Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Anna Orellana <anna.orellana@lacity.org> Mon, Oct 18, 2021 at 6:58 AM
To: Housing Element <housingelement@lacity.org>

Hello

Vince received this email.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Oct 18, 2021 at 6:57 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Anna Orellana <anna.orellana@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Eddie Williams** <eddiecwilliams@everyactioncustom.com>
Date: Fri, Oct 15, 2021 at 6:44 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that Planning has now proposed a rezoning plan that would accommodate over 250,000 more homes by 2029, and that 45% of new rezoned capacity would be created in higher-resource neighborhoods. This represents significant progress and an improvement over the status quo, and Planning is to be commended on its work so far.

However, additional improvements and commitments are still needed to make the housing element update successful. I'm also concerned that the City's current plan would yield little housing growth in many high-resource Westside neighborhoods, where housing costs are especially high.

I urge the City to incorporate the following changes to the housing element's rezoning plan:
-Target the creation of 300,000 new homes through rezoning and land-use reforms.
-Legalize 8 housing units on more parcels where apartments are today banned, particularly in high-resource areas outside of environmentally sensitive or very high fire risk areas.
-Remove sites whose redevelopment is extremely unlikely, including public facilities like schools.
-Cross-check the rezoning plan with a Fair Share methodology, to ensure that all neighborhoods are accommodating new rezoned capacity commensurate with their objective housing need.
-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Eddie Williams using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Eddie Williams
6125 Cashio St Los Angeles, CA 90035-3747
eddiecwilliams@gmail.com

--

Anna Orellana
Pronouns: She, Her, Hers
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
T: (213) 978-1271 | Planning4LA.org
E-NEWS

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:28 PM
To: eddiecwilliams@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Oct 14, 2021 at 11:24 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
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E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Oct 14, 2021 at 11:23 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
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E-NEWS

---------- Forwarded message ---------
From: **Annie Bickerton** <aebickerton@everyactioncustom.com>
Date: Thu, Oct 14, 2021 at 11:22 AM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to relay my support for a transformative update to the housing element in Los Angeles.

To fix our city's affordable housing shortage, we need an equitable plan to create 456,000 new homes by 2029, including 184,000 homes for lower-income residents.

To meet demand we need all LA neighborhoods to do their part and accommodate more homes, especially in high-resource areas that often oppose new housing opportunities. We can't miss this opportunity to advance affordability, equity, and sustainability.

It's encouraging that the proposed rezoning plan would accommodate over 250,000 more homes by 2029, and that 45% of new capacity would be created in higher-resource neighborhoods. I am grateful for the work Planning has done so far, and recognize that transformative change is urgent and essential for LA to remain livable for people of all identities and economic classes here.

As a Westside resident, I'm concerned that the City's current plan would yield little housing growth in many high-resource neighborhoods near me, where housing costs are displacing people except the wealthiest of us.

I strongly urge the City to incorporate the following changes to the housing element's rezoning plan:
-Target the creation of 300,000 new homes through rezoning and land-use reforms.
-Legalize 8 housing units on more parcels where apartments are today banned, particularly in high-resource areas outside of environmentally sensitive or very high fire risk areas.
-Remove sites whose redevelopment is extremely unlikely, including public facilities like schools.
-Cross-check the rezoning plan with a Fair Share methodology, to ensure that all neighborhoods are accommodating new rezoned capacity commensurate with their objective housing need.
-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

I encourage you to incorporate these policies into the housing element update. Los Angeles can't wait any longer for desperately needed housing.

Thank you for reading this comment, I appreciate your consideration.

Sincerely,
Annie Bickerton
11871 Washington Pl Los Angeles, CA 90066-4640
aebickerton@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:24 PM
To: aebickerton@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012
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For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Oct 14, 2021 at 3:41 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Oct 14, 2021 at 3:40 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Director of Planning
Los Angeles City Planning
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E-NEWS

---------- Forwarded message ---------
From: **Daniel Case** <dannyhoibert@everyactioncustom.com>
Date: Thu, Oct 14, 2021 at 3:39 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that Planning has now proposed a rezoning plan that would accommodate over 250,000 more homes by 2029, and that 45% of new rezoned capacity would be created in higher-resource neighborhoods. This represents significant progress and an improvement over the status quo, and Planning is to be commended on its work so far.

However, additional improvements and commitments are still needed to make the housing element update successful. I'm also concerned that the City's current plan would yield little housing growth in many high-resource Westside neighborhoods, where housing costs are especially high.

I urge the City to incorporate the following changes to the housing element's rezoning plan:
-Target the creation of 300,000 new homes through rezoning and land-use reforms.
-Legalize 8 housing units on more parcels where apartments are today banned, particularly in high-resource areas outside of environmentally sensitive or very high fire risk areas.
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-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Daniel Case using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Daniel Case
189 Walden Cir Spartanburg, SC 29301-1024
dannyhoibert@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:25 PM
To: dannyhoibert@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Oct 14, 2021 at 3:50 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Oct 14, 2021 at 3:50 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Director of Planning
Los Angeles City Planning
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E-NEWS

---------- Forwarded message ---------
From: **Andrew Heinzman** <saheinzman@everyactioncustom.com>
Date: Thu, Oct 14, 2021 at 3:47 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that Planning has now proposed a rezoning plan that would accommodate over 250,000 more homes by 2029, and that 45% of new rezoned capacity would be created in higher-resource neighborhoods. This represents significant progress and an improvement over the status quo, and Planning is to be commended on its work so far.

However, additional improvements and commitments are still needed to make the housing element update successful. I'm also concerned that the City's current plan would yield little housing growth in many high-resource Westside neighborhoods, where housing costs are especially high.

I urge the City to incorporate the following changes to the housing element's rezoning plan:
-Target the creation of 300,000 new homes through rezoning and land-use reforms.
-Legalize 8 housing units on more parcels where apartments are today banned, particularly in high-resource areas outside of environmentally sensitive or very high fire risk areas.
-Remove sites whose redevelopment is extremely unlikely, including public facilities like schools.
-Cross-check the rezoning plan with a Fair Share methodology, to ensure that all neighborhoods are accommodating new rezoned capacity commensurate with their objective housing need.
-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Andrew Heinzman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andrew Heinzman
1866 Greenfield Ave Apt 305 Los Angeles, CA 90025-4472
saheinzman@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:26 PM
To: saheinzman@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Two and four-page testimony regarding the Draft Los Angeles Element (Item 7)

1 message

Blair Smith <blair.smith@lacity.org> Mon, Oct 18, 2021 at 1:58 PM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Dick Platkin** <rhplatkin@gmail.com>
Date: Thu, Oct 14, 2021 at 12:16 AM
Subject: Two and four-page testimony regarding the Draft Los Angeles Element (Item 7)
To: <cpc@lacity.org>, Blair Smith <blair.smith@lacity.org>

To: Los Angeles City Planning Commission
Re: Two-page testimony on the draft Los Angeles Housing Element for Item 7
CPC-2020-1365-GPA
CPC-2021-5499-GPA
CEQA: ENV-2020-6762-EIR; SCH. NO. 2021010130
Date: October 14, 2021
From: Richard H. Platkin, AICP
rhplatkin@gmail.com
213-308-6354
6400 W. 5th Street, Los Angeles, CA 90048-4710

The draft Housing Element represents a contorted response to three contradictory realities.

First, LA is vastly over-zoned. It has been 22 year since the Los Angeles Department of City Planning (LADCP) last calculated the buildout of LA's adopted zoning ordinances. This analysis was part of the 1996 General Plan Framework Element's Environmental Impact Report. In 1996 LA's population was 3.5 million people, and its zoning build out population was 7.2 million people (FEIR Chapter 7, Table T-1F, Summary of Alternatives by Community Plan Area). Since then, Los Angeles adopted an Accessory Dwelling Unit (ADU) ordinance and two Density Bonus ordinances. Together they lifted LA's theoretical zoning build out population to around 9,000,000 people, or more than double LA's current population of 3.9 million people.

Second, most of this available zoning is under-utilized because private sector developers prefer to build in neighborhoods where their expensive apartment buildings generate the highest profits.

Third, the draft Housing Element tries to reconcile these contradictory realities with a model from the UC Berkeley-affiliated but private sector financed Terner Center. The Terner Center downplays most available zoning, and it conveniently concludes that LA should up-zone in the same popular neighborhoods where, understandably, private developers prefer to build their expensive and most profitable housing.

These are some of the methods that the Housing Element model uses to produce exactly what real estate developers want: up-zoning in neighborhoods that their business models and financial counselors target.

1) **The Terner Center/s model is based on 13 variables.** In combination, they are supposed to indicate the likelihood that any one of the 700,000 parcels in Los Angeles that permit residential uses, would be

developed at Lower-Income, Moderate-Income, and Above-Moderate-Income levels within the Housing Element's nine year 2021-2029 planning period.

2) **The draft Housing Element's Chapter 4 claims that all developable sites have sufficient water, sewer, and dry utilities.**

3) **Because zoning laws cannot stipulate the rents of constructed apartments,** there is no way that the City Hall could prevent developers of Above-Moderate-Income housing from taking advantage of up-zoning, especially in affluent neighborhoods, to build market and even luxury projects. While a comprehensive monitoring program could quickly detect this misuse of up-zoning, this appears to be a missing component in the 2021-2029 Housing Element.

4) **To meet the shortfall in all housing categories, the Housing Element extensively relies on enhanced density bonus ordinances.** Until the Housing Element can overcome the political barriers and legal challenges in adopting Community Plan Updates with attached up-zoning and Community Plan Implementation Ordinances, the Housing Element could not successfully address the forecast shortfall in Lower-Income and Moderate-Income units.

There are also serious shortcomings with the Terner Center's model that Los Angeles City Planning (LADCP) is relying on for its Draft 2021-2029 Housing Element:

1) Monitoring. The City of LA has no ongoing monitoring program to determine if the model's assumptions and forecasts are correct and if any of the regression model's 13 variables should be changed.

2) Limits of regression analysis. Regression analysis is based on extracting causal connections from correlations. While regression lines can extend existing these statistical relationships into the future, they cannot anticipate and self-correct for the unpredictable black swan historical events that often confound models. For example, the 1996 General Plan, relying on SCAG's regression-based population model, predicted a 2010 Los Angeles population of 4.3 million residents. Yet, in 2021 LA's population is only 3,900,000 people based on the 2020 census, and no one knows if Los Angeles will eventually reach SCAG's prediction of 4.3 million people.

This because of the weakness of regression models. They cannot readily respond to Pandemics, recessions, depressions, wars, and climate-change induced mega-storms. Parcel levels forecasts from the Terner Center's model cannot anticipate new government housing programs, new tax laws, fluctuations in interest rates, future labor contracts, supply chain breakdowns, changes in consumer housing preferences, amended building codes, inflated transportation costs, and sudden technological breakthroughs. This is why forecasts based on trend analysis often fall short, and why they must be continuously monitored to properly work.

3) Inherent weakness of changing zoning laws. Up-zoning, including density bonuses and tax breaks, cannot force investors and developers to build and operate anything, especially lower-priced housing**.** In fact, the market housing that it builds eliminates more existing low-income housing than it creates. That is why up-zoning results in gentrification, not a reduction of homelessness.

4) Planning out of sequence. Up-zoning ordinances are not integrated into the planning process and often overlook important planning considerations. Even though the General Plan Framework's Policies 3.3.1 and 3.3.2 stipulate that up-zoning should be predicated on the documentation of available infrastructure, the draft Housing Element's extensive up-zoning side-steps this requirement and, therefore, jeopardizes LA's already precarious public services and infrastructure.

City Hall's arcane political processes will determine how much of the proposed Housing Element becomes adopted policy. But, even if the Housing Element survives this hurdle, it will not easily overcome the next barriers, that we live in complicated and difficult to predict times.

Richard (Dick) Platkin, AICP
rhplatkin@gmail.com
US cell, WhatsApp: +1-213-308-6354

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

2 attachments

Platkin CPC testimony on Draft Housing Element.docx
30K

Two page version - Platkin CPC testimony on Draft Housing Element.docx
26K

To: Los Angeles City Planning Commission
Re: Testimony on the draft Los Angeles Housing Element
CPC-2020-1365-GPA
CPC-2021-5499-GPA
CEQA: ENV-2020-6762-EIR; SCH. NO. 2021010130
Date: October 14, 2021
From: Richard H. Platkin, AICP
rhplatkin@gmail.com
213-308-6354
6400 W. 5th Street, Los Angeles, CA 90048-4710

The draft Housing Element represents a contorted response to three contradictory realities.

First, LA is vastly over-zoned. It has been 22 year since the Los Angeles Department of City Planning (LADCP) last calculated the buildout of LA's adopted zoning ordinances. This analysis was part of the 1996 General Plan Framework Element's Environmental Impact Report. In 1996 LA's population was 3.5 million people, and its zoning build out population was 7.2 million people (FEIR Chapter 7, Table T-1F, Summary of Alternatives by Community Plan Area). Since then, Los Angeles adopted an Accessory Dwelling Unit (ADU) ordinance and two Density Bonus ordinances. Together they lifted LA's theoretical zoning build out population to around 9,000,000 people, or more than double LA's current population of 3.9 million people.

Much of this zoning is on under-utilized commercial streets. Their zoning automatically allows R3 and R4 apartments, all of it on transit corridors, with permitted densities of 70 to 100 units per acre. They could easily accommodate the Housing Element's Very-Low and Low-Income housing requirements, per SCAG's RHNA allocation to Los Angeles, without any discretionary actions. The combination of existing zoning and new density bonus laws that encourage Low and Very-Low income housing would allow most of the existing one and two story commercial buildings on these transit corridors to be replaced by three to six story residential apartment buildings. These in-fill buildings could consist of Low and Very-Low income apartments. In fact, the General Plan Framework Element's Chapter Two states:

> *"While [the Framework's] housing capacity is more constrained than commercial and industrial uses, the Plan's capacity for growth considerably exceeds any realistic market requirements for the future. For example, there is sufficient capacity for retail and office commercial uses for over 100 years even at optimistic, pre-recession, market growth rates."*

Second, most of this available zoning is under-utilized because private sector developers prefer to build in neighborhoods where their expensive apartment buildings generate the highest profits. According to the LA Development Map, these hot spots are Downtown Los Angeles (DTLA), Westlake, Koreatown, Hollywood, Miracle Mile, the Beverly Center-Pacific Design Center corridor, Valley Village, and Warner Center. Furthermore, if the zoning the developers need for their mega-projects is not immediately available, they can apply for zoning waivers, which City Hall grants in 90 percent of cases.

Third, the draft Housing Element tries to reconcile these contradictory realities with a model from the UC Berkeley-affiliated but private sector financed Terner Center. The Terner Center downplays most available zoning, and it conveniently concludes that LA should up-zone in the same popular neighborhoods where, understandably, private developers prefer to build their expensive and most profitable housing.

These are some of the methods that the Housing Element model uses to produce exactly what real estate developer want: up-zoning in neighborhoods that their business models and financial counselors target. If adopted by the City Council, the Housing Element's recommended changes would save the developers considerable time and money. As a result, the adoption of the draft Housing Element would allow their Return on Investment (ROI) to soar.

1) **The Terner Center/s model is based on 13 variables.** In combination, they are supposed to indicate the likelihood that any one of the 700,000 parcels in Los Angeles that permit residential uses, would be developed at Lower-Income, Moderate-Income, and Above-Moderate-Income levels within the Housing Element's nine year 2021-2029 planning period.

2) **The draft Housing Element's Chapter 4 claims that all developable sites have sufficient water, sewer, and dry utilities.** This claim is not believable because LA's infrastructure is already at the breaking point. The city's bumpy streets and sidewalks have become an obstacle course, while broken water mains and electric grid blackouts regularly occur. Furthermore, the Department of City Planning has still not established the *infrastructure monitoring unit* that the adopted 1996 General Plan Framework required. Likewise, the Planning Department has not prepared a report on LA's infrastructure and public services since 1999. This may explain why the draft Housing Elements claim that all developable sites have sufficient infrastructure is immediately contradicted by its next sentence, "*The City's infrastructure capacity and availability are being analyzed in the environmental analysis prepared for this update to the Housing Element."* When it comes to the affordable housing crisis, the draft Housing Element commitment to up-zoning supersedes sound planning principles, such as ensuring sufficient infrastructure capacity prior to up-zoning (General Plan Framework Element Objective 3.3).

3) **Because most housing built in Los Angeles results from private investment,** and because investors choose to build the more profitable Above-Moderate-Income housing, the model reveals a major shortfall (Table 4.17) of 130,000 Lower-Income units and 73,000 Moderate-Income units. Given these findings, the obvious question ought to be why the private sector produces so few Lower-Income and Moderate-Income units. *Could it possibly be the low profits and low incomes of potential renters and buyers?* The obvious policy response should then be strategies to meet these huge unmet housing needs with non-market, publicly funded housing and by increasing wages among prospective tenants. This makes far more sense than the draft Housing

Element's Program 121 of widescale up-zoning, based on the dubious claim that this up-zoning would somehow fill the low income housing shortfall.

Furthermore, because zoning laws cannot stipulate the rents of constructed apartments, there is no way that the City Hall could prevent developers of Above-Moderate-Income housing from taking advantage of up-zoning, especially in affluent neighborhoods, to build market and even luxury projects. While a comprehensive monitoring program could quickly detect this misuse of up-zoning, this appears to be a missing component in the 2021-2029 Housing Element.

4) **To meet the shortfall in all housing categories, the Housing Element extensively relies on enhanced density bonus ordinances.** They are renamed Community Plan Implementation Ordinances, but still based on the legally precarious Transit Oriented Community Guidelines. Assuming that these ordinances would be adopted through the 16 Community Plan Updates now underway, there will be considerable hurdles. First, LA's Department of Housing and Community Investment (HCID) does not physically inspect any TOC housing projects to confirm that the developer-pledged low-income units exist. Second, the registry of these low income units is unreliable. In fact, the HCID registry indicates that there are no available density bonus units in Los Angeles. Third, HCID does not maintain a registry of vetted Extremely-Low-Income, Very-Low-Income, and Low-Income tenants that landlords could refer to.

   Until the Housing Element can overcome the political barriers and legal challenges in adopting Community Plan Updates with attached up-zoning and Community Plan Implementation Ordinances, the Housing Element could not successfully address the forecast shortfall in Lower-Income and Moderate-Income units.

There are also serious shortcomings with the Terner Center's model that Los Angeles City Planning (LADCP) is relying on for its Draft 2021-2029 Housing Element:

1) **Monitoring.** The City of LA has no ongoing monitoring program to determine if the model's assumptions and forecasts are correct and if any of the regression model's 13 variables should be changed.

2) **Limits of regression analysis.** Regression analysis is based on extracting causal connections from correlations. While regression lines can extend existing these statistical relationships into the future, they cannot anticipate and self-correct for the unpredictable black swan historical events that often confound models. For example, the 1996 General Plan, relying on SCAG's regression-based population model, predicted a 2010 Los Angeles population of 4.3 million residents. Yet, in 2021 LA's population is only 3,900,000 people based on 2020 census, and no one knows if Los Angeles will eventually reach SCAG's prediction of 4.3 million people.

This is because of the weakness of regression models. They cannot readily respond to Pandemics, recessions, depressions, wars, and climate-changed induced mega-storms. Parcel levels forecasts from the Terner Center's model cannot anticipate new government housing programs, new tax laws, fluctuations in interest rates, future labor contracts, supply chain breakdowns, changes in consumer housing preferences, amended building codes, inflated transportation costs, and sudden technological breakthroughs. This is why forecasts based on trend analysis often fall short, and why they must be continuously monitored to properly work.

3) **Inherent weakness of changing zoning laws.** Up-zoning, including density bonuses and tax breaks, cannot force investors and developers to build and operate anything, especially lower-priced housing**.** In fact, the market housing that it builds eliminates more existing low-income housing than it creates. That is why up-zoning results in gentrification, not a reduction of homelessness.

4) **Planning out of sequence.** Up-zoning ordinances are not integrated into the planning process often overlook important planning considerations. Even though the General Plan Framework's Policies 3.3.1 and 3.3.2 stipulate that up-zoning should be predicated on the documentation of available infrastructure, the draft Housing Element's extensive up-zoning side-steps this requirement and, therefore, jeopardizes LA's already precarious public services and infrastructure.

City Hall's arcane political processes will determine how much of the proposed Housing Element becomes adopted policy. But, even if the Housing Element survives this hurdle, it will not easily overcome the next barriers, that we live in complicated and difficult to predict times.

To: Los Angeles City Planning Commission
Re: Two-page testimony on the draft Los Angeles Housing Element
CPC-2020-1365-GPA
CPC-2021-5499-GPA
CEQA: ENV-2020-6762-EIR; SCH. NO. 2021010130
Date: October 14, 2021
From: Richard H. Platkin, AICP
rhplatkin@gmail.com
213-308-6354
6400 W. 5th Street, Los Angeles, CA 90048-4710

The draft Housing Element represents a contorted response to three contradictory realities.

First, LA is vastly over-zoned. It has been 22 year since the Los Angeles Department of City Planning (LADCP) last calculated the buildout of LA's adopted zoning ordinances. This analysis was part of the 1996 General Plan Framework Element's Environmental Impact Report. In 1996 LA's population was 3.5 million people, and its zoning build out population was 7.2 million people (FEIR Chapter 7, Table T-1F, Summary of Alternatives by Community Plan Area). Since then, Los Angeles adopted an Accessory Dwelling Unit (ADU) ordinance and two Density Bonus ordinances. Together they lifted LA's theoretical zoning build out population to around 9,000,000 people, or more than double LA's current population of 3.9 million people.

Second, most of this available zoning is under-utilized because private sector developers prefer to build in neighborhoods where their expensive apartment buildings generate the highest profits.

Third, the draft Housing Element tries to reconcile these contradictory realities with a model from the UC Berkeley-affiliated but private sector financed Terner Center. The Terner Center downplays most available zoning, and it conveniently concludes that LA should up-zone in the same popular neighborhoods where, understandably, private developers prefer to build their expensive and most profitable housing.

These are some of the methods that the Housing Element model uses to produce exactly what real estate developer want: up-zoning in neighborhoods that their business models and financial counselors target.

1) **The Terner Center/s model is based on 13 variables.** In combination, they are supposed to indicate the likelihood that any one of the 700,000 parcels in Los Angeles that permit residential uses, would be developed at Lower-Income, Moderate-Income, and Above-Moderate-Income levels within the Housing Element's nine year 2021-2029 planning period.

2) **The draft Housing Element's Chapter 4 claims that all developable sites have sufficient water, sewer, and dry utilities.**

3) **Because zoning laws cannot stipulate the rents of constructed apartments,** there is no way that the City Hall could prevent developers of Above-Moderate-Income housing from taking advantage of up-zoning, especially in affluent neighborhoods, to build market and even luxury projects. While a comprehensive monitoring program could quickly detect this misuse of up-zoning, this appears to be a missing component in the 2021-2029 Housing Element.

4) **To meet the shortfall in all housing categories, the Housing Element extensively relies on enhanced density bonus ordinances.** Until the Housing Element can overcome the political barriers and legal challenges in adopting Community Plan Updates with attached up-zoning and Community Plan Implementation Ordinances, the Housing Element could not successfully address the forecast shortfall in Lower-Income and Moderate-Income units.

There are also serious shortcomings with the Terner Center's model that Los Angeles City Planning (LADCP) is relying on for its Draft 2021-2029 Housing Element:

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2) **Limits of regression analysis.** Regression analysis is based on extracting causal connections from correlations. While regression lines can extend existing these statistical relationships into the future, they cannot anticipate and self-correct for the unpredictable black swan historical events that often confound models. For example, the 1996 General Plan, relying on SCAG's regression-based population model, predicted a 2010 Los Angeles population of 4.3 million residents. Yet, in 2021 LA's population is only 3,900,000 people based on 2020 census, and no one knows if Los Angeles will eventually reach SCAG's prediction of 4.3 million people.

   This because of the weakness of regression models. They cannot readily respond to Pandemics, recessions, depressions, wars, and climate-changed induced mega-storms. Parcel levels forecasts from the Terner Center's model cannot anticipate new government housing programs, new tax laws, fluctuations in interest rates, future labor contracts, supply chain breakdowns, changes in consumer housing preferences, amended building codes, inflated transportation costs, and sudden technological breakthroughs. This is why forecasts based on trend analysis often fall short, and why they must be continuously monitored to properly work.

3) **Inherent weakness of changing zoning laws.** Up-zoning, including density bonuses and tax breaks, cannot force investors and developers to build and operate anything, especially lower-priced housing**.** In fact, the market housing that it builds eliminates more existing low-income housing than it creates. That is why up-zoning results in gentrification, not a reduction of homelessness.

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City Hall's arcane political processes will determine how much of the proposed Housing Element becomes adopted policy. But, even if the Housing Element survives this hurdle, it will not easily overcome the next barriers, that we live in complicated and difficult to predict times.

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Oct 14, 2021 at 8:12 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Oct 14, 2021 at 8:11 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Los Angeles City Planning
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E-NEWS

---------- Forwarded message ---------
From: **Marie Sullivan** <marie.sullivan@everyactioncustom.com>
Date: Thu, Oct 14, 2021 at 8:09 AM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

The only long term solution to the housing crisis is more housing. We must make housing easier to build.

Therefore, I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that Planning has now proposed a rezoning plan that would accommodate over 250,000 more homes by 2029, and that 45% of new rezoned capacity would be created in higher-resource neighborhoods. This represents significant progress and an improvement over the status quo, and Planning is to be commended on its work so far.

However, additional improvements and commitments are still needed to make the housing element update successful. I'm also concerned that the City's current plan would yield little housing growth in many high-resource Westside neighborhoods, where housing costs are especially high.

I urge the City to incorporate the following changes to the housing element's rezoning plan:
-Target the creation of 300,000 new homes through rezoning and land-use reforms.
-Legalize 8 housing units on more parcels where apartments are today banned, particularly in high-resource areas outside of environmentally sensitive or very high fire risk areas.
-Remove sites whose redevelopment is extremely unlikely, including public facilities like schools.
-Cross-check the rezoning plan with a Fair Share methodology, to ensure that all neighborhoods are accommodating new rezoned capacity commensurate with their objective housing need.
-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Marie Sullivan using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Marie Sullivan
2222 Electric St Los Angeles, CA 90039-3304
marie.sullivan@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:23 PM
To: marie.sullivan@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 13, 2021 at 2:23 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 13, 2021 at 2:22 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Los Angeles City Planning
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E-NEWS

---------- Forwarded message ---------
From: **Sarah Back** <sarahback1@everyactioncustom.com>
Date: Wed, Oct 13, 2021 at 2:13 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Sarah Back using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Sarah Back
1260 N Hayworth Ave West Hollywood, CA 90046-5265
sarahback1@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:13 PM
To: sarahback1@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 13, 2021 at 9:58 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 13, 2021 at 9:57 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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---------- Forwarded message ---------
From: **carl burdick** <carllburdick@everyactioncustom.com>
Date: Wed, Oct 13, 2021 at 9:55 AM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

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Personally sent by carl burdick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
carl burdick
3721 S Centinela Ave Los Angeles, CA 90066-3100
carllburdick@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:10 PM
To: carllburdick@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Oct 14, 2021 at 7:16 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Oct 14, 2021 at 7:15 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
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---------- Forwarded message ---------
From: **Chase Engelhardt** <cengelhardt@everyactioncustom.com>
Date: Wed, Oct 13, 2021 at 6:50 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

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Personally sent by Chase Engelhardt using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Chase Engelhardt
3709 Watseka Ave Los Angeles, CA 90034-4002
cengelhardt@climateresolve.org

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:18 PM
To: cengelhardt@climateresolve.org

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 13, 2021 at 2:23 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 13, 2021 at 2:12 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Director of Planning
Los Angeles City Planning
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---------- Forwarded message ---------
From: **Thomas Irwin** <thomasirwin13@everyactioncustom.com>
Date: Wed, Oct 13, 2021 at 2:10 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Thomas Irwin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Thomas Irwin
962 S Woods Ave East Los Angeles, CA 90022-3931
thomasirwin13@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:11 PM
To: thomasirwin13@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 13, 2021 at 3:41 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
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E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 13, 2021 at 3:37 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Director of Planning
Los Angeles City Planning
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E-NEWS

---------- Forwarded message ---------
From: **Meredith Jung** <meredith.jung@everyactioncustom.com>
Date: Wed, Oct 13, 2021 at 3:31 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that Planning has now proposed a rezoning plan that would accommodate over 250,000 more homes by 2029, and that 45% of new rezoned capacity would be created in higher-resource neighborhoods. This represents significant progress and an improvement over the status quo, and Planning is to be commended on its work so far.

However, additional improvements and commitments are still needed to make the housing element update successful. I'm also concerned that the City's current plan would yield little housing growth in many high-resource Westside neighborhoods, where housing costs are especially high.

I urge the City to incorporate the following changes to the housing element's rezoning plan:
-Target the creation of 300,000 new homes through rezoning and land-use reforms.
-Legalize 8 housing units on more parcels where apartments are today banned, particularly in high-resource areas outside of environmentally sensitive or very high fire risk areas.
-Remove sites whose redevelopment is extremely unlikely, including public facilities like schools.
-Cross-check the rezoning plan with a Fair Share methodology, to ensure that all neighborhoods are accommodating new rezoned capacity commensurate with their objective housing need.
-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Meredith Jung using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Meredith Jung
506 Bradbury Rd Monrovia, CA 91016-3705
meredith.jung@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:14 PM
To: meredith.jung@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 13, 2021 at 2:24 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

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E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 13, 2021 at 2:22 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Director of Planning
Los Angeles City Planning
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E-NEWS

---------- Forwarded message ---------
From: **Arjun Kolachalam** <arjunk@everyactioncustom.com>
Date: Wed, Oct 13, 2021 at 2:18 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

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Personally sent by Arjun Kolachalam using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Arjun Kolachalam
2237 Aaron St Los Angeles, CA 90026-1723
arjunk@hey.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:12 PM
To: arjunk@hey.com

Hello,

Hope all is well.

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Regards,
The Housing Element Team



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Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Oct 14, 2021 at 7:16 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Oct 14, 2021 at 7:15 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

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---------- Forwarded message ---------
From: **Allison Lee** <allee@everyactioncustom.com>
Date: Wed, Oct 13, 2021 at 9:35 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

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Personally sent by Allison Lee using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Allison Lee
3231 Cheviot Vista Pl Apt 304 Los Angeles, CA 90034-3567
allee@stanfordalumni.org

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:19 PM
To: allee@stanfordalumni.org

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Oct 14, 2021 at 7:16 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
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From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Oct 14, 2021 at 7:15 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
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E-NEWS

---------- Forwarded message ---------
From: **Tibby Rothman** <t@everyactioncustom.com>
Date: Wed, Oct 13, 2021 at 9:15 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

Dear Mike,

Thanks for your steps creating better access to housing for all. I want to support you and my fellow Angelenos in expanding these steps.

I support a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities.

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Personally sent by using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tibby Rothman
PO Box 165 Venice, CA 90294-0165
t@tibbyrothman.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:18 PM
To: t@tibbyrothman.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Oscar de la Torre asked last night if Santa Monica city, a city that has been intentionally segregated by race and class, asked if the city could give some of its affordable units to LA. The answer is YES, surrender the Santa Monica airport...

2 messages

T <tie.ryder@gmail.com> Wed, Oct 13, 2021 at 10:15 AM
To: HousingElements@hcd.ca.gov
Cc: Phil Brock <phil.brock@smgov.net>, sue.himmelrich@smgov.net, Kristin McCowan <kristin.mccowan@gmail.com>, "planning.TheWestside@LACity.org" <planning.thewestside@lacity.org>, City of Santa Monica <planning@smgov.net>, planningcomment@smgov.net, Planning CPC <cpc@lacity.org>, housing@scag.ca.gov, HousingElement@lacity.org, gleam.davis@smgov.net, christine.parra@smgov.net, lana.negrete@smgov.net, oscar.delatorre@smgov.net, contact@abundanthousingla.org

Hi Oscar,

Yes, Santa Monica can absolutely give some of Santa Monica City's RHNA affordable housing numbers to LA City if Santa Monica City Council is willing to peacefully surrender the incorrectly zoned Santa Monica airport and also willing help advocates challenge the FAA in court again to close the space in early 2022! If Santa Monica City is as small as the council claims it is, then it does not require all the land space that it has and the airport is actually in Mar Vista's territory.

With the incorrectly zoned Santa Monica airport, penmar golf course, and Ocean view farms, we could provide housing for the working middle class, students, seniors, and others that really need it! I recently talked to two students from SMC who really want affordable housing closer to their school and they should have that. I recently talked to a mother that works at the Starbucks off of Ocean park blvd. that wants more housing that she can afford, and she should have that!

The people from the working lower middle class are being misrepresented and we can speak for ourselves to testify as to what is needed in our lives and that is what I'm doing. We want vacant public land to be used for affordable housing, we want a majority of that housing protected in a CLT that will protect affordability. I'm working now to form a westside Trust for the vacant airport space, penmar golf course, and ocean view farms. And don't worry, we will get an open park in that area as well even though Santa Monica has more parks than most cities in LA County.

Stay blessed, I'm requesting again that HCD and Santa Monica City support housing advocates' vision for affordable housing on the westside of LA. We are ready to challenge the FAA again to force closure of the airport. Send the planes to Malibu! The incorrectly zoned Santa Monica airport benefits a small minority of wealthy people. I've literally watched and recorded them speeding their cars out of the airport as if it's a private race track for them! The city is having trouble finding and keeping workers, this isn't rocket science. We are not slaves and not willing to work for low wages that don't cover the cost of living! We need land and housing justice, we needed it 10 years ago, we

cannot and will not wait another 10 years! The working lower to middle class will strike and we are willing to put a lot of companies out of business by withholding our services!
--
Best,
Tieira
https://htwws.org/santamonicaairport/

https://youtu.be/a6wYwXRgFA8

SantaMonicaAirportproposal.pdf
1155K

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 8:32 AM
To: T <tie.ryder@gmail.com>

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file.

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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T: (213) 978-1302

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[Quoted text hidden]

Created by Tieira Ryder
https://htwws.org/santamonicaairport/ 01/27/21

When the incorrectly zoned Santa Monica airport closes, a closure that should be happening in this upcoming housing element cycle (2021-2029), a walkable community that includes majority affordable housing should be developed. The location is perfect for a community-owned, walkable/bike-friendly residential neighborhood that includes a variety of housing types for working-class residents on the westside, students, seniors, those living with disabilities, and many others in need of affordable housing.





Created by Tieira Ryder
https://htwws.org/santamonicaairport/ 01/27/21

To be clear, this community would include ***both community-owned rental and homeownership options.*** This pro-housing advocacy effort should be led by a housing advocate that understands the needs of the local community, someone that likely falls within the working class and has the best interest of the local community in mind. **When it comes to renting, rent should never exceed 20-30% of a resident's total income after taxes. Please keep in mind, the average worker in LA makes about $39,000 a year, this rental housing would be catered to those workers but the community itself would be mixed-income meaning it would also include market-rate units (still cheaper usually than private market-rate housing).** Along with market-rate rentals, small business/business placements would be considered throughout the community.

Housing proposal for the Santa Monica airport

(Total acres of the airport is approx. 227 acres. Planning4LA has 17 acres in the current LA City housing element (Mar Vista); SMC Bundy Campus area SMAirportBundyCampus. Please note, we are also requesting Penmar golf course for this project. ***Proposal was created by Tieira Ryder****)*

Affordable Homeownership

1. Affordable, reasonably priced homeownership for working-class residents, priority for long-term residents living or working in the Santa Monica, Venice, & Mar Vista zip codes.
2. Consider a set number of market-rate "for-sale" homes.

3. A variety of home types should be considered for development but especially multi-family housing such as plexes, condos, townhomes, and apartments. **Consider co-op ownership.**
4. **Priority consideration should also go to first-time homeowners in LA County, my recommendation is residents that have lived/worked at least 10 years in LA County.**
5. Priority consideration for historically displaced residents from supposed marginalized communities. Consider a 30-40% "right to return", "right to housing" for ADOS families. **(Google the history of displaced Black families in Santa Monica, Venice, and/or Manhattan Beach if you need more info.)**
6. The millennial generation should also receive a percentage of priority consideration, they currently own a measly 18% of the homes in Los Angeles. ***"Equity is defined as "the state, quality or ideal of being just, impartial and fair." The concept of equity is synonymous with fairness and justice."***
7. At no time would a small or large equity firm be granted permission to purchase a home within the community nor would an option be granted to purchase the community as a whole.
8. ***My recommendation on income qualifications for residents that are first-time buyers is working-class residents making between $30,000-$130,000.***
9. If potential owners require financing, ownership could be subject to ***credit union or bank approval.*** **Consider public, city-owned bank.**
10. The actual cost of homes should match that of the actual average wage of what most working-class residents make. There would likely be re-sell requirements as affordability would be protected by a trust.

Created by Tieira Ryder
https://htwws.org/santamonicaairport/ 01/27/21

Affordable Housing Rentals

1. Community-owned rental housing in mixed-income developments.
2. The recommended height for apartment buildings is 6-7 stories.
3. Set an ***"affordable rental rate" based on what the average person from the working class makes. At this moment, most workers in LA make about $39,000 a year. Affordability is usually priced for residents in the $17,000-$70,000 range.***
4. Community-owned market-rate rentals to be included, most likely still cheaper than the private market, market-rate rental housing.
5. No income ***restrictions*** once residents are housed. https://www.nhlp.org/resources/lihtc-admissions-rents-grievance-procedures/
6. Reserve a portion of the housing for ***limited to no-income residents***, considering subsidizing with; 1. HUD and/or new digital voucher program. 2. subsidize low to no income residents with market-rate apartment & business rentals. 3. Consider HCID/HACLA westside chapter. Social services for housing, food, and health-care should be ONE efficient program.
7. Affordable bachelors, studios, 1, 2, and 3 bedrooms.
8. As with *affordable homeownership*, the rental units & placements would be for various types of community members but especially ***keeping in mind our core working class which includes the essential workforce, students, seniors, veterans, those living with disabilities, etc. etc.***
9. Student apartments would be bachelor-sized apartments with smaller fridges and MUST have a kitchen area sink and a small area to put a

hot plate (or something similar) so they can cook if needed. (Similar to this https://urbanize.city/la/post/micro-unit-apartment-building)

More info on the proposed community as a whole

1. Consideration of business placements within the community.
2. Open park space, recreation center within the walkable community.
3. Consider the possible need to build new schools.
4. Consider a quality westside transit system especially for college students between SMC and/or UCLA. (cut down on car traffic congestion because students wouldn't need to drive)
5. College student housing should have its own small park area that has a WIFI and outdoor/indoor workspace for them.
6. Consider large home space for displaced minors within the community aka a "group home" to provide stability.
7. ***Request consideration for golf course closure(s) as well as other vacant land plots and buildings that have*** potential use for ***affordable housing that is community-owned and suits apartments, condos, townhomes, small and/or tiny homes for locals.*** Request more interim housing and healthcare sites on the westside for residents with long-term behavioral health needs.
8. The bigger goal is to adopt a similar social housing policy for each city in California with pro-housing community advocates from said cities leading the efforts!

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Oct 14, 2021 at 7:16 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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Date: Thu, Oct 14, 2021 at 7:15 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

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Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Denise Smith** <Heartzofdiamondz2018@everyactioncustom.com>
Date: Wed, Oct 13, 2021 at 5:15 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that Planning has now proposed a rezoning plan that would accommodate over 250,000 more homes by 2029, and that 45% of new rezoned capacity would be created in higher-resource neighborhoods. This represents significant progress and an improvement over the status quo, and Planning is to be commended on its work so far.

However, additional improvements and commitments are still needed to make the housing element update successful. I'm also concerned that the City's current plan would yield little housing growth in many high-resource Westside neighborhoods, where housing costs are especially high.

I urge the City to incorporate the following changes to the housing element's rezoning plan:
-Target the creation of 300,000 new homes through rezoning and land-use reforms.
-Legalize 8 housing units on more parcels where apartments are today banned, particularly in high-resource areas outside of environmentally sensitive or very high fire risk areas.
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-Cross-check the rezoning plan with a Fair Share methodology, to ensure that all neighborhoods are accommodating new rezoned capacity commensurate with their objective housing need.
-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

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Personally sent by Denise Smith using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Denise Smith
PO Box 2083 Hawthorne, CA 90251-2083
Heartzofdiamondz2018@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:15 PM
To: Heartzofdiamondz2018@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 13, 2021 at 4:01 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
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Los Angeles, CA 90012
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E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 13, 2021 at 3:56 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Geneva Vogelheim** <gvogelheim@everyactioncustom.com>
Date: Wed, Oct 13, 2021 at 3:55 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

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Personally sent by Geneva Vogelheim using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Geneva Vogelheim
3770 Keystone Ave Los Angeles, CA 90034-6360
gvogelheim@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:15 PM
To: gvogelheim@gmail.com

Hello,

Hope all is well.

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Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
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T: (213) 978-1302



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Day of Hearing within 48hr before Hearing Item 7

1 message

Blair Smith <blair.smith@lacity.org> Wed, Oct 13, 2021 at 9:34 AM
To: Housing Element <housingelement@lacity.org>, Cally Hardy <cally.hardy@lacity.org>

fyi.

