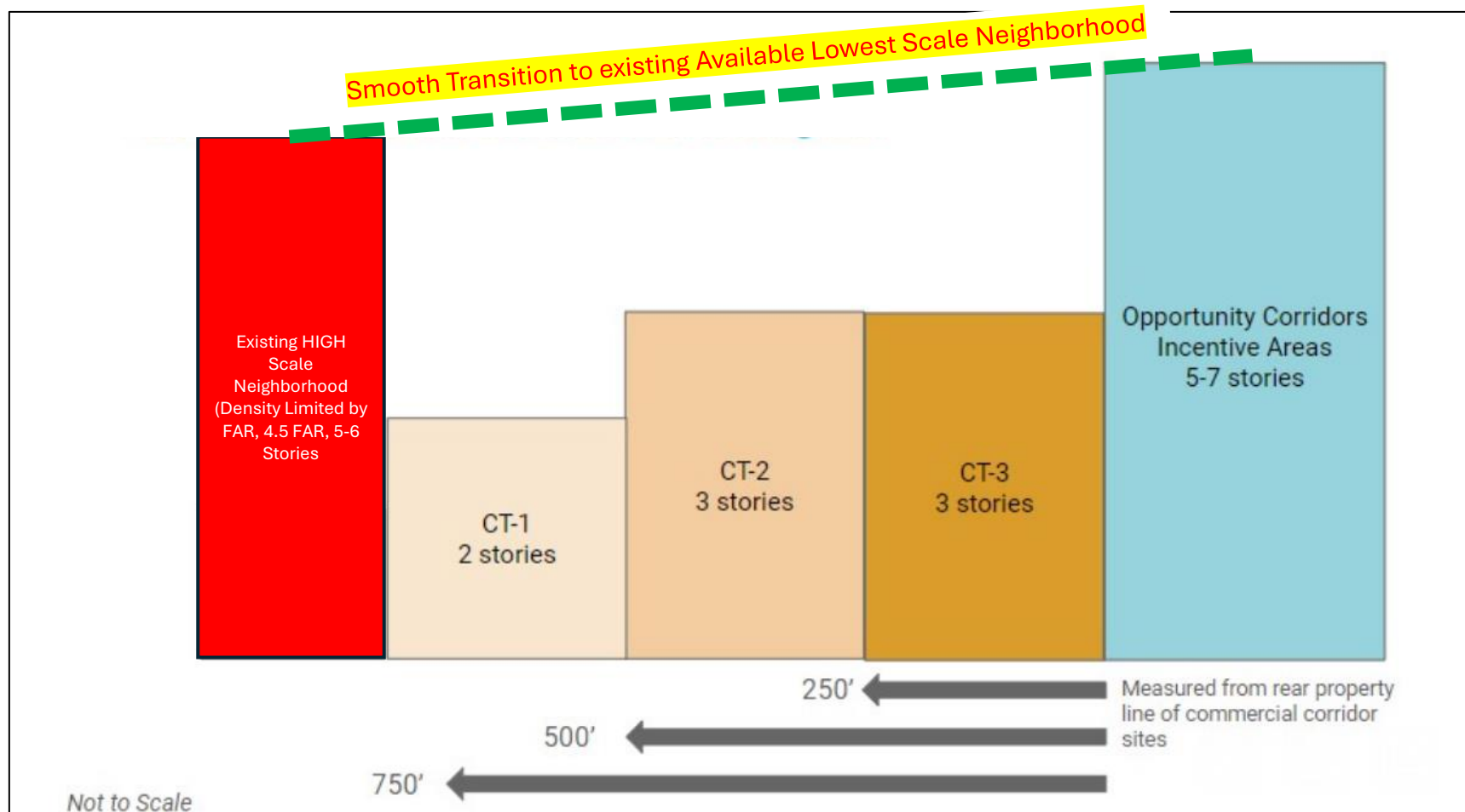
→ 2300 W Block Welleslly was higher density HISTORICALLY for over 80 years, **NOW THE LOWEST.**

Opportunity Corridor Transition (OCT) Methodology

Current
Methodology



- In CHIP, The City Planning department has not taken into consideration that in **some or many cases, low scale neighborhoods do not exist near Opportunity Corridor**
-> When NO low scale neighborhood exist, Transition should be a smooth transition towards the lowest available in that street !