---------- Forwarded message ---------
From: **Tom Williams** <ctwilliams2012@yahoo.com>
Date: Wed, Oct 13, 2021 at 9:31 AM
Subject: Day of Hearing within 48hr before Hearing Item 7
To: cpc@lacity.org <cpc@lacity.org>
Cc: <ari.briski@lacity.org>, blair.smith@lacity.org <blair.smith@lacity.org>

Day of Hearing Submissions within 48 hours of the meeting, up to and including the day of the meeting

2 pages cpc@lacity.org

7. CPC-2020-1365-GPA Council District: All CPC-2021-5499-GPC
CEQA: ENV-2020-6762-EIR; SCH. NO. 2021010130
Citywide PROPOSED PROJECT: An update to the City of Los Angeles General Plan consisting of the 2021-2029 Housing Element, Safety Element Update, and amendments to the Health Element (Plan for a Healthy Los Angeles).
The update of the General Plan, Housing Element must include the SCAG Projections for 2021-2045 and those of 2021-2029.
All documents must be included in a Programmatic EIR for all SCAG projection and process for assessing future 2029-2037 and 2038-2045 projections.
As a PEIR, the processes and mitigation/compensation measures must be provided for implementation of the Housing Element through the individual Community and project review/implementation process

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 13, 2021 at 2:44 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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Los Angeles City Planning
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E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 13, 2021 at 2:43 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
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E-NEWS

---------- Forwarded message ---------
From: **William Wright** <willrobwright@everyactioncustom.com>
Date: Wed, Oct 13, 2021 at 2:41 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

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Personally sent by William Wright using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
William Wright
734 E Kensington Rd Los Angeles, CA 90026-4427
willrobwright@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:14 PM
To: willrobwright@gmail.com

Hello,

Hope all is well.

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Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302



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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Tue, Oct 12, 2021 at 3:28 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
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Planning4LA.org
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Tue, Oct 12, 2021 at 2:48 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Craig Lyn** <craig@everyactioncustom.com>
Date: Tue, Oct 12, 2021 at 2:47 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Craig Lyn using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Craig Lyn
1920 Malcolm Ave Los Angeles, CA 90025-7643
craig@muvnday.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:08 PM
To: craig@muvnday.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Tue, Oct 12, 2021 at 6:19 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
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Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Tue, Oct 12, 2021 at 6:16 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Claire O'Hanlon** <charm@everyactioncustom.com>
Date: Tue, Oct 12, 2021 at 6:14 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

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Personally sent by Claire O'Hanlon using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Claire O'Hanlon
1237 Amherst Ave Apt 3 Los Angeles, CA 90025-1100
charm@manyquarks.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:09 PM
To: charm@manyquarks.com

Hello,

Hope all is well.

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Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Tue, Oct 12, 2021 at 2:06 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
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Los Angeles, CA 90012
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E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Tue, Oct 12, 2021 at 2:03 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
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E-NEWS

---------- Forwarded message ---------
From: **Jacob Pierce** <chewyjake@everyactioncustom.com>
Date: Tue, Oct 12, 2021 at 1:58 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

My name is Jacob, and I'm a native resident of LA County.

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

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Personally sent by Jacob Pierce using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jacob Pierce
606 King St Monrovia, CA 91016-3223
chewyjake@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:06 PM
To: chewyjake@gmail.com

Hello,

Hope all is well.

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Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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T: (213) 978-1302



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Fri, Oct 8, 2021 at 4:27 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
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E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Fri, Oct 8, 2021 at 4:25 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
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E-NEWS

---------- Forwarded message ---------
From: **Carey Bennett** <careyjeanbennett@everyactioncustom.com>
Date: Fri, Oct 8, 2021 at 4:24 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that Planning has now proposed a rezoning plan that would accommodate over 250,000 more homes by 2029, and that 45% of new rezoned capacity would be created in higher-resource neighborhoods. This represents significant progress and an improvement over the status quo, and Planning is to be commended on its work so far.

However, additional improvements and commitments are still needed to make the housing element update successful. I'm also concerned that the City's current plan would yield little housing growth in many high-resource Westside neighborhoods, where housing costs are especially high.

I urge the City to incorporate the following changes to the housing element's rezoning plan:
-Target the creation of 300,000 new homes through rezoning and land-use reforms.
-Legalize 8 housing units on more parcels where apartments are today banned, particularly in high-resource areas outside of environmentally sensitive or very high fire risk areas.
-Remove sites whose redevelopment is extremely unlikely, including public facilities like schools.
-Cross-check the rezoning plan with a Fair Share methodology, to ensure that all neighborhoods are accommodating new rezoned capacity commensurate with their objective housing need.
-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Carey Bennett using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Carey Bennett
2929 St George St Los Angeles, CA 90027-3025
careyjeanbennett@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:05 PM
To: careyjeanbennett@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

CD11 Comment Letter on the Housing, Safety, and Environmental Justice Element Updates

2 messages

Jason Douglas <jason.p.douglas@lacity.org> Fri, Oct 8, 2021 at 5:54 PM
To: Vince Bertoni <vince.bertoni@lacity.org>
Cc: Eric Garcetti <eric.garcetti@lacity.org>, Nury Martinez <nury.martinez@lacity.org>, Marqueece Harris-Dawson <mhd8@lacity.org>, Planning CPC <cpc@lacity.org>, Ann Sewill <ann.sewill@lacity.org>
Bcc: housingelement@lacity.org

Good Afternoon Mr. Bertoni,

Kindly find the attached comment letter from Councilmember Mike Bonin regarding the Housing, Safety, and Environmental Justice Element updates.

Have a wonderful, long weekend!

--

Jason Patrick Douglas
Senior Planning Deputy
Councilmember Mike Bonin
City of Los Angeles
213-473-7011 | www.11thdistrict.com

Sign Up for Mike's Email Updates

CD11 Councilmember Bonin Comment Letter Housing Safety EJ_10082021pdf.pdf
237K

Housing Element <housingelement@lacity.org> Tue, Oct 12, 2021 at 10:32 AM
To: Matthew Glesne <matthew.glesne@lacity.org>, Nancy Twum-Akwaboah <nancy.twum@lacity.org>, Marisol Romero <marisol.romero@lacity.org>, Betty Barberena <betty.barberena@lacity.org>, Blair Smith <blair.smith@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Jackie Cornejo <jackie.cornejo@lacity.org>, Maya Abood <maya.abood@lacity.org>, Wajiha Ibrahim <wajiha.ibrahim@lacity.org>, Joel Montano <joel.montano@lacity.org>

FYI

Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
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[Quoted text hidden]

CD11 Councilmember Bonin Comment Letter Housing Safety EJ_10082021pdf.pdf
237K

MIKE BONIN

City of Los Angeles
Councilmember, Eleventh District

October 08, 2021

Mr. Vince Bertoni
Director of Planning
Los Angeles City Planning
200 North Spring Street, 5th Floor
Los Angeles, California 90012
Mail Stop 395

Comments on the Housing, Safety, and Health Element Updates of the Los Angeles General Plan

Dear Mr. Bertoni,

Thank you for presenting this update of the draft Housing, Safety, and Health Elements in the midst of an unprecedented time in Los Angeles as we recover from a public health crisis and continue to make progress on our housing crisis. These challenges have had disparate impacts across our diverse City and shined a light on the inequalities that persist in our communities. Los Angeles is long overdue for the difficult conversations to dismantle the systemic land use practices that have led to widening inequality in housing opportunity, access to amenities and services, and quality of life.

The update of our City's General Plan presents a tremendous opportunity for Los Angeles to continue to lead the State in housing production and emerge as a thought leader in innovative housing solutions for the region. As we determine next steps for a Citywide Rezoning Program, I am supportive of policies that advance equitable smart growth practices, conserve our precious habitats, and promote resilience to natural disasters.

Planning for Housing Equity and Environmental Justice on the Westside
The Westside will be a key partner in advancing Environmental Justice and Affirmatively Furthering Fair Housing (AFFH). Tools such as zoning and redlining historically have been used as a means to exclude Angelenos from economic, social, and housing opportunities. The effect of such discriminatory land use practices has been particularly pronounced in my District and produced a lasting legacy of housing inequality, segregation, and exclusion. According to a recent report released by Los Angeles City Planning (City Planning) and Los Angeles Housing Department (LAHD), only 14% of affordable housing opportunities were produced in "high opportunity areas," while 62% were located in the low resource and high segregation and poverty areas within the past ten years. These statistics are revealing and we must encourage greater housing opportunities across the City.

The Los Angeles Coastal Zone will be an important consideration as we balance our priority to preserve the natural beauty of our coastline with the goal to maintain equitable access to visitor serving uses and housing opportunities. I recently introduced a motion (Council File: 21-1071) to establish a "Coastal Equity and Environmental Justice Policy" that will inform future land use practices, promote greater public participation and engagement with underrepresented and/or underserved communities, and be reflected in project determinations in the Coastal Zone pursuant to Chapter 3 of the Coastal Act. Efforts to update the General Plan must recognize the unique challenges in the Coastal Zone to discourage displacement, encourage attainable housing opportunities, and preserve coastal resources.

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7166 W. Manchester Boulevard
Los Angeles, CA 90045
(310) 568-8772
(310) 410-3946 Fax

City Hall
200 N. Spring Street, Room 475
Los Angeles, CA 90012
(213) 473-7011
(213) 473-6926 Fax

West Los Angeles Office
1645 Corinth Avenue, Room 201
Los Angeles, CA 90025
(310) 575-8461
(310) 575-8305 Fax

Planning for Wildfires and Natural Disasters
Last year, I introduced legislation (Council File: 20-1213) directing City Planning to update the Safety Element of the General Plan concurrent with the Housing Element in order to incorporate adequate fire hazard planning policies and to evaluate the capacity, safety, and viability of existing and potential evacuation routes in Very High Fire Hazard Severity Zones (VHFHSZ). Additionally, I established the Wildlands Urban Interface (WUI) Task Force (Council File: 18-1120) to mitigate the hazards residents face in these areas, particularly as the City addresses the threat of more frequent and intense wildfires due to climate change and the encroachment of development.

I commend City Planning's mindfulness of VHFHSZ, Significant Ecological Areas, and Hillside Management Areas as they consider the Housing Element's Citywide Rezoning Program to reduce exposure to natural disasters and preserve our environmental resources. The City must not only guide where growth should occur, but identify where development should not be located for the safety of our communities and the protection of our environment for future generations. Moreover, I support new items in the draft Safety Element like Policy 1.1.8 which regulates high density and/or high intensity development in VHFHSZ and minimizes unnecessary exposure of people and property.

While the City Planning made strides towards building resiliency from natural disasters, there is room to explore stronger land use regulations to limit our exposure and vulnerability. In light of new State legislation like SB 99 (2019) and AB 747 (2019), I encourage City Planning to introduce policies to discourage development in areas that do not have more than 2 evacuation routes. Additionally, the plan would benefit from stronger language to require greater setbacks, fire-protection access easements, and/or conservation easements to establish a community network of defensible space; prohibit new development in highly vulnerable communities; and to begin a conversation of managed retreat of development in communities with high exposure to hazards.

Thank you for your consideration of these issues as these plans move forward to the City Planning Commission. I look forward to continuing the conversation on how to provide the housing we need for all Angelenos and to build a resilient Los Angeles.

Please contact my Senior Planning Deputy, Jason P. Douglas, at (213) 473-7011 if you have any questions.

Respectfully,



MIKE BONIN
Councilmember, 11th District

cc: Mayor Eric Garcetti; City of Los Angeles
Council President Nury Martinez; City of Los Angeles
Councilmember Marqueece Harris-Dawson; Chair, Planning and Land Use Management Committee
Samantha Millman; President, City Planning Commission
Ann Sewill; General Manager, Los Angeles Housing Department

MB:jpd:ln

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Oct 7, 2021 at 10:20 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Oct 7, 2021 at 10:19 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Carol Gordon** <thecarolanngordon@everyactioncustom.com>
Date: Thu, Oct 7, 2021 at 10:19 AM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that Planning has now proposed a rezoning plan that would accommodate over 250,000 more homes by 2029, and that 45% of new rezoned capacity would be created in higher-resource neighborhoods. This represents significant progress and an improvement over the status quo, and Planning is to be commended on its work so far.

However, additional improvements and commitments are still needed to make the housing element update successful. I'm also concerned that the City's current plan would yield little housing growth in many high-resource Westside neighborhoods, where housing costs are especially high.

I urge the City to incorporate the following changes to the housing element's rezoning plan:
-Target the creation of 300,000 new homes through rezoning and land-use reforms.
-Legalize 8 housing units on more parcels where apartments are today banned, particularly in high-resource areas outside of environmentally sensitive or very high fire risk areas.
-Remove sites whose redevelopment is extremely unlikely, including public facilities like schools.
-Cross-check the rezoning plan with a Fair Share methodology, to ensure that all neighborhoods are accommodating new rezoned capacity commensurate with their objective housing need.
-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Carol Gordon using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Carol Gordon
2801 Glendower Ave Los Angeles, CA 90027-1118
thecarolanngordon@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:04 PM
To: thecarolanngordon@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Oct 7, 2021 at 9:34 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Oct 7, 2021 at 9:34 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
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---------- Forwarded message ---------
From: **Steven Guerry** <steven.guerry@everyactioncustom.com>
Date: Thu, Oct 7, 2021 at 9:21 AM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

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Personally sent by Steven Guerry using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Steven Guerry
5346 S Cornell Ave Chicago, IL 60615-5655
steven.guerry@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:03 PM
To: steven.guerry@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Oct 7, 2021 at 10:52 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Oct 7, 2021 at 10:22 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
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---------- Forwarded message ---------
From: **Andy May** <andymay@everyactioncustom.com>
Date: Thu, Oct 7, 2021 at 10:21 AM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

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Personally sent by Andy May using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andy May
1901 N New Hampshire Ave Los Angeles, CA 90027-1818
andymay@yahoo.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:04 PM
To: andymay@yahoo.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Abundant Housing LA - comment letter on housing element

3 messages

Anthony Dedousis <anthony@abundanthousingla.org> Wed, Oct 6, 2021 at 11:30 AM
To: Matthew Glesne <matthew.glesne@lacity.org>, Cally Hardy <cally.hardy@lacity.org>
Cc: vince.bertoni@lacity.org, Leonora Camner <leonora@abundanthousingla.org>, Housing Element <housingelement@lacity.org>

Hi Matt and Cally,

Thanks again for talking through the housing element and the rezoning plan with me on Friday. I appreciated the opportunity to ask questions and better understand the plan in more detail.

Ahead of next Thursday's City Planning Commission hearing, AHLA submitted a comment letter on the housing element's rezoning plan, and I wanted to share the letter with you as well. Please let us know if there's a good opportunity to talk through any of our recommendations and ideas.

Thanks again for your team's hard work, and looking forward to continuing to engage on the housing element update process.

Regards,

Anthony

--

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

211006 LA City HE Letter on Rezoning Plan.pdf
298K

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 6, 2021 at 11:34 AM
To: Arthi Varma <arthi.varma@lacity.org>, Nicholas Maricich <nicholas.maricich@lacity.org>, Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>, Housing Element <housingelement@lacity.org>

Hello.

I'm forwarding an email copied to Vince and sent to staff.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
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Planning4LA.org

[Quoted text hidden]

211006 LA City HE Letter on Rezoning Plan.pdf
298K

Housing Element <housingelement@lacity.org> Wed, Oct 6, 2021 at 12:33 PM
To: Jackie Cornejo <jackie.cornejo@lacity.org>, Nancy Twum-Akwaboah <nancy.twum@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Joel Montano <joel.montano@lacity.org>, Maya Abood <maya.abood@lacity.org>

FYI

Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
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T: (213) 978-1302

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---------- Forwarded message ---------
From: **Anthony Dedousis** <anthony@abundanthousingla.org>
Date: Wed, Oct 6, 2021 at 11:31 AM
Subject: Abundant Housing LA - comment letter on housing element
To: Matthew Glesne <matthew.glesne@lacity.org>, Cally Hardy <cally.hardy@lacity.org>
Cc: <vince.bertoni@lacity.org>, Leonora Camner <leonora@abundanthousingla.org>, Housing Element <housingelement@lacity.org>

[Quoted text hidden]

211006 LA City HE Letter on Rezoning Plan.pdf
298K

October 6, 2021

Ms. Samantha Millman
President, City Planning Commission
201 N. Figueroa Street
Los Angeles, CA 90012

Dear Ms. Millman,

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

That's why we've called for a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities.

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

- In January 2021, we wrote to recommend that, as part of the housing element update process and RHNA rezoning, the City set housing growth targets for each CPA, based on objective, quantifiable criteria like housing costs, median income, access to transit, proximity to job centers, access to parks and schools, patterns of historical exclusion and segregation, and environmental quality.
- In February, we wrote to express our concern that early drafts of the housing element update did not incorporate an equitable distribution approach to promoting housing growth.
- In April, the California Department of Housing and Community Development (HCD) issued detailed guidelines that clearly require cities to promote lower-income housing opportunities in high-opportunity neighborhoods, and defines quantitative benchmarks for assessing cities' AFFH compliance. This indicates that HCD intends to set the bar high on AFFH compliance in housing element updates, as required under Assembly Bill 686.

- In June, we wrote to express support for the Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416) and the Report Relative to a City Zoning Code Update (CF 20-1042), and encouraged the City Council to incorporate major reforms into the housing element update.
- In July, we wrote to express enthusiasm for the draft housing element's econometric model to forecast existing site capacity, and to urge the City to propose a transformational rezoning and constraint removal plan in the next iteration of the housing element.

We have reviewed the latest version of the City's draft Housing Element, dated October 1, 2021, and **we are encouraged that the City has made improvements to its forecast of the Adequate Sites Inventory, and proposed a promising, balanced approach to rezoning.**

In particular:

- **The Adequate Sites Inventory was revised to more accurately forecast the City's development potential without policy changes.** The July draft's analysis of the Adequate Site Inventory found that the City's total development potential during the 6th cycle is 266,647 homes[1], suggesting that an annual average of 33,331 homes will be permitted throughout the 6th cycle. However, this is almost double the average number of homes permitted between 2017 and 2020 (about 17,800 homes per year), indicating that the City's forecast was over-optimistic and likely to fall short in reality. The October 1 version updates key assumptions, finding that the City's total development potential is 231,000 homes by 2029[2] (roughly 29,000 homes per year), and proposes to rezone for 255,000 more homes (an increase of 36,000 homes relative to the July draft).
- **The housing element proposes to accommodate 255,000 more homes by 2029 through balanced rezoning and land use reform.** The rezoning program includes bold policy reforms that encourage equitable citywide housing supply growth, with 45% of new capacity created in higher-resource census tracts.[3] This would include an expansion of the City's Transit-Oriented Communities (TOC) program to areas where apartments are banned, an expansion of the City's Density Bonus program, and rezoning of low-density transit corridors.
- **The rezoning plan would expand the City's theoretical zoned capacity by roughly 1.5 million housing units, creating the conditions for 255,000 homes to actually be built.** This recognizes that *realistic capacity* and *theoretical zoned capacity* are two different things, which is consistent with the City's analysis of the sites inventory and accords with Assembly Bill 1397 (2017)'s requirement to discount sites' capacity by the sites' probability of development during the planning period. Just as UCLA admits 3,000 students when they want 2,000 incoming students, the City must increase zoned capacity well above the target number of new homes in order for that target to be achieved.

[1] Housing Element, City of Los Angeles, July 2021 draft, pg. 4-6
[2] Housing Element, City of Los Angeles, October 2021 draft, pg. 4-1
[3] Housing Element, City of Los Angeles, October 2021 draft, pg. 4-82

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

Nevertheless, we still have major concerns about the City's plan to meet its state-mandated RHNA targets, and recommend changes ahead of final submission of the plan to HCD. Portions of the revised draft continue to contain major inconsistencies with HCD's instructions and the requirement that housing element updates affirmatively further fair housing under Assembly Bill 686, and does not provide a detailed, specific, and credible plan for implementation of a successful rezoning and land use reform program, as required under Government Code Section 65583(c).

The following issues are of particular concern to us:

1. Portions of the Adequate Sites Inventory methodology are still over-optimistic about the City's likely housing development potential without rezoning or major land use reforms. As a result, the housing element only proposes to accommodate 255,000 homes through rezoning, when rezoning for a minimum of 300,000 homes is needed to achieve the City's RHNA goal.

The draft housing element's analysis of the Adequate Site Inventory finds that the City's total development potential during the 6th cycle is roughly 231,000 homes, or an annual average of about 29,000 homes. This is much higher than the average number of homes permitted between 2017 and 2020 (about 17,800 homes)[4], suggesting that many of the Adequate Site Inventory's assumptions are unlikely to be realized in reality. For example, forecasts for Private Development Project completion, ADU production, and Public Land Programs remain over-optimistic, the proposed No Net Loss buffer is insufficient, and the Adequate Site Inventory includes parcels containing rent-stabilized units as potential redevelopment sites. These issues cause the Adequate Site Inventory's estimate of total development potential to be unrealistically high (see pg. 4-9 of our July 27 comment letter for additional explanation).

While we are encouraged that the latest Adequate Site Inventory estimate was reduced to 231,000 homes (from 266,000 homes in the July draft), and that the rezoning target was increased to 255,000 homes (up from 219,000 homes in the July draft), we estimate that the rezoning target would need to be increased further, to 306,000 homes, in order to achieve the RHNA target.[5] This also accords with policy instructions in a letter signed by seven City Councilmembers, which endorsed a rezoning target of 300,000 homes.[6]

[4] HCD APR Dashboard, Units Permitted by Structure per Year, 2017-20
[5] Comment Letter on Draft Housing Element, July 27, 2021, p. 10
[6] Comment Letter from City Councilmembers, RE: Draft Housing Element and CF: 20-1042, August 13, 2021, p. 2

We urge the City to update the Adequate Sites Inventory methodology to include more realistic assumptions about the City's likely housing development potential without major land use reforms, and to update the rezoning target to at least 300,000 homes.

2. The City's rezoning plan may be over-optimistic about the likelihood that rezoned parcels will be developed during the 6th cycle. More parcels, especially R1-zoned lots in high-resource neighborhoods, must be added to the rezoning plan.

According to Planning, the City's rezoning program would encourage the development of 255,000 more homes by creating about 1.56 million units of new zoned capacity.[7] This roughly assumes that 16% of new zoned capacity will be developed during the 6th cycle.

However, this assumption may overestimate a rezoned site's likelihood of development. In the City's econometric analysis of the sites inventory, where recent parcel-level redevelopment trends were used to forecast likely future residential development in a "business as usual" scenario, the model forecasted that the sites with the strongest redevelopment opportunities (i.e. in the top 1 percent of redevelopment likelihood) only had a 13% probability of redevelopment during the coming 8 years.[8] Although a rezoning program would strengthen the economic feasibility of redevelopment of more parcels, it may still be over-optimistic to assume that the *average* rezoned parcel would have a higher likelihood of redevelopment than the *best* parcels under current zoning.

For this reason, the housing element's rezoning plan should be amended to create additional new zoned capacity (this will also make it easier to achieve an increased rezoning target of 300,000 homes). The plan could increase new zoned capacity by allowing larger buildings on the parcels already identified in the rezoning plan, and by adding more parcels to the rezoning plan. One way to do both would be to legalize 8 housing units on more R1-zoned parcels, particularly in high-resource areas outside of environmentally sensitive or very high fire risk areas. The recently-passed Senate Bill 10 would help to facilitate this local reform.

3. The rezoning plan should be updated to remove sites whose redevelopment is extremely unlikely, and should also remove all public facility sites such as schools.

The City's rezoning plan includes many large sites that are entirely unrealistic for residential redevelopment, including the Los Angeles County Museum of Art, the La Brea Tar Pits, the Academy Museum of Motion Pictures, the Petersen Automotive Museum, the Cathedral of Our Lady of the Angels, and the Hyperion Wastewater Reclamation Plant. It is completely understandable that a rezoning analysis containing over 250,000 parcels would accidentally include these types of sites. The rezoning plan should be reviewed in order to remove infeasible sites from the final site list.

[7] Housing Element, City of Los Angeles, October 2021 draft, pg. 4-50

[8] Appendix 4.6, Housing Element, City of Los Angeles, October 2021 draft, pg. 22-23. The model predicted that the top 1% of sites had an 8.6% probability of redevelopment in the coming 5 years, which is equivalent to a 13.4% probability over 8 years.

Additionally, the rezoning plan anticipates about 9,600 new homes to be built on the sites of public facilities, including schools, through public-private joint development programs.[9] While "The capacity assumptions recognize that the vast majority of public land (99%) is not suitable for housing development due to existing public use and insufficient public resources to develop 100% affordable housing"[10], even an assumption that 1% of publicly-owned land will be developed into mixed-income housing by 2029 seems unrealistic, given that this pace of joint development has not occurred in recent years. Additionally, the Adequate Sites Inventory already counts 10,000 units of "equitable housing" on 300 acres of public land towards the city's Adequate Sites Inventory[11], which also seems unlikely to occur without additional funding. Assuming an additional 10,000 units on top may be double-counting.

For these reasons, the Public Facilities parcels should be removed from the rezoning plan, and the rezoned capacity made up for on other parcels with a higher likelihood of redevelopment.

4. The rezoning plan should be cross-checked with a Fair Share methodology, to ensure that all CPAs are accommodating new rezoned capacity commensurate with their objective housing need. The City's current plan would yield little housing growth in many high-resource Westside CPAs, a problem that could be solved by using a Fair Share methodology to guide rezoning.

Earlier this year, Councilmember Gil Cedillo and Council President Nury Martinez called for a "Fair Share" approach to future planning for affordable housing growth and to the housing element's rezoning program. The resulting Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416) and Report Relative to a City Zoning Code Update (CF 20-1042) illustrate that restrictive zoning, especially apartment bans, have discouraged housing production (both market-rate and subsidized) in Los Angeles' higher-cost, supply-constrained neighborhoods. These reports, as well as the July housing element draft, proposed a Citywide Housing Needs Allocation Process/Targeted Fair Share Zoning Allocation formula that would guide a future Framework Element update and community plan updates.

However, the City's rezoning plan did not incorporate a Fair Share methodology to apportion new rezoned capacity by CPA, based on an estimate of each CPA's housing needs. One way to create this estimate would be through a formula that quantifies factors like housing costs, median income, access to transit, access to opportunity, and historical housing production. This would be in keeping with HCD's recommendation that cities distribute lower-income housing opportunities throughout the city, and first identify development potential for lower-income housing in high-opportunity neighborhoods. This would also align with HCD's standards for AFFH compliance in housing elements.

[9] Housing Element, City of Los Angeles, October 2021 draft, pg. 4-47
[10] Housing Element, City of Los Angeles, October 2021 draft, pg. 4-47
[11] Housing Element, City of Los Angeles, October 2021 draft, pg. 4-30

About 45% of the new capacity created through the City's proposed rezoning plan would be located in higher-resource census tracts. While this represents laudable progress, it's likely not enough to firmly shift a status quo where most new housing is accommodated in lower-opportunity areas. According to the City's site inventory analysis, only 29% of the city's existing development potential is located in higher-resource tracts, while 51% is located in low-resource and high segregation/poverty tracts.[12]

Additionally, many high-resource, supply-constrained Westside CPAs would accommodate very little of the new capacity created through the City's proposed rezoning plan. Westchester (2.7% of the rezoning plan's total new housing production), Sherman Oaks (2.3%), Westwood (1.2%), Venice (0.9%), and Brentwood (0.4%) all would see little rezoning, despite tremendous housing need and extremely high housing costs.[13] While we recognize that portions of these CPAs are exposed to very high fire risk and future flooding risk, there are significant areas within these CPAs that do not face these risks and should accommodate more of the total rezoning plan.

We recommend merging the proposed Equitable RHNA Rezoning Program and Citywide Housing Needs Allocation Process/Targeted Fair Share Zoning Allocations methodologies, ensuring that a consistent set of standards would guide RHNA rezoning, a Framework Element update, and all future community plan updates. This methodology should be cross-checked with the City's rezoning plan, and used to guide revisions to the City's rezoning plan prior to finalizing the housing element update. This would ensure that a solid majority of new housing opportunities are accommodated in moderate-, high-, and highest-resource census tracts.

5. Commit to a 2022 implementation of as much of the rezoning plan as possible.

A majority of the City's rezoning plan would be created through policy updates that apply citywide, such as an expansion of TOC, an expansion of the Density Bonus, a rezoning of low-density corridors, and encouragement of "missing middle" residential development. In order to encourage stronger housing production as early as possible in the 6th cycle, these proposals must be swiftly approved by the City Council in 2022.

However, the City still proposes to rely on Community Plan updates to achieve 43% of the RHNA rezoning program. This is concerning, since the Community Plan update process has a very poor track record of delivering strong, rapid housing growth. Recent Community Plan updates have suffered from years-long delays to develop and implement, often due to nuisance lawsuits from housing opponents (the Hollywood Community Plan update is a particularly salient example). Additionally, these updates often reflect the policy preferences of vocal housing opponents (e.g. the Westside Community Plan), rather than the broader community, which is why they generally do not meaningfully increase new housing opportunities. Relying on a

[12] Housing Element, City of Los Angeles, October 2021 draft, pg. 4-65
[13] While these percentages are not stated outright in the housing element, AHLA staff tabulated anticipated new housing growth through rezoning by CPA in Appendix 4.7 (Inventory of Candidate Sites for Rezoning spreadsheet).

fundamentally broken process to achieve a rezoning program that must be implemented by October 2024 is a recipe for failure.

The long-delayed Downtown and Hollywood Community Plans must be approved by the City Council in 2022. The rezoning policies that are proposed for the other 14 community plans, and are in earlier stages of development, should be fast-tracked outside of the traditional community plan process and approved by City Council in one single package, potentially in tandem with the other citywide policy updates called for in the rezoning plan (e.g. TOC expansion). Full implementation of the rezoning plan by the end of 2022 is an ambitious but necessary goal.

6. The City must update the Framework Element by 2024, in parallel with the RHNA rezoning.

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

While the Housing Element and Fair Share Reports recognize the need for an updated Framework Element, they don't commit to a date by which to achieve this effort. Updating the Framework Element by 2024 is a necessary step towards implementation of a high-quality, comprehensive Fair Share approach to the RHNA rezoning program, especially one that significantly expands new housing production in higher-resource Westside neighborhoods.

7. Commit to a 2022 implementation of a strong constraint removal program that would apply citywide.

Government Code Section 65583(c) requires housing elements to include programs with concrete action steps to facilitate housing production.[14] Per HCD's Housing Elements Building Blocks, "Programs must include specific action steps the locality will take to implement its policies and achieve its goals and objectives. Programs must also include a specific timeframe for implementation, identify the agencies or officials responsible for implementation, describe the jurisdiction's specific role in implementation, and (whenever possible) identify specific, measurable outcomes." Building Blocks lists definite time frames for implementation, demonstration of a firm commitment to implement the program, description of the local government's specific role in program implementation, description of the specific action steps to implement the program, and proposed measurable outcomes (e.g., the number of units created,

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

completion of a study, development of a homeless shelter, initiation of a rezone program, preservation of at-risk units, etc.) as appropriate examples of concrete action steps.

While the Housing Element discusses at length the many governmental constraints that restrict housing production and foster housing scarcity and unaffordability, it lacks a detailed, credible plan for constraint removal that would apply citywide, as required under California housing element law. The Goals section of the draft housing element frequently uses words like “plan”, “explore”, “consider”, “examine”, but contains very few firm commitments to action or implementation.

In order to encourage stronger housing production as early as possible in the 6th cycle, the City must commit to the following constraint removal policies in 2022:

- Eliminate on-site parking requirements, instead allowing property owners to decide how much on-site parking is necessary.
- Reduce restrictions on maximum height, floor-area ratio, unit size, and lot coverage.
- Raise the Site Plan Review threshold to 250 homes, and establish a fast by-right review process for all new multifamily and mixed-use buildings which meet the zoning law and the General Plan.
- Pre-approve standard ADU, small-scale “missing middle” multifamily and small lot subdivision housing plans, allowing developers to receive a permit quickly if they use a pre-approved design.
- Reduce fees on new multifamily residential development.

***

The City of Los Angeles has a legal obligation to sufficiently plan to meet current and future residents’ housing needs, in a way that guarantees access to opportunity for Californians of all racial and ethnic backgrounds. We respectfully urge you to support the above recommendations, and to encourage the City Council to incorporate these recommendations into the final version of the housing element update.

Thank you for your time and consideration.

Sincerely,

Leonora Camner	Sonja Trauss
Executive Director	Executive Director
Abundant Housing LA	YIMBY Law

CC: Megan Kirkeby, Deputy Director, Housing Policy Development, HCD
Melinda Coy, Land Use and Planning Manager, HCD
Tyrone Buckley, Assistant Deputy Director of Fair Housing, HCD
Paul McDougall, Housing Policy Development Manager, HCD

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Oct 7, 2021 at 7:38 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Oct 7, 2021 at 7:33 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
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E-NEWS

---------- Forwarded message ---------
From: **David Barboza** <dejaybe@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 8:02 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that Planning has now proposed a rezoning plan that would accommodate over 250,000 more homes by 2029, and that 45% of new rezoned capacity would be created in higher-resource neighborhoods. This represents significant progress and an improvement over the status quo, and Planning is to be commended on its work so far.

However, additional improvements and commitments are still needed to make the housing element update successful. I'm also concerned that the City's current plan would yield little housing growth in many high-resource Westside neighborhoods, where housing costs are especially high.

I urge the City to incorporate the following changes to the housing element's rezoning plan:
-Target the creation of 300,000 new homes through rezoning and land-use reforms.
-Legalize 8 housing units on more parcels where apartments are today banned, particularly in high-resource areas outside of environmentally sensitive or very high fire risk areas.
-Remove sites whose redevelopment is extremely unlikely, including public facilities like schools.
-Cross-check the rezoning plan with a Fair Share methodology, to ensure that all neighborhoods are accommodating new rezoned capacity commensurate with their objective housing need.
-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by David Barboza using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
David Barboza
7239 Comstock Ave Unit C Whittier, CA 90602-1353
dejaybe@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:56 AM
To: dejaybe@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 6, 2021 at 2:55 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 6, 2021 at 2:54 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
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---------- Forwarded message ---------
From: **Alexander Booth** <alexanderbooth@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 2:53 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Alexander Booth using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Alexander Booth
520 S Mariposa Ave Apt 207 Los Angeles, CA 90020-2714
alexanderbooth@kfalosangeles.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:38 AM
To: alexanderbooth@kfalosangeles.com

Hello,

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Regards,
The Housing Element Team



Housing Element Staff
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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

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To: Housing Element <housingelement@lacity.org>

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
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Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
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---------- Forwarded message ---------
From: **Nicholas Burns III** <nkburns3@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 2:35 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Nicholas Burns III using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nicholas Burns III
1740 S Westgate Ave Unit H Los Angeles, CA 90025-3792
nkburns3@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:37 AM
To: Nick Burns <nkburns3@gmail.com>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 6, 2021 at 2:36 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 6, 2021 at 1:34 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Leonora Camner** <leonora@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 1:33 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that Planning has now proposed a rezoning plan that would accommodate over 250,000 more homes by 2029, and that 45% of new rezoned capacity would be created in higher-resource neighborhoods. This represents significant progress and an improvement over the status quo, and Planning is to be commended on its work so far.

However, additional improvements and commitments are still needed to make the housing element update successful. I'm also concerned that the City's current plan would yield little housing growth in many high-resource Westside neighborhoods, where housing costs are especially high.

I urge the City to incorporate the following changes to the housing element's rezoning plan:
-Target the creation of 300,000 new homes through rezoning and land-use reforms.
-Legalize 8 housing units on more parcels where apartments are today banned, particularly in high-resource areas outside of environmentally sensitive or very high fire risk areas.
-Remove sites whose redevelopment is extremely unlikely, including public facilities like schools.
-Cross-check the rezoning plan with a Fair Share methodology, to ensure that all neighborhoods are accommodating new rezoned capacity commensurate with their objective housing need.
-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Leonora Camner using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Leonora Camner
1013 16th St Santa Monica, CA 90403-4331
leonora@abundanthousingla.org

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:25 AM
To: Leonora Camner <leonora@abundanthousingla.org>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 6, 2021 at 2:36 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 6, 2021 at 1:19 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
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E-NEWS

---------- Forwarded message ---------
From: **Haley Feng** <fxbhaley@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 1:13 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Haley Feng using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Haley Feng
3155 S Sepulveda Blvd Los Angeles, CA 90034-4220
fxbhaley@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:20 AM
To: fxbhaley@gmail.com

Hope all is well.

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Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 6, 2021 at 2:37 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 6, 2021 at 2:24 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
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E-NEWS

---------- Forwarded message ---------
From: **Andy Freeland** <andy@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 2:23 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Andy Freeland using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andy Freeland
901 S Flower St Unit 300 Los Angeles, CA 90015-2296
andy@andyfreeland.net

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:35 AM
To: Andy Freeland <andy@andyfreeland.net>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Oct 7, 2021 at 7:39 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Oct 7, 2021 at 7:30 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Tami Kagan-Abrams** <tami@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 6:35 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

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Personally sent by Tami Kagan-Abrams using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tami Kagan-Abrams
2430 Hercules Dr Los Angeles, CA 90046-1634
tami@abramsgroup.org

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:02 PM
To: tami@abramsgroup.org

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 6, 2021 at 2:36 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
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Planning4LA.org
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 6, 2021 at 1:26 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Sami Khamis** <khamissami@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 1:23 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

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Personally sent by Sami Khamis using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Sami Khamis
3155 S Sepulveda Blvd Los Angeles, CA 90034-4220
khamissami@yahoo.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:22 AM
To: khamissami@yahoo.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 6, 2021 at 3:16 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 6, 2021 at 3:16 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Director of Planning
Los Angeles City Planning
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E-NEWS

---------- Forwarded message ---------
From: **Arjun Kolachalam** <arjunk@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 3:12 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Arjun Kolachalam using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Arjun Kolachalam
2237 Aaron St Los Angeles, CA 90026-1723
arjunk@hey.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:40 AM
To: arjunk@hey.com

Hello,

Hope all is well.

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Regards,
The Housing Element Team



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[Quoted text hidden]

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Fwd: Support for a strong & transformative housing element update

2 messages

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To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Oct 7, 2021 at 7:32 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Director of Planning
Los Angeles City Planning
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Los Angeles, CA 90012
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E-NEWS

---------- Forwarded message ---------
From: **Martha Kriley** <Martha.kriley@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 8:26 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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However, additional improvements and commitments are still needed to make the housing element update successful. I'm also concerned that the City's current plan would yield little housing growth in many high-resource Westside neighborhoods, where housing costs are especially high.

I urge the City to incorporate the following changes to the housing element's rezoning plan:
-Target the creation of 300,000 new homes through rezoning and land-use reforms.
-Legalize 8 housing units on more parcels where apartments are today banned, particularly in high-resource areas outside of environmentally sensitive or very high fire risk areas.
-Remove sites whose redevelopment is extremely unlikely, including public facilities like schools.
-Cross-check the rezoning plan with a Fair Share methodology, to ensure that all neighborhoods are accommodating new rezoned capacity commensurate with their objective housing need.
-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Martha Kriley using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Martha Kriley
3360 E Foothill Blvd Apt 220 Pasadena, CA 91107-6060
Martha.kriley@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:57 AM
To: Martha.kriley@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 6, 2021 at 2:37 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 6, 2021 at 2:23 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Mariana Mellor** <mcns.777@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 2:12 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

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Personally sent by Mariana Mellor using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Mariana Mellor
768 Tuolumne Ave Thousand Oaks, CA 91360-4250
mcns.777@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:33 AM
To: mcns.777@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 6, 2021 at 2:37 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 6, 2021 at 2:22 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Director of Planning
Los Angeles City Planning
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E-NEWS

---------- Forwarded message ---------
From: **Babak Mozaffari** <bm@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 2:12 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

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-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

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Personally sent by Babak Mozaffari using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Babak Mozaffari
525 Santa Monica Blvd Apt 404 Santa Monica, CA 90401-3613
bm@contactbm.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:29 AM
To: Babak M <bm@contactbm.com>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012
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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 6, 2021 at 2:36 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
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Planning4LA.org
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 6, 2021 at 2:22 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Director of Planning
Los Angeles City Planning
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E-NEWS

---------- Forwarded message ---------
From: **Andrew Silver** <asilverins@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 2:18 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that Planning has now proposed a rezoning plan that would accommodate over 250,000 more homes by 2029, and that 45% of new rezoned capacity would be created in higher-resource neighborhoods. This represents significant progress and an improvement over the status quo, and Planning is to be commended on its work so far.

However, additional improvements and commitments are still needed to make the housing element update successful. I'm also concerned that the City's current plan would yield little housing growth in many high-resource Westside neighborhoods, where housing costs are especially high.

I urge the City to incorporate the following changes to the housing element's rezoning plan:
-Target the creation of 300,000 new homes through rezoning and land-use reforms.
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-Remove sites whose redevelopment is extremely unlikely, including public facilities like schools.
-Cross-check the rezoning plan with a Fair Share methodology, to ensure that all neighborhoods are accommodating new rezoned capacity commensurate with their objective housing need.
-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.
- The plan should also include the Livable Communities framework for mixed used, multi story, affordable, and missing middle housing in underutilized commercial zones.

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Personally sent by Andrew Silver using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andrew Silver
4328 Bellingham Ave Studio City, CA 91604-1605
asilverins@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:27 AM
To: Andrew Silver <asilverins@gmail.com>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012
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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

3 messages

Henry van Moyland <henryvanmoyland@everyactioncustom.com> Wed, Oct 6, 2021 at 9:19 PM
Reply-To: henryvanmoyland@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. By creating a thorough quantitative model that estimates sites' likelihood of redevelopment, Planning has provided a fair estimate of the City's current realistic capacity for new housing and acknowledged that Los Angeles will only achieve 10% of its RHNA target in a "business as usual" scenario. The draft housing element also proposes creating over 220,000 homes through rezoning and other land use reforms, particularly in high-resource areas that have accommodated little new housing in recent years. All of this represents significant progress.

Now, additional bold action and specific implementation measures are needed to make the housing element update successful. I urge the City to:
-Target the creation of 300,000 new homes through rezoning and land use reforms.
-Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
-Increase affordable housing opportunities in high-opportunity neighborhoods.
-Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
-Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Henry van Moyland using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Henry van Moyland
546 S Curson Ave Los Angeles, CA 90036-3253
henryvanmoyland@gmail.com

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 6, 2021 at 10:53 PM
To: Housing Element <housingelement@lacity.org>

[Quoted text hidden]
--

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning

LOS ANGELES CITY PLANNING
200 N. Spring St., Room 425
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Planning4LA.org
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Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:41 AM
To: henryvanmoyland@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
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T: (213) 978-1302

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Oct 7, 2021 at 7:38 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Oct 7, 2021 at 7:30 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
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E-NEWS

---------- Forwarded message ---------
From: **Tom Vosburgh** <thomas.a.vosburgh@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 4:58 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

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-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

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Personally sent by Tom Vosburgh using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tom Vosburgh
11833 Goshen Ave Apt 4 Los Angeles, CA 90049-6346
thomas.a.vosburgh@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:58 AM
To: thomas.a.vosburgh@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 6, 2021 at 3:11 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
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Planning4LA.org
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 6, 2021 at 3:05 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **William Wright** <willrobwright@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 3:04 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by William Wright using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
William Wright
734 E Kensington Rd Los Angeles, CA 90026-4427
willrobwright@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:39 AM
To: willrobwright@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Oct 6, 2021 at 2:36 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Oct 6, 2021 at 2:11 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Kevin Zelaya** <kevz21189@everyactioncustom.com>
Date: Wed, Oct 6, 2021 at 2:06 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households.

This requires a bold, transformative approach to the housing element update that encourages strong housing growth at all levels of income and in all neighborhoods, particularly high-resource areas that have often opposed new housing opportunities. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that Planning has now proposed a rezoning plan that would accommodate over 250,000 more homes by 2029, and that 45% of new rezoned capacity would be created in higher-resource neighborhoods. This represents significant progress and an improvement over the status quo, and Planning is to be commended on its work so far.

However, additional improvements and commitments are still needed to make the housing element update successful. I'm also concerned that the City's current plan would yield little housing growth in many high-resource Westside neighborhoods, where housing costs are especially high.

I urge the City to incorporate the following changes to the housing element's rezoning plan:
-Target the creation of 300,000 new homes through rezoning and land-use reforms.
-Legalize 8 housing units on more parcels where apartments are today banned, particularly in high-resource areas outside of environmentally sensitive or very high fire risk areas.
-Remove sites whose redevelopment is extremely unlikely, including public facilities like schools.
-Cross-check the rezoning plan with a Fair Share methodology, to ensure that all neighborhoods are accommodating new rezoned capacity commensurate with their objective housing need.
-Commit to a 2022 implementation of as much of the rezoning plan as possible, as well as a strong constraint removal program that would apply citywide.
-Update the Framework Element by 2024, in parallel with the RHNA rezoning.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Kevin Zelaya using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Kevin Zelaya
1139 S Rimpau Blvd Los Angeles, CA 90019-1812
kevz21189@gmail.com

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 11:26 AM
To: kevz21189@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Update - Inventory of Candidate Sites for Rezoning

Kristina Kropp <kkropp@lunaglushon.com> Mon, Oct 4, 2021 at 10:31 AM
To: Matthew Glesne <matthew.glesne@lacity.org>
Cc: Housing Element <housingelement@lacity.org>, Rob Glushon <rglushon@lunaglushon.com>

Hi Matt,

Sorry to keep coming back to this, but I think we do have some more questions. We have a community meeting tomorrow evening at which we would like to provide accurate information.

1. Could you help us understand the process? It seems like this is going to the CPC, essentially for consideration on the 14? And then I assume approval by City Council. Seems to me from the staff report that they will be recommending wholesale changes to the Plan. How is it that properties can be added or deleted later? Then what is the CPC considering on the 14th?
2. Where do we point constituents to understand the proposed changes? For example, if I put in the address 590 Moreno, it says that this is an “ADU” zone, generally described as an update to permit an additional ADU on larger sized lots with reduced barriers. But what barriers are proposed to be eliminated? How do we access that information?

Happy to jump on a call if easier.

Thanks,

Kristina

Kristina Kropp, Esq.

Luna & Glushon, A Professional Corporation

16255 Ventura Boulevard, Suite 950

Encino, California 91436

Telephone (818) 907-8755

Fax (818) 907-8760

Dennis R. Luna

(1946-2016)

==========

This email contains information from the Law Offices of Luna & Glushon which may be confidential or protected by the attorney-client privilege and/or the work product doctrine. If you are not the intended recipient, any review, reliance, copying, disclosure, distribution or other use of information contained herein is prohibited. If you are not the intended recipient, please contact the sender and delete the original, all copies, and any attachments

---

From: Matthew Glesne <matthew.glesne@lacity.org>
Sent: Friday, October 1, 2021 2:28 PM
To: Kristina Kropp <kkropp@lunaglushon.com>
Cc: Housing Element <housingelement@lacity.org>; Rob Glushon <rglushon@lunaglushon.com>

[Quoted text hidden]

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Update - Inventory of Candidate Sites for Rezoning

Matthew Glesne <matthew.glesne@lacity.org> Fri, Oct 8, 2021 at 11:41 AM
To: Kristina Kropp <kkropp@lunaglushon.com>
Cc: Housing Element <housingelement@lacity.org>, Rob Glushon <rglushon@lunaglushon.com>

Yes on the CPC date for the 14th. I don't know what you mean about recommending wholesale changes.

As we explain in the materials, inclusion on the list does not mean the site will not be subject to an actual change in zoning. That is a separate step that will require their own zoning ordinances and public process over the course of the next three years. For example there would be a separate zoning code ordinance to implement the "Opportunity ADU" strategy you reference. Yes, we say this future ADU ordinance is anticipated to include some targeted reforms to ADU development standards to better meet citywide goals - but these details have not yet been developed. I don't think we are talking about major changes to current rules - mostly minor technical things. There may also be properties and geographies added or removed subject to those future zoning ordinances as they are developed in the future.

Matt

[Quoted text hidden]

--

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

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Hi from pb..... General Plan Housing and Safety Element Public Hearing | Actualización de losElementos de Vivienda y de Seguridad:El informe del personal está disponible

2 messages

pbparlor@juno.com <pbparlor@juno.com> Sat, Oct 2, 2021 at 3:16 PM
To: housingelement@lacity.org

STOP "OVER BUILDING LA" ! La Cienega & JEFFERSON is an EYE SORE, TOO MUCH, TOO TALL, UGLY ....also not affordable.....

---------- Original Message ----------
From: Los Angeles City Planning <housingelement@lacity.org>
To: pbparlor@juno.com
Subject: General Plan Housing and Safety Element Public Hearing | Actualización de losElementos de Vivienda y de Seguridad:El informe del personal está disponible
Date: Fri, 1 Oct 2021 21:50:22 -0400 (EDT)



Para ver en español, desliza hacia abajo.

Dear Stakeholders,

The proposed 2021-2029 Housing Element, Safety Element, and amendments to the Health Element will be heard by the City Planning Commission (CPC) on October 14th, 2021. A staff report, which includes the latest draft of each proposed plan, is now available on the Los Angeles City Planning website.

Access the staff report and draft plans here.

Information on the CPC meeting, including how to attend and comment, is available below. A limited public hearing will be held by the City Planning Commission prior to consideration of the proposed plans. In addition to the CPC meeting the Housing Element

will be heard at the Affordable Housing Commission on October 6th, meeting details will be posted here.

City Planning Commission - Virtual Meeting

Thursday October 14, 2021
Meeting to begin after 8:30 a.m.

Access the City Planning Commission Agenda here

Use this link to join Zoom meeting at the designated time:

Virtual Meeting

Meeting ID	849 6500 5926
Password	377316
To call in	+1 213 338 8477 US +1 669 900 9128 US

In addition to revised draft documents for the CPC staff report, a new interactive map is now available for sites identified in Housing Element Appendix 4.1 Inventory of Adequate Sites for Housing and Appendix 4.7 Inventory of Candidate Sites for Rezoning.

Access the interactive map here.

Staff held two virtual public hearings on the Proposed Plans on September 21st and 22nd. A summary of comments shared at the public hearing and submitted in writing is available in the Staff Report. A full recording of the hearing is also available on the Los Angeles City Planning Website.

Access a recording of the public hearing here.

Estimadas Partes Interesadas,

La Comisión de Planeación (CPC por sus siglas en inglés) escuchará el propuesto Elemento de Vivienda del Plan General 2021-2029, el Elemento de Seguridad y una lista de enmiendas al Elemento de Salud el 14 de octubre de 2021. Un informe del personal, que incluye el último borrador de cada plan propuesto, ahora está disponible en el sitio web del Departamento de Planeación de la Ciudad de Los Ángeles.

Acceda al informe del personal y al Borrador de planes propuestos de CPC aquí.

La información sobre la reunión del CPC, incluyendo como asistir y comentar, está disponible a continuación. Una audiencia pública limitada será realizada por la Comisión de Planeación antes de considerar los planes propuestos. Además de la reunión de CPC, el Elemento de Vivienda se escuchará en la Comisión de Vivienda Asequible el 6 de octubre, los detalles de la reunión se publicarán aquí.

Comisión de Planeación - Reunión Virtual

Jueves 14 de octubre de 2021
La reunión comenzará después de las 8:30 a.m.

Acceda la agenda de la Comisión de Planeación aquí.

ID de reunión	849 6500 5926
Contraseña	377316
Marque por su ubicación	+1 213 338 8477 US +1 669 900 9128 US

Use este enlace para unirse a la reunión de Zoom:

Audiencia Pública

Además de los borradores revisados para el informe del personal de la CPC, ahora está disponible un nuevo mapa interactivo para los sitios identificados en el Apéndice 4.1 Inventario de sitios adecuados para Vivienda y el Apéndice 4.7 Inventario de sitios candidatos para la rezonificación.

Acceda el mapa interactivo aquí.

El personal realizo dos audiencias públicas virtuales sobre los planes propuestos el 21 y 22 de septiembre. Un resumen de los comentarios compartidos en la audiencia pública y presentados por escrito está disponible en el informe del personal. Una grabación completa de la audiencia también está disponible en el sitio web del Departamento de Planeación de la Ciudad de Los Ángeles.

Acceda la grabación de la audiencia pública aquí.

LOS ANGELES
CITY PLANNING

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Los Angeles City Planning | 200 N. Spring St, Room 525, Los Angeles, CA 90012

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- **Across US, Women March for Abortion Rights**

Housing Element <housingelement@lacity.org> Wed, Oct 6, 2021 at 9:47 AM
To: "pbparlor@juno.com" <pbparlor@juno.com>

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

4 messages

Flora Melendez <flora.melendez@lacity.org> Thu, Sep 30, 2021 at 10:06 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Sep 30, 2021 at 10:05 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **David Heflin** <heflindavid.l@everyactioncustom.com>
Date: Thu, Sep 30, 2021 at 10:02 AM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. But additional bold action and specific implementation measures are needed to make the housing element update successful.

I urge the City to:
- Rezone enough new capacity to result in the creation of 300,000 new homes, enough to close the RHNA gap.
- Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods, and would require wealthy, high-opportunity areas to accommodate the most new housing.
- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Allow "missing middle" multifamily housing citywide.
- Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
- Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Sincerely,

Personally sent by David Heflin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
David Heflin
695 S Santa Fe Ave Los Angeles, CA 90021-1300
heflindavid.l@gmail.com

Housing Element <housingelement@lacity.org> Tue, Oct 19, 2021 at 11:47 AM
To: heflindavid.l@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file and taken into consideration

as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Mail Delivery Subsystem <mailer-daemon@googlemail.com> Tue, Oct 19, 2021 at 11:47 AM
To: housingelement@lacity.org

Address not found

Your message wasn't delivered to **heflindavid.l@gmail.com** because the address couldn't be found, or is unable to receive mail.

LEARN MORE

The response was:

```
550 5.1.1 The email account that you tried to reach does not exist. Please try double-checking
the recipient's email address for typos or unnecessary spaces. Learn more at
https://support.google.com/mail/?p=NoSuchUser q4sor755527oiv.11 - gsmtp
```

Final-Recipient: rfc822; heflindavid.l@gmail.com
Action: failed
Status: 5.1.1
Diagnostic-Code: smtp; 550-5.1.1 The email account that you tried to reach does not exist. Please try
550-5.1.1 double-checking the recipient's email address for typos or
550-5.1.1 unnecessary spaces. Learn more at
550 5.1.1 https://support.google.com/mail/?p=NoSuchUser q4sor755527oiv.11 - gsmtp
Last-Attempt-Date: Tue, 19 Oct 2021 11:47:46 -0700 (PDT)

---------- Forwarded message ----------
From: Housing Element <housingelement@lacity.org>
To: heflindavid.l@gmail.com
Cc:
Bcc:
Date: Tue, 19 Oct 2021 11:47:35 -0700
Subject: Re: Support for a strong & transformative housing element update
----- Message truncated -----

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:29 PM
To: heflindavid.l@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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On Thu, Sep 30, 2021 at 10:06 AM Flora Melendez <flora.melendez@lacity.org> wrote:
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Livable Communities Initiative

2 messages

Teddy M. Kapur <tkapur@pszjlaw.com> Wed, Sep 29, 2021 at 4:08 PM
To: "housingelement@lacity.org" <housingelement@lacity.org>

Hi, my name is Teddy Kapur. I live in Hancock Park. My zip code is 90004. A plan called The Livable Communities Initiative has been submitted to the Department of Planning to be included in the next Housing Element. I think it's a great solution to LA's housing crisis and urge that it be included and approved in the next housing element. Thank you.

Regards,

Teddy Kapur

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:33 PM
To: "Teddy M. Kapur" <tkapur@pszjlaw.com>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through council committees.

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing element

3 messages

Jennifer Levin <jentwelve@gmail.com> Wed, Sep 29, 2021 at 9:30 PM
To: housingelement@lacity.org

Hello. Is it too late to submit public comment on the Housing Element?

Thanks,
Jennifer Levin

Housing Element <housingelement@lacity.org> Thu, Sep 30, 2021 at 8:52 AM
To: Jennifer Levin <jentwelve@gmail.com>

Hi Jennifer,

Comments can still be directed to us for inclusion in the case file but they will not be reflected in our City Planning Commission (CPC) staff report. If you would like the decision makers to see the comments please direct them to cpc@lacity.org with the case number CPC-2020-1365-GPA; ENV-2020-6762-EIR. The commission office will forward us all emails they receive for inclusion in the case file and will provide them to the commissioners.

Following the CPC action, the case will be transmitted to the City Council for committee review then Council action. Once transmission occurs a Council File will be established in which comments can be submitted directly for City Council Decision maker review.

Please let us know if you have any questions.



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Jennifer Levin <jentwelve@gmail.com> Thu, Sep 30, 2021 at 8:55 AM
To: Housing Element <housingelement@lacity.org>

Wow. Thank you so much for getting back to me! I will do that.

Jennifer Levin
310 849 2265
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Sep 29, 2021 at 9:09 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Sep 29, 2021 at 7:16 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
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Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Claire O'Hanlon** <charm@everyactioncustom.com>
Date: Tue, Sep 28, 2021 at 10:46 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I believe Los Angeles is for everyone! We are losing our neighbors to the cost of living here. We need more housing and we need concrete actions to get us there.

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Allow "missing middle" multifamily housing citywide.
- Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
- Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Sincerely,

Personally sent by Claire O'Hanlon using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Claire O'Hanlon
1237 Amherst Ave Apt 3 Los Angeles, CA 90025-1100
charm@manyquarks.com

Housing Element <housingelement@lacity.org> Wed, Sep 29, 2021 at 11:54 AM
To: charm@manyquarks.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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Planning4LA.org
T: (213) 978-1302



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Pipeline Projects - Housing Element Update

2 messages

The Cains <cainfam@verizon.net> Tue, Sep 28, 2021 at 5:56 PM
Reply-To: The Cains <cainfam@verizon.net>
To: "housingelement@lacity.org" <housingelement@lacity.org>
Cc: "melaniemihal@gmail.com" <melaniemihal@gmail.com>, "eliz.pollock@gmail.com" <eliz.pollock@gmail.com>, "pallinson@yahoo.com" <pallinson@yahoo.com>, "bareiff@verizon.net" <bareiff@verizon.net>, "8usanv@gmail.com" <8usanv@gmail.com>, "elliepac@gmail.com" <elliepac@gmail.com>, "thehikerjoe@gmail.com" <thehikerjoe@gmail.com>, "dcnevil@gmail.com" <dcnevil@gmail.com>

Dear Sir or Madam:

The Land Use Committee of the Del Rey Residents Association (DRRA) would like to know how you determine that a location/address be placed in the Pipeline Projects of your Housing Element Update. There may be more locations to be added and perhaps there are locations to be removed. Also, are there projects that are currently in progress?

Also, we request a version of *Appendix 4.3 Pipeline Projects - Private Development* that is searchable. As you know, the document is exhaustively comprehensive. It is a disservice to the community to make it unsearchable. We will appreciate your help with this and will appreciate a searchable version by October 5,2021.

Thank you in advance for your help.

Regards,

Mary and Jim Cain
DRRA Land Use Committee Members

Housing Element <housingelement@lacity.org> Thu, Oct 21, 2021 at 8:49 AM
To: The Cains <cainfam@verizon.net>

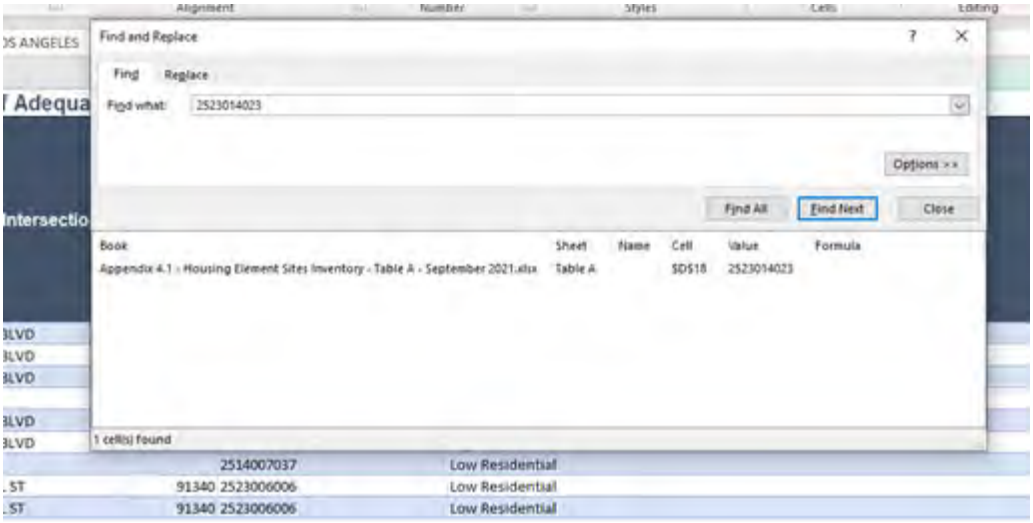
Hello,

Thank you for your question.

The housing element may satisfy its RHNA requirement through a variety of methods other than identifying specific sites (Government Code Section 65583.1). This includes the identification of units permitted, built, entitled, or pending that may occur through planned and approved projects that are already in the development pipeline within the jurisdiction.

The City of Los Angeles has a significant pipeline of development projects, these are projects that are seeking entitlements or are actively pursuing construction. More information on Pipeline Development can be found in Chapter 4 on pages 164 – 167. Table 4.10 summarizes the current inventory of residential and mixed-use development projects with active entitlements or pending building permits.

Regarding the searchability of Chapter 4 appendices, the excel files should allow you to search. If you select "Find All" in the dialog box, it will list the rows/cells containing the information you are looking for (see below example).



Best,

Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

(no subject)

2 messages

Jamin Warren <jaminwarren@gmail.com> Mon, Sep 27, 2021 at 5:30 PM
To: HousingElement@lacity.org
Cc: Jaime Del Rio <jaime@abundanthousingla.org>

To whom it may concern:

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. But additional bold action and specific implementation measures are needed to make the housing element update successful.

I urge the City to:

- Rezone enough new capacity to result in the creation of 300,000 new homes, enough to close the RHNA gap.
- Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods, and would require wealthy, high-opportunity areas to accommodate the most new housing.
- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Allow "missing middle" multifamily housing citywide.
- Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
- Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Best,
Jamin

Housing Element <housingelement@lacity.org> Wed, Sep 29, 2021 at 11:19 AM
To: Jamin Warren <jaminwarren@gmail.com>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

plan avoids stability and resolve

2 messages

david adams <dadams.hm@gmail.com> Sun, Sep 26, 2021 at 9:15 PM
To: HousingElement@lacity.org

Without consideration for the true definition and implementation of ecology, your plan is shortsighted at best. Increasing population and density compounds existing problems and creates unforeseen new sets of problems. History is a window of opportunity to learn from failure and end a vicious cycle of repetition that has no resolve, but only serves to further destabilize, deteriorate and fragment society. When in the history of Los Angeles has housing problems been resolved? Resolve doesn't mean shorterm, it means long term with minor fluctuations. Had ecology been the model, all problems including housing would be manageable and not extreme as they are now. Ecology is the connection and interaction of systems supporting other systems. Bill Clinton ran his candidacy saying "It's the economy stupid". He and his predecessors have been wrong all along. "It's the Ecology Stupid" would have been accurate. Supply is never a problem until demand exceeds resources. It's a delicate balance. Adding more of anything is never the solution including population, but integrating small changes maintains stability. We must flatten the curve. Our growth is out of control and only serves to threaten all of humanity. It's a runaway train.

Consider infrastructure and climate as just 2 elements of ecology. Over the last several decades, we have been in a long decline. Severe drought and crumbling infrastructure can not support an increasing population, no matter how much funding is delegated because there are limited resources such as materials, labor, logistics while allowing a healthy and productive society to function. Furthermore, carbon based materials contribute to climate change and drought. Life can not be sustained without water and adding more people to a city that can not produce water is illogical and foolish. Instead of new buildings, first fill all existing buildings, commercial and residential i. Discourage real estate investment from businesses and limit it to individuals that live and work in communities. The time has come that the government works for the individual and society, not private business that serves only to profit off the backs of others. Allow the taxpayer to insure Housing, Health and Education so they may one day become nonprofit and not a profit making machine for others to claim their contribution to Los Angeles..

Our greatest global treasures are protected and preserved for all to enjoy and honor by regulating the amount of human traffic. All human creation including our cities are treasures, but we must preserve them limiting the human footprint. It was a sad day for the city when LA planners allowed residential property to occupy curb to curb leaving with no green space for children to play. Inner city children never know nature, but only concrete and asphalt and repeated all for adding more without resolve. You are responsible for shaping the lives of individuals and society. Please stop selling out to developers and represent homeowners that have raised families here for generations. Have the courage to end the vicious cycle of unsustainable growth now! Allow your heart to guide you and think differently.

Housing Element <housingelement@lacity.org> Wed, Sep 29, 2021 at 11:12 AM
To: david adams <dadams.hm@gmail.com>

Hello David,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: I'm against rezoning of Westwood hills

2 messages

Daniel Skolnick <daniel.skolnick@lacity.org> Mon, Sep 27, 2021 at 11:12 AM
To: Housing Element <HousingElement@lacity.org>



Daniel Skolnick
Senior Planning Deputy
Councilmember Paul Koretz, Fifth District
200 North Spring Street, Room 440, Los Angeles, CA 90012
(213) 473-7005 Los Angeles City Hall Office
Email: daniel.skolnick@lacity.org

PLEASE NOTE: All email correspondence with the office of Councilmember Paul Koretz (including any attachments), along with any associated personal identifying information, is considered a public record under the California Public Records Act and may be subject to public disclosure under the Act.

---------- Forwarded message ---------
From: **Ellen Ceaser** <ejceaser@gmail.com>
Date: Sun, Sep 26, 2021 at 4:06 PM
Subject: I'm against rezoning of Westwood hills
To: <daniel.skolnick@lacity.org>, <james.bikhart@lacity.org>, <joan.pelico@lacity.org>, <Paul.Koretz@lacity.org>

Dear Sir,
I have been a resident of Westwood Hills for over 30 years and the 2nd owner of my house. I sent my children to the local elementary school and loved its diversity, including both apartment dwellers adjacent to UCLA and UCLA employees' children as well as kids from the neighborhood. I am from the east coast and this reminds of the east coast with its rolling hills and different housing styles.

I am appalled to hear that Westwood Hills is being considered for rezoning in its entirety, in addition to the impacts from SB 9 and SB10. The narrow streets are already difficult to pass (my cars parked on the street) have been sideswiped twice in the last 10 years). More density and cars will only exacerbate this.

I feel that real estate professionals are already disturbing the neighborhood ambiance by putting up "mansions, utilizing the entire lot. It is destroying the neighborhood feel as well as the beautiful landscapes and trees of the neighborhood.

Please do not allow this area to be full of apartments. Conversion to multi family apartments zoning will devalue the housing stock in this area. Why not just increase density in areas already zoned for apartments and close to the major rail lines? SB9 and SB10 are bad enough.

Sincerely,

Ellen Ceaser
Barlock Avenue

I am a widow and my house is my major asset. I cannot afford for it to be devalued.

Housing Element <housingelement@lacity.org> Wed, Sep 29, 2021 at 11:17 AM
To: ejceaser@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: comment on the Draft Housing Element

2 messages

Planning CPC <cpc@lacity.org> Mon, Sep 27, 2021 at 8:02 AM
To: Housing Element <housingelement@lacity.org>

FYI-

---------- Forwarded message ---------
From: **Ann Dorsey** <aedorsey@hotmail.com>
Date: Sun, Sep 26, 2021 at 4:29 PM
Subject: comment on the Draft Housing Element
To: cpc@lacity.org <cpc@lacity.org>

To Whom It May Concern:

I am concerned that affordable housing is not being given the needed priority to ensure a reduction of the housing/homelessness crisis. It is not simply a matter of building more housing. The housing must be affordable for those who are low income and very low income. I suggest the following :

- Restoring HUD and redevelopment agency public and subsidized housing programs to fill the low-priced housing gap.
- Stopping density bonus programs and other forms of upzoning since they are responsible for the declining supply of affordable housing in Los Angeles.
- Strengthening the state's and LA's Rent Stabilization Ordinance. The cutoff date could be moved up from 1978 to 1995 or even 2006. This could save many existing lower-priced housing units from the developers' bulldozers.
- Restricting investment groups that drive up the cost of housing by buying homes and apartments as investments and then keeping them off the market.
- Requiring LA's Department of Housing and Community Investment (HCID) to create reliable, accessible public registries of density bonus housing and vetted low-income renters.
- Requiring HCID to physically inspect pledged density bonus housing, to certify that it exists and is rented to certified low-income tenants.
- Adopting tougher anti-mansionization ordinances to prevent the demolition of older, lower-priced housing and its replacement with expensive, resource-intensive McMansions.
- Reforming California's Ellis Act to prevent the eviction of low-income tenants so real estate developers can create infill building pads for expensive apartment buildings.

Thank you,

Ann Dorsey
Northridge, CA 91325

Housing Element <housingelement@lacity.org> Wed, Sep 29, 2021 at 11:14 AM
To: Ann Dorsey <aedorsey@hotmail.com>

Hello Ann,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team

Housing Element Staff
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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Comments to Draft 2021-2029 Housing Element

2 messages

Daniel Skolnick <daniel.skolnick@lacity.org> Mon, Sep 27, 2021 at 11:13 AM
To: Housing Element <HousingElement@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>



Daniel Skolnick
Senior Planning Deputy
Councilmember Paul Koretz, Fifth District
200 North Spring Street, Room 440, Los Angeles, CA 90012
(213) 473-7005 Los Angeles City Hall Office
Email: daniel.skolnick@lacity.org

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---------- Forwarded message ---------
From: **Tina Gittelson** <tgelegant@gmail.com>
Date: Thu, Sep 23, 2021 at 5:46 PM
Subject: Comments to Draft 2021-2029 Housing Element
To: <cpc@lacity.org>
Cc: Paul.Koretz@lacity.org <Paul.Koretz@lacity.org>, joan.pelico@lacity.org <joan.pelico@lacity.org>, daniel.skolnick@lacity.org <daniel.skolnick@lacity.org>, james.bickhart@lacity.org <james.bickhart@lacity.org>

Dear Sirs:

I am seriously concerned about the Draft 2021-2029 Housing Element and the unfortunate theory that rezoning single family neighborhoods will address the need for over 400,000 new residential units. Our neighborhoods and infrastructure are already struggling with overcrowding, no parking, power outages, broken water mains and crime. Does quality of life enter into the equation of changing the landscape of single family neighborhoods to provide more housing inventory?

I am submitting the following comments.

1) Analysis ignores impact of SB 9 and possibly also SB 10 – Governor Newsom signed SB 9 and SB 10 into law last week. These bills will have tremendous impact on housing stock in the coming decade, by adding 4 to 10 or more units on single-family lots. You have taken ADUs into account in your inventory and projections, and now you *must* take SB 9 and SB 10 into account as well. The city must redo projections to take this major change in policy into account.

2) Request extension of deadline – because of the omission of any analysis of the effect that the new state laws SB 9 and SB 10 will have on housing, the City of LA must request that the state grant an extension of the deadline for submission of the Housing Element to enable the city to do this additional analysis.

3) Data made deliberately difficult to review – the Planning Dept. has provided Excel spreadsheets, including in particular Appendix 4.7 - Candidate Sites for Rezoning, in which normal Excel functions such as sort, filter, cut and copy have been restricted. To make matters worse, the spreadsheet has no discernible organization – there are more than 267,000 addresses in Appendix 4.7, which are listed randomly, not organized by zip code, street, Community Plan Area or in any other noticeable manner – and by its restrictions on the spreadsheet the city prevents the public from organizing them in a meaningful way. This is clearly a deliberate attempt to obscure from the public the actual impact of this massive list of addresses targeted for rezoning by the Housing Element – which is so egregious as to amount to a lack of public notice.

4) No maps provided – in addition to the disorganized and restricted manner in which the targeted addresses are listed, the city compounds the effective lack of public notice by further obscuring the list of affected properties in failing to provide any visual representation of the city's proposal. At a minimum, the city should provide detailed maps for each Council District showing clearly which addresses are being targeted.

5) Biased and baseless projections – the city is relying on biased and baseless projections from one source, the Terner Center, which is heavily financed by real estate, big tech and financial interests, https://ternercenter.berkeley.edu/about-us/supporters/. At a minimum, the city should also take into account projections from other reputable sources, such as the Embarcadero Institute, which exposes the double-counting being done in reaching projected housing needs, see, e.g., https://embarcaderoinstitute.com/portfolio-items/double-counting-in-the-latest-housing-needs-assessment/ and https://embarcaderoinstitute.com/portfolio-items/housing-models-compared/. The state Office of Planning and Research also provides projections.

The projections being used by the city are especially suspect, in light of the fact that California has been *losing* population in recent years – so much so that with the 2020 Census the state has lost a Congressional seat for the first time in its history.

6) Appendix 4.1 - Housing Element Sites Inventory – in addition to omitting any consideration of SB 9 and SB 10, the Sites Inventory fails to take into account the maximum number of potential units that could be built on each site, including in particular underutilized lots in *existing* commercial and multifamily zones. For example, each lot along a "transit corridor" should be credited with the maximum number of units that could be built there under TOC rules, taking into account all available incentives that could be granted.

7) Westwood Hills inappropriate for multifamily – the city has put on its list of targeted addresses virtually our entire neighborhood of Westwood Hills. Westwood Hills is a single-family neighborhood of 600 homes situated between UCLA and Sepulveda Blvd, and between Sunset Blvd. and the VA Cemetery.

This easily identifiable, compact neighborhood was developed by the Janss family in 1929 and 1930 as part of their master plan for the new UCLA campus in Westwood. The goal of the master plan was to provide

a *variety* of housing options near the campus, along with a commercial center (Westwood Village). Today, Westwood is already one of the most densely developed areas in the entire city of Los Angeles – with UCLA, Westwood Village, copious multifamily housing options in the North Village, along Hilgard, Veteran and immediately south of Wilshire, the high-rise office buildings and high-rise residential buildings in the Wilshire Corridor. The intersection of Wilshire Blvd. and Veteran Ave., adjacent to exits and entrances from the 405 Freeway leading to nearby business centers in Brentwood, Westwood, Beverly Hills and Century City, is one of the busiest intersections in the United States.

Further, the word *Hills* appears in the name of our neighborhood *because it is hilly*, with many narrow streets – and therefore it is singularly inappropriate for multifamily development. The neighborhood is already densely packed, surrounded by a densely developed area that cannot reasonably sustain additional density. I notice, for example, that you omit any addresses in adjacent Bel Air from your list of targeted addresses – why is that?

8) Lack of adequate infrastructure – the city has failed to maintain its sewer, power, water and other infrastructure, which is old, crumbling, and simply unable to accommodate the increase in density being proposed.

9) Lack of affordable housing – the city's most glaring housing need is for affordable housing, but the city has no mechanism either for ensuring that the hundreds of thousands of additional units will in fact be affordable when built, or if "affordable" initially, for subsequently keeping track of and enforcing affordability for each unit in the future years.

Thank you for your attention to these serious issues.

Sincerely,

Tina Gittelson

Westwood Hills resident

tgelegant@gmail.com

310-472-9600

Housing Element <housingelement@lacity.org> Tue, Sep 28, 2021 at 10:36 AM
To: tgelegant@gmail.com

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750



Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302



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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Comments to Draft 2021-2029 Housing Element

2 messages

Planning CPC <cpc@lacity.org> Fri, Sep 24, 2021 at 12:41 PM
To: Housing Element <housingelement@lacity.org>

FYI - Please add to the case file.

---------- Forwarded message ---------
From: **Terrence Grasmick** <mickgrasmick@icloud.com>
Date: Thu, Sep 23, 2021 at 5:41 PM
Subject: Comments to Draft 2021-2029 Housing Element
To: <cpc@lacity.org>

Dear Sirs:

I have the following comments regarding the Draft 2021-2029 Housing Element, for which you have scheduled virtual public hearings for September 21 and 22, 2021. I may also submit additional comments in the future either at a hearing or in writing.

1) Analysis ignores impact of SB 9 and possibly also SB 10 – Governor Newsom signed SB 9 and SB 10 into law last week. These bills will have tremendous impact on housing stock in the coming decade, by adding 4 to 10 or more units on single-family lots. You have taken ADUs into account in your inventory and projections, and now you *must* take SB 9 and SB 10 into account as well. The city must redo projections to take this major change in policy into account.

2) Request extension of deadline – because of the omission of any analysis of the effect that the new state laws SB 9 and SB 10 will have on housing, the City of LA must request that the state grant an extension of the deadline for submission of the Housing Element to enable the city to do this additional analysis.

3) Data made deliberately difficult to review – the Planning Dept. has provided Excel spreadsheets, including in particular Appendix 4.7 - Candidate Sites for Rezoning, in which normal Excel functions such as sort, filter, cut and copy have been restricted. To make matters worse, the spreadsheet has no discernible organization – there are more than 267,000 addresses in Appendix 4.7, which are listed randomly, not organized by zip code, street, Community Plan Area or in any other noticeable manner – and by its restrictions on the spreadsheet the city prevents the public from organizing them in a meaningful way. This is clearly a deliberate attempt to obscure from the public the actual impact of this massive list of addresses targeted for rezoning by the Housing Element – which is so egregious as to amount to a lack of public notice.

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properties in failing to provide any visual representation of the city's proposal. At a minimum, the city should provide detailed maps for each Council District showing clearly which addresses are being targeted.

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The projections being used by the city are especially suspect, in light of the fact that California has been *losing* population in recent years – so much so that with the 2020 Census the state has lost a Congressional seat for the first time in its history. These projections also fail to take into account the impacts of the pandemic and the shift to remote working, which no longer require employees to live near their work. Not only does this permit employees to live outside of employment centers, but it will also result in freeing up commercial space as businesses no longer require all their employees to be physically present in the office at the same time.

6) Appendix 4.1 - Housing Element Sites Inventory – in addition to omitting any consideration of SB 9 and SB 10, the Sites Inventory fails to take into account the maximum number of potential units that could be built on each site, including in particular underutilized lots in *existing* commercial and multifamily zones. For example, each lot along a "transit corridor" should be credited with the maximum number of units that could be built there under TOC rules, taking into account all available incentives that could be granted.

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This easily identifiable, compact neighborhood was developed by the Janss family in 1929 and 1930 as part of their master plan for the new UCLA campus in Westwood. The goal of the master plan was to provide a *variety* of housing options near the campus, along with a commercial center (Westwood Village). Today, Westwood is already one of the most densely developed areas in the entire city of Los Angeles – with UCLA, Westwood Village, copious multifamily housing options in the North Village, along Hilgard, Veteran and immediately south of Wilshire, the high-rise office buildings and high-rise residential buildings in the Wilshire Corridor. The intersection of Wilshire Blvd. and Veteran Ave., adjacent to exits and entrances from the 405 Freeway leading to nearby business centers in Brentwood, Westwood, Beverly Hills and Century City, is one of the busiest intersections in the United States.

Further, the word *Hills* appears in the name of our neighborhood *because it is hilly*, with many narrow streets – and therefore it is singularly inappropriate for multifamily development. The neighborhood is already densely packed, surrounded by a densely developed area that cannot reasonably sustain additional density. I notice, for example, that you omit any addresses in adjacent Bel Air from your list of targeted addresses – why is that?

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9) Lack of affordable housing – the city's most glaring housing need is for affordable housing, but the city has no mechanism either for ensuring that the hundreds of thousands of additional units will in fact be affordable when built, or if "affordable" initially, for subsequently keeping track of and enforcing affordability for each unit in the future years.

Thank you for considering these comments.

Terrence J. Grasmick
242 Denslow Avenue
Los Angeles, CA 90049-3223
310.210.8553
mickgrasmick@icloud.com

Housing Element <housingelement@lacity.org> Wed, Sep 29, 2021 at 11:10 AM
To: mickgrasmick@icloud.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Update - Inventory of Candidate Sites for Rezoning

9 messages

Kristina Kropp <kkropp@lunaglushon.com> Thu, Sep 23, 2021 at 11:26 AM
To: "HousingElement@lacity.org" <HousingElement@lacity.org>

Hi, we are trying to find (if one exists) a map of the Candidate Sites for Rezoning. The spreadsheet on the City's website is not searchable, so we are trying to see if there is an easier way to identify the sites.

Can you please provide?

Much appreciated,

Kristina

Kristina Kropp, Esq.

Luna & Glushon, A Professional Corporation

16255 Ventura Boulevard, Suite 950

Encino, California 91436

Telephone (818) 907-8755

Fax (818) 907-8760

Dennis R. Luna

(1946-2016)

==========

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Housing Element <housingelement@lacity.org> Fri, Sep 24, 2021 at 11:43 AM
To: Kristina Kropp <kkropp@lunaglushon.com>

Kristina,

Maps and description of the Candidate sites for Rezoning are available in CH4:

https://planning.lacity.org/odocument/aa9d124b-aa60-4cf4-b77c-8dac371a7742

Descriptions of each rezoning strategy, including applicable locations, begins on pg 4-41. Maps start on pg 4-51 .We are emphasizing the strategies more than particular locations, as the latter is subject to further refinement and revision (see disclaimer below - taken from Chapter 4)

We are working on providing additional ways for the public to understand this large dataset including web based mapping tools, which we hope to have available on the website very soon.

Disclaimer: It is important to note that the Rezoning Program Candidate Sites Inventory lists many more sites and potential units than will be necessary to satisfy the RHNA requirements. This is purposeful to allow the flexibility for future conversations on the rezoning strategies and sites. As such, sites included on the list should be considered a potential list of sites for rezoning consideration, not a list of sites that will be rezoned. Other sites can be added, and listed sites can be removed or amended. A public review process will ultimately decide which sites are rezoned at which densities but should follow the Housing Element's objective of an equitable rezoning program that furthers fair housing goals. The City has three years to complete required rezoning, and many of the work efforts under the larger Rezoning Program are only now being initiated and developed and will be refined through a community engagement process. As such, important details such as densities, location, development standards and affordable housing requirements are estimated based on reasonable assumptions made at the time.

Housing Element Staff

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Kristina Kropp <kkropp@lunaglushon.com> Fri, Sep 24, 2021 at 12:29 PM
To: "matthew.glesne@lacity.org" <matthew.glesne@lacity.org>
Cc: Housing Element <housingelement@lacity.org>

Thanks, Matt. I really appreciate your help. You are right, this is an incredible amount of data for constituents to absorb.

Kristina Kropp, Esq.

Luna & Glushon, A Professional Corporation

16255 Ventura Boulevard, Suite 950

Encino, California 91436

Telephone (818) 907-8755

Fax (818) 907-8760

Dennis R. Luna

(1946-2016)

==========

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[Quoted text hidden]

Kristina Kropp <kkropp@lunaglushon.com> Tue, Sep 28, 2021 at 4:46 PM
To: Housing Element <housingelement@lacity.org>
Cc: "matthew.glesne@lacity.org" <matthew.glesne@lacity.org>

Is there any way to set up a 10-15 minute conversation? This is just so dense. We represent a very large group of property owners in Brentwood and are trying to relay to them what properties in their vicinity are on this list and what the procedure is going forward (including what this CPC hearing in October is).

Much appreciated,

Kristina

Kristina Kropp, Esq.

Luna & Glushon, A Professional Corporation

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---

From: matthew.glesne@lacity.org <matthew.glesne@lacity.org> **On Behalf Of** Housing Element
Sent: Friday, September 24, 2021 11:44 AM

To: Kristina Kropp <kkropp@lunaglushon.com>
Subject: Re: Housing Element Update - Inventory of Candidate Sites for Rezoning

Kristina,

[Quoted text hidden]
[Quoted text hidden]
[Quoted text hidden]

Kristina Kropp <kkropp@lunaglushon.com> Fri, Oct 1, 2021 at 9:19 AM
To: Housing Element <housingelement@lacity.org>
Cc: "matthew.glesne@lacity.org" <matthew.glesne@lacity.org>, Rob Glushon <rglushon@lunaglushon.com>

Good morning, I am following up on my email from Tuesday.

Can we please set up a quick call? Like I said, we represent a very large group of constituents in the Brentwood area and are trying to understand (1) what the process going forward is, including what is being considered at the next CPC hearing; and (2) how to identify properties in Brentwood which are being proposed for upzoning (however preliminary that list may be).

Thank you,

Kristina

Kristina Kropp, Esq.