Proposals to reduce/eliminate ‘Disparity’ in Density, Height and FAR

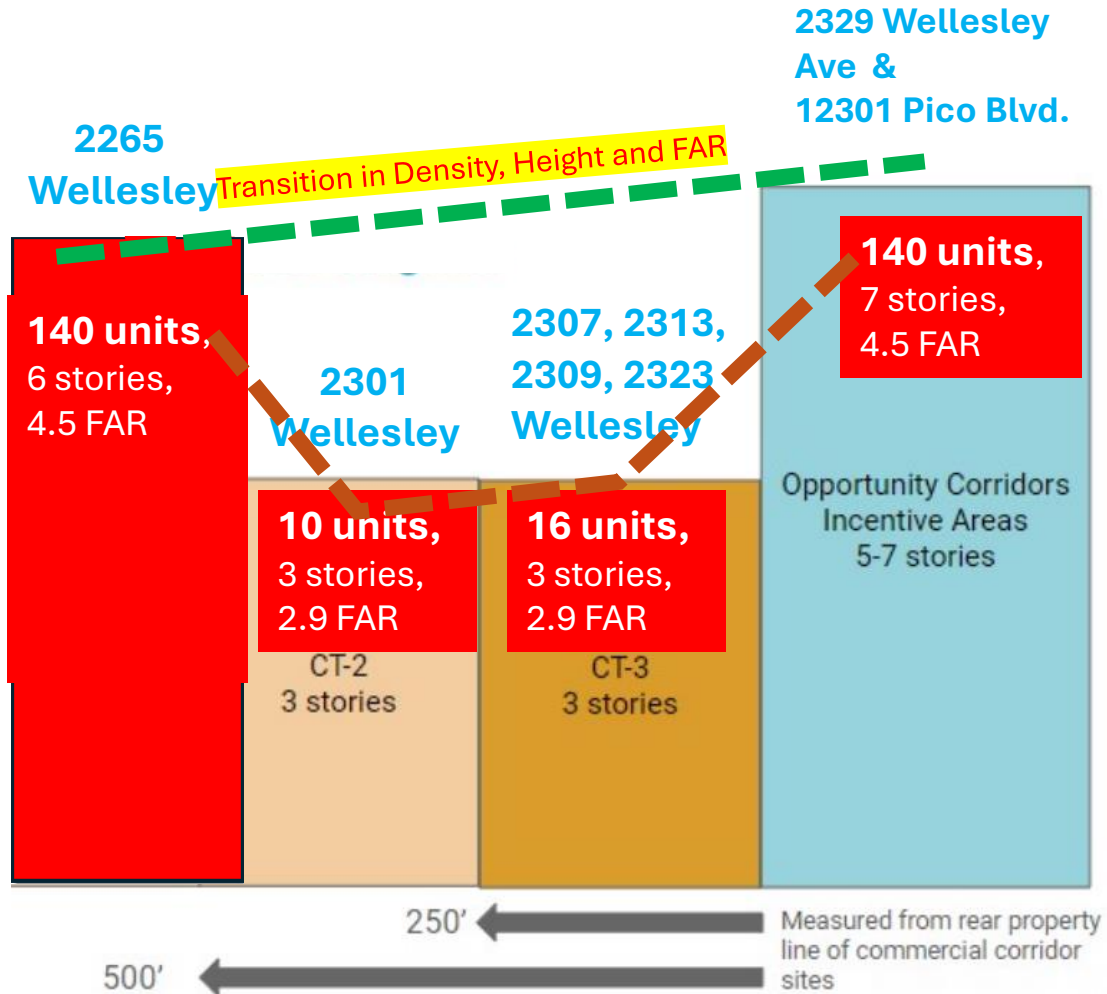
Proposal #1

Proposal #1 to remove disparity CITYWIDE:

Include a language in Opportunity Corridor Transition area to include “.....on streets where low scale neighborhood is not available within 750 feet of Opportunity corridor, the transition shall be stepped down in Density, height and FAR evenly towards the lowest available scale neighborhood allowed within 750 feet of Opportunity Corridor...”