Luna & Glushon, A Professional Corporation

16255 Ventura Boulevard, Suite 950

Encino, California 91436

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Dennis R. Luna

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[Quoted text hidden]

Matthew Glesne <matthew.glesne@lacity.org> Fri, Oct 1, 2021 at 2:28 PM
To: Kristina Kropp <kkropp@lunaglushon.com>
Cc: Housing Element <housingelement@lacity.org>, Rob Glushon <rglushon@lunaglushon.com>

Hi Kristina, sorry we've just been a bit crazy trying to get a staff report, revised draft and webapp map tool I mentioned out this week. As mentioned, we hope this mapping tool will assist folks in more easily identifying and better understanding the Candidate Sites for Rezoning. If you are in our mailing list you should receive an e-blast later today with all this info. Or check our Housing Element website after 5/6pm (look for the new "Map" tab).

If, after reviewing this information, you still have questions please let us know.

Matt
[Quoted text hidden]

Kristina Kropp <kkropp@lunaglushon.com> Fri, Oct 1, 2021 at 2:30 PM
To: Matthew Glesne <matthew.glesne@lacity.org>
Cc: Housing Element <housingelement@lacity.org>, Rob Glushon <rglushon@lunaglushon.com>

Ok, thanks, will do.

Kristina Kropp, Esq.

Luna & Glushon, A Professional Corporation

16255 Ventura Boulevard, Suite 950

Encino, California 91436

Telephone (818) 907-8755

Fax (818) 907-8760

Dennis R. Luna

(1946-2016)

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[Quoted text hidden]

Kristina Kropp <kkropp@lunaglushon.com> Mon, Oct 4, 2021 at 10:31 AM
To: Matthew Glesne <matthew.glesne@lacity.org>
Cc: Housing Element <housingelement@lacity.org>, Rob Glushon <rglushon@lunaglushon.com>

Hi Matt,

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Fri, Sep 24, 2021 at 11:59 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Sep 23, 2021 at 1:23 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Debbie Paperman** <debbiepaperman@everyactioncustom.com>
Date: Thu, Sep 23, 2021 at 1:08 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. But additional bold action and specific implementation measures are needed to make the housing element update successful.

I urge the City to:
- Rezone enough new capacity to result in the creation of 300,000 new homes, enough to close the RHNA gap.
- Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods, and would require wealthy, high-opportunity areas to accommodate the most new housing.
- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Allow "missing middle" multifamily housing citywide.
- Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
- Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Sincerely,

Personally sent by Debbie Paperman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Debbie Paperman
2120 4th St Santa Monica, CA 90405-2318
debbiepaperman@gmail.com

Housing Element <housingelement@lacity.org> Wed, Sep 29, 2021 at 11:07 AM
To: debbiepaperman@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file and taken into consideration

as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Mandeville Canyon's Input to the LA City Housing Element

2 messages

Teri Kahn <terikahn2003@gmail.com> Thu, Sep 23, 2021 at 2:41 PM
To: housingelement@lacity.org, cpc@lacity.org
Cc: Mike Bonin <mike.bonin@lacity.org>, John Binder <jfbinder@roadrunner.com>, Eric Edmunds <lalhasa@aol.com>, Michelle Bisnoff <bisnoff@gmail.com>, Carolyn Jordan <cjordan@glaserweil.com>

Mandeville Canyon writes to express its grave concern about the real and present danger of densification in its hillsides. Mandeville Canyon Road is a five mile long boxed canyon. The only way in and out of our canyon is down a two lane road which is narrow and winding in several areas. It is the longest dead-end street in the entire city of Los Angeles. Given the current changes in climate, including chronic drought conditions and Santa Ana winds that grow stronger each year, it can be argued that this canyon should never have been developed in the first place. But here we are—4,000 of us in roughly 1,300 single family homes. It is obvious that increased densification would only heighten this danger.

The Brentwood Hills are subject to recurrent wildfires; in fact, we have had two large fires in the past two years. For that reason we are designated as a Very High Fire Hazard Severity Zone by CalFire and our local Fire Station. Our steep canyon and hillside areas make fighting fires dangerous and difficult. Fire trucks would have a tough time getting up here and the operation would most probably have to be done by water drops from the air and men on the ground. In addition, a majority of areas were built before the 1970's and have above ground power lines, adding to the fire hazard. Perhaps the most telling thing I can impart is the fact that so many of our neighbors have lost their fire insurance. Carriers assign the risk as very high and so the premiums are either very expensive or they refuse the coverage altogether.

Any up-zoning would significantly increase levels of construction and density. The danger of construction-related fire will increase and be amplified by the associated traffic due to more people and more cars all vying to get down one single two-lane road.
Please don't make Mandeville Canyon a death trap.

Sincerely,

Teri Redman Kahn
President of the Board of Directors,
Mandeville Canyon Association

Housing Element <housingelement@lacity.org> Tue, Sep 28, 2021 at 10:28 AM
To: Teri Kahn <terikahn2003@gmail.com>
Cc: Planning CPC <cpc@lacity.org>, Mike Bonin <mike.bonin@lacity.org>, John Binder <jfbinder@roadrunner.com>, Eric Edmunds <lalhasa@aol.com>, Michelle Bisnoff <bisnoff@gmail.com>, Carolyn Jordan <cjordan@glaserweil.com>

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be included in the comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Housing Element: New zones - bungalow courts, rowhouses

2 messages

Matthew Glesne <matthew.glesne@lacity.org> Thu, Sep 23, 2021 at 4:15 PM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Jay Ross** <ross_jay@hotmail.com>
Date: Thu, Sep 23, 2021 at 4:14 PM
Subject: Housing Element: New zones - bungalow courts, rowhouses
To: Matthew.Glesne@LACity.org <Matthew.Glesne@lacity.org>

Matt,

A problem is that LA's zoning allows only 3-4 story duplexes or 5-8 story stucco cube apartments.

If you want to add a missing middle, create new zones fo:
“Brownstones/Rowhouses” – 3 stories, 3 units per lot, 1.5 FAR is sufficient.
“Bungalow Courts” – 2 stories, 5 units per lot, 1.5 FAR is sufficient.

--

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

Housing Element <housingelement@lacity.org> Wed, Sep 29, 2021 at 11:00 AM
To: Jay Ross <ross_jay@hotmail.com>

Hello Jay,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning



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Planning4LA.org
T: (213) 978-1302



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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

6A Housing Element comment - suitable sites

2 messages

T <tie.ryder@gmail.com> Thu, Sep 23, 2021 at 12:43 PM
To: planningcomment@smgov.net
Cc: housing@scag.ca.gov, HousingElements@hcd.ca.gov, Planning CPC <cpc@lacity.org>, housing@planning.lacounty.gov, HousingElement@lacity.org, Councilmember Bonin <councilmember.bonin@lacity.org>

Hi all,

Thank You for your hard work regarding housing justice that is required of all cities in LA County. My team is preparing a 3D animation proposal for majority community-owned housing at the incorrectly zoned Santa Monica airport and Penmar golf course. The video will be available early next week!

With CA's water shortage and per the White House, we cannot allow over 10,000 acres of vacant land space to go unused in LA County or to be used only to cater to the wealthy as it currently is! I recently spoke to 2 students from SMC and they too want student housing at SMA. We could use the city's support in contracting a city attorney to challenge the FAA again in court but we are prepared to take the matter before a judge without the support of the city if necessary.

--
Best,
Tieira
https://htwws.org/santamonicaairport/

SantaMonicaAirportproposal.pdf
1155K

Housing Element <housingelement@lacity.org> Wed, Sep 29, 2021 at 11:05 AM
To: T <tie.ryder@gmail.com>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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Planning4LA.org
T: (213) 978-1302



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

[Quoted text hidden]

Created by Tieira Ryder
https://htwws.org/santamonicaairport/ 01/27/21

When the incorrectly zoned Santa Monica airport closes, a closure that should be happening in this upcoming housing element cycle (2021-2029), a walkable community that includes majority affordable housing should be developed. The location is perfect for a community-owned, walkable/bike-friendly residential neighborhood that includes a variety of housing types for working-class residents on the westside, students, seniors, those living with disabilities, and many others in need of affordable housing.





Created by Tieira Ryder
https://htwws.org/santamonicaairport/ 01/27/21

To be clear, this community would include ***both community-owned rental and homeownership options.*** This pro-housing advocacy effort should be led by a housing advocate that understands the needs of the local community, someone that likely falls within the working class and has the best interest of the local community in mind. **When it comes to renting, rent should never exceed 20-30% of a resident's total income after taxes. Please keep in mind, the average worker in LA makes about $39,000 a year, this rental housing would be catered to those workers but the community itself would be mixed-income meaning it would also include market-rate units (still cheaper usually than private market-rate housing).** Along with market-rate rentals, small business/business placements would be considered throughout the community.

Housing proposal for the Santa Monica airport

(Total acres of the airport is approx. 227 acres. Planning4LA has 17 acres in the current LA City housing element (Mar Vista); SMC Bundy Campus area SMAirportBundyCampus. Please note, we are also requesting Penmar golf course for this project. ***Proposal was created by Tieira Ryder****)*

Affordable Homeownership

1. Affordable, reasonably priced homeownership for working-class residents, priority for long-term residents living or working in the Santa Monica, Venice, & Mar Vista zip codes.
2. Consider a set number of market-rate "for-sale" homes.

3. A variety of home types should be considered for development but especially multi-family housing such as plexes, condos, townhomes, and apartments. **Consider co-op ownership.**
4. **Priority consideration should also go to first-time homeowners in LA County, my recommendation is residents that have lived/worked at least 10 years in LA County.**
5. Priority consideration for historically displaced residents from supposed marginalized communities. Consider a 30-40% "right to return", "right to housing" for ADOS families. **(Google the history of displaced Black families in Santa Monica, Venice, and/or Manhattan Beach if you need more info.)**
6. The millennial generation should also receive a percentage of priority consideration, they currently own a measly 18% of the homes in Los Angeles. ***"Equity is defined as "the state, quality or ideal of being just, impartial and fair." The concept of equity is synonymous with fairness and justice."***
7. At no time would a small or large equity firm be granted permission to purchase a home within the community nor would an option be granted to purchase the community as a whole.
8. ***My recommendation on income qualifications for residents that are first-time buyers is working-class residents making between $30,000-$130,000.***
9. If potential owners require financing, ownership could be subject to ***credit union or bank approval.*** **Consider public, city-owned bank.**
10. The actual cost of homes should match that of the actual average wage of what most working-class residents make. There would likely be re-sell requirements as affordability would be protected by a trust.

Created by Tieira Ryder
https://htwws.org/santamonicaairport/ 01/27/21

Affordable Housing Rentals

1. Community-owned rental housing in mixed-income developments.
2. The recommended height for apartment buildings is 6-7 stories.
3. Set an ***"affordable rental rate" based on what the average person from the working class makes. At this moment, most workers in LA make about $39,000 a year. Affordability is usually priced for residents in the $17,000-$70,000 range.***
4. Community-owned market-rate rentals to be included, most likely still cheaper than the private market, market-rate rental housing.
5. No income ***restrictions*** once residents are housed. https://www.nhlp.org/resources/lihtc-admissions-rents-grievance-procedures/
6. Reserve a portion of the housing for ***limited to no-income residents***, considering subsidizing with; 1. HUD and/or new digital voucher program. 2. subsidize low to no income residents with market-rate apartment & business rentals. 3. Consider HCID/HACLA westside chapter. Social services for housing, food, and health-care should be ONE efficient program.
7. Affordable bachelors, studios, 1, 2, and 3 bedrooms.
8. As with *affordable homeownership*, the rental units & placements would be for various types of community members but especially ***keeping in mind our core working class which includes the essential workforce, students, seniors, veterans, those living with disabilities, etc. etc.***
9. Student apartments would be bachelor-sized apartments with smaller fridges and MUST have a kitchen area sink and a small area to put a

hot plate (or something similar) so they can cook if needed. (Similar to this https://urbanize.city/la/post/micro-unit-apartment-building)

More info on the proposed community as a whole

1. Consideration of business placements within the community.
2. Open park space, recreation center within the walkable community.
3. Consider the possible need to build new schools.
4. Consider a quality westside transit system especially for college students between SMC and/or UCLA. (cut down on car traffic congestion because students wouldn't need to drive)
5. College student housing should have its own small park area that has a WIFI and outdoor/indoor workspace for them.
6. Consider large home space for displaced minors within the community aka a "group home" to provide stability.
7. ***Request consideration for golf course closure(s) as well as other vacant land plots and buildings that have*** potential use for ***affordable housing that is community-owned and suits apartments, condos, townhomes, small and/or tiny homes for locals.*** Request more interim housing and healthcare sites on the westside for residents with long-term behavioral health needs.
8. The bigger goal is to adopt a similar social housing policy for each city in California with pro-housing community advocates from said cities leading the efforts!

Housing Element <housingelement@lacity.org>

Comments to Draft 2021-2029 Housing Element

3 messages

Tim Shaheen <teepeeshaheen@gmail.com> Thu, Sep 23, 2021 at 11:53 AM
To: HousingElement@lacity.org
Cc: Paul.Koretz@lacity.org, joan.pelico@lacity.org, daniel.skolnick@lacity.org, james.bickhart@lacity.org, Terry Tegnazian <terrteg@outlook.com>

Dear Sirs:

We are all for ameliorating the severe **affordable** housing shortage, but the government should be bearing that cost via our tax dollars, and implementing a plan that accounts for the specific circumstances of each neighborhood. If that were truly done, the plan's authors would see that there already exists far more up-zoned land than it currently says it requires to increase housing availability. Instead, you've put forward a developer's giveaway, and at the cost of many of your constituents whom you're ostensibly trying "to help." Moreover, it would seem the government is intent on using the hard-earned equity of residents in our neighborhood, for example, to subsidize their "housing" program (And for whom? Rich renters looking for luxury rentals?). This is akin to forcing landlords, rather than the government, to subsidize non-paying tenants by disallowing landlords their normal recourse of eviction. In essence, your plan is a taking of private property by lowering our home values via rezoning in order to subsidize apartment developers' entry into heretofore exclusively residential neighborhoods, and to what end (for anyone but the developers?)? Its effect is akin to eminent domain on a large chunk of our property values (representing most residents' life savings), without any recompense.
The almost innumerable flaws of your plan are in the glaring details, as my neighbor, Terry Tegnazian, pointed out in a much more technical, detailed, and withering critique; and, with which I wholeheartedly agree. Please study it (below):

1) Analysis ignores impact of SB 9 and possibly also SB 10 – Governor Newsom signed SB 9 and SB 10 into law last week. These bills will have tremendous impact on housing stock in the coming decade, by adding 4 to 10 or more units on single-family lots. You have taken ADUs into account in your inventory and projections, and now you *must* take SB 9 and SB 10 into account as well. The city must redo projections to take this major change in policy into account.

2) Request extension of deadline – because of the omission of any analysis of the effect that the new state laws SB 9 and SB 10 will have on housing, the City of LA must request that the state grant an extension of the deadline for submission of the Housing Element to enable the city to do this additional analysis.

3) Data made deliberately difficult to review – the Planning Dept. has provided Excel spreadsheets, including in particular Appendix 4.7 - Candidate Sites for Rezoning, in which normal

Excel functions such as sort, filter, cut and copy have been restricted. To make matters worse, the spreadsheet has no discernible organization – there are more than 267,000 addresses in Appendix 4.7, which are listed randomly, not organized by zip code, street, Community Plan Area or in any other noticeable manner – and by its restrictions on the spreadsheet the city prevents the public from organizing them in a meaningful way. This is clearly a deliberate attempt to obscure from the public the actual impact of this massive list of addresses targeted for rezoning by the Housing Element – which is so egregious as to amount to a lack of public notice.

4) No maps provided – in addition to the disorganized and restricted manner in which the targeted addresses are listed, the city compounds the effective lack of public notice by further obscuring the list of affected properties in failing to provide any visual representation of the city's proposal. At a minimum, the city should provide detailed maps for each Council District showing clearly which addresses are being targeted.

5) Biased and baseless projections – the city is relying on biased and baseless projections from one source, the Terner Center, which is heavily financed by real estate, big tech and financial interests, https://ternercenter.berkeley.edu/about-us/supporters/. At a minimum, the city should also take into account projections from other reputable sources, such as the Embarcadero Institute, which exposes the double-counting being done in reaching projected housing needs, see, e.g., https://embarcaderoinstitute.com/portfolio-items/double-counting-in-the-latest-housing-needs-assessment/ and https://embarcaderoinstitute.com/portfolio-items/housing-models-compared/. The state Office of Planning and Research also provides projections.

The projections being used by the city are especially suspect, in light of the fact that California has been *losing* population in recent years – so much so that with the 2020 Census the state has lost a Congressional seat for the first time in its history. These projections also fail to take into account the impacts of the pandemic and the shift to remote working, which no longer require employees to live near their work. Not only does this permit employees to live outside of employment centers, but it will also result in freeing up commercial space as businesses no longer require all their employees to be physically present in the office at the same time.

6) Appendix 4.1 - Housing Element Sites Inventory – in addition to omitting any consideration of SB 9 and SB 10, the Sites Inventory fails to take into account the maximum number of potential units that could be built on each site, including in particular underutilized lots in *existing* commercial and multifamily zones. For example, each lot along a "transit corridor" should be credited with the maximum number of units that could be built there under TOC rules, taking into account all available incentives that could be granted.

7) Westwood Hills inappropriate for multifamily – the city has put on its list of targeted addresses virtually our entire neighborhood of Westwood Hills. Westwood Hills is a single-family neighborhood of 600 homes situated between UCLA and Sepulveda Blvd, and between Sunset Blvd. and the VA Cemetery.

This easily identifiable, compact neighborhood was developed by the Janss family in 1929 and 1930 as part of their master plan for the new UCLA campus in Westwood. The goal of the master plan was to provide a *variety* of housing options near the campus, along with a commercial center (Westwood Village). Today, Westwood is already one of the most densely developed areas in the entire city of Los Angeles – with UCLA, Westwood Village, copious multifamily housing options in the North Village, along Hilgard, Veteran and immediately south of Wilshire, the high-rise office buildings and high-rise residential buildings in the Wilshire Corridor. The intersection of Wilshire Blvd. and Veteran Ave., adjacent to exits and entrances from the 405 Freeway leading to nearby business centers in Brentwood, Westwood, Beverly Hills and Century City, is one of the busiest intersections in the United States.

Further, the word *Hills* appears in the name of our neighborhood *because it is hilly*, with many narrow streets – and therefore it is singularly inappropriate for multifamily development. The neighborhood is already densely packed, surrounded by a densely developed area that cannot reasonably sustain additional density. I notice, for example, that you omit any addresses in adjacent Bel Air from your list of targeted addresses – why is that?

8) Lack of adequate infrastructure – the city has failed to maintain its sewer, power, water and other infrastructure, which is old, crumbling, and simply unable to accommodate the increase in density being proposed.

9) Lack of affordable housing – the city's most glaring housing need is for affordable housing, but the city has no mechanism either for ensuring that the hundreds of thousands of additional units will in fact be affordable when built, or if "affordable" initially, for subsequently keeping track of and enforcing affordability for each unit in the future years.

In closing, I'd just like to say, who needs the idiocy of Trump when you have California Democrats passing these sorts of "rob from the poor, give to the rich" bills spewing from Sacramento? This bill is a very blunt tool that will do far more damage than repair.

Sincerely,

Tim Shaheen

218 Tilden Ave.

Los Angeles 90049

Housing Element <housingelement@lacity.org> Wed, Sep 29, 2021 at 10:55 AM
To: Tim Shaheen <teepeeshaheen@gmail.com>

Hello Tim,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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[Quoted text hidden]

Tim Shaheen <teepeeshaheen@gmail.com> Wed, Sep 29, 2021 at 12:42 PM
To: Housing Element <housingelement@lacity.org>

Thanks for the update.
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Safety and Health Element

2 messages

coni acos <coni.epnc@gmail.com> Wed, Sep 22, 2021 at 5:04 PM
To: Housing Element <housingelement@lacity.org>

To whom it may concern,

Please refer to my attachment.
Best wishes,
Connie Acosta

Safety Element recomendations by Connie Acosta.docx
176K

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 10:54 AM
To: coni acos <coni.epnc@gmail.com>

Hello Coni,

Hope all is well.

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

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[Quoted text hidden]

By Connie Acosta, Board member of the Echo Park Neighborhood Council (Speaking singularly)

Safety and Health Elements Concerns in Downtown L.A.

September 22, 2021

Mitigate noise and pollution levels by planting tall evergreens in the following two places:

1. The William Mead Homes, Housing Authority of City of Los Angeles (HACLA), located at 1300 N. Cardinal Street, the most industrial manufacturing part of Chinatown. On the northerly side, Housing development fronts the DWP Maintenance Facility and is surrounded in the east on Bolero Street by the railroad tracks used daily by Southern Pacific and Metro Link. Zero mitigation noise or pollution effort by CD1 or City Planning. From the baseball field where the children plan, I saw the sparks from the steel wheels on steel rails as they went past the field.

2. Downtown Harbor Freeway from Sunset Blvd to Washington Blvd: Vehicles use max air-conditioning levels to combat the sudden rise in temperature in that stretch. Buildings are very tall and compacted with hardly any open space.

Stop Permitting TOCs Construction over Uncapped-idly Oil Wells.

hhtp://zimas.lacity.org shows thousands of uncapped wells on the map grid of the Temple/Beaudry area, a hundred years ago a los Angeles thriving Oil Field. Presently, that dense and highly contaminated residential area is under construction with many TOCs. According to CD1 reports to the Echo Park Neighborhood Council, this area had the highest covid-19 related counts and deaths than any other area in CD1.

I have read many idle well records regarding the temple/beaudry area. For safety purposes before building a TOC in these type of conditions, LA City Planning with DTSC should do a thorough clearing with in a 500-ft radius. Check for idle uncapped wells and broken piping that connects the wells underground, including the adjacent streets and edges of the total tied lots. Records show that since no agency is requesting of this, the developers are not doing anything more and beyond.

Within the Colton Property boundary, there are five known oil and gas wells previously owned by the Manley Oil Company (MOC). The five wells are not abandoned consistent with the Public Resource Code (PRC) and the California Code of Regulations (CCR). All five wells' surface plugs are not present. One is idle while the other four are buried-idle wells. Each well is identified with the initials MOC and a number, and then an eight-digit

serial number.

In 2003 a report of Property and Well Transfer was issued listing ten wells on the Colton Property. Then in 2004, MOC 6 in its abandonment operations was dug deep below grade and "filled with cement at 210 feet to the surface." MOC 6 met the standard approval of date, and well was reported not leaking. However, as of 12/18/18, MOC 6 shows not to be in compliance with Division standards: an upper hydrocarbon zone isolation plug was inadequate and a hydrocarbon zone isolation plug was not present.

Similarly, the Court Property presently contains 7 major oil wells, but only one significant oil well. MOC 4 was plugged and abandoned as of December 18, 2018 consistent with current PRC and CCR. Out of the remaining 6 wells, five are buried-idle missing their surface plugs, and are missing their isolation plugs for freshwater base, as well as upper hydrocarbon zone and hydrocarbon zone plugs. The sixth oil well has inadequate upper and lower hydrocarbon zone isolation plugs, per Division records.

Protection our Downtown Wildlife Eco-System

Many natural wildlife habitats-sanctuaries-and-corridors are habitually being destroyed in Elysian Hills. Conservation is vital for the survival of the many migratory bird species as well as for the benefit and enjoyment of the world. Wildlife select their habitats on secluded mountain tops filled with old trees and brush not necessarily protected trees. Below are two examples from the many wildlife habitats destroyed and some with a potential for destruction in Elysian Hills:

- In the last 4 months, (TOC) Dynamic Developers at 1013 Everett Street L.A 90026 destroyed 16 mature trees along with other wild shrubs that sustained wildlife across 8 parcels at the top of hill. This micro-forest alone provided various layers of canopy and moisture to its environment from its underground water reservoir (aquifer). When the birds migrate to this area, they will find less bird sanctuaries available in Elysian Park.

  Also, the proposed (7-story, 70 unit TOC) hillside project, at 1251 Sunset Blvd--under appeal) contains 100-year old trees and other wild shrub that self-sustain from their own aquifer. The new project will destroy all trees on site and their aquifers during excavation. Project design shows a few trees on the rooftop that obviously would be sustained by our imported drinking water.

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Comments and concerns re: 2021-2029 Housing plan

2 messages

Miriam Alexander <ma@miriamalexander.com> Wed, Sep 22, 2021 at 12:44 PM
To: "HousingElement@lacity.org'" <HousingElement@lacity.org>, "Paul.koretz@lacity.org" <Paul.koretz@lacity.org>, "joan.pelico@lacity.org" <joan.pelico@lacity.org>, "Daniel.skolnick@lacity.org" <Daniel.skolnick@lacity.org>, "James.bickhart@lacity.org" <James.bickhart@lacity.org>

My neighbor has framed the position better than I possibly could have, so in addition to my earlier email this week, am forwarding hers, which reflect my position as well.

1) Analysis ignores impact of SB 9 and possibly also SB 10 – Governor Newsom signed SB 9 and SB 10 into law last week. These bills will have tremendous impact on housing stock in the coming decade, by adding 4 to 10 or more units on single-family lots. You have taken ADUs into account in your inventory and projections, and now you *must* take SB 9 and SB 10 into account as well. The city must redo projections to take this major change in policy into account.

2) Request extension of deadline – because of the omission of any analysis of the effect that the new state laws SB 9 and SB 10 will have on housing, the City of LA must request that the state grant an extension of the deadline for submission of the Housing Element to enable the city to do this additional analysis.

3) Data made deliberately difficult to review – the Planning Dept. has provided Excel spreadsheets, including in particular Appendix 4.7 - Candidate Sites for Rezoning, in which normal Excel functions such as sort, filter, cut and copy have been restricted. To make matters worse, the spreadsheet has no discernible organization – there are more than 267,000 addresses in Appendix 4.7, which are listed randomly, not organized by zip code, street, Community Plan Area or in any other noticeable manner – and by its restrictions on the spreadsheet the city prevents the public from organizing them in a meaningful way. This is clearly a deliberate attempt to obscure from the public the actual impact of this massive list of addresses targeted for rezoning by the Housing Element – which is so egregious as to amount to a lack of public notice.

4) No maps provided – in addition to the disorganized and restricted manner in which the targeted addresses are listed, the city compounds the effective lack of public notice by further obscuring the list of affected properties in failing to provide any visual representation of the city's proposal. At a minimum, the city should provide detailed maps for each Council District showing clearly which addresses are being targeted.

5) Biased and baseless projections – the city is relying on biased and baseless projections from one source, the Terner Center, which is heavily financed by real estate, big tech and financial interests, https://ternercenter.berkeley.edu/about-us/supporters/. At a minimum, the city should also take into account projections from other reputable sources, such as the Embarcadero Institute, which exposes the double-counting being done in reaching projected housing needs, see, e.g., https://embarcaderoinstitute.com/portfolio-items/double-counting-in-the-latest-housing-needs-assessment/ and https://embarcaderoinstitute.com/portfolio-items/housing-models-compared/. The state Office of Planning and Research also provides projections.

The projections being used by the city are especially suspect, in light of the fact that California has been *losing* population in recent years – so much so that with the 2020 Census the state has lost a Congressional seat for the first time in its history. These projections also fail to take into account the impacts of the pandemic and the shift to remote working, which no longer require employees to live near their work. Not only does this permit employees to live outside of employment centers, but it will also result in freeing

up commercial space as businesses no longer require all their employees to be physically present in the office at the same time.

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This easily identifiable, compact neighborhood was developed by the Janss family in 1929 and 1930 as part of their master plan for the new UCLA campus in Westwood. The goal of the master plan was to provide a *variety* of housing options near the campus, along with a commercial center (Westwood Village). Today, Westwood is already one of the most densely developed areas in the entire city of Los Angeles – with UCLA, Westwood Village, copious multifamily housing options in the North Village, along Hilgard, Veteran and immediately south of Wilshire, the high-rise office buildings and high-rise residential buildings in the Wilshire Corridor. The intersection of Wilshire Blvd. and Veteran Ave., adjacent to exits and entrances from the 405 Freeway leading to nearby business centers in Brentwood, Westwood, Beverly Hills and Century City, is one of the busiest intersections in the United States.

Further, the word *Hills* appears in the name of our neighborhood *because it is hilly*, with many narrow streets – and therefore it is singularly inappropriate for multifamily development. The neighborhood is already densely packed, surrounded by a densely developed area that cannot reasonably sustain additional density. I notice, for example, that you omit any addresses in adjacent Bel Air from your list of targeted addresses – why is that?

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Miriam Alexander
Ophir Drive, 90024

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 3:13 PM
To: Miriam Alexander <ma@miriamalexander.com>

Hello Miriam,

Hope all is well.

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

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Housing Element Staff



Los Angeles City Planning

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T: (213) 978-1302



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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

ENV-2020-6762-EIR ; Housing and Safety Elements

pat allinson <pallinson@yahoo.com> Wed, Sep 22, 2021 at 2:36 PM
To: "Cally.Hardy@lacity.org" <cally.hardy@lacity.org>
Cc: "housingelement@lacity.org" <housingelement@lacity.org>, "ourla2040@lacity.org" <ourla2040@lacity.org>

Hello,

My specific comment letter dated 9/22/21 is attached.
Also attached are 2 related comment letters, included as part of my overall comments.
If these should go to anyone else in the Planning Department, please forward and/or let me know.

Thank you for your efforts on behalf of Los Angeles,

Pat Allinson
Del Rey Resident

3 attachments

Pat letter re housing_safety 09 22 2021.pdf
32K

Pat 2021 response to Ballona FEIR - Google Docs.pdf
80K

Pat's Community Plan Comment Letter October, 2020 - Google Docs.pdf
64K

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

ENV-2020-6762-EIR ; Housing and Safety Elements

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 4:14 PM
To: pat allinson <pallinson@yahoo.com>

Hello Pat,

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[Quoted text hidden]

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

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

September 22, 2021

Dear Ms. Hardy:

I live in Los Angeles on La Villa Marina, in the Villa Marina West community of townhomes. The Ballona Wetlands are at the end of my street; my street is between Lincoln Blvd (Hwy 1) and the 90 Freeway. I appreciate the opportunity to comment on this DEIR.

GENERAL COMMENTS

In addition to the thousands of pages made available when the notice of the DEIR was sent, there are pages/reports included by reference, appendices missing, and one of the supplied EXCEL tables was so immense I had to ask a favor from an individual to reduce the file to something I could actually use (I do not own EXCEL). I was unable to read the entirety of the original DEIR, nor the subsequent changes in September.

I understand there is a deadline set by the State, but this deadline was known well in advance. The time frame between issuing the incomplete draft and the September 7 comment deadline (now September 22 after changes) is unreasonable.

HOUSING ELEMENT

I live in the Del Rey section of Council District 11. Del Rey is part of the MarVista/Palms/DelRey Community Plan that City Planning has been working on for years. It is still in the Draft/Summary of Comments phase. I attach copies of my Community Plan comments as part of this letter's comments on this DEIR.

Existing undeveloped space near the historic Ballona Wetlands should be zoned Open Space. This includes Bird Island (aka 5000 Beethoven); Ballona Wetlands Areas A, B, and C; and APN 4211007910 through 42110079924 and APN 421107BRK. (Note: inclusion of APB 4211007910 on 'the list' wins my 'most baffling' award).

Both the Housing Element and the Safety Element should include consideration of the proposed Ballona Wetlands project.

SAFETY ELEMENT

My major safety concerns based on where I live are:

1. Ballona Creek and potential flooding from overflowing creek beds and/or rising sea level. This applies both to the existing Wetlands and to the proposed changes in the State's EIR.

   From the Department of the Interior's Office of Environmental Policy and Compliance, Comment Letter AF-1:
   Primary Concern #5: 'uncertainty regarding the extent of maintenance required for flood control and recreation infrastructure.'

   If the feds have 'uncertainty' about the Ballona Wetlands Project and the maintenance required, it's worth including in the Safety Element.

   Please direct me to where Ballona was addressed in the Safety Element of the DEIR. In particular, the effect of the changes to the Ballona Creek waterways as detailed in the proposed Ballona Wetlands Restoration.

2. The Aliso Canyon Gas Leak / Well Blowout was in October, 2015. This event raised additional concerns about the gas storage facilities located well within 5 miles of where I live - in particular those under the Ballona Wetlands.

   Please direct me to where the Ballona Gas Storage Fields are addressed in the Safety Element of the DEIR, including any plans to have the Gas Company pay to close these facilities in a timely and orderly fashion.

Thank you for your attention to these matters. I am copying the 2 e-addresses from the 9/21/21 presentation.

Sincerely,

Patricia Allinson
Del Rey Resident

Ec: housingelement@lacity.org
ourla2040@lacity.org

Enc/Attached:

- Patricia Allinson's Community Plan Comments, dated October 14, 2020, originally submitted via the Del Rey Residents Association's Website, current version lightly edited for typos/clarity
- My additional comments on the proposed Ballona Wetlands project

To: (See Distribution List)
From: Patricia Allinson
Date: _____
Re: Proposed Ballona Wetlands Restoration Project

Why am I writing?
In 2020, I helped a local non-profit organization distribute its latest position paper on the Ballona Wetlands Restoration Project. I want to explain why, during a global pandemic, I thought it was important enough to make sure our elected officials were aware of our concerns with the Project.
I don't want our elected officials to allow a project of this size to proceed without extensive review and consideration of all potential significant impacts of the Project. I do this from a personal perspective as I live in La Villa Marina West, within walking distance of Area C, and I do Not want any restoration project to be approved at this time.

Why do I care?
The proposed Project is huge. The proposed Project is important.
It will directly impact the ecosystem of nearly 600 acres along Ballona Creek. It will potentially cost hundreds of millions of dollars and take years to complete, and then more years post-construction until plants and wildlife are fully established.
This needs to be done right, and it needs to be done right the first time, if it needs to be done at all.

Why do I want a 'No Project' alternative at this time?
There are critical questions that must be answered, and communicated to and with the public, prior to making any commitment to a project of this size and impact. Until All concerns are addressed, the only alternative must be to pause, and wait until we are sure of the right steps before moving forward. Further, the "No Project" alternative doesn't mean "do nothing", it means proceed with gentle maintenance and repair (tender loving care). For example, removing non-native vegetation while addressing the long-term goals for the gas field.

My concerns include:
1. General Lack of Agreed Upon Goals
2. Flooding
3. Gas Fields
4. Fire and Emergency Response Risks
5. Impact on Nearby Housing
6. Lack of helpful responses to comments/questions

Details for each of the above concerns are below/attached.

In Summary
Until everything is addressed, the 'do nothing' option is the only acceptable option.

If I can clarify any of my concerns, please contact me.

Thank you,

Patricia Allinson,
La Villa Marina West Resident

Details on the concerns listed above:

1. **General Lack of Agreed-Upon Goals**
   From Comment Letter AF1: 'Our primary concerns with the proposed project are: 1) the lack of clear objectives for the restoration; 2) the large extent of temporal impacts to vegetated areas (about 336 acres for about 10 years) relative to the gain in aquatic/wetland habitats (about 61 acres); 3) the increase in habitat fragmentation associated with placement of new flood control levees/berms; 4) the increase in disturbance to wildlife associated with increased recreation; and 5) uncertainty regarding the extent of maintenance required for flood control and recreation infrastructure.'
   When the Department of the Interior's Office of Environmental Policy and Compliance says the objectives are not clear, then it's time to revisit, review, restate, get agreement on, and communicate 'Clear Objectives'.
   From Response AF1-19: 'The selected project design will be the restoration objective…'
   It is extremely concerning that objective was not established prior to final decisions. Shouldn't the restoration objective(s) be established before the project design is determined?
2. **Flooding**
   Per Comment Letter AF1: 'reduce flood risk to the surrounding communities/infrastructure for up to the 100-year flood event (not to exceed 68,000 cubic feet per second)' and 'Please clarify if additional flood protection will be required if the proposed restoration project does not move forward.' The responses acknowledge the 68,000 cfs limitation

(AF1-2), and say 'The Corps Section 408 process would determine the existing flood control levels and their sufficiency. Corps Engineers to-date have not proposed the need for additional flood protection measures at Ballona Wetlands' (AF1-24).
I did not see where the Corps of Engineers said additional flood protection measures would Not be needed.
I can't be the only person who thinks the Corps of Engineers should be asked to determine the cfs, without telling them what the limit is.
Calculations must be based on current information (not from 1979), and future calculations must include the impact of global warming. And if the Corps needs to be asked, then please ask them.

3. **Gas Fields**
   Local officials have supported permanently closing the SoCalGas Playa del Rey gas storage Facility within the Ballona Reserve. Yet 'none of the restoration alternatives has been revised to include' the closing (Response O8-16), and '...each of the restoration alternatives would involve abandonment and replacement of wells as needed to accommodate the proposed restoration' (Response I29-1).
   If the possibility that the facilities will be closed exists (and it does), then the effects should be considered prior to any final decision on the Ballona Wetlands Project. The public should not pay for this project until After a decision is reached on the facilities, and the Gas Company must pay its share.
   In addition to googling Aliso Canyon, there is a Ballona-specific article at http://www.actcoastal.org/wiki/A_Ticking_Time_Bomb_Underneath_the_Ballona_Wetlands#:~:text=The%20SoCalGas%20Playa%20del%20Rey,hundreds%20of%20thousands%20of%20residents.
   The gas facilities Must be addressed in this process.
4. **Fire and Emergency Response Risks**
   Concerns about Fire and Emergency Response Risks, especially considering the height of a possible levee with a bike path on top, were responded to with 'Fire response agencies provided no specific comments regarding soil relocation or Area C' (I2-6) and ''No concerns have been raised from emergency response services regarding responding to accidents on or near the elevated bike path' (I2-12). While I expect the Fire Department could develop a response to any new situation, I would like to know that the Fire Department has been specifically asked for their concerns, and any required equipment/training/etc is planned and funded.
   For any who wonder about a fire in a wetlands, it happens. The following article is about a fire that was close to Lincoln Blvd, and not in the middle

of the Wetlands (i.e. relatively close to a major street, thus easier for the fire department to reach).
http://www.actcoastal.org/wiki/A_Ticking_Time_Bomb_Underneath_the_Ballona_Wetlands#:~:text=The%20SoCalGas%20Playa%20del%20Rey,hundreds%20of%20thousands%20of%20residents.
As an indication of the neighborhood's concern during dry weather, the local newsletter reports a resident 'reached out to our contact for Area C and was told that they have no funds to do any brush mitigation or cleanup in Area C'. Some neighbors make sure they have water hoses on hand 'just in case'.

5. **Impact on Nearby Housing**
   Some of the Alternative Projects would relocate dirt from the other side of Lincoln to Area C, adjacent to our community of townhomes. This would increase the height by 13 to 30 feet above existing grade (Response F8-2). My interpretation of the responses to concerns raised by folks who live in 2 to 3 story townhomes along Area C was basically since the additional height does not impact a public view, it does not need to be addressed. But it does need to be addressed. And noting the existence of a concrete wall at ground level (F8-3) without pointing out it was under 6 foot tall and is at the garage level (underneath the townhome living levels), is unhelpful.
6. **Lack of Helpful Responses:**
   a. From Comment Letter AF3:
      'NMFS generally concurs with the USACE's determination that the Project may have a substantial temporary adverse impact associated with Project construction, but may result in long-term benefits to EFH. Specifically, the Project would result in a net increase in the quantity of EFH by restoring and creating estuarine HAPC. In addition, the Project has the potential to increase the quality of existing EFH by re-establishing tidal connectivity between Ballona Creek and adjacent habitat. However, this dynamic hydrologic reconnection is expected to increase erosion and turbidity in the Project area, which may result in adverse impacts to EFH.'
      The Response to AF3-10 notes the general concurrence, and fails to address the erosion and turbidity concerns due to tidal connectivity:
      'NMFS' general concurrence with the Corps' determination that the Project may have a substantial temporary adverse impact from restoration/ construction, but may result in long-term benefits to

EFH is noted.'
This is just one example of an incomplete response.

b. Many of the responses to local concerns were 'acknowledged and are now part of the record of information that will be considered as part of CDFW's decision making process' (see approximately half of the responses to Comment Letter F8 as examples). The implication is someone, somewhere, is making decisions that severely impact our neighborhood. And we won't find out exactly what those are until after it is too late to do anything about it - unless we start notifying our elected officials now, and ask for a pause; and for a 'do nothing' alternative for now.

If you've read this far, Thank You!

And if you would let me know you received this, thank you again.

To: City Planning et al via DRRA
From: Pat Allinson
Re: 2020 Community Plan, Del Rey
Date: 10/14/20

Thank you for all the work you have done on this, and thank you for your attention to everyone's comments. My comments on the Draft Concepts of the 2020 Community Plan for Del Rey are below.

I believe it is critical to make a second draft available to the Community for discussion prior to finalizing the Plan.

General Comments:

More people usually means more housing is needed. Obtaining more housing via zoning is problematic. This is the Westside - I am very doubtful that more 'affordable housing' units will actually 'be affordable' for folks earning an hourly wage, or the many people living without a conventional roof over their heads. I would like to see practical transition housing for those currently homeless in the Draft Concepts, if not as a separate facility, possibly included as a new category of 'super affordable' housing required of new developments.

Trying to entice developers to include affordable housing by offering additional height/stories for their buildings through zoning raises concerns. It can lead to buildings too high for the surrounding community, and it can strain already stressed infrastructure by allowing ever increasingly dense developments. Developers can refuse to build units, and wait until the next zoning cycle and ask for more, holding existing properties as investments instead of adding units to the housing inventory in the near future.

Go Big so more people have homes

- Increase the % of affordable housing required for any increases in height/density/etc.
- Developers want an additional floor? Make the minimum 50% affordable housing for each additional floor. Developers say they can't make a profit? then don't build on the Westside.
- State says height increases must be allowed near transit? Make the qualifications for occupants consistent with income level that is not high enough to afford private transportation.
- State is making proposals that affect City Planning? Make more stringent proposals.
- Developers want additional height? Developments must provide needed housing above what the state requires, and in the number and categories the City deems appropriate.
- Want more density? Turn a ground floor space into a Senior Center, Community Meeting Room that the existing community can enjoy for the life of the building - and it must be open to the public, at set times at least 80 hours a week.
- Do not want to provide parking, and say it's not needed because there's a bus line within a mile? Pay for multiple 24-hour, free shuttle buses for as long as the building exists.
- If the State is going to make decisions that cause increasing traffic problems, the State should complete mass transit on Lincoln first. (I am short of details here, but we need it, and a Lincoln Blvd Project has been talked about for years).

Use it or Lose it

- Re-zoning by its nature changes the value of property. A property zoned for a 20 story apartment building is worth more to a developer than if that same property was zoned for a 5 story apartment building.

- As I understand it, it is costly for the City to attempt to 'down zone' a property as that would be taking potential funds from the owner, so the City really does not encourage owners to 'build it now because we changed the zoning', it just encourages to build it 'some time in the future' (i.e. don't use it, don't lose it).
- The City should make any up-zoning conditional on having the desired effect. Willing to allow residential on top of commercial? Make it conditional on the residential having the Final EIR issued prior to the start of the next Community Plan cycle; if that doesn't happen, then the City has the right to change the zoning back to the previous use at the next cycle.
- Example: I understand Bird/DelRey/Beethoven Island was onced zoned open space. That changed, and the owners have proposed building more than once, but did not reach agreement on the exceptions they requested to the new (now current) zoning. With the new Community Plan, I assume the owners understandably do not want the zoning to go back to open space - they received an unrealized windfall with an unconditional upzone.
- It won't be popular with developers, but if they want a 'windfall' from the re-zoning process, there should be conditions - including use it or it may revert back to the previous zoning without recompense.

Restrictions must remain:

- When a community agrees to 'excess' height and density in one spot, that does not mean the community wants, or supports, that same 'excess' as the new norm in the next Community Plan.
- Q conditions must remain. Saying they will be covered by zoning instead of Q conditions means that they can be more easily overturned, and that is not what was agreed to.
- When considering 'comparable' height and density, the 'exceptions' must not be used as the new norm. 'Exceptions' must not be used to justify additional height and density in all neighboring properties.
- Removing restrictions in the next Community Plan makes the restrictions basically meaningless. Once word gets out, I predict no one will ever approve an exemption for excess height and/or density again.

Environmental Impact Report (EIR)

- I am not an expert, but I have read parts of other EIRs. I do not expect any helpful and/or significant impacts as a result of the EIR on the Community Plan process. I would like to be disappointed.
- At a minimum, the process should be changed to prevent additional traffic gridlock, and require developers to present the effects of an entire project, not the effect of the 'first' part - to be followed by the effect of the 'second' part at a future date. Splitting the project into smaller pieces for purposes of reducing the effect (think traffic) on the existing community should not be allowed.

Infrastructure

- What I heard at a meeting was that housing had to be built before the infrastructure because that's the way the City works (i.e. demand before supply). The City needs to rethink, and change, the way it works.
- The Draft Plan includes many, many re-zoned areas with the obvious intent of increasing housing, which will probably reflect the ever increasing population of the Westside.
- Was any additional space identified for recreational uses? (How many people can use the existing parks at once?)
- Were there any calculations of the impact on local public schools? (What will the pupil to teacher ratio be if there are no additional classrooms?)
- Will the utilities be in place before the new zoning goes into effect?
- Maybe traffic could be addressed before all the intersections grind to a halt?
- A few takeaways from recent large residential developments, built and proposed: a) 'Open space' attributable to the projects seemed to include the rooftop and other areas that were not available to the public/neighbors. This needs to be distinguished when evaluating projects. b) The way traffic was evaluated, only a few intersections needed mitigation. This was met with general disbelief by neighbors. As I understand it, because the intersections already have way too many cars they do not

get worse 'enough' with the addition of a major development. And if they did, then developers can cut the project into multiple projects, and are only required to prepare an EIR on the project they propose. Methods used to evaluate a project's traffic effects must be changed before the entire Westside is in eternal gridlock. c) Developers always say they have enough parking for their project. Nearby streets are constantly adding permit parking restrictions because of the lack of parking. This disconnect needs to be addressed.

Specific Comments:

1. Area C of the Ballona Wetlands was not re-zoned to Open Space on the Draft Concepts. Area C, roughly bounded by Lincoln, Culver Blvd, and the 90, is an acknowledged part of the Ballona Wetlands Reserve, and an integral part of the State's potential plans for the Wetlands. I understand Area C is owned by the State, and do not know why the City would refuse to rezone it as Open Space. Please let me (and others) know asap if Area C will not be zoned Open Space in the final Plan.
2. Bird/DelRey/Beethoven Island:
   I agree with the Del Rey Residents Association that this property should revert to its previous zoning of Open Space.
3. Tule Wetlands, located between the 90 and La Villa Marina:
   I understand the owner was recently denied the ability to build on this property given that it is wetlands. Given that building is not allowed, why is there not a zone change proposed? My ideal would be to zone it as open space. Barring that, at a minimum apply a zone that obviously limits development (I understand the current agriculture zoning would have allowed a paved parking lot).
4. Lincoln Blvd, between Fiji and the 90:
   a. Height should be based on the existing 5(?) story apartments, not the sole 10 story building at the far end (near Fiji).
   b. Height should be based on ground level starting at Lincoln Blvd (not an artificially built up level)
   c. In order to make life still enjoyable in the 2-3 story townhomes near Lincoln (the Villa Marina Historic Residential District) that are across an alley from the proposed changes, the zoning must include: setbacks, access restricted to Lincoln (not the alley), allowable air flow, etc. fyi, when the apartment buildings were built, there were several restrictions negotiated before the buildings were allowed.
   d. The Q condition for Little Fiji Island located on Fiji Way must remain. Otherwise La Villa Marina will turn into a shortcut between Lincoln and the 90. This was the situation in the past and was not appropriate for a residential neighborhood. That was the reason for the Q condition, and it will be a disaster if the shortcut returns after ever increasing nearby development.

5. Marina MarketPlace:
   This site is one of the few commercial sites in Del Rey. I was unhappy with the photo in the Draft Plan, but was not as unhappy with the details on the pdf supplied to the Villa Marina Council. The details are extremely important. It would be helpful if City Planning would present their vision at a public meeting. Without knowing more, my choice is the Villa Marina Council's comment (see www.villamarinacouncil.org), with much reduced height and much increased open space.
6. Give Mother Nature a fighting chance:
   There are places with native vegetation planted between city streets and city sidewalks. The sites also include water drainage features. I think this was included in some Community Plan suggestions years ago. I would like this to be a requirement for all new development to separate pedestrians from cars and help the environment. There was also a plan for particular trees/plants. I do not remember seeing this in the Draft Concepts, but City Planning should have this info available - and I would like it included in the next draft.
7. Keep Q restrictions on Stella Apartments and Little Fiji Island; keep the Cedars hospital site(s) zoned as hospital.

8. The potential Regional Center on Lincoln Blvd should not be done at this time. Do not revisit this possibility until Lincoln Blvd has mass transit that works better than the current bus lines, and has designated bike lanes..
9. With respect to the two sites near the Santa Monica airport, they should be used for the benefit of the City, and the City must retain ownership of both properties. I would suggest coordinating with Santa Monica. I would also ask the City fire/police/other departments for their input. Ideally, I would like to include parks and a community center. Fyi, traffic on Bundy at rush hour is problematic, and spills into surrounding streets.

Things I especially liked (Thank you!)

- Commercial only on ground floor of Marina MarketPlace.
- Replacement housing must include at least the same number of units as being replaced.
- Encouraging the concept of community via walkability.
- Additional restrictions on properties close to open space, in particular close to the Ballona Wetlands.
- The 'Neighborhood Village' concept - these could be awesome!
- Allowing ADUs on single-family sites large enough to support them.
- Expanding bike lanes in a way that helps, not harms, the community's waterways.

Thank you,
Pat

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Re: Community Comment

2 messages

Lyric Armstrong REALTIST <ljahomes@gmail.com> Wed, Sep 22, 2021 at 12:17 PM
To: housingelement@lacity.org

> First Time Homebuyers are being written out of homeownership continuously due to SB 9 and SB 10, etc. It is the goal and wish for LA to enact an ordinance that reclaims authority in combat of SB 9 and 10 due to our vast concerns of over development, lack of affordable housing, parking issues. etc. And, due to the fact that SB 9 and 10 only require a Affidavit for owner occupied intent not as a requirement.

African American communities are over enadated with traffic, parking issues, etc. Open space land need to be rezoned versus removal of SFR zoning; which is the result of SB 9 and 10.

> Please advise - Lyric Armstrong, Residence of Baldwin Vista and 2nd Vice President of Consolidated Board of Realtist, Inc. the historic organization that fights for democracy in housing located in Baldwin Hills.

Lyric Armstrong, Realtist®

In the Realtist Spirit



Real Estate Professional and Advocate for Over 12 Years, Consolidated Board of Realtists, Inc., 2nd Vice President

Lyric Armstrong

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> "[One] is not a full man [or woman] who does not own a piece of land."-Proverb
>
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Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 3:12 PM
To: Lyric Armstrong REALTIST <ljahomes@gmail.com>

Hello Lyric,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

General Plan Housing and Safety Element Public Hearing: Public comments

2 messages

Philip Armstrong <philipa474@gmail.com> Wed, Sep 22, 2021 at 10:59 AM
To: housingelement@lacity.org

Hello Planning Element Team,

Please find attached my public comments on the Housing Element Update and let me know if you have any questions.

Thanks,
Philip Armstrong

Public comments.docx
15K

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 2:52 PM
To: Philip Armstrong <philipa474@gmail.com>

Hello Philip,

Hope all is well.

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

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Housing Element Staff
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[Quoted text hidden]

Public comments: General Plan Housing and Safety Element Public Hearing

The problem is described:

Among the cities in the U.S., Los Angeles is in a class by itself when it comes to rent burdened and overcrowded households. (Draft Housing and Safety Element webinar, Webinar Presentation Slides, Slide #22)

Simply put, over the past 40 years, Los Angeles has welcomed more people without adding enough places for them to live. (Revised Draft Housing Element, page 11)

Displacement pressures are intensifying and Angelenos (particularly families with children) are increasingly leaving the City because, in part, they no longer find it possible to afford the cost of housing. Young people in particular, are not able to form households. (Revised Draft Housing Element, page 12)

What is described as progress in solving the problem is actually allowing the problem to get bigger because the need is going up more than the supply is increasing to meet the higher need at the lower and moderate income categories:

Progress in meeting the RHNA targets in the prior planning cycle: The City's RHNA overall target of 82,002 units was met. However, insufficient housing in the lower and moderate income categories was produced. (Draft Housing and Safety Element webinar, Webinar Presentation Slides, Slide #53; Revised Draft Housing Element, page 20)

In short, during the prior planning cycle, only about 25% of the RHNA targets for the lower and moderate income categories was met while about 298% of the RHNA target for the above moderate income (market rate) housing category was met.

My understanding is that, were it not for the passage of Propositions H and HHH (which were not factored into the prior planning cycle), the shortfall in meeting the RHNA targets for the lower and moderate income categories would have been even larger.

Plans for meeting the RHNA targets in the current planning cycle: As described more fully in the RHNA Section of Chapter 1, the City estimates that under current assumptions it will likely be unable to meet its total RHNA targets for new construction. The City is therefore projected to fall short at the affordable (below 120% AMI) income ranges, but may meet the above moderate (market-rate) production levels. While the RHNA allocation suggests that almost 260,000 units affordable to households earning less than 120% AMI will be needed, it is anticipated that approximately 51,000 affordable units may be constructed within the eight year RHNA period at this range (about 20% of the target). This is a reflection that total housing needs for lower and moderate income households greatly exceeds the ability to meet those needs with existing financial resources and incentive programs. However, it is important to highlight that this Housing Element is projecting a significant increase in housing production at all

income ranges compared to prior cycles. (Revised Draft Housing Element, pages 21 to 22)

The solution is described:

The General Plan can be thought of as a city's "constitution for development," or the foundation upon which all land use decisions are to be based. … The General Plan is, however, more than just the legal basis for all local land use decisions; it is the vision for how the City will evolve, reflecting the values and priorities of its communities. (Revised Draft Housing Element, page 17)

To reach our estimated RHNA target, Los Angeles would need to permit an average of 57,000 units each year. Which would require significant production increases for both market rate and affordable housing. (Draft Housing and Safety Element webinar, Webinar Presentation Slides, Slide #54)

My conclusion: Using the passage of Propositions H and HHH as examples of thinking outside of the box, the problems associated with Los Angeles' housing crisis, which I see as principally a crisis of housing affordable to lower income households, will only get worse until the Mayor and the City Council get serious and take some accountability for solving this problem.

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

BASPOA Comments on Housing & Safety Elements Update

4 messages

Lois Becker/Mark Stratton <loismark@gmail.com> Wed, Sep 22, 2021 at 4:34 PM
To: vince.bertoni@lacity.org, HousingElement@lacity.org
Cc: councilmember.bonin@lacity.org, Len Nguyen <len.nguyen@lacity.org>, Jason Douglas <jason.p.douglas@lacity.org>, center@biologicaldiversity.org, Mike Antin <mantin11@yahoo.com>, "Marian A. Dodge" <chairman@hillsidefederation.org>, update@brentwoodalliance.org, Brentwood Residents Coalition <BRC90049@aol.com>

Attached please find a letter from Bel Air Skycrest Property Owners' Association (BASPOA) in support of an earlier letter from the Center for Biological Diversity (the Center) on the Update to the Housing and Safety Elements of the General Plan. The Center's letter is also attached.

Thank you.

Lois Becker, Community Liaison
Bel Air Skycrest Property Owners' Association

2 attachments

BASPOA HOUSING & SAFETY ELEMENTS Update letter 9-22-21.pdf
495K

Ctr for Biological Diversity_City of LA Housing Element_2021-09-07.pdf
397K

Jason Douglas <jason.p.douglas@lacity.org> Wed, Sep 22, 2021 at 5:05 PM
To: Lois Becker/Mark Stratton <loismark@gmail.com>
Cc: Vince Bertoni <vince.bertoni@lacity.org>, Housing Element <HousingElement@lacity.org>, Councilmember Bonin <councilmember.bonin@lacity.org>, Len Nguyen <len.nguyen@lacity.org>, center@biologicaldiversity.org, Mike Antin <mantin11@yahoo.com>, "Marian A. Dodge" <chairman@hillsidefederation.org>, update@brentwoodalliance.org, Brentwood Residents Coalition <BRC90049@aol.com>

Received!

--

Jason Patrick Douglas
Senior Planning Deputy
Councilmember Mike Bonin
City of Los Angeles
213-473-7011 | www.11thdistrict.com

Sign Up for Mike's Email Updates

[Quoted text hidden]

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 11:00 AM
To: Lois Becker/Mark Stratton <loismark@gmail.com>

Hello,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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

On Wed, Sep 22, 2021 at 4:34 PM Lois Becker/Mark Stratton <loismark@gmail.com> wrote:
[Quoted text hidden]

Blair Smith <blair.smith@lacity.org> Wed, Sep 29, 2021 at 10:55 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Flora Melendez** <flora.melendez@lacity.org>
Date: Thu, Sep 23, 2021 at 7:48 AM
Subject: Fwd: BASPOA Comments on Housing & Safety Elements Update
To: Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>, Cally Hardy <cally.hardy@lacity.org>
Cc: Nicholas Maricich <nicholas.maricich@lacity.org>, Arthi Varma <arthi.varma@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Sep 22, 2021 at 4:35 PM
Subject: Fwd: BASPOA Comments on Housing & Safety Elements Update
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
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E-NEWS

[Quoted text hidden]

--

Blair Smith
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2 attachments

BASPOA HOUSING & SAFETY ELEMENTS Update letter 9-22-21.pdf
495K

Ctr for Biological Diversity_City of LA Housing Element_2021-09-07.pdf
397K

BEL AIR SKYCREST Property Owners' Association

Sent via email

September 22, 2021

Vince Bertoni, Director of Planning
Los Angeles Department of City Planning
200 North Spring Street
Los Angeles, CA 90012
vince.bertoni@lacity.org
HousingElement@lacity.org

Re: City of Los Angeles' General Plan Housing Element 2021-2029 and Safety Element Update - Bel Air Skycrest Property Owners' Association Comments

Dear Director Bertoni:

This letter is written on behalf of Bel Air Skycrest Property Owners' Association (BASPOA), to acknowledge the importance of the Housing and Safety Elements Update (Update) currently underway and **to urge an even more proactive approach to** what is very possibly the most pressing, truly existential crisis that this city has ever faced: **mega-wildfires**.

BASPOA supports the very thorough and thoughtful recommendations submitted by the Center for Biological Diversity (the Center) in its September 7, 2021 letter (attached). We believe that incorporating these recommendations would make the Update a more relevant and powerful toolset, and we ask for your serious consideration.

As described in the Draft Environmental Impact Report (DEIR), extreme climate conditions are creating an environment that is increasingly vulnerable to wildfires. In addition, a growing body of peer-reviewed scientific studies points to the role played by human activity, densification, and infrastructure in igniting and vastly amplifying the destructive effects of these fires. The result, as climate scientists are documenting on a daily basis, is a self-perpetuating and vicious cycle, in which things will continue to get worse. Here in Los Angeles, it's not just individual species of plants and animals (including the human species) that are endangered but all of our hillsides and canyons -- the entire Santa Monica Mountains range, the geographic spine of Los Angeles.

It is right and good that the Update should include plans for rebuilding after disasters. But the wholesale destruction of our mountains in a truly devastating mega-wildfire or series of wildfires constitutes a catastrophic event from which humans, with all the ingenuity, good intentions and resources in the world, may never be able to "rebuild" and from which nature itself, for all its powers of resilience, may require generations to recover. Just yesterday a *Washington Post* headline screamed, "**Wildfires are changing California forever and making it harder to see a**

future here." So we must do everything we can now to prevent a disaster of this scale from happening -- and to protect our city and minimize the destruction if it does. But really, PREVENTION IS THE KEY.

RESTRICTING DEVELOPMENT

First and foremost BASPOA urges Planning to incorporate the Center for Biological Diversity's recommendation that **"**the Update include policies that **restrict new development in wildfire hazard severity zones."**

This is especially important to us because our community is situated one mile west of the 405 Freeway, immediately adjacent to the Mulholland Institutional Corridor, in the Very High Fire Hazard Severity Zone (VHFHSZ) of the Santa Monica Mountains, and we have been reading the "smoke signals" for a while. It came as no great surprise when community members were told by the firefighters at local Station 109 that we are "long overdue" for a major fire.

Less than two months ago (August 3, 2021) an LADWP subcontractor switching out old wooden power poles for more "firesafe" metal ones dropped one of the new poles onto some wires, blowing three transformers and sparking a brush fire on the hillside just east of the Bel Air Church, across Mulholland from the Mirman and Westland Schools, not a quarter-mile from our homes....



Brushfire on Mulholland – photo by Renee Schiavone from the *Brentwood, CA Patch*, August 3, 2021

Fortunately, the winds were light that day and fire crews were able to respond quickly and extinguish the quarter acre blaze in under half an hour. But had the wind been stronger, had firefighting personnel and equipment been stretched any thinner, it could have been a very different story. And had the timing been off by just a few hours in either direction, say when some 4,000 students, staff and parents from the Institutional Corridor were on the road, not to mention all the commuters cutting between the Valley and the Westside, then we might all (residents included) have been stuck in evacuation gridlock on Mulholland (our sole, shared access road), with emergency vehicles struggling to get by, while the flames jumped to other communities across the hillsides.

It would be a major sin of omission if I failed also to mention two full-fledged fires which occurred in the past five years (the Skirball Fire, 2017, and the Getty Fire, 2019), both of which directly threatened Bel Air Skycrest over periods of several days. The first triggered a *voluntary* and the second a *mandatory* evacuation for the Mulholland Corridor, including Bel Air Skycrest and the neighboring community of Bel Air Knolls. No wonder our two communities have, for several years now, been asking, along with the Federation of Hillside and Canyon Associations and the Brentwood Residents Coalition, for a moratorium on new development in the hillsides until there has been a comprehensive assessment (traffic, safety, and evacuation studies, including roadway capacity analysis to ensure concurrent, ***safe*** egress/ingress for evacuees and emergency responders).

MEASURES THAT PREVENT & PROTECT

Of course we must meet the wildfire threat on multiple fronts. So BASPOA also strongly endorses the Center for Biological Diversity's recommended inclusion of a variety of **home hardening and retrofitting programs, as well as homeowner training,** to improve the resilience, health and survival likelihood of buildings, property, and communities in Very High Fire Hazard Severity Zones and to ensure that homeowners know how to safely defend their homes or when and how to evacuate safely and effectively, as the situation demands. To the Center's list of suggested "hardening" programs and improvements, BASPOA would add **universal air filtration systems** as an essential part of all retrofitting/infrastructure plans going forward, since smoke inhalation impacts a much larger and more geographically expansive portion of the population than do the actual fires.

As referenced above, BASPOA has long agreed on the need for **detailed evacuation analysis and standards**. (Hardening protects structures, safe and effective evacuation protects lives!) **Two new State** laws on Emergency Evacuation Routes directly address this issue: **SB 99, chapter 202** requires all cities and counties to review and update the Safety Element to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes **and AB 747, chapter 681** requires that local agencies review and update their Safety Element as necessary to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios. BASPOA asks that you **adopt these policies now** as you update the Safety Element.

There is also the matter of financial protection. As we and all our neighbors know, insurance policy cancellation notices have been sweeping across the hillsides as fast as the wildfires themselves and can be devastating in their own way. So BASPOA joins the Center for Biological Diversity in asking that the Update require that applications for all projects and expansions **demonstrate full insurability,** *including fire insurance*, either through a private carrier or by evidence of the developer/owner having adequate funding to self-insure.

CEQA PRESERVATION

Finally, the Center expresses **strong concern about "streamlining" CEQA requirements**. BASPOA shares this concern 100%, particularly where hillside development is concerned. CEQA provides an incredibly useful toolkit for analyzing fire impacts, even if some of the tools are perceived to be redundant. The fact is, when dealing with environmentally sensitive areas like the Santa Monica Mountains, we need more, not less, environmental analysis, and **redundancy of protections is actually preferred.**

IN CONCLUSION

Wildland-urban developments have long been portrayed as highly desirable places to live, places where the "best of both worlds" (the nurturing, rejuvenating power of nature and the technology and convenience of modern culture) could peaceably coexist. But the reality, as those who live in such places are now realizing, is that coexistence has always been tenuous. Human activity and the infrastructure that supports it have their unintended consequences. And nature is not always nurturing. Now, with the rapid escalation of climate change, we are seeing a dark side to "coexistence", in which the two worlds seem set on an accelerating collision course, posing ever more serious threats to health, life and habitat, for human communities and wilderness/wildlife alike. Governor Newsom has set an important goal with the adoption of 30x30, making California the first state in the nation to commit to achieving conservation status for 30% of its lands and water by the year 2030, in order to protect natural resources and biodiversity. Los Angeles is fortunate to still have a significant amount of open space, but we must do a better job of protecting this rapidly disappearing resource or it won't be around much longer. So we ask that the EIR include an **assessment of the significant impact of wildfire on human health, habitat and wildlife, and that it present science-based mitigations to minimize said impacts.** And we agree with the Center yet again on **adoption of the Wildlife Ordinance by the end of 2021.**

The threat of wildfire (along with other effects of climate change) looms large in our present, and -- if we do not act immediately, responsibly, and boldly -- it will loom even larger in our future.. We are a city on a precipice, watching as the canyons just beyond us are beginning to **erupt** in flames. Action is needed, and it is needed NOW. There is no time to lose.

The timing of this General Plan Update is an opportunity to confront this many-faceted problem head-on, in ways that can actually make a huge difference in our lives and the life of our city.

The revised Housing and Safety Elements will be the blueprint for Los Angeles going forward in the crucial decade ahead, as we seek to create better, safer ways to survive and even thrive within

this new reality and to mitigate its negative, potentially devastating impacts on the landscape of our lives.

We appreciate the important work you and the department are doing to create a more protective General Plan for our city, and we appreciate this opportunity to give input. Thank you.

Respectfully,



Lois Becker, Community Liaison
Bel Air Skycrest Property Owners' Association

CC:
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September 7, 2021

Sent via email

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

Dear Mr. Bertoni,

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

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

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

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

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

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

More detailed comments are provided below.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

II. Home-hardening existing communities should be a central component of the Update's Objective 3.3 "Promote disaster and climate resilience in citywide housing efforts"

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

[3] Congress for the New Urbanism (CNU). "Defining the 15-minute city." Accessed September 7, 2021. https://www.cnu.org/publicsquare/2021/02/08/defining-15-minute-city

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

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

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

[4] California Environmental Justice Alliance. "Environmental & Housing Justice Policy Platform." Accessed September 7, 2021. https://calgreenzones.org/platform-for-environmental-housing-justice/

VI. Conclusion

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

Thank you for your consideration of these comments.

Sincerely,



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Housing Element <housingelement@lacity.org>

BACH Comments on Housing Element and Safety Element Update

3 messages

Wendy-Sue Rosen <rosenfree@aol.com> Wed, Sep 22, 2021 at 4:59 PM
Reply-To: Wendy-Sue Rosen <rosenfree@aol.com>
To: "Vince.Bertoni@lacity.org" <Vince.Bertoni@lacity.org>, "HousingElement@lacity.org" <HousingElement@lacity.org>
Cc: "mj.bonin@lacity.org" <mj.bonin@lacity.org>, "len.nguyen@lacity.org" <len.nguyen@lacity.org>, "jason.p.douglas@lacity.org" <jason.p.douglas@lacity.org>, "update@brentwoodalliance.org" <update@brentwoodalliance.org>

Please accept the attached comments from BACH in response to the Draft EIR on the City's Housing Element and Safety Element Update.

Thank you,

Wendy-Sue Rosen
Brentwood Alliance of Canyons & Hillsides

BACH Comments on Housing & Safety Elements 9-22-2021.pdf
214K

Jason Douglas <jason.p.douglas@lacity.org> Wed, Sep 22, 2021 at 5:05 PM
To: Wendy-Sue Rosen <rosenfree@aol.com>
Cc: "Vince.Bertoni@lacity.org" <Vince.Bertoni@lacity.org>, "HousingElement@lacity.org" <HousingElement@lacity.org>, "mj.bonin@lacity.org" <mj.bonin@lacity.org>, "len.nguyen@lacity.org" <len.nguyen@lacity.org>, "update@brentwoodalliance.org" <update@brentwoodalliance.org>

Received!

--

Jason Patrick Douglas
Senior Planning Deputy
Councilmember Mike Bonin
City of Los Angeles
213-473-7011 | www.11thdistrict.com

Sign Up for Mike's Email Updates

[Quoted text hidden]

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:54 PM
To: Wendy-Sue Rosen <rosenfree@aol.com>

Hello Wendy,

Hope all is well.

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

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



Housing Element Staff
Los Angeles City Planning

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



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On Wed, Sep 22, 2021 at 5:00 PM Wendy-Sue Rosen <rosenfree@aol.com> wrote:
[Quoted text hidden]

BRENTWOOD ALLIANCE OF CANYONS & HILLSIDES

September 22, 2021

Sent via email to Vince.Bertoni@lacity.org & HousingElement@lacity.org

Vincent P. Bertoni, AICP
Director of Planning
Los Angeles Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012

RE: Los Angeles General Plan Housing and Safety Element Updates

Dear Director Bertoni:

These comments are submitted on behalf of Brentwood Alliance of Canyons & Hillsides ("BACH")[1] regarding the City's Housing and Safety Element updates. BACH has had an opportunity to review several submissions to the record for these General Plan amendments, including the excellent letter from the Center for Biological Diversity ("CBD") submitted on September 7, 2021. We largely agree with CBD's perspective and recommendations and write to provide additional observations and recommendations.

BACH agrees that it is appropriate and desirable to exclude certain areas from the Rezoning Program that are either environmentally sensitive or where additional development represents a significant threat to public safety. These include local Very High Fire Hazard Severity Zones (VHFHSZs), areas with high natural resource value and sensitive habitat areas however designated, coastal areas at risk due to sea level rise, and floodplain areas. Upzoning to increase residential density within such areas should not be permitted.

Similar limitations should be implemented as part of the Safety Element update to ensure no new residential, commercial, institutional, or other development is permitted in areas where existing hazardous conditions makes such development unsafe for existing communities. In short, it is imperative that the Housing and Safety Elements not only provide specific policy direction to explain where additional housing *should* be located, but for those locations where additional housing and other development *should not* be located.

[1] BACH is an alliance of hillside residents and organizations founded in response to the growing threat of climate change and the unprecedented risk of wildfire due to development encroaching into the fragile Santa Monica Mountains ecosystem. BACH supports and promotes sustainable communities, public safety, fire-safe land use policies, and the preservation of habitat, wildlife connectivity, open space, trails, and the urban tree canopy.

We find the Housing Element update currently being undertaken by Los Angeles County instructive and urge the City of Los Angeles to take a similar approach. Los Angeles County's approach to site selection for housing is summarized at its website[2] as follows:

Where should more housing, especially multi-family housing be built?

When determining where to rezone to allow for more housing, especially multi-family housing types such as apartments and townhouses, *the main goals are to encourage infill development in urbanized areas, and to prioritize public health, safety, and equity.*

Sites in environmentally sensitive or naturally constrained areas, such as the Coastal Zone, Fire Hazard Severity Zones, Significant Ecological Areas and Hillside Management Areas are not selected for rezoning as these areas are not suitable for multi-family housing development. The map below shows the environmentally sensitive and naturally constrained areas in the unincorporated areas.

Environmentally Sensitive and Naturally Constrained Areas



Sites that are outside of environmentally sensitive or naturally constrained areas are then prioritized based on additional locational criteria. Sites that are located near transit, amenities, and services, and within areas served by existing infrastructure (e.g. public water and sewer systems) are considered more suitable for multi-family housing development and thus rezoning.

[2] See County of Los Angeles Housing Element Update – Draft Rezoning Program website, last updated July 30, 2021, available at: https://storymaps.arcgis.com/stories/c1ade07ca342481a88bfd877252e4713. Italicized emphasis added.

> Also, historic, discriminatory land use and housing policies have resulted in disadvantaged communities with concentrated poverty. To encourage diverse, inclusive, and mixed-income neighborhoods, sites that are located in areas with more resources and opportunities in terms of educational attainment, employment, and economic mobility as identified by the State are also prioritized for rezoning.

The County's map of environmentally sensitive and naturally constrained areas shows the entirety of the San Gabriel, Santa Monica, and Verdugo Mountains are appropriately excluded from increased development. Where sensitive areas identified by the County fall within the City of Los Angeles, the City should coordinate its Housing Element and Safety Element policies with the County and likewise exclude these areas from its own site selection program, both to protect environmentally sensitive areas, however designated, and protect public safety based on existing threats that are only expected to increase in coming decades due to global climate change and local drought conditions. The City of Los Angeles has a land area of approximately 470 square miles. Removing these areas will not constrain the City's ability to meet its mandated RHNA goals, or even greatly exceed them.

BACH notes that the City has a history of considering all parcels within the City limits as being located within an urban infill area, making no distinction between highly urban areas and environmentally sensitive areas. BACH is aware of no state law or regulation requiring this approach. We urge the City to recognize the obvious difference between densely developed urban centers and areas within the Wildland Urban Interface and other sensitive environmental areas, by creating a locally applicable definition for "urban infill."

We share CBD's grave concern over the Housing Element's proposal to facilitate additional streamlining of CEQA requirements. As CBD's letter correctly notes:

> CEQA is one of the few tools that disadvantaged communities have to be aware of and fight back against housing being located next to polluting developments, such as light and heavy industrial facilities, oil and gas operations, recycling and manufacturing facilities, and warehouses with heavy truck traffic. The law's robust environmental review process can require site specific analysis and additional soil sampling to verify site safety. It is also critical that housing is built on sites that are healthy and suitable for housing development. Exempting projects from CEQA without adequate safeguards could allow homes to be built on toxic and polluted land without appropriate public participation, impact analysis and disclosure, and mitigation.

We join CBD and others in strongly opposing Program 55, and urge that it be removed from the Housing Element update.

Finally, AB 747 requires jurisdictions to review and update their safety elements as necessary to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios. While this requirement does not go into effect until 2022, as a matter of good public policy, and especially during a time of extreme drought conditions made worse by climate change, the City should always ensure that its emergency evacuation planning is up to date and using the best available data to ensure the highest level of public safety. Likewise, SB 99 requires the Safety Element update to include information identifying residential developments in hazard areas that do

not have at least two emergency evacuation routes. The Housing Element update should use this required Safety Element information to inform its site selection process, removing from consideration for increased density any areas that do not have at least two emergency evacuation routes.

Thank you for the opportunity to provide and your consideration of these comments.

Sincerely,

Brentwood Alliance of Canyons & Hillsides:

Bel Air Skycrest Property Owners' Association
Lois Becker, Community Liaison

Brentwood Hills Homeowners Association
Eric Edmunds, President

Brentwood Residents Coalition
Wendy-Sue Rosen, President

Mountaingate Open Space Maintenance Association
Stephen Drimmer, President

cc: Councilmember Mike Bonin

Housing Element <housingelement@lacity.org>

Brentwood - Housing Element Public Comment

2 messages

Bisnoff Email <bisnoff@gmail.com> Wed, Sep 22, 2021 at 4:59 PM
To: Housing Element <housingelement@lacity.org>, cpc@lacity.org
Cc: Len Nguyen <len.nguyen@lacity.org>, daniel.skolnick@lacity.org, "'Carolyn Jordan' (cjordan@glaserweil.com)" <cjordan@glaserweil.com>

Dear Housing Element & City Planning Staff,
Please find the Brentwood Community Council public comment regarding the draft Housing Element, including Appendix 4.7
Thank you,
Michelle Bisnoff
Chair
Brentwood Community Council

Michelle A. Bisnoff
Chair, BCC
Commissioner, City of Los Angeles Innovation and Performance Commission & Chair, Fund Committee
Board Member, Los Angeles County Animal Care Foundation

BCC Housing Element FINAL_executed.pdf
196K

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 10:50 AM
To: Bisnoff Email <bisnoff@gmail.com>

Hello Michelle,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

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BRENTWOOD Community Council

149 S. Barrington Ave., Box 194, Los Angeles, CA 90049
www.brentwoodcommunitycouncil.org

September 22, 2021

VIA EMAIL:

Housing.Element@lacity.org
Attention: Cally Hardy, City Planning Associate

City Planning Commission
cpc@lacity.org

RE: Comments to Appendix 4.7 of the Draft Housing Element 2021-2029 Update ("Draft HE")

Planning Department, Housing Element Staff, Council District 11:

The Brentwood Community Council ("**BCC**") represents 35,000 community stakeholders, including 13 resident associations, 3 business districts, 1 BID, multi-family residents, business organizations, schools, religious groups, volunteer service groups, public safety, transportation and environmental representatives.

As set forth in prior correspondence, the BCC received a copy of Appendix 4.7, which contains more than 250,000 separate parcels of property identified for potential upzoning, only 1 week prior to comments being due. Further:

1. **The City is not required to complete the Housing Element process by October, 2021 per State Law[1]; we demand an extension of 30 business days and 1 opportunity for each Community Plan to comment on their region, as the City is not required to file or seek State permission for an extension; the City's self**

[1] *To remain on an eight-year planning cycle, the City must adopt its housing element within 120 calendar days from the statutory due date of October 15, 2021 for Southern California Association of Governments (SCAG) localities. If adopted after this date, Government Code section 65588, subdivision (e)(4), requires the housing element be revised every four years until adopting at least two consecutive revisions by the statutory deadline.*

imposed 8-year planning cycle places an undue burden on stakeholders given the compressed time period in which to analyze voluminous data and provide meaningful comment.

2. **SB9:** What more is required given the State law? The City Planning Department has not analyzed nor taken into account the impact of SB 9 on the Housing Element; such analysis is required before filing a plan with the State and requires public comment.
3. **SB99 and SRA/VHFHSZ Regulation 14 CCR 1270:** The City Housing Element is more likely obligated to declare, versus suggest, that parcels located in the VHFHSZ are ineligible for upzoning, as the Housing Element does not take into account *the combination of* SB99, SB9 and 14 CCR 1270 for Very High Fire Hazard Severity Zones, wherein the sum result is that the City is required to determine a process by which *no permitting* may take place for lot splits and upzoning in VHFZSZ for parcels less than 1 acre and located on dead end roads of more than 800 feet, and/or in locations with less than 2 methods of ingress/egress, and/or parcel maps dated after January 1, 1991.
4. **Zero Affordability Mandates in any zoning notes or designations other than ToC.** The City Housing Element does not provide any measurable indication that it will actually produce affordable housing units, other than existing ToC requirements.
5. **The City Housing Element Process Places an Undue Burden on 3,923,000 Residents**: a non-sortable file of 250,000 entries; 1 calendar week for review that included a weekend and religious holiday; no parcel maps; inaccurate addresses; no zoning terminology. The entire process places an undue burden on 3,923,000[2] City of Los Angeles residents who may seek to comment on their communities.
6. **No Explanation of Zoning Codes in Row X of Appendix 4.7 of the Housing Element:** Meaningful comment cannot be made by any stakeholder when an explanation of the codes set forth in the column "X" of Appendix 4.7 are unavailable and which appear to relate to potential zoning programs. The BCC has not received an answer to this question and cannot meaningfully evaluate the proposals without that information.
7. **Excessive Undercounts in Commercial Zones and Multifamily Parcels Along Major Transit Routes**: Undercounts should be reviewed with public comment in each Community Plan area before the City files with the State. Underutilized commercial/multifamily parcels along major transit routes are not credited with the maximum number of units possible under the City's Transit Oriented Zoning ordinance. If this one ordinance had been accurately maximized in the draft Housing Element, it is likely that Los Angeles would come close to meeting its

[2] 2021 population

SCAG housing unit goal with zero upzoning in areas where there is ***no infrastructure to support such density.***

8. **Inaccurate Projections:** Additional data must be added to City housing projections before the Housing Element is filed with the State. The City relies on projections from **one** source, the Terner Center, which is heavily financed by real estate, big tech and financial interests (Terner). At minimum, the City should take into account other projection models from reputable sources, such as the Embarcadero Institute, (Embarcadero Institute and Housing Models in CA, or the the State Office of Planning and Research, which differ with the Terner Center, and, therefore, create a model based on multiple data sources.
9. **Failure to Address the Environment:** We demand the Housing Element utilize the City of Los Angeles Urban Forestry Tree Map before designating a parcel for upzoning; the Housing Element selected parcels with zero consideration for decimating extensive urban cooling tree canopy. The Planning Department requires developers to replace decimated canopy with exceedingly small trees that do not replace true canopy coverage, or, in some cases, do not require any tree replacement. Therefore, we demand the Housing Element purpose match the City Planning Department process and save as much tree canopy as possible.

The BCC objects to any properties being suggested for any form of upzoning that are within the BCC's VHFHSZ. Even an ADU form of upzoning would be unacceptable in VHFHSZs, where increased density poses a significant public health and safety concern on single egress routes during fire evacuations.

Finally, the BCC questions whether any upzoning of any kind is necessary in light of the State's passage of SB 9 and SB 10. While the BCC has very grave concerns regarding the extent of the implementation of these pieces of legislation in Los Angeles, we also believe that even a modest implementation of SB 9 and SB 10 would result in significant additional potential density, obviating the need for City implemented upzoning.

Thank you,

Michelle Bisnoff
Chair, Brentwood Community Council

cc: Councilmember Mike Bonin, CD-11

Councilmember Paul Koretz, CD-5
Len Nguyen, CD-11 Planning Deputy
Daniel Skolnick, CD-5 Planning Deputy

Housing Element <housingelement@lacity.org>

Brentwood - Housing Element Public Comment

2 messages

Bisnoff Email <bisnoff@gmail.com> Wed, Sep 22, 2021 at 4:59 PM
To: Housing Element <housingelement@lacity.org>, cpc@lacity.org
Cc: Len Nguyen <len.nguyen@lacity.org>, daniel.skolnick@lacity.org, "'Carolyn Jordan' (cjordan@glaserweil.com)" <cjordan@glaserweil.com>

Dear Housing Element & City Planning Staff,
Please find the Brentwood Community Council public comment regarding the draft Housing Element, including Appendix 4.7
Thank you,
Michelle Bisnoff
Chair
Brentwood Community Council

Michelle A. Bisnoff
Chair, BCC
Commissioner, City of Los Angeles Innovation and Performance Commission & Chair, Fund Committee
Board Member, Los Angeles County Animal Care Foundation

BCC Housing Element FINAL_executed.pdf
196K

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 10:50 AM
To: Bisnoff Email <bisnoff@gmail.com>

Hello Michelle,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Letter From Brentwood Glen Association

2 messages

Cori Solomon <terikor@gte.net> Wed, Sep 22, 2021 at 4:24 PM
To: housingelement@lacity.org, cpc@lacity.org

To Whom It May Concern:

Attached please find the Brentwood Glen Association's comment letter to the revised Draft EIR and Draft HE.

Cori Solomon
President
Brentwood Glen Association

Housing Element Letter - Brentwood Glen Association.pdf
2194K

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 4:52 PM
To: Cori Solomon <terikor@gte.net>

Hello,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
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T: (213) 978-1302

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[Quoted text hidden]

BRENTWOOD GLEN
ASSOCIATION

Cori Solomon,
President

Stacy Galina

David Heldman

Margaret Orenstein

Mary Pringle

Jacqui Rosen

Neil Smolen

Teri Solomon

Yoram Tal

September 22, 2021

VIA E-MAIL

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

and

City Planning Commission
cpc@lacity.org

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

Ladies and Gentlemen:

Brentwood Glen Association ("BGA") is a community of 500 families bounded on the West by the. Veterans Administration property, on the north by Sunset Boulevard, on the east by Church Lane, and on the South by Waterford Street, hereby makes the following comments concerning the revised Draft EIR for the Draft HE and Safety Element Update, as well as the Draft HE and the Safety Element Updates.