$6250 \times 4.5 / 200 = 140$ units
*200 sqft is minimum DU size

**Example
On 2300 W
Block Wellesley**



Proposal #2

Proposal #2: Include in Item C (2), Page 35

-> Including TOI along with OC can help avoid 'islands' and improve equitable distribution of density, height and FAR

Draft Citywide Housing Incentive Program Ordinance (Clean Version)

June 27, 2024

Page 35

(c) **Eligibility.** To qualify for the provisions of this subdivision, a Mixed Income Incentive Project (Project) must satisfy all of the following eligibility requirements:

(1) Meet the definition of one of the following:

- (i) Mixed Income Incentive Project with a five or more Total Units, or
- (ii) Opportunity Corridor Transition Area Incentive Project with four or more Total Units.

(2) Be located in and meet the requirements of a Transit Oriented Incentive Area, Opportunity Corridor Incentive Area, or an Opportunity Corridor Transition Incentive Area as described in Paragraphs (e), (f), and (g) below, except that properties are abutting, across the street or alley, or having a common corner with a site eligible for Opportunity Corridor Incentives shall also be eligible for the Opportunity Corridor Incentives as described in paragraph (f) below,

(3) Reserve a percentage of the Project's Total Units for:

- (i) Restricted Affordable Units in a Project for at least one of the following income levels, as defined on Table 12.22 A.38(c)(3).1 or by providing the combination of income levels as defined on 12.22 A.38(c)(3).2 Table, or
- (ii) Restricted Affordable Units in a Opportunity Corridor Transition Area Incentive Project for at least one of the following income levels, as defined on Table 12.22 A.38(c)(3).3 below.

properties are abutting, across the street or alley, or having a common corner with a site eligible for Opportunity Corridor Incentives and Transit Oriented Area Incentives shall also be eligible for the Opportunity Corridor Incentives and Transit Oriented Area Incentives equal to the ones abutting, across the street or alley, or having a common corner. as described in paragraph (f) below for the Opportunity Corridor and Table Table 12.22 A.38(e)(2) for Transit Oriented Incentive Areas.

- I. Eliminates need to reduce or remove Maximum Allowable Density
- II. Applies Density, height, FAR evenly without having 'islands'
- III. Enables focus on Transit Oriented Areas and help remove cars from road, carbon neutrality and work/live/play concepts

Reasoning

- 1) For OC corridor -> properties are abutting, across the street or alley, or having a common corner with a site eligible for Opportunity Corridor Incentives shall also be eligible for the same Opportunity Corridor Incentives
 - a) There is no minimum Maximum Allowable Density of 5-unit requirement for OC adjacent lots above, as long as they are multi-zoned lots.
- 2) Similar reasoning can be applied to Transit Oriented Areas.
- 3) This helps 2300 West Block Wellesley to be equal to 2300 East Block Wellesley -> more equity, remove 'Island' on West Block, and applied to the entire county where 'disparity' may arise.

Proposal #3

Proposal #3

Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

- Remove underlying minimum of 5 for Transit Oriented Incentive Area (TOIA) as this requirement is not required for Opportunity Corridors Incentive Area (OC),
- Specifically those which come under BOTH Transit Oriented Area + Opportunity Corridor Area.

Transit Oriented Areas in
High opportunity areas,
Density is Limited only by
floor area + get 33'
additional height+ FAR 45%