1. Analysis ignores the impact of SB 9 and possibly also SB 10 – Governor Newsom signed SB 9 and SB 10 into law on September 5, 2021. These bills will have a tremendous impact on housing in the coming decade by adding 4 to 10 or more units on single-family lots. You have taken ADUs into account in your inventory and projections, and now you must take SB 9 and SB 10 into account as well. The city must redo projections to take this significant change in policy into account.

2. Request extension of deadline – because of the omission of any analysis of the effect that the new state laws SB 9 and SB 10 will have on housing, the City of LA must request that the state grant an extension of the deadline for submission of the Housing Element to enable the city to do this additional analysis.

In addition, The Draft Housing Element states, *"To remain on an eight-year planning cycle, the City must adopt its housing element within 120 calendar days from the statutory due date of October 15, 2021, for Southern California Association of Governments (SCAG) localities. If adopted after this date, Government Code section 65588, subdivision (e)(4), requires the housing element be revised every four years until adopting at least two consecutive revisions by the statutory deadline."*

This statement does not mean the Housing Element has to be complete by October 15, 2021. The city must allow more time to analyze the impacts of SB 9 and SB 10 and the maximum number of units that could be built on underutilized lots in existing commercial and multifamily zones, to consult and incorporate projections from reputable sources other than the Terner Center, and to provide the public with spreadsheets and maps in a format that can be seen and understood, to allow for meaningful community input.

3. Unsystematic Data is difficult to review – the Planning Dept. has provided Excel spreadsheets, including Appendix 4.7 - Candidate Sites for Rezoning, in which normal Excel functions such as sort, filter, cut, and copy are restricted. In addition, the spreadsheet has no discernible organization –addresses are listed randomly in Appendix 4.7 and not organized by zip code, street, Community Plan Area, or in any other noticeable manner. These restrictions on the spreadsheet by the city prevent the public from organizing them in a meaningful way, forcing the public to assume this was a deliberate attempt to obscure the actual impact of this massive list of addresses targeted for rezoning by the Housing Element.

4. No maps provided – in addition to the unsystematic and restricted manner in which the targeted addresses are listed, the city further obscures the list of affected properties by failing to provide any visual representation of the city's proposal. At a minimum, the city should provide detailed maps for each Council District showing which addresses are being targeted.

5. Biased and baseless projections – the city, relies on potentially biased projections from one source, the Terner Center, which is heavily financed by real estate, big tech, and financial interests https://ternercenter.berkeley.edu/about-us/supporters/. At a minimum, the city should also consider projections from other reputable independent sources, such as the Embarcadero Institute, which exposes the double-counting being done in reaching projected housing needs, see, e.g., https://embarcaderoinstitute.com/portfolio-items/double-counting-in-the-latest-housing-needs-assessment/ and https://embarcaderoinstitute.com/portfolio-items/housing-models-compared/. The state Office of Planning and Research also provides projections.

The projections being used by the city are questionable because California has been losing population in recent years – so much so that with the 2020 Census, the state has lost a Congressional seat for the first time in its history. These projections also fail to consider the impact of the pandemic and the shift to remote working, which has reduced the importance for many employees to live near their work.

6. Appendix 4.1 - Housing Element Sites Inventory – in addition to omitting any consideration of SB 9 and SB 10, the Sites Inventory fails to consider the maximum number of potential units that could be built on each site, including in particular underutilized lots in *existing* commercial and multifamily zones. For example, each lot along a "transit corridor" should be credited with the maximum number of units that could be built under TOC rules, taking into account all available incentives that could be granted.

7. Brentwood Glen is inappropriate for multifamily – many of the homes listed in the Brentwood Glen on Appendix 4.7 are situated against a hillside that backs up to the VA. The city has not considered the geological integrity and stability of the hillside and how it would affect the homes adjacent to these homes and the VA property. In the case of the VA, this could undermine the safety of Veterans and the purpose of the Greater Los Angeles VA.

Many of the ADUs proposed for the Brentwood Glen properties may not be the best use of affordable housing. Many would be used for extensions of their existing properties.

8. Analysis Ignores Upcoming Impact of I 405 ExpressLanes Project and Sepulveda Pass Transit Project – many of the apartments listed in Appendix 4.7 are subject to property taking under several of the alternatives proposed by the I 405 ExpressLanes project. Once Sepulveda Pass Project details are made available to the public, these will impact those apartments.

9. Lack of adequate infrastructure – the city has failed to maintain its sewer, power, water, and other infrastructure, which is old, crumbling, outdated, and simply unable to accommodate the proposed increase in density.

The infrastructure of the Glen may already be over taxed with development of many additional housing units at the of VA and that an additional DEIR and studies are needed to determine what the current infrastructure clean handle and what upgrades would be required.

10. Lack of affordable housing – the city's most glaring housing need is for affordable housing. The city has no mechanism either for ensuring that the hundreds of thousands of additional units will be affordable when built, or if "affordable" initially, for subsequently keeping track of and enforcing affordability for each unit in the future years.

Sincerely,

Brentwood Glen Association

Cori Solomon

Cori Solomon, President

Housing Element <housingelement@lacity.org>

Comments on housing element

2 messages

Anthony Burton <a.anthony.burton@gmail.com> Wed, Sep 22, 2021 at 4:32 PM
To: housingelement@lacity.org

Hi there,

I am a resident of Silver Lake, Council District 13, zip code 90039, and I would like to submit the following comments on the Draft Housing Element:

- We are in the midst of a housing crisis and climate crisis which means we need a lot of new housing and we need it fast and we need to close to jobs and transit. We should employ every policy solution we can to make this happen, especially in the form of upzoning.
- The plan needs teeth; we need aggressive policies that actually create more housing, and not just along arterial roads or in industrial areas, but along transit corridors, in jobs-rich districts, and in high resource communities that currently restrict all new development.
- We need housing available at all income levels, in all neighborhoods throughout the city so workers do not have to traverse tens of miles to get to jobs, education, and social services.
- We need housing in areas that have milder climates (i.e., near the coast) as temperatures continue to rise, requiring more and more air conditioning, and as fires continue to spread.

Thank you,

A. Anthony Burton

2240 Duane St
Los Angeles CA 90039

--
Anthony Burton
937-272-8428

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 10:41 AM
To: Anthony Burton <a.anthony.burton@gmail.com>

Hello Anthony,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing ELEMENT -- The Livable Communities Initiative

2 messages

Steve Byrnes <stevebyrnes@earthlink.net> Wed, Sep 22, 2021 at 2:41 PM
To: housingelement@lacity.org

To Whom It May Concern,

My name is Steve Byrnes. I live in the Pacific Palisades neighborhood. My zip code is 90402.

The Livable Communities Initiative, which has been submitted to the LA Department of Planning, should be included in the next Housing Element. I think this offers a great addition to the Housing Element.

Thank you,

Steve Byrnes

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 4:15 PM
To: Steve Byrnes <stevebyrnes@earthlink.net>

Hello Steve,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Modifications to Draft Housing Element from Coastal San Pedro NC

2 messages

Kristina Smith <ksmith-mailroom@mail.com> Wed, Sep 22, 2021 at 2:45 PM
To: housingelement@lacity.org
Cc: Robin Rudisill <wildrudi@mac.com>, Doug Epperhart <EPPERHART@cox.net>, Councilmember Buscaino <councilmember.buscaino@lacity.org>, Ryan Ferguson <ryan.ferguson@lacity.org>, Alison Becker-CD15 <Alison.Becker@lacity.org>, Aksel Palacios-CD15 <aksel.palacios@lacity.org>

Dear Housing Element Staff:

Attached please find a letter and resolution from the Coastal San Pedro Neighborhood Council recommending modifications to the draft Housing Element.

Please acknowledge receipt of this email and the attachment.

Thank you.

Kristina Smith
Neighborhood Council Services
310-918-8650 cell

Letter and Resolution Re Housing Element.pdf
571K

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 4:29 PM
To: Kristina Smith <ksmith-mailroom@mail.com>

Hello Kristina,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Doug Epperhart
President

Dean Pentcheff
Vice President

Kathleen Martin
Secretary

Sheryl Akerblom
Treasurer

COASTAL SAN PEDRO NEIGHBORHOOD COUNCIL

1840 S Gaffey St., Box 34 • San Pedro, CA 90731 • (310) 918-8650
cspnclive@gmail.com

September 22, 2021

To: HousingElement@lacity.org

The following Resolution recommending modifications to the draft Housing Element was passed by the Coastal San Pedro Neighborhood Council Board on September 20, 2021.

Re: Motion recommending modifications to the draft Housing Element

Whereas the goal of protection and preservation of existing residents in existing housing is of elevated importance in the draft Housing Element;

Whereas protection of the Community Character of our neighborhoods has always been a core element of our General Plan and Community Plans;

Whereas the current draft Housing Element mentions only "preserving existing architectural context" of our neighborhoods and does not address neighborhood character;

Whereas increased density increases the need for Open Space in order to serve the recreational, environmental, health and safety needs of the community;

Whereas locating development in residential areas that are located near transit may not result in transit use as the residents' jobs may not be located near transit;

Whereas the City has an increasingly diminishing level of tree canopy;

Whereas the City intends to expand density bonus and other affordable housing incentive program opportunities for greater incentives and streamlining;

Whereas the City wants the majority of rezoning to be in the Higher Opportunity Areas; and

Whereas the protection of sea level rise areas is of upmost importance.

Therefore Be It Resolved that **the** Coastal San Pedro Neighborhood Council requests that the draft Housing Element be modified as follows:

1. Zone changes from residential to commercial shall not be allowed.

2. Demolition of 100% residential structures for purposes of commercial projects of any kind, including mixed use, shall not be allowed, and the draft Mello Act Ordinance must be modified accordingly.

3. The Coastal Zone areas subject to sea level rise within the next 50 years, or the average lifetime of a development, whichever is longer, shall not be targeted for increased density.

4. The language regarding protection of neighborhood character should be changed from “preserving existing architectural context” to “preserving existing neighborhood character,” particularly in the Coastal Zone areas where this is required by the Coastal Act state law, and particularly in “special coastal communities,” such as Coastal San Pedro, which have additional protection under Coastal Act Section 30253.

5. Rezoning should begin with a focus on repurposing underutilized commercial areas, strip malls, and shopping centers.

6. The focus on new development should be on areas where there are already existing jobs.

7. The focus on protection and preservation of low-income housing should be for all low-income housing and not just for that in RSO buildings.

8. The existing tree canopy and accessible open space in our communities must not be allowed to decrease from its current level.

9. Development using Density Bonus and other affordable housing programs must require conformance with Community Plan policies regarding community character and with Coastal Act policies regarding community character for the Coastal Zone areas of the City.

Please contact Robin Rudisill, Chair of the CSPNC Planning Committee, at 310-721-2343 should you have any questions related to this letter and resolution.

Sincerely,



Doug Epperhart, President
On behalf of the Coastal San Pedro Neighborhood Council Board

CC:

Councilmember Buscaino
Councilmember.Buscaino@lacity.org

Alison Becker, Senior Advisor Councilmember Buscaino
Alison.Becker@lacity.org

Aksel Palacios, Planning Deputy Councilmember Buscaino
Aksel.Palacios@lacity.org

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Re: Coastal San Pedro NC Motion Re: TOC Development

Matthew Glesne <matthew.glesne@lacity.org> Wed, Sep 22, 2021 at 12:04 PM
To: Kristina Smith <ksmith-mailroom@mail.com>, Housing Element <housingelement@lacity.org>
Cc: "Bertoni, Vince" <Vince.Bertoni@lacity.org>, "Roble, Faisal" <faisal.roble@lacity.org>, Councilmember Buscaino <councilmember.buscaino@lacity.org>, Alison Becker-CD15 <Alison.Becker@lacity.org>, Aksel Palacios-CD15 <aksel.palacios@lacity.org>, Ryan Ferguson <ryan.ferguson@lacity.org>

Received - and CCd to the Housing Element comment email. Thank you for the comments.

Matt

On Wed, Sep 22, 2021 at 11:57 AM Kristina Smith <ksmith-mailroom@mail.com> wrote:

> Dear Planning Representatives:
>
> Attached is a letter from the Coastal San Pedro Neighborhood Council containing a resolution passed by the Board on 9-22-21.
>
> Please acknowledge receipt of this email and the attachment.
>
> Thank you,
> Kristina Smith
> Neighborhood Council Services
> 310-918-8650 cell

--

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

Doug Epperhart
President

Dean Pentcheff
Vice President

Kathleen Martin
Secretary

Sheryl Akerblom
Treasurer

COASTAL SAN PEDRO NEIGHBORHOOD COUNCIL

1840 S Gaffey St., Box 34 • San Pedro, CA 90731 • (310) 918-8650
cspnclive@gmail.com

September 22, 2021

Vince Bertoni, Director of Planning
Vince.Bertoni@lacity.org

Faisal Roble, Principal City Planner
Faisal.Roble@lacity.org

Matt Glesne, Senior City Planner
Matthew.Glesne@lacity.org

Re: Motion recommending that City incentives for Transit-Oriented Communities (TOC) development must include guarantees of qualifying transit

Dear City Planning Representatives:

At the September 20, 2021 meeting of the Coastal San Pedro Neighborhood Council, the Governing Board passed the following resolution:

***Whereas*,** the City of Los Angeles has instituted a Transit-Oriented Communities (TOC) Incentive program to provide convenient options for low-income residents, add to the City's housing stock, and promote alternatives to car travel**;**

***Whereas*,** the City requires developers to qualify for an incentive tier and obtain verification via the Metro Development Services Center to construct projects that would otherwise not be allowed for density or parking reasons;

***Whereas*,** in numerous cases City Planning has granted incentives and subsequently prior to development completion Metro has reduced or eliminated transit services which would demote or disqualify the parcel from those very incentives;

***Whereas*,** such cases result in a situation in which Metro provides insufficient transit infrastructure while the developers construct insufficient parking to service the property being developed causing undo burden on the surrounding community;

***Whereas*,** without a critical mass of transit there exists little to no possibility of alternatives to car travel or for a reduction in congestion or pollution which lead to a reduction in quality of life for those in and around the development.

Therefore be it Resolved, the Coastal San Pedro Neighborhood Council insists that the City Planning Department coordinate with Metro to ensure all Transit-Oriented Communities remain serviced by designated transit under which the incentives were granted through and after the completion of the project for at least five years.

Please contact Robin Rudisill, Chair of the CSPNC Planning Committee, at 310-721-2343 should you have any questions related to this letter and resolution.

Sincerely,



Doug Epperhart, President
On behalf of the Coastal San Pedro Neighborhood Council Board

CC:

Councilmember Buscaino
Councilmember.Buscaino@lacity.org

Alison Becker, Senior Advisor Councilmember Buscaino
Alison.Becker@lacity.org

Aksel Palacios, Planning Deputy Councilmember Buscaino
Aksel.Palacios@lacity.org

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Comments to Draft 2021-2029 Housing Element

2 messages

Mark D'Andrea <mpda@protonmail.com> Wed, Sep 22, 2021 at 10:56 AM
Reply-To: Mark D'Andrea <mpda@protonmail.com>
To: "Paul.Koretz@lacity.org" <Paul.Koretz@lacity.org>, "joan.pelico@lacity.org" <joan.pelico@lacity.org>, "daniel.skolnick@lacity.org" <daniel.skolnick@lacity.org>, "james.bickhart@lacity.org" <james.bickhart@lacity.org>, "board@westwoodhills.groups.io" <board@westwoodhills.groups.io>, "HousingElement@lacity.org" <HousingElement@lacity.org>

I would like to echo the comments of my neighbor, Terry Tegnazian, which I copy below. Make no mistake, we residents, particularly in the targeted area of Westwood Hills, are **LIVID** at the draft proposal as well as the process by which you are attempting to make such sweeping, ill-considered changes. The character and purpose of our neighborhood stands to be destroyed by your proposed changes and we will strongly resist such attempts.

It certainly appears as an underhanded attempt to ram through changes at the behest of developers. Please prove me wrong by considering your actual constituents, residents who live, work, and pay taxes in the City of Los Angeles.

Sincerely,
Mark D'Andrea

1) Analysis ignores impact of SB 9 and possibly also SB 10 – Governor Newsom signed SB 9 and SB 10 into law last week. These bills will have tremendous impact on housing stock in the coming decade, by adding 4 to 10 or more units on single-family lots. You have taken ADUs into account in your inventory and projections, and now you *must* take SB 9 and SB 10 into account as well. The city must redo projections to take this major change in policy into account.

2) Request extension of deadline – because of the omission of any analysis of the effect that the new state laws SB 9 and SB 10 will have on housing, the City of LA must request that the state grant an extension of the deadline for submission of the Housing Element to enable the city to do this additional analysis.

3) Data made deliberately difficult to review – the Planning Dept. has provided Excel spreadsheets, including in particular Appendix 4.7 - Candidate Sites for Rezoning, in which normal Excel functions such as sort, filter, cut and copy have been restricted. To make matters worse, the spreadsheet has no discernible organization – there are more than 267,000 addresses in Appendix 4.7, which are listed randomly, not organized by zip code, street, Community Plan Area or in any other noticeable manner – and by its restrictions on the spreadsheet the city prevents the public from organizing them in a meaningful way. This is clearly a deliberate attempt to obscure from the public the actual impact of this massive list of addresses targeted for rezoning by the Housing Element – which is so egregious as to amount to a lack of public notice.

4) No maps provided – in addition to the disorganized and restricted manner in which the targeted addresses are listed, the city compounds the effective lack of public notice by further obscuring the list of affected properties in failing to provide any visual representation of the city's proposal. At a minimum, the city should provide detailed maps for each Council District showing clearly which addresses are being targeted.

5) Biased and baseless projections – the city is relying on biased and baseless projections from one source, the Terner Center, which is heavily financed by real estate, big tech and financial interests, https://ternercenter.berkeley.edu/about-us/supporters/. At a minimum, the city should also take into account projections from other reputable sources, such as the Embarcadero Institute, which exposes the double-counting being done in reaching projected housing needs, see, e.g., https://embarcaderoinstitute.com/portfolio-items/double-counting-in-the-latest-housing-needs-assessment/ and https://embarcaderoinstitute.com/portfolio-items/housing-models-compared/. The state Office of Planning and Research also provides projections.

The projections being used by the city are especially suspect, in light of the fact that California has been *losing* population in recent years – so much so that with the 2020 Census the state has lost a Congressional seat for the first time in its history. These projections also fail to take into account the impacts of the pandemic and the shift to remote working, which no longer require employees to live near their work. Not only does this permit employees to live outside of employment centers, but it will also result in freeing up commercial space as businesses no longer require all their employees to be physically present in the office at the same time.

6) Appendix 4.1 - Housing Element Sites Inventory – in addition to omitting any consideration of SB 9 and SB 10, the Sites Inventory fails to take into account the maximum number of potential units that could be built on each site, including in particular underutilized lots in *existing* commercial and multifamily zones. For example, each lot along a "transit corridor" should be credited with the maximum number of units that could be built there under TOC rules, taking into account all available incentives that could be granted.

7) Westwood Hills inappropriate for multifamily – the city has put on its list of targeted addresses virtually our entire neighborhood of Westwood Hills. Westwood Hills is a single-family neighborhood of 600 homes situated between UCLA and Sepulveda Blvd, and between Sunset Blvd. and the VA Cemetery.

This easily identifiable, compact neighborhood was developed by the Janss family in 1929 and 1930 as part of their master plan for the new UCLA campus in Westwood. The goal of the master plan was to provide a *variety* of housing options near the campus, along with a commercial center (Westwood Village). Today, Westwood is already one of the most densely developed areas in the entire city of Los Angeles – with UCLA, Westwood Village, copious multifamily housing options in the North Village, along Hilgard, Veteran and immediately south of Wilshire, the high-rise office buildings and high-rise residential buildings in the Wilshire Corridor. The intersection of Wilshire Blvd. and Veteran Ave., adjacent to exits and entrances from the 405 Freeway leading to nearby business centers in Brentwood, Westwood, Beverly Hills and Century City, is one of the busiest intersections in the United States.

Further, the word *Hills* appears in the name of our neighborhood *because it is hilly*, with many narrow streets – and therefore it is singularly inappropriate for multifamily development. The neighborhood is already densely packed, surrounded by a densely developed area that cannot reasonably sustain additional density. I notice, for example, that you omit any addresses in adjacent Bel Air from your list of targeted addresses – why is that?

8) Lack of adequate infrastructure – the city has failed to maintain its sewer, power, water and other infrastructure, which is old, crumbling, and simply unable to accommodate the increase in density being proposed.

9) Lack of affordable housing – the city's most glaring housing need is for affordable housing, but the city has no mechanism either for ensuring that the hundreds of thousands of additional units will in fact be affordable when built, or if "affordable" initially, for subsequently keeping track of and enforcing affordability for each unit in the future years.

Sent with ProtonMail Secure Email.

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 2:42 PM
To: Mark D'Andrea <mpda@protonmail.com>

Hello Mark,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fw: Failure Notice

2 messages

Joyce Dillard <dillardjoyce@yahoo.com> Wed, Sep 22, 2021 at 5:00 PM
To: "HousingElement@lacity.org" <HousingElement@lacity.org>

----- Forwarded Message -----
From: MAILER-DAEMON@yahoo.com <mailer-daemon@yahoo.com>
To: "dillardjoyce@yahoo.com" <dillardjoyce@yahoo.com>
Sent: Wednesday, September 22, 2021, 06:58:08 PM CDT
Subject: Failure Notice

Sorry, we were unable to deliver your message to the following address.

<HousingElement@lacity.com>:
No mx record found for domain=lacity.com

---------- Forwarded message ----------
You need to address this element in realistic terms. Who benefits? Who pays for the needed infrastructure?

Los Angeles is now the market for institutional investors which needs to be addressed. The changes to the Los Angeles market is not reflected.

Vacant land and hazard areas should be incorporated as to availability.

Joyce Dillard
522 Clifton St
Los Angeles CA 90031

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:53 PM
To: Joyce Dillard <dillardjoyce@yahoo.com>

Hello Joyce,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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T: (213) 978-1302



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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

LA City 6th Cycle Housing Element Draft Comments (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

3 messages

Lucia Choi <Lucia.Choi@disabilityrightsca.org> Wed, Sep 22, 2021 at 2:45 PM
To: "Paul.mcdougall@hcd.ca.gov" <Paul.mcdougall@hcd.ca.gov>, "HousingElements@hcd.ca.gov" <HousingElements@hcd.ca.gov>, Housing Element <housingelement@lacity.org>
Cc: Navneet Grewal <Navneet.Grewal@disabilityrightsca.org>

Hello,

Please find attached Disability Rights California's comments on Los Angeles City's 6th Cycle Housing Element Draft. Thank you.

Best,

Lucia Choi (pronoun: she/her)
Staff Attorney
Civil Rights Practice Group

Disability Rights California
California's protection and advocacy system

350 South Bixel St. Suite 290
Los Angeles, CA 90017
Office: (213) 213-8000
Direct: (213) 213-8093
Fax: (213) 213-8001

The information in this transmittal (including attachments, if any) is privileged and confidential and is intended only for the recipient(s) listed above. Any review, use, disclosure, distribution or copying of this transmittal is prohibited except by or on behalf of the intended recipient. If you have received this transmittal in error, please notify me immediately by reply email and destroy all copies of the transmittal. Any inadvertent disclosure does not waive the attorney-client privilege.

The information in this transmittal (including attachments, if any) is privileged and confidential and is intended only for the recipient(s) listed above. Any review, use, disclosure, distribution or copying of this transmittal is prohibited except by or on behalf of the intended recipient. If you have received this transmittal in error, please notify me immediately by reply email and destroy all copies of the transmittal. Any inadvertent disclosure does not waive the attorney-client privilege. Thank you

LA Housing Element 6th Cycle Draft Comments_Final.pdf
205K

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 4:31 PM
To: Matthew Glesne <matthew.glesne@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Maya Abood <maya.abood@lacity.org>, Jackie Cornejo <jackie.cornejo@lacity.org>, Blair Smith <blair.smith@lacity.org>

FYI

Housing Element Staff
Los Angeles City Planning

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

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

LA Housing Element 6th Cycle Draft Comments_Final.pdf
205K

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 4:43 PM
To: Lucia Choi <Lucia.Choi@disabilityrightsca.org>

Hello Lucia,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302

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

[Quoted text hidden]

Disability Rights California
California's protection & advocacy system

LOS ANGELES REGIONAL OFFICE
350 S. Bixel St., Ste. 290
Los Angeles, CA 90017
Tel: (213) 213-8000
TTY: (800) 719-5798
Toll Free: (800) 776-5746
Fax: (213) 213-8001
www.disabilityrightsca.org

September 22, 2021

Paul McDougall
Department of Housing and Community Development
Division of Housing and Policy Development
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
Paul.mcdougall@hcd.ca.gov
HousingElements@hcd.ca.gov

Los Angeles City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Housing.Element@lacity.org

VIA U.S. MAIL AND EMAIL

Re: Comments on the City of Los Angeles's Draft 6th Cycle (2021-2029) Housing Element

To Whom It May Concern:

Disability Rights California ("DRC") submit comments on the 2021-2029 City of Los Angeles Housing Element Draft ("Housing Element Draft" or "Draft"). DRC is a state-wide, non-profit disability rights organization federally mandated to advance and protect the human and legal rights of Californians with disabilities. DRC was part of the Los Angele Housing Element Task Force. The following comments on the Housing Element Draft pertain to people with disabilities in the City and include intersectional issues and concerns that impact people with disabilities.

I. Public Participation and Outreach

State law requires that the City make a "diligent effort . . . to achieve public participation of all economic segments of the community in the development of the

housing element, and the program shall describe this effort."[1] We commend the City for its outreach efforts on the Housing Element Task Force, kick-off workshops, webinars, and Plan to House LA Survey. But these efforts were not proportional to the diverse linguistic population of the City. While some of the outreach and engagement were conducted in Spanish, no other languages were represented in the webinars, surveys, or workshops despite the need. Based on U.S. Census Bureau data from 2019, there are 90,282 Korean speakers in the City, but 55,762 of them speak English less than "very well."[2] Similarly, there are 87,850 Tagalog speakers, 29,172 of whom speak English less than "very well", and 63,323 Chinese speakers, 29,444 of whom speak English less than "very well."[3] Also, none of the advertising for public comment and hearing opportunities were translated to languages other than Spanish.

Additionally, while some community-based organizations were part of the Housing Element Task Force and the focus group held in August 2021,[4] and such organizations likely have members with disabilities, there were no disability community-based organizations contacted by the City or involved in the City's outreach. Examples of Los Angeles disability organizations are Greater Los Angles Agency on Deafness (GLAD), Independent Living Center of Southern California (ILCSC), Mental Health America of Los Angeles, and Communities Actively Living Independent & Free (CALIF). Given the Housing Element Draft's recognition of the significant constraints on accessible, affordable housing for people with disabilities and the profound need for such housing, the Draft would greatly benefit from focused feedback from disability community-based organizations.

Finally, the City simultaneously sought comments on its Housing Element Draft and submitted the Draft to the California Department of Housing and Community Development ("HCD") for review. Thus, updates to the Draft were being made as the public were submitting comments to the City, possibly making past comments obsolete. This can cause confusion. The City made edits to the Draft up until September 20, 2021 and scheduled public hearings for September 21 and September 22, with comments due September 22. This does not give the public enough time to review the latest draft of comments and provide thoughtful feedback. This makes the public hearing and comment process much less effective.

II. Chapter 1: Housing Needs Assessment for People with Disabilities

To thoroughly quantify and assess the housing needs of people with disabilities, the City should provide the requisite details in the Housing Element Draft on particular housing needs. While the Draft specifies to some extent housing needs of people with vision-related disabilities, hearing disabilities, and ambulatory disabilities, it does not detail the particular housing needs of the diverse types of disabilities.[5] For example, the

[1] Cal. Gov. Code § 65583(c)(9)
[2] http://www.laalmanac.com/LA/la10.php.
[3] Id.
[4] 2021-2029 Housing Element Revised Draft, Appendix 0.1: Summaries of Public Outreach - Housing Element Focus Group Report
[5] 2021-2029 Housing Element Revised Draft, Ch 1: Housing Needs Assessment, p. 76

Draft does not describe the specific housing needs of people with self-care difficulties, cognitive difficulty, or independent living difficulty. Some sources of data could include local regional centers, Cornell University's Disability Statistics Online Resource,[6] or the Department of Development Services' Quarterly Client Characteristics Report.[7] We look forward to this information being possibly contained in the still forthcoming Affirmatively Furthering Fair Housing Appendix. HCD's guidance on the requisite analysis of housing for people with disabilities includes the identification of housing types that can accommodate people with disabilities.[8] This information is vital in holistically assessing the City's housing needs and existing housing stock for people with disabilities.

The City also overall fails to quantify unmet housing stock for people with disabilities due to missing and incomplete information on housing needs described above. And in assessing the need for physically accessible housing for people with disabilities, current accessible housing stock information is needed. We appreciate the City highlighting the Accessible Housing Program in its Draft. And while the Draft discusses the Affordable & Accessible Housing Registry that can help the public locate accessible housing in the City,[9] it does not provide the City's current progress on its 4,000 accessible unit goal under the Corrected Settlement Agreement in *Independent Living Center of Southern California et al v. City of Los Angeles*. It also provides no information as to whether any and how many of the accessible units constructed under the Corrected Settlement Agreement are actually occupied by those in need of those units. As the Registry is a live database, quantifying the current available and occupied accessible housing units in the City at the time of the Draft can record its progress and keep the City accountable to its goals. It also provides a full analysis of the City's housing stock, as required by law.[10]

III. Chapter 2: Alleviating Constraints to Providing Housing for People with Disabilities

A. Reasonable Accommodation Ordinance and Process

As the City recognizes in its Housing Element Draft, the Reasonable Accommodation process is important for people with disabilities to receive accommodation in policies and procedures for land use and zoning with the City Department of Planning and alleviate constraints to housing. The implementation of the Reasonable Accommodation Ordinance can be improved to make the process more accessible and inclusive.

---

[6] Available at https://www.disabilitystatistics.org/reports/acs.cfm?statistic=1
[7] Available at https://www.dds.ca.gov/transparency/facts-stats/quarterly-client-characteristics-reports/
[8] Available at https://www.hcd.ca.gov/community-development/building-blocks/housing-needs/people-with-disabilities.shtml
[9] 2021-2029 Housing Element Revised Draft, Ch 6: Housing Goals, Policies, Objectives, and Programs p. 241
[10] Cal. Gov. Code § 65583(a)(2)

First, the Los Angeles Municipal Code requires that reasonable accommodation requests be made in writing.[11] However, there is no process outlined for people who, due to their disabilities, are unable to submit a request in writing. Such a process should be made available, and a plan should be included in the Draft to easily publish and make notice of this process so that more people can be informed and take part in the Reasonable Accommodation process. The Draft states that since the adoption of the Ordinance in 2006, "multiple requests for reasonable accommodation have been filed and approved."[12] While specific numbers have not been provided, barriers and complications with the reasonable accommodation process may be the cause of fairly low number of requests filed and approved since the adoption of the Ordinance.

Second, the Reasonable Accommodation Request form (CP-7819) requires that certain findings and questions be explained and addressed. Two of these requirements are that the applicant explain (1) that the requested accommodation would not impose an undue financial burden or administrative burden on the City and (2) that the requested accommodation not require a fundamental alteration in the nature of the City's land use and zoning program. Such requirements violate federal and state disability rights laws and establish a barrier in the reasonable accommodation process by requiring the applicant to produce information that is solely in the City's purview. The City is subject to the Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973. Under Title II of the ADA, the City, and not the applicant, has the burden to demonstrate that the requested accommodation would be an undue burden or fundamental alteration.[13] Section 504 has similar requirements for recipients of federal financial assistance.[14] Section 504 also requires that the undue burden be both financial and administrative, but Form CP-7819 allows the City to deny requests for *either* financial or administrative burden. Requiring applicants to provide this information can deter persons with disabilities from engaging in the accommodation process because they are unable to supply information that the City, rather than they, have. The City should remove these requirements on its accommodation request form to alleviate constraints on housing accommodation for people with disabilities.

B. Non-Governmental Constraints

Along with potential and actual governmental constraints, the Housing Element needs an analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing.[15] Neither in the Constraints chapter nor in the assessment of fair housing summary does the Draft discuss opposition from residents to housing for people with disabilities and its difficulty in siting such housing – particularly supportive housing for people with disabilities. Neighborhood opposition (NIMBYism) are often based on discriminatory views

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[11] LAMC 12.22.A.27; 2021-2029 Housing Element Revised Draft, Appendix 2.1: Governmental, Non-Governmental, and Constraints for People with Disabilities, p. 106.
[12] 2021-2029 Housing Element Revised Draft, Appendix 2.1: Governmental, Non-Governmental, and Constraints for People with Disabilities, p. 107.
[13] 28 C.F.R. § 35.130(b)(7)
[14] 24 C.F.R. § 8.33
[15] Cal. Gov. Code § 95583(a)(6)

regarding people with disabilities. People with disabilities also experience terrible harassment from neighbors. The City should adequately explore this constraint and retain and implement programs to help reduce anti-disability behavior and prevent housing opportunities for people with disabilities. While the Draft includes a program on educating neighborhood council members on discriminatory housing practices, the City should further explore methods to help site housing for people with disabilities despite neighborhood opposition.

IV. Chapter 4: Adequate Sites for Housing

A. Adequate Sites to meet RHNA Needs

The Housing Element Draft relies on Accessory Dwelling Units (ADUs) as an additional means to meet its RHNA goals. The City also provides some data on how many ADU permits have been issued by the City in recent years and uses that data to approximate about 5,000 ADUs per year during the 6th cycle. However, there is no information on how many ADU units have actually been used or are projected to be used for rental housing and their affordability levels. Without this information, the City cannot include these numbers into its RHNA goals. Additionally, any programs to incentivize and accelerate the production of ADUs should analyze, consider, and require accessibility standards, so that more accessible units can be built as part of such a program.

The City also looks at Public Land Programs to help meet its RHNA goals. The program is a strategic plan to create 10,000 units of equitable housing on public land within five years. The plan focuses on using public land to drive a housing solution that would utilize modular and pre-fabricated housing. Such plan and programs should include a requirement that such modular and pre-fabricated housing meet federal accessibility standards to increase accessible housing production.

B. Affirmatively Furthering Fair Housing (AFFH) Analysis

The Affirmatively Furthering Fair Housing (AFFH) analysis in Chapter 4 clearly demonstrate the inequities that exist in the current zoning code. Current zoning places an over-representative share of new unit potential in areas of highest risk of gentrification and displacement. Housing instability, particularly caused by displacement (which can disrupt networks of care and services), can have severe impacts on a person's health, particularly people with disabilities. Mitigating such displacement must be part of any AFFH strategy. The current zoning also shows that areas with the lowest development capacity also have the fewest people of color. While we appreciate this analysis and the City's re-zoning program to address the inequities, the Draft must acknowledge the history of unjust land use. Thus, we urge the City to include in Chapter 4 current and past policies and programs which have led to these unjust conditions, identify risks of inaction, make a commitment to center community needs and reserve decades of racist land use designations through a robust community engagement process, and conduct additional analysis of the realistic development potential of

rezoned sites that subsequently inform the rezoning program. A successful rezone program must include an analysis of realistic development potential in high and highest opportunity areas. The City then should use this analysis to adequately allocate and designate affordable housing through the rezone program. The Housing Element should also include a wider array of housing models with social housing and community land trusts.

V. Housing Goals, Policies, Objectives, and Programs

A. Strengthen renter protections and prevent displacement by strengthening RSO protections (Objective 2.1)

Goal 2, Objective 2.1 of the Housing Element Draft seeks to "strengthen rent protections, prevent displacement, and increase the stock of affordable housing."

We urge the City to include in its Housing Element policies and programs to strengthen the City's rent stabilization ordinance (RSO) and just-cause eviction protections. Many individuals and families with disabilities are on a fixed income. Social security payments are limited to less than $1,000 monthly, which is far below the median rent price in the City. These individuals do not have additional rental subsidy and rely on their rent-controlled apartments to keep their rent payments lower than market rate.[16] However, with an average 3% annual rent increase for rent controlled units, and without the corresponding increase in income or wages, low-income people with disabilities are being pushed out of these units, especially in gentrifying neighborhoods. The Housing Element should direct the City Council to amend the RSO to reduce the annual allowable rent increase.

Furthermore, allowing landlords of master-metered units to impose even larger rent increases creates further displacement due to increasing rent burdens. It also incentivizes landlords to not upgrade their gas and electric utilities, and households on master-meter utilities use more energy than individually metered households. Upgrades to gas and electric systems will also benefit the environment. Tenants in master-metered units should have the same protections against rent increases as any other tenant.

Finally, we urge the City to codify a tenant's right to counsel in an eviction proceeding. This will guarantee access to an attorney to all tenants who face an eviction. We also ask that the City, especially in the aftermath of the COVID-19 pandemic and its harmful impact on renters, explore additional opportunities to strengthen the RSO and restrict allowable grounds for eviction. This can include permanent restrictions on evictions based on no-pet policies or nuisance allegations

[16] *See* Technical Assistance Collaborative, Priced Out: The Housing Crisis for People with Disabilities, https://www.tacinc.org/resources/priced-out/

(both of which are frequently used to target people with disabilities) and policies to alleviate rent-debt.

B. Ensure that people with disabilities have an equal opportunity to rent, use, and enjoy affordable housing (Objective 4.1)

To meet the Draft's Objective on housing access and affordability for people with disabilities, the City should include additional programs that are currently non-existent in its Draft. First, the City limits its objectives and programs related to supportive housing for people experiencing homelessness. While people with disabilities are overrepresented in the homeless population, many people with disabilities who are not homeless, or do not meet the requisite definitions of homelessness, require supportive services to maintain stable housing. This can include people living with aging relatives, people cycling through psychiatric institutions or locked facilities, people living in settings that resemble institutions rather than community-based housing, and others. The City does not create any programs to specifically address this gap of unmet needs.

Second, the City acknowledges the importance of physical modifications to housing that allow people with disabilities to remain in their housing. "Another regulatory and practical constraint impacting housing for people with disabilities is the unwillingness of some landlords to comply with state and federal fair housing laws by providing reasonable accommodations and allowing reasonable modifications."[17] Even if a landlord is willing to allow modifications, the cost of the modifications is placed on many tenants. The City does not adequately describe a program with a schedule and quantifiable objectives for assisting non-senior individuals with physical modifications to existing units (such as a "grants for ramps" program).

C. Programs must include a schedule of actions and timeline

The Draft Housing Element must contain "[a] program which sets forth a schedule of actions during the planning period, each with a timeline for implementation."[18] Each specific action should indicate which agencies and which officials will be responsible for the implementation of the identified actions. Each action must have a timeline for its implementation so that the actions can have "beneficial impacts" during the planning period.[19] The actions contained in the following Programs need timelines and schedule of actions:

- Program 8: Accessible Housing Program
- Program 11: Land Use and Building Code Policies to Support Aging in Place and Special Needs Housing
- Program 15: Public Land for Affordable Housing

[17] 2021-2029 Housing Element Revised Draft, Appendix 2.1: Governmental, Non-Governmental, and Constraints for People with Disabilities, p. 105
[18] Cal. Govt. Code § 65583(c)
[19] Id.

- Program 16: New Models for Affordable Housing
- Program 24: Residential Rehabilitation of Public Housing
- Program 33: RSP Inventory Monitoring
- Program 60: Zoning Code Revision
- Program 105: Rental Assistance for Homeless Households with Disabilities

D. Additional comments on the following specific programs

1) Program 8: Accessible Housing Program

This program results from a ground-breaking settlement agreement and policies to improve accessibility and fair housing policies in subsidized housing in the City.[20] Currently, over 10,000 people with disabilities in the City are on wait lists for accessible housing units. Thus, the objectives of this Program are urgent, and the City should include a timeline and schedule of actions in order to meet its accessibility goals. As of now, the Program does not include any timelines or schedule of actions.

Currently, the program's objective is to "ensure that all affordable housing developments comply with the City's Fair Housing Policies." Per the *Independent Living Center of Southern California et al v. City of Los Angeles* settlement, the program should include (1) ensuring the compliance of applicable federal and state accessibility requirements, including those adopted under the ADA, Section 504 of the Rehabilitation Act, HUD, California Government Code 11135, and California Building Codes Chapters 11A and 11B and (2) ensuring that all covered properties comply with applicable federal and state fair housing and disabilities laws.

The City should also include in this Program its planned outreach efforts for its Enhanced Accessibility Program for people who are Blind, have low vision, Deaf, hard of hearing, or have speech difficulties. The City should be conducting outreach to these communities to determine what features maybe helpful.

We appreciate the City's plan to update and improve the online Affordable & Accessible Housing Registry. But we urge the City to include in this program its plan to improve ways to efficiently notify registrants on the availability of vacant units. We also request that the City include in this program ways in which the City is tracking its progress on making sure registrants, including unhoused individuals, are given priority to accessible units and that accessible units are not rented to individual who do not need them.

2) Program 42: Section 8 Vouchers for Disabled and Elderly Households

This program blurs housing considerations for seniors and people with disabilities – two groups with overlapping but distinct housing needs. Also, while the program

[20] Settlement Agreement in *Independent Living Center of Southern California et al v. City of Los Angeles*

provides an annual number of vouchers, it does not state how the vouchers will be distributed via the specialized program, how many vouchers will be allocated to each specialized program, and the Housing Authority of City of Los Angeles' involvement in this program.

3) Program 45: Enforce, Monitor, and Preserve Affordable Housing Covenants

Program 45 of the Draft seeks to enforce, monitor, and preserve affordable housing covenants. The City does not streamline and monitor the process for accessibility covenants like it does for affordability covenants. There should be a similar program with accessibility covenants that (1) requires developers to record covenants for accessible units prior to receiving a building permit and (2) assist with preparing and issuing the covenant. Additionally, the City should take measures to ensure that the database maintained through this program is available in accessible formats.

4) Program 47: Monitor and Report on Housing Production Goals

This program should also include production goals for accessible housing and include means to track such goals.

5) Program 63: Accessory Dwelling Units

This program seeks to incentivize and accelerate the production of ADUs. Any programs should consider accessibility requirements so that people with disabilities can benefit from these units. Such requirements and standards should also include one's ingress and egress access to the ADU on the parcel.

6) Program 82: Accommodations for Persons with Disabilities

This program limits staff training on processing accommodation requests to the Planning Department. While accommodation in policies and procedures for land use and zoning is vital, other departments in the City and other government entities that work with the City can impact housing access for people with disabilities. The City should expand training programs to entities such as the Los Angeles Department of Building and Safety, the Los Angeles Housing Department, and the Los Angeles Homeless Services Authority. The City should also coordinate individual reasonable accommodation procedures for each department that enforces housing and safety codes to process requests faster and handle improper denials of reasonable accommodations.

7) Program 109: Coordinated Entry System (CES)

In order to strengthen the Coordinated Entry System to function efficiently and effectively, the Program should include means to track disability-related needs and accommodations of each disabled person experiencing homelessness accessing CES. For example, the City should include in the system that the individual has a service animal or emotional support animal, so that they can be placed in the appropriate housing setting that would accommodate such an animal. Also, as mentioned above,

CES should function in a way that ensures that unhoused individuals in need of accessible units are given a priority for the accessible units, and that such units are not rented to individuals who don't need accessible unit, preserving this scarce resource for those who need it.

8) Program 125: Transit Oriented Communities

This program seeks to provide incentives to encourage transit oriented mixed income development. While the City acknowledges the need for affordable housing near transit, it does not acknowledge the need for accessible housing or incorporate it into its programs. Without accessible housing units and accessible pathways to and from housing and public transportation, people with disabilities will not have equal access to transit-oriented communities.

Thank you for your consideration of our comments We hope that they will assist the City in finalizing an inclusive 2021-2029 Housing Element that expands housing opportunities for people with disabilities in the City of Los Angeles.

Best,



Lucia Choi, Staff Attorney
Navneet Grewal, Litigation Counsel
Disability Rights California

Housing Element <housingelement@lacity.org>

Fwd: ECWA's Response to the Draft 2021-2029 Housing Element

2 messages

Kathy Guyton <kguyton@ecwandc.org> Wed, Sep 22, 2021 at 2:01 PM
To: housingelement@lacity.org

Attached is ECWA's response and request

--
Kathy L. Guyton
Secretary
Empowerment Congress West Area Neighborhood Development Council (ECWANDC)
www.ecwandc.org
"Be yourself. Everyone else is already taken." Oscar Wilde

ECWA RHNA.pdf
134K

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 4:08 PM
To: Kathy Guyton <kguyton@ecwandc.org>

Hello Kathy,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Los Angeles City Planning
201 N Figueroa Street
Los Angeles, CA 90012

Mark Ridley Thomas
200 N Spring Street, Room 420
Los Angeles, CA 90012

Marqueece Harris-Dawson
200 N Spring Street, Room 450
Los Angeles, CA 90012

RE: Candidate Sites for Rezoning within Empowerment Congress West Area NDC

Empowerment Congress West Area NDC (ECWA) would like to express our dissatisfaction with the selection of almost 500 sites within our boundaries as candidates for rezoning in the 6th Regional Housing Needs Assessment (RHNA) cycle. We respectfully request that all sites within ECWA be removed from the list of rezoning candidates. We feel strongly that our area has been overburdened with excess housing capacity because of the West Adams/Leimert community plan update, the Transit Oriented Communities incentive program, and a myriad of state legislation that has expanded density bonus and upzoned all our low-density residential areas (Senate Bill 9, Assembly Bill 68). We are concerned that city planning has not allowed enough time to pass between now and their previous upzonings of our area to analyze and determine if a market rate upzoning approach leads to better outcomes for those in the community who need affordable housing. Please look for sites elsewhere in the city to meet the inflated RHNA numbers. The following are some of the sites that we are opposing:

3701 STOCKER ST
3756 SANTA ROSALIA DR
3731 STOCKER ST
3860 CRENSHAW BLVD
3741 STOCKER ST
3751 STOCKER ST
3761 STOCKER ST
3860 CRENSHAW BLVD
3840 CRENSHAW BLVD
3840 CRENSHAW BLVD
3894 CRENSHAW BLVD
4020 MARTIN LUTHER KING JR
3440 43RD ST
2725 VERNON AVE
4350 11TH AVE
3405 43RD ST
3800 CRENSHAW BLVD
4343 CRENSHAW BLVD
4233 CRENSHAW BLVD
4330 DEGNAN BLVD
4300 CRENSHAW BLVD
2909 VERNON AVE
4074 CRENSHAW BLVD
2921 VERNON AVE
4340 LEIMERT BLVD
4350 11TH AVE
4342 11TH AVE
4306 CRENSHAW BLVD
4267 CRENSHAW BLVD
2801 VERNON AVE
2801 VERNON AVE
4249 CRENSHAW BLVD
3540 MARTIN LUTHER KING JR
4319 LEIMERT BLVD
4330 DEGNAN BLVD
4300 CRENSHAW BLVD
4320 CRENSHAW BLVD
2909 VERNON AVE
3200 VERNON AVE
2921 VERNON AVE
2700 VERNON AVE
4233 CRENSHAW BLVD
2712 VERNON AVE
4362 LEIMERT BLVD
4070 CRENSHAW BLVD
3411 43RD PL
4340 LEIMERT BLVD
4315 LEIMERT BLVD
4342 11TH AVE
4331 CRENSHAW BLVD
2615 VERNON AVE
4249 CRENSHAW BLVD
3540 MARTIN LUTHER KING JR
3025 VERNON AVE
4279 CRENSHAW BLVD
4309 LEIMERT BLVD
4319 LEIMERT BLVD
4289 CRENSHAW BLVD
2617 VERNON AVE
2806 VERNON AVE
2916 VERNON AVE
2901 VERNON AVE
4285 CRENSHAW BLVD

4315 LEIMERT BLVD
4317 CRENSHAW BLVD
4307 CRENSHAW BLVD
2713 VERNON AVE
4241 CRENSHAW BLVD
2603 MARTIN LUTHER KING JR
4331 LEIMERT BLVD
3025 VERNON AVE
3100 VERNON AVE
4283 CRENSHAW BLVD
2506 MARTIN LUTHER KING JR
2806 VERNON AVE
4257 CRENSHAW BLVD
2829 VERNON AVE
3210 VERNON AVE
3314 VERNON AVE
3017 VERNON AVE
2410 VERNON AVE
4257 CRENSHAW BLVD
4287 CRENSHAW BLVD
3017 VERNON AVE
4124 HILLCREST DR
4196 SANTO TOMAS DR
4000 SANTO TOMAS DR
4120 SANTO TOMAS DR
2704 42ND ST
4143 SUTRO AVE
4063 SUTRO AVE
4050 8TH AVE
2515 MARTIN LUTHER KING JR
4348 2ND AVE
4071 LEIMERT BLVD
4113 GARTHWAITE AVE
4110 LEIMERT BLVD
4105 GARTHWAITE AVE
4120 LEIMERT BLVD
4128 LEIMERT BLVD
4136 LEIMERT BLVD
4144 LEIMERT BLVD
4079 CREED AVE
4091 CREED AVE
4146 6TH AVE
4069 CREED AVE
4137 SUTRO AVE
2416 VERNON AVE
4074 LEIMERT BLVD
4080 LEIMERT BLVD
4086 LEIMERT BLVD
4351 4TH AVE
4068 8TH AVE
2407 VERNON
2409 VERNON AVE
2413 VERNON
2411 VERNON
4117 GARTHWAITE AVE
4062 8TH AVE
2604 VERNON AVE
2606 VERNON AVE
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2612 VERNON AVE
2516 MARTIN LUTHER KING JR BLVD
2323 VERNON AVE
2515 MARTIN LUTHER KING JR BLVD
2301 MARTIN LUTHER KING JR BLVD
2215 VERNON AVE
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2501 MARTIN LUTHER KING JR BLVD
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2300 MARTIN LUTHER KING JR BLVD
4058 LEIMERT BLVD
2205 VERNON AVE
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2315 VERNON AVE
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2208 VERNON AVE
2320 VERNON AVE
2814 MARTIN LUTHER KING JR BLVD
4051 LEIMERT BLVD
4100 ARLINGTON AVE
2300 MARTIN LUTHER KING JR BLVD
2314 MARTIN LUTHER KING JR BLVD
4348 2ND AVE
4119 LEIMERT BLVD
4161 LEIMERT BLVD
4196 4TH AVE
2201 VERNON AVE
2900 MARTIN LUTHER KING JR
4101 GARTHWAITE AVE
4135 GARTHWAITE AVE
4139 GARTHWAITE AVE
4143 SUTRO AVE
4116 GARTHWAITE AVE
2601 42ND ST
2607 42ND ST
2611 42ND ST
4196 5TH AVE
4195 5TH AVE
2705 42ND ST
4192 SUTRO AVE
4355 ARLINGTON AVE
2525 VERNON AVE
2610 MARTIN LUTHER KING JR
2528 MARTIN LUTHER KING JR
4089 LEIMERT BLVD
4101 LEIMERT BLVD
4101 LEIMERT BLVD
4119 LEIMERT BLVD
4127 LEIMERT BLVD
4141 LEIMERT BLVD
4121 GARTHWAITE AVE
4125 GARTHWAITE AVE
4131 GARTHWAITE AVE
2709 42ND ST
2401 VERNON AVE
4350 3RD AVE
2412 VERNON AVE
2508 VERNON AVE
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2916 MARTIN LUTHER KING JR
2528 MARTIN LUTHER KING JR
4355 ARLINGTON AVE
2501 VERNON AVE
2208 VERNON AVE
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2420 MARTIN LUTHER KING JR
2430 MARTIN LUTHER KING JR
2500 MARTIN LUTHER KING JR
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2406 VERNON AVE
2208 VERNON AVE
2320 MARTIN LUTHER KING JR
2400 MARTIN LUTHER KING JR
2718 MARTIN LUTHER KING JR
2518 VERNON AVE
2320 MARTIN LUTHER KING JR
2204 MARTIN LUTHER KING JR
3782 MARTIN LUTHER KING JR
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3700 MARTIN LUTHER KING JR
4013 MARLTON AVE
4020 BUCKINGHAM RD
3710 MARTIN LUTHER KING JR
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3724 MARTIN LUTHER KING JR
3900 MARTIN LUTHER KING JR
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3742 MARTIN LUTHER KING JR
3732 MARTIN LUTHER KING JR
3840 MARTIN LUTHER KING JR
3838 MARTIN LUTHER KING BLVD
3772 MARTIN LUTHER KING JR
3860 MARTIN LUTHER KING JR
3856 MARTIN LUTHER KING JR
3850 MARTIN LUTHER KING JR
4023 MARLTON AVE
4020 BUCKINGHAM RD
3800 MARTIN LUTHER KING JR
4020 BUCKINGHAM RD
4020 BUCKINGHAM RD
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3782 MARTIN LUTHER KING JR
4020 BUCKINGHAM RD
3782 MARTIN LUTHER KING JR
4120 11TH AVE
4041 HILLCREST DR
4231 4TH AVE
4261 CREED AVE
4281 CREED AVE
4293 CREED AVE
4283 MCCLUNG DR
3104 43RD PL
2610 43RD PL
3110 43RD PL
3114 43RD PL
3118 43RD PL
3122 43RD PL
3014 43RD PL
3020 43RD PL
4060 CREED AVE
4064 CREED AVE
4068 CREED AVE
4072 CREED AVE
4076 CREED AVE
4080 CREED AVE
4084 CREED AVE
2600 43RD PL
3100 43RD PL
2614 43RD PL
2618 43RD PL
2700 43RD PL
2704 43RD PL
2710 43RD PL
2714 43RD PL
3130 43RD PL
2718 43RD PL
3134 43RD PL
2722 43RD PL
3138 43RD PL
2726 43RD PL
3200 43RD PL
3206 43RD PL
2732 43RD PL
3210 43RD PL
2800 43RD PL
3216 43RD PL
2806 43RD PL
3220 43RD PL
2810 43RD PL
3224 43RD PL
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2834 MARTIN LUTHER KING JR
2826 MARTIN LUTHER KING JR
2822 MARTIN LUTHER KING JR
4148 CREED AVE
4088 CREED AVE
4092 CREED AVE
4214 CREED AVE
4218 CREED AVE
4100 CREED AVE
4222 CREED AVE
4213 MCCLUNG DR
4104 CREED AVE
4226 CREED AVE
4217 MCCLUNG DR
4230 CREED AVE
4108 CREED AVE
4114 CREED AVE
4232 CREED AVE
4221 MCCLUNG DR
4118 CREED AVE
4236 CREED AVE
4225 MCCLUNG DR
4240 CREED AVE
4122 CREED AVE
4229 MCCLUNG DR
4244 CREED AVE
4126 CREED AVE
4251 CREED AVE
4130 CREED AVE
4248 CREED AVE
4235 MCCLUNG DR
4134 CREED AVE
4138 CREED AVE
4252 CREED AVE
4142 CREED AVE
4239 MCCLUNG DR
4254 CREED AVE
4267 CREED AVE
4256 CREED AVE
4243 MCCLUNG DR
4260 CREED AVE
4247 MCCLUNG DR
4264 CREED AVE
4251 MCCLUNG DR
4266 CREED AVE
4257 MCCLUNG DR
4270 CREED AVE
4274 CREED AVE
4261 MCCLUNG DR
4285 CREED AVE
4278 CREED AVE
4265 MCCLUNG DR
4282 CREED AVE
4269 MCCLUNG DR
4286 CREED AVE
4273 MCCLUNG DR
4290 CREED AVE
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4294 CREED AVE
3841 DON FELIPE DR
3770 SANTA ROSALIA DR
3321 VERNON AVE
3850 SANTA ROSALIA DR
4260 3RD AVE
4126 ARLINGTON AVE
3214 VERNON AVE

Housing Element <housingelement@lacity.org>

Housing Element Comment

2 messages

indiejean@att.net <indiejean@att.net> Wed, Sep 22, 2021 at 4:41 PM
To: HousingElement@lacity.org
Cc: Thryeris Mason <missmason.nandc@gmail.com>, David Greenman <greenman.nandc@gmail.com>

TO: Housing Element Staff

Matthew Glesne, Senior City Planner

Blair Smith, City Planner

Please accept the following comments from the Empowerment Congress North Area Development Council (NANDC)

Jean Frost

Area 3 Rep

NANDC

Housing Element Comment September 22.pdf
179K

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 10:39 AM
To: indiejean@att.net

Hello Jean,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

NANDC
North Area Neighborhood Development Council

September 22, 2021

TO: Housing Element Staff
Matthew Glesne, Senior City Planner
Blair Smith, City Planner
City of Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

FROM: Empowerment Congress North Area Development Council (NANDC)

Via e mail: HousingElement@lacity.org

Dear Planning Staff,

NANDC supports the goals of the Housing Element of the General Plan currently under revision by the DCP.

The expressed goals are:

The overarching goals of the Housing Element that embody the City's commitment to meeting housing needs are:

To produce and preserve an adequate supply of ownership and rental housing that is safe and healthy; affordable to people of all income levels, races, and ages; and suitable to their various needs.

To ensure housing that helps to create safe, livable, and sustainable neighborhoods.

To ensure that housing opportunities are available to all without discrimination.

To prevent and end chronic homelessness.

However positive the goals, the way these are achieved is extremely important. The Housing Element Document is expansive and wide ranging. NANDC wishes to support the goals and offer some comments on areas that should be revisited or improved.

NANDC reviewed the Housing Element at its duly noticed August 24th Policy Committee meeting and at its September 2 full Board meeting. This letter reflects our comments by Board and stakeholders and contains a myriad list of suggestions and observations with a goal to improve the document. Some of us also were able to attend the PlanChkLA meeting and listen to Matt Glesne's excellent presentation.

NANDC has historically supported affordable housing, housing for low income and very low-income families and individuals. The current proposals under the TOC Program are a dismal failure and amount to a huge giveaway to developers without getting sufficient benefits in return. It is shocking to learn

that 2/3 of the affordable housing currently being developed in the city is from this TOC program since there are such significant negative impacts that are associated with these on and off menu bonuses with as little as 5% VLI units in return. We would like to specifically tie developer "giveaways" to affordable unit creation (ties in with requiring universal replacement of stabilized and affordable housing units), preferably in a 2:1 ratio.

NANDC went through extensive analysis during the South Community Plan review process, in identifying TODs, transit-oriented districts. Then the TOC program came along and virtually every site in NANDC is transit oriented by its definition. This needs to be evaluated and tightened up because currently extremely incompatible buildings are being built in the middle of neighborhoods that ought to be conserved. Further the exemption from CPIO rules for TOC projects is not a positive step.

Programs like the TOC program are not fixing our housing problems but rewarding developers without getting a reasonable return on our "gives." NANDC has been able to seek and received numerous additional affordable and work force housing units simply by asking developers to create more affordable units in return for the support of the Council. The failure to key "affordable' to neighborhood norms usually means that the housing provided as affordable is not affordable to current residents of the areas. There are no programs to allow existing residents the right of return. The average median income which is used to define "affordable" should be based within a two-to-three-mile radius of the proposed development. Tenants whose housing is being removed should have first right of return.

The housing element says 90% of homes in LA are married families, people living alone, or family units – this seems to negate a need to develop more "co-living" options which tend to be a monetizing of available bedrooms. These are not projects to house those in need of housing who are currently sleeping in cars or on the streets.

There is consistent focus on luxury, market rate and affordable housing, but middle-income housing is often neglected. More needs to be done to encourage middle income opportunities and conserve existing neighborhoods.

There is no discussion of programs to create home ownership. Home ownership builds family wealth and community stability. But when the cost of a condominium or "starter home" in Los Angeles is over $500,000, it is very difficult for the average family to save for the 20% down payment let alone cover the monthly mortgage payment. First time home buyer programs that assist with down payments, rebates that help lower the monthly mortgage payments and waving of city fees associated with buying a home, can help our middle and lower middle class community members become homeowners. The Community Redevelopment Agency had a program that saved historic housing and sold homes by lottery to a moderate-income family, the sale price being supported by a "soft second."

After WWII, affordable home for sale were developed for those returning from the war; townhomes and craftsman bungalows might offer design suggestions. This type of development would need subsidy.

There are insufficient design guidelines being applied to TOC development. The South Community Plan erred in making design guidelines voluntary, a departure from the previous South Community Plan.

NANDC is concerned on the retention of RSO units – there is no point in creating new affordable units if previous tenants have been displaced and there is no net GAIN of affordable housing units. We support the creation of new housing while balancing the important goal of conserving NANDC's character neighborhoods. Too often TOCs are permitted that demolish affordable units. e.g., demolish 3 units and provide 6 new, without calculating this loss of the 3.

In the Housing Element, there is not enough discussion of sustainability, infrastructure needs and preservation of public open space. Indeed, the ability to count balconies and roof decks as open space is rather misleading in any community discussion. TOC buildings are being approved without public open space amenities that can support a livable city. There needs to be stronger emphasis on infra-structure, landscaping, and public open space. Site Plan Review needs to be retained.

The city needs to question effectiveness of the Small Lot Subdivision Ordinance, which originally was intended to help create more affordable ownership solutions for the moderate-income persons. But currently most of these projects result in homes fetching well over $1 million, and some of these projects are being designed as rental housing crowding multiple individual renters into shared housing suites (often for student housing). It again has provided a bonus to developers with no real community return. This is NOT providing home ownership opportunities.

Affordable, low-income, and housing for the unhoused should be distributed equitably throughout the city. Inclusionary zoning needs to be revisited in a form that will pass any legal tests. With the South Los Angeles and West Adams-Baldwin Hills-Leimert Community Plan areas, when these two Community Plans were updated, together the new zoning represented 25% of the City's entire potential new housing capacity, and that zoning capacity was concentrated between Pico and Exposition Boulevards, straddling the 10 Freeway. Another 15% of the City's housing unit capacity was within the Hollywood Community Plan. 40% of zoning capacity resting in just three Community Plans is clearly the opposite of "equitable distribution of housing throughout the city." There needs to be zoned capacity for new housing spread throughout the City in a fair manner.

Not enough is being done to understand the different strata of homeless needs, some which require extensive supportive services and others who simply need an opportunity for housing. The idea that these various denser developments will actually cause a "trickle down" to help homeless needs is an assumption that has yet to be demonstrated by data.

NANDC will continue to comment on the Housing Element as it develops within the DCP process. This letter reflects the motion/carried under section VII. d. at the NANDC September 2, General Board Meeting to provide comments to the City per the Policy Committee and Board discussion.

NANDC
North Area Neighborhood Development Council

Neighborhoods and people need to be conserved and there is not enough recognition of retaining character defining neighborhoods, culturally and architecturally, and the residents that reside within them and the steps that can be taken to preserve neighborhood character. Other cities are creating culturally significant zones, much like HPOZs and Specific Plans. The Housing Element needs to support these types of tools in creating and preserving housing.

Submitted by

Jean Frost, Chair Policy Committee
Area3 Rep, NANDC
c/o 2341 Scarff Street, LA, CA 90007
Per NANDC Board motion of September 2, 2021

www.NANDC.org

Housing Element <housingelement@lacity.org>

Comments regarding "The Housing Plan for LA"

2 messages

Tracey Fitzgerald <fitz.fitz4@verizon.net> Wed, Sep 22, 2021 at 2:04 PM
Reply-To: Tracey Fitzgerald <fitz.fitz4@verizon.net>
To: "housingelement@lacity.org" <housingelement@lacity.org>, "cpc@lacity.org" <cpc@lacity.org>
Cc: "paul.koretz@lacity.org" <paul.koretz@lacity.org>, "daniel.skolnick@lacity.org" <daniel.skolnick@lacity.org>, "AssemblymemberBryan@assembly.ca.gov" <AssemblymemberBryan@assembly.ca.gov>

The Team at The Plan to House LA (via email)
HousingElement@lacity.org
Los Angeles Planning Commission (via email)
cpc@lacity.org 9/22/21 via email

Dear Officials,

I have the following comments regarding the way in which "Plan to House LA" has been developed seemingly without consideration of the following: The release of the 2020 Census and the effects of the pandemic on workplace activity, the underutilization of properties along transit corridors and the pandemic's effect on commercial and retail space; the city's ancient utility infrastructure; and LA's inability to ensure the development of low-income or affordable housing and the cities inability to track it after completion. All of this leading back to the same housing problem as before the plan.

1. **The results of the 2020 Census and the repercussions of the Pandemic** - the House LA Plan was released in March of 2020 before the release of 2020 Census and the beginning of the Pandemic. The State grew at 6.1%, its lowest rate since the 1930's. LA grew at a smaller 2% over that same decade while housing grew at a 6.7%. These trends should be considered in developing a housing program for the next 10 years. Also, the census showed that the majority of State's growth was in Riverside and San Bernardino. This represents a flight to the suburbs for affordability but also due to the change in office work patterns. The pandemic brought the need to adapt to a virtual workplace. Employers no longer required employees to be in an office. Individuals could live anywhere and work anywhere. This dramatic shift in the workplace and its effects on transportation were not considered in this plan.
2. **The under-utilization of space along transit corridors** – Properties along the corridor can be modified or developed for residential or mixed-use. Utilization of existing space along transit corridors would allow developers to add residential and mixed-use properties without the constraints of height, parking and improvements to infrastructure. Additionally, the pandemic has had an unknown impact on commercial and retail space. As companies continue to embrace the virtual office and individuals continue to shop from home, the demand for commercial and retail space will continue to decline. These properties, perfect for multi use, can be developed for additional housing.
3. **LA's utility infrastructure is ancient** – The cities current infrastructure was mostly built during or right after the 1930's. That infrastructure is quickly approaching 100 years old. This plan does not consider the effect of up zoning on infrastructure. For example, a single-family neighborhood with a sudden influx of density. Water pressure drops, sewers overload and increases on electricity leads to blackouts. Who handles that? The city? The developer? Without considering infrastructure, increases in density are development for the "sake of development".
4. **LA's inability to develop affordable or low-income housing -** Like in many cities, Developers are given many incentives to develop affordable and low-income housing. After completion, the property is not really priced at for low income but rather below market. In the end, low-income becomes relative to the community not really low-income. Additionally, the city does not seem to have the ability to track affordable or low-income units. Once a unit has been inhabited and vacated, the unit is re-priced at market value losing its affordability aspects and the benefits to the community.

Thank you in advance for your consideration of these important views.

Tracey Fitzgerald
11135 Cashmere Street
Los Angeles, CA 90049
310-991-1080
Email: fitz.fitz4@verizon.net

CC: Councilman Paul Kortez - Paul.Koretz@lacity.org

CD5 Planning Deputy Daniel Skolnick - Daniel.Skolnick@lacity.org
Assemblyman Issac Bryan – AssemblymemberBryan@assembly.ca.gov
Stephen Rohde, President WHOPA – rohdevictr@aol.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 4:13 PM
To: Tracey Fitzgerald <fitz.fitz4@verizon.net>

Hello Tracey,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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Planning4LA.org
T: (213) 978-1302



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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Sep 22, 2021 at 11:53 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Sep 22, 2021 at 11:45 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Joshua Gonzales** <joshuag7@everyactioncustom.com>
Date: Wed, Sep 22, 2021 at 11:45 AM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. But additional bold action and specific implementation measures are needed to make the housing element update successful.

I urge the City to:
- Rezone enough new capacity to result in the creation of 300,000 new homes, enough to close the RHNA gap.
- Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods, and would require wealthy, high-opportunity areas to accommodate the most new housing.
- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Allow "missing middle" multifamily housing citywide.
- Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
- Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Sincerely,

Personally sent by Joshua Gonzales using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Joshua Gonzales
1806 1/2 S Bonnie Brae St Los Angeles, CA 90006-5510
joshuag7@usc.edu

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 3:07 PM
To: joshuag7@usc.edu

Hello Joshua,

Hope all is well.

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

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Los Angeles City Planning

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Planning4LA.org
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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

The Livable Communities

2 messages

Ada Gorn <adag@creativecompound.com> Wed, Sep 22, 2021 at 1:17 PM
To: housingelement@lacity.org

Hello,

I am a homeowner in Studio City in 91604. I own an office building in West Hollywood in 90046.

I am writing because a plan called The Livable Communities Initiative has been submitted to the Department of Planning to be included in the next Housing Element. I believe it's a great solution to LA's housing crisis and urge that it be included and approved in the next housing element.

Thank you.

--
Ada Gorn
Vice President

creative compound

Phone (877) 297-8887
Email adag@creativecompound.com
Website www.creativecompound.com

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:59 PM
To: Ada Gorn <adag@creativecompound.com>

Hello Ada,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750



Los Angeles, CA. 90012
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T: (213) 978-1302



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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Sep 22, 2021 at 9:28 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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Los Angeles, CA 90012
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Sep 22, 2021 at 9:09 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Stephen Jones** <immobilesteelrims@everyactioncustom.com>
Date: Wed, Sep 22, 2021 at 9:03 AM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I live in Culver City, work in Los Angeles, and I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Sincerely,

Personally sent by Stephen Jones using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Stephen Jones
4252 Coolidge Ave Los Angeles, CA 90066-5416
immobilesteelrims@gmail.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:17 PM
To: immobilesteelrims@gmail.com

Hello Stephen,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be

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Los Angeles City Planning

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Comments on Update PLan

2 messages

Sue Kaplan <sakother@ca.rr.com> Wed, Sep 22, 2021 at 11:10 AM
To: housingelement@lacity.org

Attached are my comments made at last night's webinar. Please enter them in the public record.

Thank you,

Sue Kaplan
Resident of CD11 (Venice)

LA CIty Housing Element Update_Sk public comment 2021-09-21.pdf
37K

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 2:59 PM
To: Sue Kaplan <sakother@ca.rr.com>

Hello Sue,

Hope all is well.

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

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Los Angeles City Planning

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T: (213) 978-1302

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[Quoted text hidden]

22 September 2021

Housing Element Group

Via email

RE: Comment at Webinar on September 21, 2021

Dear Staff,

I would like to put in the record my comments from last night. Thank you for providing an opportunity to speak on the Housing Element update.

I am part of a non-profit, Citizens Preserving Venice. We advocate for the protections and preservation that the Coastal Act provides as we are a special coastal community.

We support and agree with the comments made by Ms Robin Rudisill concerning affordable housing and the loss of existing multi-family housing being demolished and turned into luxury housing and Mixed-Use Development. We too are protected by the MELLO Act. It is even more dire here in Venice and it is critical that you consider these issues in the updated Housing Element plan.

It is imperative that you not add density to the sensitive areas of Venice, especially the historic districts of Oakwood and the Milwood Walk Streets.

I want to add comments to clarify the use and abuse of ADUs. ADUs are a good method for ***adding*** density but are, in fact, not being used in this way but as replacements for multi-family affordable housing in Venice. ADUs are not required to be rented nor to be affordable. Owners make them a part of their homes for their personal use. Developers and homeowners when selling their projects don't even mention an ADU but in advertise them as an additional bedroom or office. Some have even designed their projects to be able to open them up and make them a part of the entire project.

Please support the preservation of true residential density in Venice. Please don't allow the commercialization of residential housing in what you are designating transit corridors. The mix of residential with the commercial is a character of Venice to be protected.

You have an opportunity to fix the loopholes in the ADU Ordinance and to protect affordable housing in Venice.

Thank you,
Sue Kaplan,
Resident of CD11 and Venice

Housing Element <housingelement@lacity.org>

Housing Element Update and Draft Environmental Impact Review (DEIR)

2 messages

Adrian Fine <afine@laconservancy.org> Wed, Sep 22, 2021 at 2:42 PM
To: "housingelement@lacity.org" <housingelement@lacity.org>

On behalf of the Los Angeles Conservancy, please see attached our comments on the Housing Element Update and Draft Environmental Impact Review (DEIR).

Thank you and best, Adrian

Adrian Scott Fine

Senior Director of Advocacy

Los Angeles Conservancy

afine@laconservancy.org

-

Pronouns: He / His / Him

Celebrate L.A.'s Legacy Businesses! Join us as the Conservancy explores legacy businesses throughout Los Angeles County, https://www.laconservancy.org/curating-city-legacy-business

laconservancy.org

E-News – Facebook – Twitter – Instagram

Membership starts at just $40

Join the Conservancy today

LAC Comments Housing Element, DEIR, L.A. Conservancy, 9.22.2021.pdf
526K

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 3:55 PM
To: Adrian Fine <afine@laconservancy.org>

Hi Adrian,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. To clarify the DEIR comment period closed on September 7th at 5 p.m. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be included in the environmental case file.

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



Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

LOS ANGELES CONSERVANCY

523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

September 22, 2021

Sent Electronically

Cally Hardy, City Planning Associate
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Email: housingelement@lacity.org

RE: Draft Environmental Impact Report for the Citywide Housing Element 2021-2029 Update / Safety Element Update (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

Dear Cally Hardy:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Environmental Impact Report (EIR) for the Citywide Housing Element 2021-2029 Update / Safety Element Update. Through my position, the Conservancy also participates in this process as a member of the City's Housing Element Update Task Force. We recognize this as a priority for all Angelenos and essential to the city's growth and development in the future.

The Housing Element Update to the General Plan establishes programs, policies, and actions to further the goal of meeting the existing and projected housing needs of all family income levels in the City of Los Angeles. It provides evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2029, and it identifies any rezoning program needed to reach the required housing capacity. The proposed Housing Element Update will replace the current Housing Element that was adopted in 2013.

As Los Angeles faces one of its worst affordable housing crises since the postwar period, the Housing Element and Community Plan Updates play a pivotal role in providing guidance for equitable housing solutions. Under the RHNA allocation, the City is required to provide capacity for at least 456,577 housing units. Of those, 115,978 are set aside for very low income, 68,743 for low income, and 74,091 for moderate income during the eight-year period. To meet Housing and Community Development (HCD) requirements, the City will accommodate a 25 percent buffer for a total target capacity of 230,338 units for lower-income households. Given the

current zoning, it is estimated that the City will need to include a program to rezone for the creation of 93,230 additional units of capacity. The rezoning program is set to be completed by 2024 and largely accomplished through the implementation of updated Community Plans.

The need to rezone or up-zone to allow for greater density as a means to create increased housing capacity should not come solely at the expense of historic resources. Already affordable and higher-density, HPOZs could be greatly impacted by such changes to zoning. Such measures also put many older, historically eligible yet undesignated buildings at risk. Lower density, car-centric properties could be a more viable solution for adding much-needed new housing and density.

We previously submitted this but I will refer you again to this excerpt from the Conservancy's recent study, *Preservation Positive Los Angeles*, which looks to the city's commercial strip centers as a targeted approach for increasing density and providing new housing production where it makes good planning sense:

> According to data from CoStar, the City of Los Angeles has 673 strip centers, 29 commonly known as strip malls. They are commercial buildings, typically one story, with retail or office units arranged in a row with a large parking lot in front. Strip centers in Los Angeles consume more than 24 million square feet of land to accommodate 7,237,000 square feet of gross leasable area for the businesses providing goods and services located there. The average strip center is a 10,753 square foot building sitting on 35,814 square feet of land. The vast majority are located on an existing public transportation routes.
>
> If all the strip centers were rezoned for housing and then developed, they could provide:
> • 24 million square feet of land redeveloped into 96 million square feet of buildings in four- and five-story structures.
> • 7,237,000 square feet of ground floor commercial space in the new buildings.
> • 71.3 million square feet of upper floor residential could create 83,929 apartments of 850 square feet each.
>
> • Even if one parking space were provided for each apartment, 63,416 housing units could still be built.
>
> The above is an oversimplified analysis. Of course, there would need to be a range of unit sizes, some areas could accommodate much higher buildings, and not all current owners of these strip centers may be interested in making the change. This example merely illustrates that there are a variety of viable options to adding both density and housing along transit corridors. This could be accomplished by encouraging the redevelopment of low-density, automobile-oriented parcels, rather than diminishing the quality and character of existing historic neighborhoods.

A recent (August 25, 2020) Spectrum News 1 piece ("Strip Malls, Big-Box Stores Could be Used for Housing in LA" also reached this same conclusion, stating there are many under-utilized commercial strip centers and big box retail throughout Los Angeles that could be redeveloped and/or adaptively reused for new housing. Many of these are already located along existing



transit so it makes sense to provide affordable housing here. Bottom line, the City needs to offer substantial incentives to encourage and direct new housing production and density where it makes for good planning and smart development. New housing production should reinforce and build upon our existing community assets. This should be done through various targeted City initiatives, as part of its HCD's programs, the Community Plan update process, and the Housing Element Update.

I. Inclusion of SurveyLA findings and analysis of potential conflicts in the Housing Element Update and data analysis

It is imperative that the Housing Element Update include and fully incorporate SurveyLA findings throughout the plan to identify resources and determine any potential conflicts with what is proposed.

In an attempt to meet RHNA goals, the Draft Housing Element includes the identification of sites for upzoning (Appendix 4.7 Inventory of Candidate Sites for Rezoning and Appendix 4.1 Inventory of Adequate Sites for Housing) and those that could accommodate greater housing density than what currently exist. It does not appear that this data collection including any cross-referencing with SurveyLA data or existing naturally occurring affordable housing (NOAH)/RSO housing. In attempt to avoid these conflicts, the Housing Element should at least identify if these properties are already identified as historic and/or serving as NOAH/RSO housing.

According to SurveyLA, 6.2% of parcels in Los Angeles are designated or considered potentially historic. It should be noted that many of the city's NOAH and RSO units are located within older and historic buildings and high-density neighborhoods and HPOZs included within the 6.2% of parcels. With nearly 94% of the city available for development and expansion, historic preservation cannot be blamed for impeding development or housing production.
Surveys are intended to help identify eligible individual historic resources and areas of concentrations of contributing resources that qualify as potential historic districts. The data from SurveyLA exists and should be fully incorporated into the Housing Element Update and made available in a user-friendly format so that it is useful for long-term planning purposes and balancing preservation and development priorities.

Surveys are intended to help identify eligible individual historic resources and areas of concentrations of contributing resources that qualify as potential historic districts. The data from SurveyLA exists and should be fully incorporated into the Housing Element Update and made available in a user-friendly format so that it is useful for long-term planning purposes, balancing preservation, and housing production priorities.

The Housing Element Update should articulate a clear understanding of the survey results to better plan for preservation and development in the future. This information is critical as a starting point in identifying potentially significant resources. Informative maps of historic districts, planning districts, and CPIOs should be fully incorporated into the Housing Element Update document to better inform interested parties.



Recommendation: include SurveyLA and NOAH/RSO housing data as part of the data collection analysis for the Inventory of Candidate Sites for Rezoning and the Inventory of Adequate Sites for Housing.

II. Modify and Expand Adaptive Reuse 2.0 Provisions

Through DTLA 2040 and the Housing Element Update, the City proposes to update its adaptive reuse program in Downtown. As a policy established in 1999 (Adaptive Reuse Ordinance, ARO), adaptive reuse has successfully resulting in the creation of new housing (more than 12,000 new housing units) and reinvestment in existing community assets. Without question, it has also been central to the revitalization of Downtown Los Angeles. Now, following more than twenty years of progress it is time to revise the policy to ensure it remains effective as an incentive to encourage the reuse of existing buildings. This is not only good for preservation but sustainability as we need to retain and reinvest in existing resources rather than throw them away.

A number of buildings remain that present new challenges and require innovative solutions. Costs for rehabilitation and retrofit are much greater and difficult now than when the ARO was first established, in part due to the complexity of various codes that must be adhered to and an escalation in overall construction. Adaptive Reuse 2.0 aims to solve many of the issues that now face historic buildings that are not capable of being converted only into housing. Greater flexibility and adaptability within city codes is needed.

Adaptive reuse 2.0 (Article 9) does not distinguish between historic and non-historic resources, despite there being clear differences and challenges. It concentrates on larger-scale, unified development projects, whereby adaptive reuse is one incentive, but this falls short in offering additional incentives for single building projects. One example would be to allow historic buildings to add additional floor area (intermediate floors and mezzanines), where viable and regardless of use. Further, any amenity requirements should be tied to new floor area only, not existing for the historic buildings.

Many underutilized buildings that remain empty are those that present unique challenges (small floor plates, ADA accessibility issues, etc.) and unable to be combined with other buildings or a larger project. Until we are able to help in this area, many of these types of historic buildings will remain empty and under-utilized. Therefore, additional incentives are especially needed for these types of examples to ensure financial feasibility for rehabilitation. If we can help these projects “pencil out”, they have an opportunity to create additional housing which lines up with this clear priority articulated within the Housing Element Update.

Learn from DTLA 2040 as Adaptive Reuse 2.0 no longer limits adaptive reuse projects to dwelling unit conversions. “Under the Downtown Plan, the Proposed Downtown Adaptive Reuse Program will be expanded through the New Zoning Code to allow for the conversion of eligible buildings to any permitted or conditionally permitted by the designated Use District of property.” The new expanded uses are expected to resolve many of the hurdles faced by



developers who were unable to convert historic buildings into housing because of building and life-safety codes.

In a number of City Planning presentations, planners stated that the new Adaptive Reuse program would allow for any building that is 25 years or older to be eligible for these incentives. However, nowhere in the Draft Community Plan and supporting documents could this be found. We understand this was originally articulated and restricted to buildings constructed prior to July 1, 1974 in the ARO. This date is no longer applicable to DTLA 2040 and believe it should be removed. Instead, it should just say 25 years with no reference to a specific cut-off date.

Recommendation: build off the good work done through DTLA 2040 to expedite adopting a new citywide adaptive reuse program and policy. Please distinguish between historic and non-historic adaptive reuse types of projects, and offer additional incentives which are needed to offset costs and unique challenges associated with historic buildings. Change the criteria to clearly state any building 25 years or older is eligible for the Adaptive Reuse Program. By specifying 25 years, Adaptive Reuse 2.0 will allow new building stock to become eligible for incentives year after year, rather than tying it to 1974.

III. Prioritize retention and preservation of existing affordable housing and NOAH/RSO needs, and amplify through concrete strategies

Los Angeles cannot build our way out of the affordable housing crisis, especially as we consistently destroy existing affordable housing throughout this city at the same time. The RHNA targets are exceedingly ambitious and will be difficult to meet, and compounded if we are not also developing a clear and comprehensive strategy for affordable housing retention.
A citywide plan needs to be a combination of production and retention/preservation strategies. We appreciate that this is fully articulated in the body of the Housing Element Update but there seems to be an unevenness when looking at the suggested programs and policies, clearly weighted toward production.

Older and historic residences make up a significant number of irreplaceable NOAH. As much as 69 percent of housing in the city's Historic Preservation Overlay Zones (HPOZs) has more than one unit and 39 percent of those properties provide five or more units. These units qualify under rent stabilization ordinance (RSO), a policy many working class Angelenos depend on to remain in their homes.

The Conservancy strongly encourages the City to develop serious retention and preservation strategies as part of the Housing Element Update, on par with those identified for housing production. It cannot be solely focused on the new construction component without giving serious consideration of what we already have now and are routinely losing. Without a real strategy, we will continue to lose this NOAH and put people at risk of falling into homelessness.



We encourage the consideration of creative approaches to preserve NOAH that involve both the public and private sectors. We understand many of funding programs and options such as the Low Income Housing Tax Credit and bond financing is weighted toward housing production efforts. This requires the City of Los Angeles to get creative.

Recommendation: provide greater priority and programs to assist in the retention and preservation of NOAH/RSO housing. Develop incentives and establish a reliable and accurate tracking system to determine how existing housing is faring in this process, rather than emphasizing only the production side.