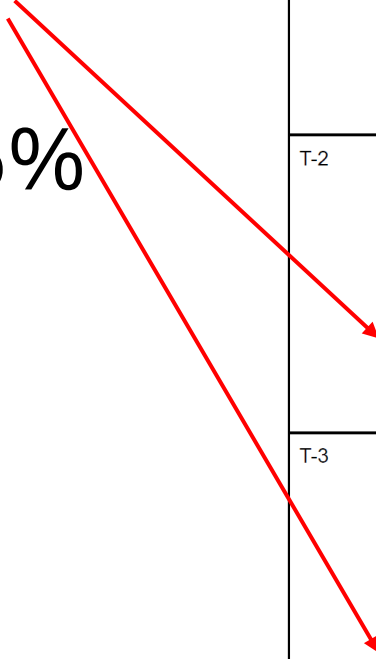


Table 12.22 A.38(e)(2)(i)				
Eligibility Subarea	Density Bonus	Parking	Floor Area Ratio (FAR)	Height
	In each subarea, the maximum increase in the otherwise Maximum Allowable Residential Density shall be as follows:	In each subarea, the required parking ratio shall be as follows: ^{1 2 6}	In each subarea, the maximum allowable FAR shall be as follows: ^{3 4}	In each subarea, the maximum allowable height permitted shall be equal to the following: ⁵
T-1	Moderate and Lower Opportunity Areas: 100%	No parking minimum required. If parking is provided, up to 40% of spaces may be provided as compact vehicular spaces. Tandem parking may also be permitted so long as a 24-hour attendant is present on-site.	R - zones: 40% increase.	One additional story, up to 11 additional feet.
			C - zones: 3.25:1, or 40% increase, whichever is greater.	
			R - zones: 40% increase.	
			C - zones: 4.2:1, or 45% increase, whichever is greater.	
T-2	Moderate and Lower Opportunity Areas: 110%		R - zones: 40% increase.	Two additional stories, up to 22 additional feet.
			C - zones: 4.2:1, or 50% increase, whichever is greater.	
			R - zones: 45% increase.	
			C - zones: 4.5:1, or 50% increase, whichever is greater.	
T-3	Moderate and Lower Opportunity Areas: 120%		R - zones: 45% increase.	Three additional stories up to 33 additional feet.
			C - zones: 4.5:1, or 50% increase, whichever is greater.	
			R - zones: 50% increase.	
			C - zones: 4.65:1, or 55% increase, whichever is greater.	
	Higher Opportunity Areas: 120%			
	Higher Opportunity Areas: Limited by Floor Area			
	Higher Opportunity Areas: Limited by Floor Area			

But Exceptions for limiting density for sites less than base 5 units

Section (e) (2)(i) Exceptions on Page 64

Exceptions:

a. Sites with a Maximum Allowable Density of less than 5 units, shall be eligible for Density Bonus of:

- i. T-1: 60%
- ii. T-2: 70%
- iii. T-3: 80%

b. Sites with a Maximum Allowable Density of less than 5 units are not eligible to increase FAR or height.

But these Exceptions DO NOT exist for Opportunity Corridors

Footnotes:

1 Required automobile parking applies for all Residential Units in a Project (not just the restricted affordable units), inclusive of disabled and required guest parking, where applicable. All parking spaces provided shall comply with Subdivision 12.21 A.5 of the Code. Except that any combination of standard, compact or tandem spaces may be provided. Tandem parking spaces that do not comply with Subparagraph 12.21 A.5(h)(2) of the Code may be provided in any configuration as long as a parking attendant or an automated parking system is provided at all times.

2 Pursuant to California Civil Code Section 1947.1, provided parking shall be sold or rented separately from the units in properties with 16 or more units, as verified by the Los Angeles Housing Department.

3 The maximum increase in the allowable FAR permitted shall be equal to the table above, provided that any additional floor area provided through this Paragraph is utilized only by residential uses. Any nonresidential uses shall be limited to the FAR associated with a site's underlying zoning prior to the application of any Incentive.

4 For the purpose of applying this incentive, commercial zones include Hybrid Industrial zones, Commercial Manufacturing zones and any defined area in a Specific Plan or overlay district that allows for both commercial uses and residential uses.

5 The increase in height shall be applicable to a Project over the entire project site regardless of the number of underlying height limits. The height increase may be applied to the maximum allowable height in feet or stories permitted by the zone, including for mixed-use Projects.

6 Consistent with California Government Code Section 65915(p)(4), required parking spaces provided allowable may be uncovered.

(i) Exceptions.

a. Sites with a Maximum Allowable Residential Density of less than 5 units shall be eligible for the following Density Bonuses:

- i. T-1: 60%
- ii. T-2: 70%
- iii. T-3: 80%

b. Sites with a Maximum Allowable Residential Density of less than 5 units, Designated Historic Resource(s), or Non-Contributing Element(s) as defined in LAMC Section 13B.8.1.C of Chapter 1A of this Code shall not be eligible for an incentive to increase allowable FAR or height above one additional story, up to 11 additional feet.

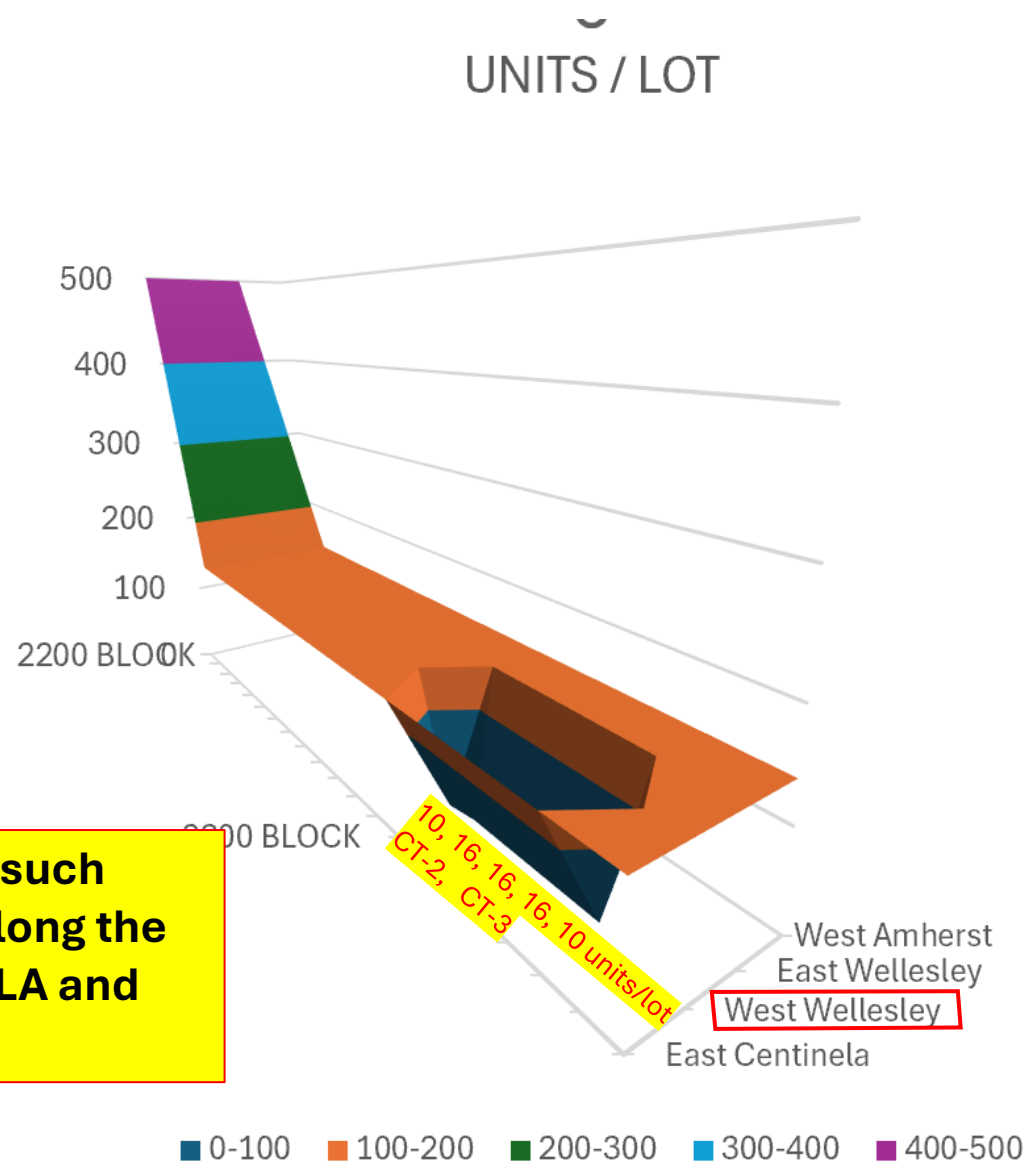
Because these Exceptions (<5) DO NOT exist for Opportunity Corridors

- Opportunity corridors with R2, RD3, RD1.5, etc are treated equally and uniformly with respect to Density, FAR and Height as R3 and higher zoned areas.
- This Produces uniform density, FAR, Height application across multi-family lots, reducing Disparity.

Request CPC to modify (CHIP) Ordinance: CPC-2023-7068-CA to:

2) Remove underlying minimum of 5 for Transit Oriented Incentive Area (TOIA) as this requirement is not required for Opportunity Corridors Incentive Area (OC)

Example of Disparity of density near Expo/Bundy Transit



This is one example. Many such Disparities may be found along the many Transit Stops across LA and can be avoided

West LA PLUM vote to upzone 2300 West
Block Wellesley to equal to surrounding area



Planning and Land Use Management Cmte.

To: Jamie Keeton, Chair, Board of Directors
Fr: J. Ross, Chair
Date: Mar. 13, 2019
Re: Resolution: 2300 block of Wellesley Ave. – neighbor request for re-zone

This resolution is only a recommendation from the PLUM Committee, and it will be considered by the Board of Directors for a final decision on Mar.27.

Resolution: The PLUM voted, 4-2-0, to recommend that the Board support re-zoning the five properties on west side of the 2300 Wellesley Ave. block, in order to make the zoning the same as the future zoning of the rest of the area in the Exposition Station Transit Neighborhood Plan, pending the support of the 5 property owners on the block.

Facts and background:

1. Request:
<https://www.dropbox.com/home/2019%20PLUM/Wellesley2300%20block%20zone%20change>
2. 5 parcels are zoned R2 on the west side of 2300 Wellesley Ave. block.
3. The Exposition Station TNP upzoned the R1 zones in the area to high-density housing (R3, R4), including the east side of the 2300 Wellesley Ave. block. The Planning Dept. may have decided to upzone only R1 parcels in the area, and the west side block was the only R2 zone in the area.
4. The NC voted in 2017 to support preservation of the R2 zoning for this block with a height limit of 3 stories. The NC chose to preserve the R1 zoning of all of the interior blocks of this area, including across the street on the east side of the 2300 Wellesley block.

Findings and justifications:

1. All parcels in the area should have the same zoning.

Dissenting opinions: J. Ross: This may be a re-consideration of a previous NC Resolution from 2017, which is not allowed. The NC already voted on the issue of zoning for this area. Owners should be happy to retain R2 zone, which means no 6-story apartments will be built next to them (which is allowed by TOC regulations). If owners claim that R1 should be upzoned because of R4 is located across the street, then conversely, owners can also say R4 should be downzoned because of R1 across the street.

Ex parte communications: J.Ross discussed PLUM scheduling with the property owner, R. Prasanna.

Disclosures and conflicts of interest: None disclosed by any committee members.

To government agencies: Only the Chair and designated Boardmembers may testify to public agencies on behalf of the West L.A. Sawtelle NC. The Board requests that the Council Office and private/non-profit entities do not testify or speculate on behalf of the NC.

Request to upzone

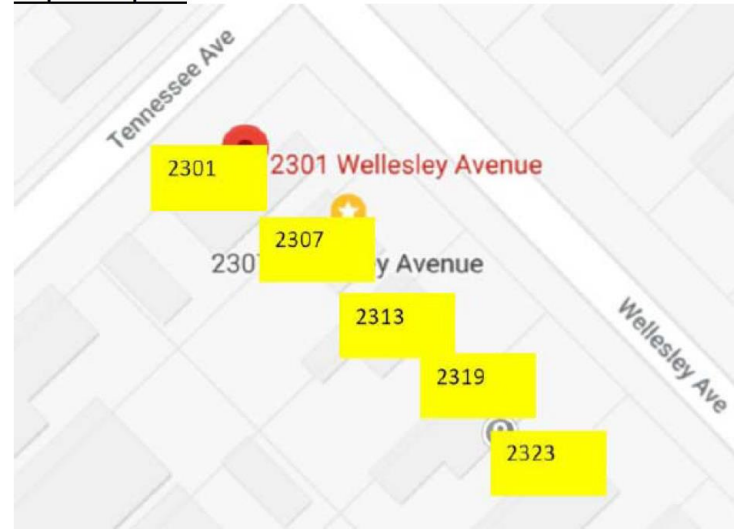


Figure 2: Zimas details extracted shows that on 3/6/19, Over 200 Lots are currently in R1-1 Single Family Dwelling Use Zoning. With Expo Line plan, most of these lots will change to 10 Multi Family Dwelling use Zoning, a change of 1000% for the 200 surrounding lots. But 2300 Wellesley Block remains Single Family use with 2 units.

Communication from Public

Name: The Rev. Dr. Joanne Leslie

Date Submitted: 12/09/2024 05:50 PM

Council File No: 21-1230-S5

Comments for Public Posting: I strongly believe that appropriately scaled multi-unit housing structures belong in and can add to the desirability of all parts of the city, including those currently zoned for only single family homes. In order to keep all neighborhoods vibrant, to reduce long commutes (and the environmental damage they cause) and to provide opportunities for upward mobility we need more housing, more affordable housing, more housing near where people work and more housing near public transportation. All of this means expanding CHIP. I encourage the City Council to amend the proposed CHIP Ordinance to include Exhibit D Option 1. A recent UCLA Lewis report indicates that the current draft CHIP ordinance will not deliver the 450,000 housing units mandated by state law, even under the most optimistic scenario. The only way to deliver on housing is to allow CHIP incentives to apply to single-family-zoned parcels. Choose Option 1, remove barriers to housing, and stem the tide of displacement. Urbanize LA reported in July that the City of LA had only permitted - not even produced - 9.2% of its RHNA targets through 2023. Moreover, permits were down 18.9% through the first half of 2024. The City Council needs to generate a lot more production, not just permits. Those who resist expanding the number of parcels eligible for programs under CHIP must understand that LA will not meet its RHNA obligations. Moreover, the benefits of eliminating barriers to housing are already apparent across the country — liberalization works! Minneapolis is a prime example: NPR reported in February that Minneapolis's zoning reforms led to a 1% increase in rental prices between 2017 and 2022, compared to 14% across the rest of the state. Closer to home, The Financial Times reported in October that the greater San Diego area experienced some of the fastest year-over-year rental declines in the country. This is not by accident – San Diego has been assertive in liberalizing height and FAR restrictions and in actually utilizing TOD and other incentives. This is a chance to expand opportunity for all Angelenos. Both the Brennan Center for Justice and the American Redistricting Project currently predict that California will lose four more seats in the House of Representatives, and four electoral college votes, during the 2030 U.S. Census and Reapportionment. This displacement is caused by the myriad of housing restrictions that were designed and

implemented for exclusion and segregation. As trustee of Los Angeles's present and future, you can chart a new course for our city marked by freedom, fairness, and opportunity. City Planning has given you the tools to make low-density areas eligible for the CHIP incentives. YIMBY Los Angeles and its coalition partners have been strongly advocating for Option 1, which would maximize the ordinance's potential to deliver on LA's housing needs. While Option 1 is the best option, other options would be an improvement on the current restrictions. Councilmember Raman proposed a combination of Options 2 and 6, which would open up a large number of parcels for both mixed income and 100% affordable housing. We appreciate Councilmember Raman's courageous leadership on this issue. Do not be discouraged by loud minorities who benefit from the status quo. The people of Los Angeles need actual solutions to the housing crisis. We need to expand our economic base. We need to address our climate crisis head-on, not enforce more exclusionary single family zoning. The answer is growth. The answer is opportunity. The answer is allowing people to build the future they want. Let's set Los Angeles on course for both lower rents and economic prosperity. Choose Option 1.

Communication from Public

Name: Federico figus

Date Submitted: 12/09/2024 05:53 PM

Council File No: 21-1230-S5

Comments for Public Posting: We support the exclusion of R1 single family zones from multi-family housing development. We specifically oppose Exhibit D “options” which would permit such incompatible zoning. The Third Draft identifies sufficient zoning capacity to fulfill the Regional Housing Needs Allocation (RHNA) state mandate without resorting to such options. R1 zones are like parks and open spaces, they provide much needed relief from the noise and congestion of our city. They are also very green, with an abundance of trees and greenery, essential for the health and well being of our city. Every day, dozens of people walk their dogs or their children in our area. Many are from outside our area looking for safe, low trafficked tree lined streets. I urge you not to take these much needed areas away from the residents of Los Angeles, thank you

Communication from Public

Name: Chanchanit Martorell

Date Submitted: 12/09/2024 06:00 PM

Council File No: 21-1230-S5

Comments for Public Posting: 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.



THAI COMMUNITY DEVELOPMENT CENTER

6376 Yucca Street, Suite B

Los Angeles, CA 90028

Phone : (323) 468-2555 Fax : (323) 461-4488

December 9, 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 the Thai Community Development Center (Thai CDC) regarding the Citywide Housing Incentive Program, 21-1230-S5 and the Resident Protections Ordinance 21-1230-S8. Thai CDC 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”¹

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.

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.² 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

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

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

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.³

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 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 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.⁴ 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,



Chanchanit Martorell
Executive Director

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

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