IV. Conclusion

As the City of Los Angeles faces one of its worst housing crises since the postwar period, the Conservancy is optimistic that the City will craft a policy that meets the current and future housing needs. Historic preservation is an important tool in the City's land use toolkit, by protecting existing naturally occurring affordable housing stock throughout the city, countless low and moderate-income families will continue to have a roof over their heads.

Recommendations:

1) Include SurveyLA and NOAH/RSO housing data as part of the data collection analysis for the Inventory of Candidate Sites for Rezoning and the Inventory of Adequate Sites for Housing.
2) Build off the good work done through DTLA 2040 to expedite adopting a new citywide adaptive reuse program and policy. Please distinguish between historic and non-historic adaptive reuse types of projects, and offer additional incentives which are needed to offset costs and unique challenges associated with historic buildings. Change the criteria to clearly state any building 25 years or older is eligible for the Adaptive Reuse Program. By specifying 25 years, Adaptive Reuse 2.0 will allow new building stock to become eligible for incentives year after year, rather than tying it to 1974.
3) Provide greater priority and programs to assist in the retention and preservation of NOAH/RSO housing. Develop incentives and establish a reliable and accurate tracking system to determine how existing housing is faring in this process, rather than emphasizing only the production side.



About the Los Angeles Conservancy:
The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Senior Director of Advocacy

cc: Department of City Planning's Office of Historic Resources

Housing Element <housingelement@lacity.org>

Fwd: Proposed GP Housing Element Amendment

1 message

Blair Smith <blair.smith@lacity.org> Wed, Oct 6, 2021 at 11:04 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Planning CPC** <cpc@lacity.org>
Date: Wed, Sep 22, 2021 at 12:22 PM
Subject: Fwd: Proposed GP Housing Element Amendment
To: Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>

FYI- Please add to the case file.

---------- Forwarded message ---------
From: **Laura Lake** <laura.lake@gmail.com>
Date: Wed, Sep 22, 2021 at 12:11 PM
Subject: Proposed GP Housing Element Amendment
To: Planning CPC <CPC@lacity.org>
Cc: Laura M Lake <laura.lake@gmail.com>, Mike Eveloff <meveloff@gmail.com>, Jim O'Sullivan <jamesos907@gmail.com>

Fix the City hereby submits the following comments for the record:
1. Mandatory GPF Policy 3.3.2 requires that the city must not approve discretionary increases in density or intensity unless there is adequate infrastructure and city services, especially emergency services. There is no substantial evidence in the record showing adequate infrastructure or city services for current demand, no less additional demand.
2. SB 9 and SB 10 create an inconsistency with the General Plan of Los Angeles. This makes the Housing Element inconsistent. We request a supplemental EIR to analyze the impacts of SB 9 and 10.
3. Affordable housing requirements are merely creating an abundance of market-rate while not making a dent in the demand for affordable housing.
4. We incorporate by reference letters and comments from the public.

Laura Lake, Ph.D.
FIX THE CITY
--
Laura Lake, Ph.D.
Cell 310-497-5550

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Comment

2 messages

Samantha Leach <samantha@s-hw.com> Wed, Sep 22, 2021 at 2:46 PM
To: "housingelement@lacity.org" <housingelement@lacity.org>

Hi,

I'm writing in regard to the proposed Housing Element. In particular, I think more emphasis could be added to the plan encouraging development of Lower to Moderate income households, "missing middle" housing, and alternative typologies.

The way the density and TOC bonuses are currently written, the vast majority of developers choose the Extremely Low Income bonus option as it performs the best financially. This results in an exceptionally large housing gap for people in Los Angeles who don't qualify as ELI but can't afford market rate housing. I think the bonus structure or language could be re-written to encourage more projects to utilize the Very Low or Lower Income thresholds. While it is of course critical that the Housing Element provides support to the homeless and impoverished communities, it also leaves out the majority of Los Angelenos who are somewhere in the middle.

I also believe more emphasis should be placed on "missing middle" housing projects. During the update session, it was mentioned that there are plans to encourage more townhouse and four-plex development in single family areas. While this is a significant improvement, it still leaves a gap where projects jump from 4 units on a single lot to 50+ units project on half a block or more. There should be more done to allow true infill multi-family projects, particularly in the 5-20 unit range. These types of projects are great for neighborhood character, safety, and density, yet are currently financially infeasible to many developers primarily because of parking minimums. Infill projects rarely work when a third to half of a project's budget and gross square footage is dedicated to parking.

Lastly, alternative housing typologies should be further explored. Typologies like micro-units, co-ops, and congregate housing have been widely successful in other cities, and the demographics of LA are well suited for these types of projects. Providing micro or congregate housing options for university students, young people who have recently moved to LA, or people who are in the area temporarily for work, could help free up other traditional housing for larger or more established households.

I appreciate your time and look forward to seeing the final Housing Element.

Samantha Leach | Associate
SHW | o 206 329 1802 c 323 328 6067 | s-hw.com

Seattle | Los Angeles

SHW will be working remotely until further notice. All meetings will be moved online.

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 4:31 PM
To: Samantha Leach <samantha@s-hw.com>

Hello Samantha,

Hope all is well.

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

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



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

FW: Comments re: Draft 6th Cycle (2021-2029) Housing Element (Legal Aid Foundation of Los Angeles)

3 messages

Pui-Yee Yu <PYu@lafla.org> Wed, Sep 22, 2021 at 5:07 PM
To: "housingelement@lacity.org" <housingelement@lacity.org>

Hello. I received a bounce back email and am attempting to send this again.

From: Pui-Yee Yu
Sent: Wednesday, September 22, 2021 4:54 PM
To: Paul.mcdougall@hcd.ca.gov; HousingElements@hcd.ca.gov; Housing.Element@lacity.org
Cc: Angela McNair Turner <amcnair@lafla.org>
Subject: Comments re: Draft 6th Cycle (2021-2029) Housing Element (Legal Aid Foundation of Los Angeles)

To Whom It May Concern,

Attached, please find comments to the Draft 6th Cycle Housing Element.

Regards,

Pui-Yee Yu, MSW, JD | Staff Attorney

Full first name is Pui-Yee

Pronouns: she, her, hers

Legal Aid Foundation of Los Angeles

Housing and Communities Workgroup

7000 S. Broadway | Los Angeles, CA 90003

213.640.3952 **direct** | 213.640.3988 **facsimile**

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Los Angeles City Housing Element, LAFLA Comments 9.22.21.pdf
817K

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 6:16 PM
To: Jackie Cornejo <jackie.cornejo@lacity.org>, Blair Smith <blair.smith@lacity.org>, Nancy Twum-Akwaboah <nancy.twum@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Betty Barberena <betty.barberena@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Marisol Romero <marisol.romero@lacity.org>, Maya Abood <maya.abood@lacity.org>, Wajiha Ibrahim <wajiha.ibrahim@lacity.org>

FYI

Housing Element Staff
Los Angeles City Planning

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T: (213) 978-1302

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

Los Angeles City Housing Element, LAFLA Comments 9.22.21.pdf
817K

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 11:02 AM
To: Pui-Yee Yu <PYu@lafla.org>

Hello,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
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For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]

Legal Aid Foundation of Los Angeles
South Los Angeles Office
7000 S. Broadway
Los Angeles, CA 90003

1-800-399-4529
www.lafla.org
Writer's Direct Line: 213-640-3952

September 22, 2021

Paul McDougall
Department of Housing and Community Development
Division of Housing and Policy Development
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
Paul.mcdougall@hcd.ca.gov
HousingElements@hcd.ca.gov

Los Angeles City Planning
200 N. Spring Street, Room 525
Los Angeles, CA 90012
Housing.Element@lacity.org

VIA U.S. MAIL AND EMAIL

Re: Comments Regarding the City of Los Angeles's Draft 6th Cycle (2021-2029) Housing Element

To Whom It May Concern:

Legal Aid Foundation of Los Angeles ("LAFLA") is the frontline law firm for low-income people throughout Los Angeles County. LAFLA seeks to achieve equal justice through direct representation, systems change, and community education. We do a great deal of work in the area of housing, including affirmative litigation; national, state, and local policy work regarding the preservation and production of affordable housing; and eviction defense. LAFLA has five

community offices throughout Los Angeles County, including in the City of Los Angeles ("the City"), and runs a community clinic focused on housing issues in Downtown Los Angeles in collaboration with a local nonprofit advocacy organization. In addition, LAFLA is a member of the City's 63-member Housing Element Task Force, as well as a member of the Stay Housed L.A. coalition, which is a collaboration between the City, Los Angeles County, and local community based organizations and legal services providers to disseminate information and resources to help tenants remain in their homes. As such, LAFLA takes a great deal of interest in the City's Housing Element and its impact on residents. There are numerous concerns with the City's Draft 6th Cycle Housing Element ("Draft Housing Element"). Concerns and recommendations are outlined in this letter.

I. The Draft Housing Element Does Not Reflect Adequate Public Participation

Local governments are required to make a "diligent effort…to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort."[1] Community input must be gathered and factored in to the Housing Element analysis. Though the City did coordinate an outreach effort, its efforts were not commensurate with its diverse population of nearly 4 million people. The City has planned two additional webinars this month, announced on August 31, 2021. However, there should be additional community engagement targeting linguistically diverse and lower income residents for this Draft Housing Element as well as future housing element endeavors.[2]

It is commendable that City formed a 63-member Housing Element Task Force. It is likewise laudable that the City held workshops and webinars for the Task Force and the public, broadcast a Housing Element Video on Channel 35 and DASH buses, and conducted seven presentations to neighborhood councils and alliance groups and other stakeholders. The City held three webinars in fall 2020, two in English and one in Spanish, all with a total audience of approximately 260 people.[3] In November 2020, a poll was conducted (via text message and mobile/landline telephone calls) among 800 English and Spanish speakers. This was the only outreach effort where the City states it achieved a statistically representative cross-section of Angelenos. In December 2020, a digital survey was released, to which approximately 1,800 Angelenos responded.

The City simultaneously sought public comments on the Draft Housing Element and submitted it to the California Department of Housing and Community Development ("HCD") for review. Thus, updates to the Draft Housing Element were being made as the public was submitting

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Cal. Gov. Code §65583(c)(9).[1]

[2] The City itself highlights that "[i]n Los Angeles, like many cities, renters, unhoused residents, youth and residents in lower-income areas have far lower rates of participation in long-term planning processes like the Housing Element. The lack of diverse voices in the planning process has historically resulted in an imbalance of single-family zoning in high resource areas and a disproportionate share of multi-family and affordable housing development located in High Segregation/High Poverty areas." Draft Housing Element, p. 1-58.

Draft Housing Element, Appendix A, p. 3.[3]

comments to the City, possibly making past comments obsolete. This can cause confusion. The City made edits to the Draft up until September 20, 2021 and scheduled public hearings for September 21 and September 22, with comments due September 22. This does not give the public enough time to review the latest draft of comments and provide thoughtful feedback. This makes the public hearing and comment process much less effective.

Regardless, as the City remarks in the Draft Housing Element, "[a]n additional component of the Housing Element outreach process involves community-based organizations assisting with workshops with a particular focus on residents living in neighborhoods with higher percentages of populations that fall into the protected classes."[4] As such, we offer the following observations.

a. Engagement of Stakeholder Groups and Formation of the Housing Element Task Force

The community should be informed about how the 63 members were chosen when "more than 280 persons and organizations applied",[5] given the City's stated intention to form "[a] diverse, balanced group."[6] This information would promote transparency and clarify that stakeholder groups have a fair chance of being selected for a task force in any given year. Any identifiable structural barriers touching implicating equity could be addressed in future Task Force selection processes.

Moreover, because the housing element development and refinement process is ongoing, the should City consider clearly defining the role of the Housing Element Task Force. Perhaps the Task Force constituted for each Housing Element can remain intact and continue meeting and playing a monitoring role as the Draft Housing Element Cycle progresses.

It is also of note that the City held stakeholder meetings with seven community groups from February through May 2021. Although the City's efforts at engaging community-based organizations and community leaders are commendable, LAFLA cautions that meeting with representatives does not automatically equate to sufficient outreach to individuals. Los Angeles community-based organizations are not distributed evenly across geographic areas, and there are more than seven neighborhoods, meaning the stakeholder meetings could not possibly have covered the City.

The City did create a Housing Element Video that was shown on Channel 35 and DASH buses. While the video has garnered over 45,000 views, it is unclear what demographics are reached by this avenues. Further, the number of views alone is inconclusive, as we do not know if these were unique view by different viewers.

Directly reaching individuals within communities that typically have lower rates of participation in the planning process is a very important form of direct outreach that should also occur alongside outreach to the community-based organizations that represent the interests of the

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Draft Housing Element, p. 1-58.[4]
Draft Housing Element, p. 28.[5]
[6] Draft Housing Element, p. 28[6]

communities they serve. The City should consider adopting target outreach numbers for individuals engaged from different communities.

b. Public Engagement Efforts Did Not Clearly Achieve Geographic and Socioeconomic Diversity

From the City's description of its public outreach efforts, we know only the following markers and proxies with respect to geographic or socioeconomic diversity achieved:

- The reach and geographic coverage of Channel 35 and DASH buses on which the City's Housing Element Video was shown.
- Describing the approximately 1,800 Angelenos who responded to a digital survey released in December 2020:
    - "Compared to citywide demographics, respondents tended to be older, whiter, and over representative of homeowners, though not by a signfiicant margin. 23% of survey respondents identified as Latinx and 13% of survey respondents as Black/African American."[7]
    - 53% of respondents spend more than 30% of their income on housing costs, with 26% spending more than half their income on housing.
    - 44% of respondents were renters and 3% of respondents were unhoused.
    - Respondents were residents of Central and West, South-West and North-East LA, with less representation from the Harbor and Valley communities.

Conclusions are accordingly difficult to draw one way or the other with respect to achievement of diversity. We recommend that the City adopt a strategy for improving and better tracking efforts relative to geographic and socioeconomic diversity of its outreach efforts.

c. The City Failed to Meaningfully Engage Limited English Proficient Communities

The City is required to find and implement research-based outreach methods to "affirmatively further fair housing and effectively reach communities in a culturally-appropriate, language-inclusive manner." Instead of meeting this requirement, the City alleged it would "utilize grant funding to support additional outreach across many housing efforts including the Housing Element Update and other strategies initiated by the City of Los Angeles to accelerate housing production and promote equity-based models for increasing affordable housing development."[8] The City indicates in the Draft Housing Element that outreach events will be held "to maximize participation from populations with a disproportionate amount of 'essential' workers, those impacted by the pandemic, and residents with limited English proficiency."[9] However, it is unclear that such outreach efforts or events took place.

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[7] Draft Housing Element, Appendix A, p. 4.
[8] Draft Housing Element, p. 1-58.
[9] Draft Housing Element, p. 1-58.

It is appreciated that "[e]fforts were taken by staff to provide outreach in Spanish to reach the City's large mono-lingual community",[10] including two webinars in Spanish with live question and answer, one Spanish Concepts Webinar with live question and answer, and a poll reaching a total of 800 English and Spanish speakers. However, no materials were provided in other languages, despite the linguistic diversity in this City. For example, based on U.S. Census Bureau data from 2019, there are 90,282 Korean speakers in the City, but 55,762 of them speak English less than "very well."[11] Similarly, there are 87,850 Tagalog speakers, 29,172 of whom speak English less than "very well", and 63,323 Chinese speakers, 29,444 of whom speak English less than "very well."[12]

It appears that not even the advertising for public hearing opportunities was professionally translated for non-English speakers of langauges other than Spanish. This is perplexing, as it is the explicitly the policy of both the City and the City's Housing and Community Investment Department ("HCID") "to take reasonable steps to provide meaningful access for persons with Limited English Proficiency…to all HCIDLA-funded programs and activities."[13]

We recommend that the City dedicate resources to determine the level of outreach need in all languages represented with the City's borders, and that goals and objectives be set for achieving the predicted level of need in at least in the languages with the highest numbers of speakers.

d. The City Failed to Meaningfully Engage the Disability Rights Community

There were no disability community-based organizations contacted by the City or involved in the City's outreach. Given the Draft Housing Element's recognition of the significant constraints on accessible, affordable housing for people with disabilities and the profound need for such housing, it would greatly benefit from focused feedback from disability community-based organizations.

e. The Draft Housing Element Lacks Meaningful Effort to Engage All Economic Segments of the Community

The Draft Housing Element does not specifically highlight any efforts by the City to meaningfully engagee "all economic segments of the community." Advertising on one TV channel and on the DASH buses are arguably classifiable as attempts to reach people who have not customarily taken part in Housing Element updates to become active. Moreover, the December 2020 digital survey did identify the geographic communities from which respondents came, and the geography of the City arguably stands in for socioeconomic diversity given the way racial and economic inequality straddles neighborhood lines in the City. The survey also indicated that 44% of respondents were renters and 3% were unhoused. Nonetheless, the City should develop a long

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[10] Draft Housing Element, p. 27.
[11] http://www.laalmanac.com/LA/la10.php.
[12] *Id.*
[13] https://hcidla2.lacity.org/about-us/accessibility.

term plan and strategy of setting discrete engagement goals for different economic segments in the community that can be evaluated.

II. The Analysis of Governmental Constraints Should Include More Detailed Discussion on the Challenges and Potentials of the City's Ongoing Rezoning Effort

Housing Element law requires "[a]n analysis of potential and actual governmental constraints upon the maintenance, improvement or development of housing…including land use controls…and any locally adopted ordinances that directly impact the cost and supply of residential development.[14] The City has known that "achieving the RHNA allocation would require substantial legislative reform and public subsidy",[15] and the Draft Element describes governmental constraints relating to zoning, land use requirements, entitlement and permitting procedures, infrastructure requirements, and fees, and explains City programs aimed at alleviating each. Our comments center on the City's rezoning efforts.

The City's RHNA allocation for 2014-2021 is 456,643 units of affordable housing. Under state housing element law, local jurisdictions must show that they have adequate land zoned to accommodate the RHNA allocation,[16] or must rezone within three years in order to accommodate the assigned allocation.[17] Any zoning required by a prior housing element but not completed, must be completed within one year of the due date of the new housing element.[18] Based on the Adequates Sites Inventory, discussed in a separate section below, the City will have to achieve its RHNA allocation by rezoning for an additional 219,732 units.

The Draft Housing Element states that the new zoning code effort (RecodeLA) has been ongoing since 2013, but was unveiled in 2020. RecodeLA reforms will be applied incrementally as Community Plans are updated. Thirty-five Community Plans in total cover the City, and during the 5th Housing Element Cycle six Community Plan Updates occurred. All remaining Community Plans are to be updated by 2023.

It is of concern that not all Community Plans will be updated by 2023, and that rezoning will not occur quickly enough to prevent affordable housing development from being further concentrated in the High Segregation & Poverty areas identified in Map 4.4, included in Section V below.

In addition to concerns regarding timing and rollout of the rezoning effort, it is possible that zoning code changes will not begin to address systemic disparities and inequities. In short, the City is layering these zoning code changes over other land use requirements and prior zoning mandates. We acknowledge the complexity of these requirements. However, the City

[14] Cal. Gov. Code § 65583(a)(5).
[15] Draft Housing Element, p. 1-50.
[16] Cal. Gov. Code Section 65913.1.
[17] Cal. Gov. Code Section 65584.09.
[18] Cal. Gov. Code Section 65584.09.

acknowledges that the zoning code, which has not been overhauled since 1946, supports inequity by its own recitation of the following facts:[19]

- The zoning code shows residential development is allowed on 56.2% of the City's land area. Of residential land area, more than 70% is reserved for single-family housing, 12.3% for lower density multi-family, and 17.3% permits higher density multi-family developments.
- Residential density is not distributed equitably. The City's past land use and zoning practices reserved more land area citywide for single-family housing, while limiting and concentrating multi-family housing in Central and South Los Angeles. Furthermore, 83% of residential land in the City's Highest Resource areas, and 79% of residential land in High Resource areas (as depicted in Map 4.4, included in Section V below) do not permit construction of multi-family housing.
- In contrast, just 19% of the residentially zoned land in the areas considered High Segregation and Poverty is allocated to single-family uses, whereas over 80% allows multi-family development."

By layering zoning changes over such a complex interlocking web of zoning and other land use requirements, it is likely the City will simply replicate the segregation and inequitable geographical distribution of affordable housing through its Community Plans updates. In fact, as discussed in Section V below, it appears much of the rezoning will take place in High Segregation/High Poverty areas. There should be more detailed consideration given to how this outcome can be avoided or mitigated as rezoning proceeds.

As zoning changes are rolled out incrementally across Community Plan areas, it will be important for the City to "create a new community housing needs assessment methodology that would allocate citywide housing targets across Community Plan areas in a way that seeks to address patterns of racial and economic segregation, promote jobs/housing balance, provide ample housing opportunities, and affirmatively further fair housing."[20] This is one of the aims of Program 50 (Update the Citywide Growth Strategy to Meet Housing Needs). LAFLA encourages the City to fully fund this Program 50 and ensure that it is adequately staffed so that racial and economic segregation can be examined across Community Plan Areas, not just within them.

Finally, the City should examine whether and how bold strategies like requiring all new developments to provide a minimum level of affordable housing might interact with the various constraints examined. We believe the City should do some lead thinking on possibilities such as incorporating income-based affordability level requirements into the zoning code, especially as the City intends to gradually implement its new Rezone Program in the various Community Plan areas over the next two years. The zoning code has not been overhauled for decades, and it is clear from this Draft Housing Element itself that it is hard to amend given bureaucratic inertia, and there is the danger that amendment becomes only tinkering, not fundamentally addressing the longstanding propositions of racism and historic inequality that underpin much of urban planning.

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[19] Draft Housing Element, Appendix p. 2.1-11.
[20] Draft Housing Element, p. 6-90.

The City should be trying to leverage this opportunity for change in zoning policy to achieve potentially higher returns for the public good.

Relatedly, as the City itself notes the rising cost of construction materials, it should consider a policy disfavoring adopting fee-in-lieu models, whereby hard requirements that actual affordable units be constructed are waived with payment of a fee. Development in California is expensive, and the trend has been for the expense to rise, so the buying power of fee-in-lieu dollars weakens over time.

III. The Draft Housing Element Does Not Contain an Adequate Analysis of Nongovernmental Constraints

Jurisdictions are required to conduct "[a]n analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availabilty of financing, the price of land, and the cost of construction."[21]

The City's analysis focuses squarely on these nongovernmental constraints raised in the statute. However, there are many things outside the purview of government, and we urge the City to conduct an analysis of NIMBY opposition to the preservation, conservation, and development of housing for all economic segments of the community.

The Draft Housing Element fails to include an analysis of NIMBY opposition to affordable housing developments in the City, despite observing that "[p]ublic opposition to new housing is often strong, and has led to decades of policies that have made housing creation harder and often increased development risk and timelines, particularly in the higher resource areas of the City."[22] The City must study this as closely as any of the focused-on constraints if it truly desires for affordable housing to be distributed equitably throughout the City and not concentrated in lower-income neighborhoods. Such analysis of the effect of NIMBY sentiment should consider both the history of such opposition in the community and the opportunities for opposition provided by the community's development approval processes.

IV. Constraints on Housing for People with Disabilities and Special Needs

As the City recognizes in its Draft Housing Element, the Reasonable Accommodation process is important for people with disabilities to receive accommodation in policies and procedures for land use and zoning with the City Department of Planning and alleviate constraints to housing. The implementation of the Reasonable Accommodation Ordinance can be improved to make the process more accessible and inclusive.

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[21] Cal. Gov. Code Section 65583(a)(6).

[22] Draft Housing Element, p. 2-3.

First, the Los Angeles Municipal Code requires that reasonable accommodation requests be made in writing.[23] However, there is no process outlined for people who, due to their disabilities, are unable to submit a request in writing. Such a process should be made available, and a plan should be included in the Draft to easily publish and make notice of this process so that more people can be informed and take part in the Reasonable Accommodation process. The Draft states that since the adoption of the Ordinance in 2006, "multiple requests for reasonable accommodation have been filed and approved."[24] While specific numbers have not been provided, barriers and complications with the reasonable accommodation process may be the cause of the fairly low number of requests filed and approved since the adoption of the Ordinance.

Second, the Reasonable Accommodation Request form (CP-7819) requires that certain finding and questions be explained and addressed. Two of these requirements are that the applicant explain (1) that the requested accommodation would not impose an undue financial burden or administrative burden on the City and (2) that the requested accommodation not require a fundamental alteration in the nature of the City's land use and zoning program. Such requirements violate federal disability rights laws and establish a barrier in the reasonable accommodation process by requiring the applicant to produce information that is solely in the City's purview. The City is subject to the Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973. Under Title II of the ADA, the City, and not the applicant, has the burden to demonstrate that the requested accommodation would be an undue burden or fundamental alteration.[25] Section 504 has similar requirements for recipients of federal financial assistance.[26] Section 504 also requires that the undue burden be both financial and administrative, but Form CP-7819 allows the City to deny requests for *either* financial or administrative burden. Requiring applicants to provide this information can deter persons with disabilities from engaging in the accommodation process because they are unable to supply information that the City, rather than they, have. The City should remove these requirements on its accommodation request form to alleviate constraints on housing accommodation for people with disabilities.

V. The Adequate Sites Inventory Reinforces Existing Patterns of Overcrowding, Segregation, and Resource Distribution

The Adequate Sites Inventory ("ASI") is the City's inventory of land suitable for residential deveopment without the need for any legislative action by the City. It was developed through an econometric model that the City partnered with Terner Center for Housing Innovation to create to determine the realistic development potential of individual sites in the City based on the City's building permit data. It identifies an anticipated affordable unit potential of 266,647 units, of which 81,312 are anticipated to be Lower Income. As a result, given the City's RHNA allocation of

[23] LAMC 12.22.A.27; Draft Housing Element, p. 106.
[24] Appendix 2.1 at p. 107.
[25] 28 C.F.R. § 35.130(b)(7)
[26] 24 C.F.R. § 8.33

456,643 units of affordable housing, the City's intended rezoning program, called ReZone, must accommodate 219,732 units.

The City states that its "[i]nventory includes sites that were identified through three key components, including expected development potential on vacant and underutilized sites, planned and approved development projects, and non-site-specific development potential that provide additional alternative means of meeting the RHNA", including pipeline redevelopment projects, accessory dwelling units, and Project Homekey.

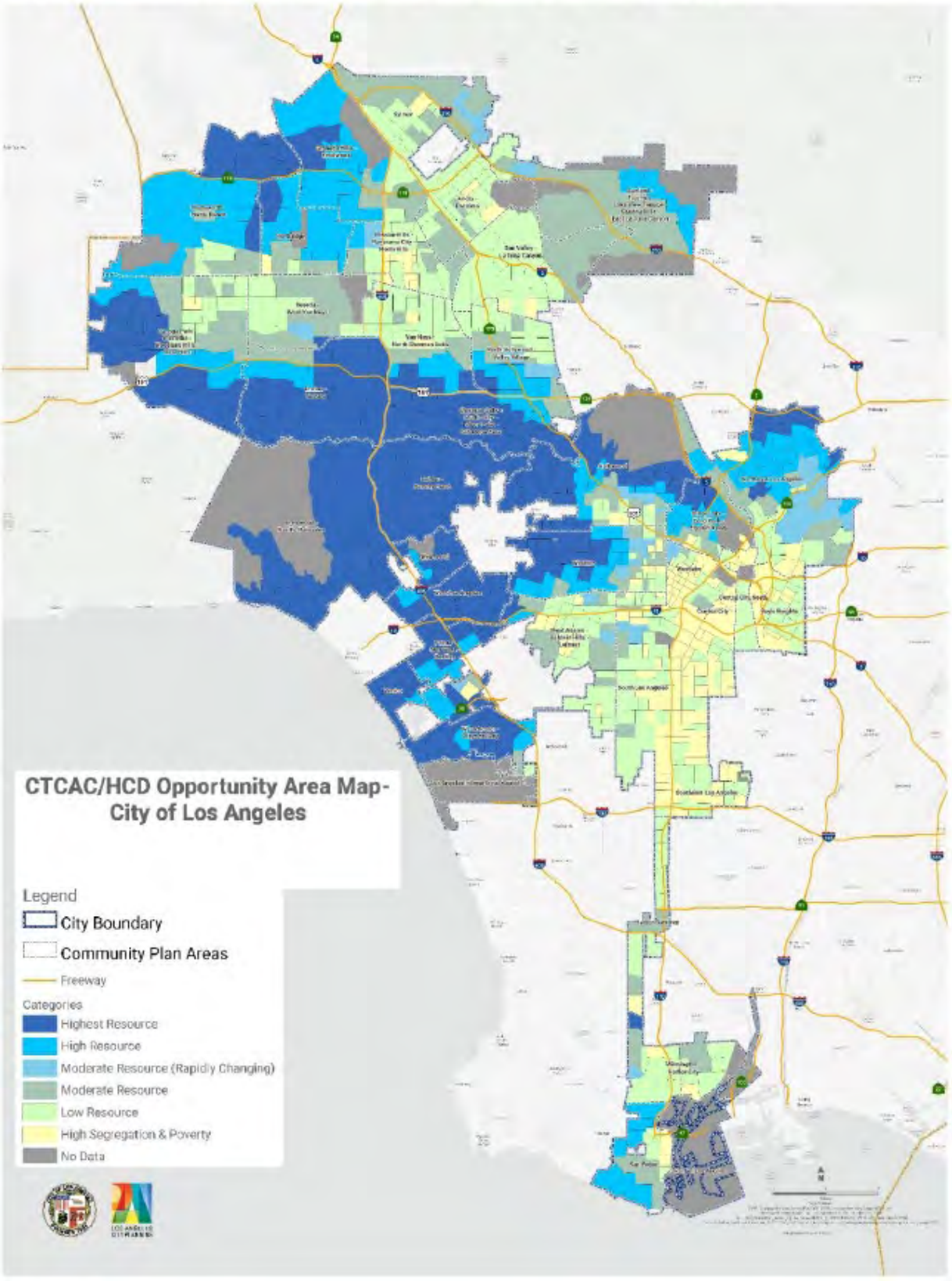
The City recognizes that "lower-income areas have far lower rates of participation in long-term planning processes like the Housing Element. The lack of diverse voices in the planning process has historically resulted in an imbalance of single-family zoning in high resource areas and a disproportionate share of multi-family and affordable housing development located in High Segregation/High Poverty areas." In fact, the City notes that "the RHNA is largely accommodated in relatively few parts of the City, which are primarily those that are zoned for multi-family residential uses and have more active residential development activity." However, at the same time, the City also acknowledges and seems to accept that the Terner Center Adequate Sites Inventory "is found to largely reflect existing conditions in the City. While the Adequate Sites Inventory does not exacerbate existing conditions related to fair housing and patterns of segregation, it does not actively improve them. Rather, it reflects existing disparities in the City's zoning and development patterns."[27] Stopping short of making an overt commitment to working toward remedying the disparities, the City remarks "[t]he analysis finds that there is significant opportunity to improve these conditions through the implementation of the 6th Cycle Housing Element."[28]

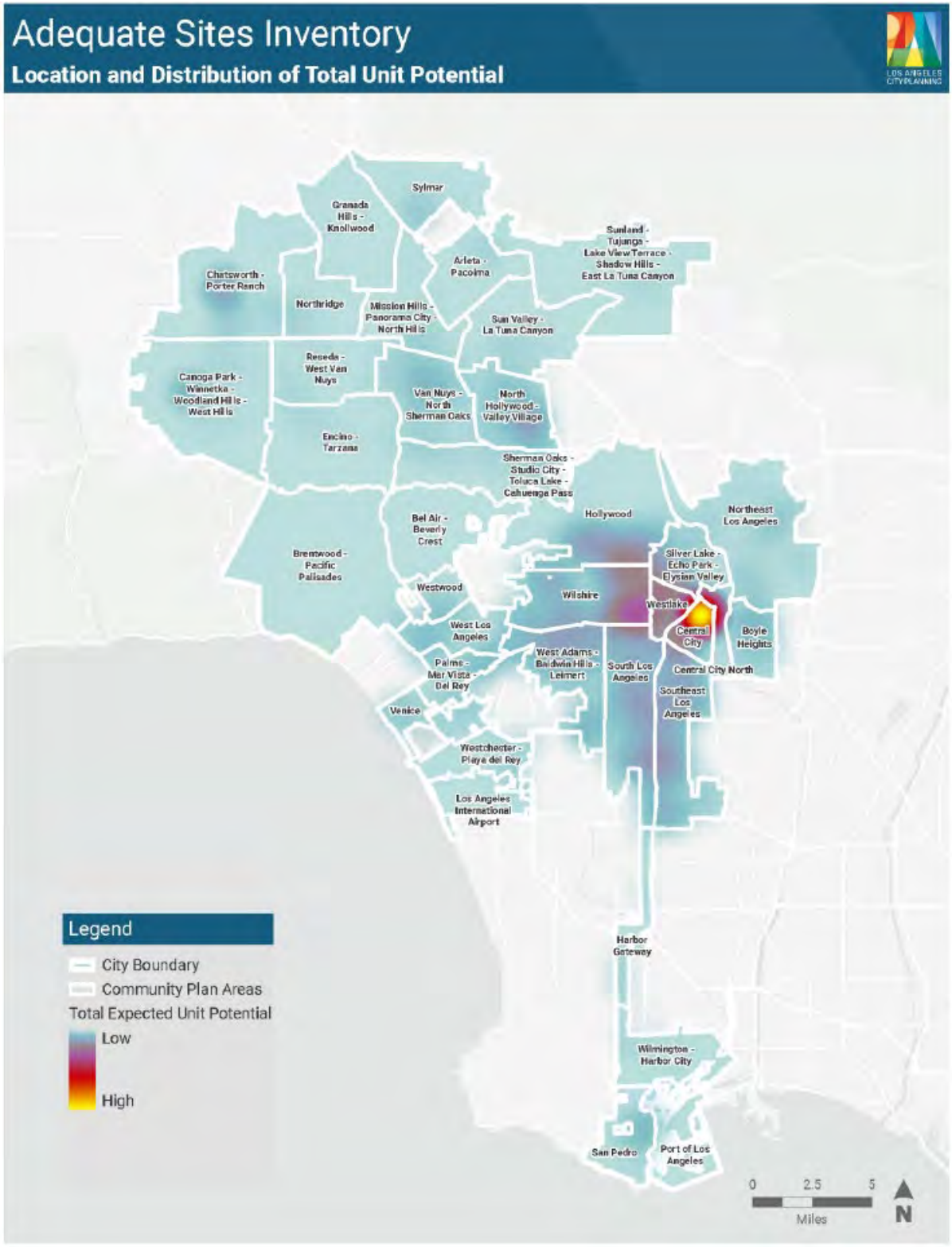
In fact, viewing the Adequate Site Inventory maps (below) alongside the TCAC/HCD Opportunity map (also below), the potential development sites identified by the City's and Terner Center's predictive models are concentrated in areas described as having "High Segregation & Poverty", notably including the Downtown Los Angeles/Central City area. Settling for an ASI that relies on existing zoning capacity and recent patterns is unacceptable, as having a blueprint for future planning which largely reflects existing conditions is antithetical to the AFFH purposes of the housing element process. It is unacceptable that "the disparities found in the Sites Inventory reflect existing disparities in the City's zoning and development patterns."[29] Instead of being satisfied with the Sites Inventory not exacerbating existing conditions, we recommend the City develop proactive goals around how to hasten the realistic development of affordable housing units in areas of higher opportunity, and thereby assuring that housing is sited in all neighborhoods of the City.

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[27] Draft Housing Element, p. 6-2.
[28] Draft Housing Element, 4-2.
[29] Draft Housing Element, p. 4-44.

Map 4.4. TCAC/HCD Opportunity Map, City of Los Angeles

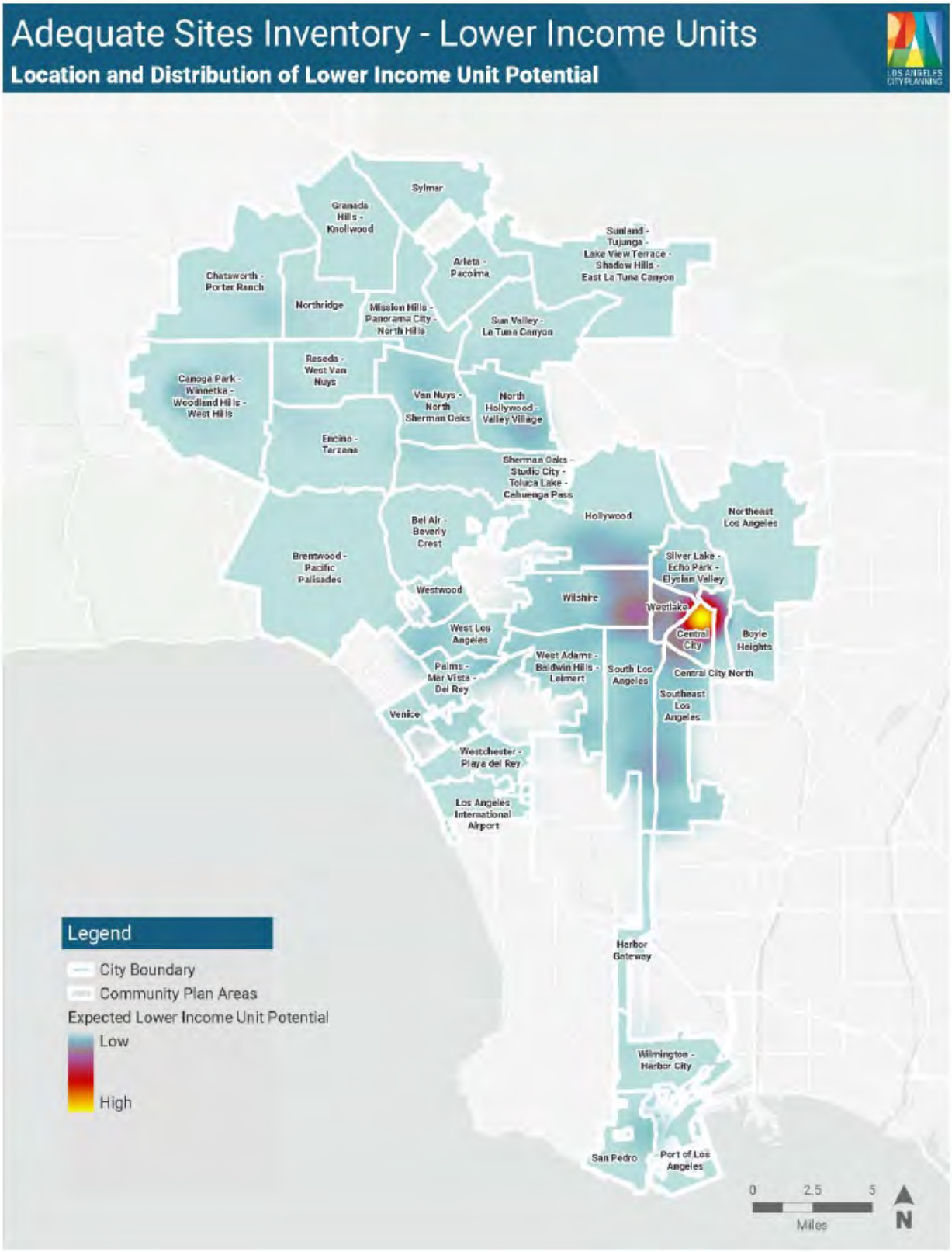




a. The ASI on the RHNA Allocation Targeting Lower Income Households

California Government Code Section 65913.1 (the “least cost zoning” statute) requires communities to zone sufficient sites to meet the entire share of the regional housing need. In conjunction with Section 65683 (the “no-net-loss” statute), these linked obligations mandate the locality to designate and zone sufficient sites to meet the community’s RHA for very low, low and moderate income households during the Housing Element period, soon enough to enable development during the planning period.

The City acknowledges in the Draft Housing Element that it will have a hard time meeting RHNA allocation targets for lower income sites identified in the ASI. The City actually provides a map showing that the ASI sites identified as likely to be developed with lower income units actually correlates to the High Segregtion/High Poverty areas shown in the TCAC/HCD opportunity map.



In addition, the City's Program 61, titled "Provide Adequate Sites for Lower Income Households on Nonvacant and Vacant Sites Previously Identified, states one instance where rezone

will occur by-right.[30] However, the program description also acknowledges that the City still needs to rezone non-vacant sites identified in the 5th Cycle Housing Element, and vacant sites identified in the 4th and 5th Cycle Housing Elements. The City is falling behind on rezoning identified as necessary in even prior housing elements. We urge the City to put additional resources toward rezoning and otherwise providing for the lower income target RHNA allocation.

Despite the problematic geographic concentration of affordable units and the scale and sheer amount of rezoning that must be accomplished to try and meet the City's lower income RHNA allocation, the City acknowledges a need for citywide rezoning to focus on "creating signficant new opportunities for housing development, particularly affordable housing development, in areas of High Opportunity." Program 121, titled "RHNA Re-Zoning", describes an effort to do so by identifying and recommending for rezoning a minimum of 97,851 moderate and above moderate units and a minimum of 121,881 lower income (which includes very low income and low income) units by October 30, 2024. This program will respond to the findings of the City's pending AFFH analysis by later including strategies that advance equity. We look forward to reviewing these strategies and ensuring that they point toward this particular program's laudable equity goals.

VI. The Draft Housing Element on Affirmatively Further Fair Housing ("AFFH")

AB 686 requires that the 6th Cycle Housing Element include an AFFH analysis to create the framework for the City's 2022 update to its Assessment of Fair Housing. HUD's regulations on AFFH requirements were released in mid-2021, and the City appears to be making progress on refining its AFFH analysis and Assessment of Fair Housing, as described in Programs 123 and 124.

The Affirmatively Furthering Fair Housing (AFFH) analysis in Chapter 4 clearly demonstrates the inequities that exist in the current zoning code. Current zoning places an over-representative share of new unit potential in areas of highest risk of gentrification and displacement. Housing instability, particularly that caused by displacement (which can disrupt networks of care and services), can have severe impacts on a person's health, particularly people with disabilities. Mitigating such displacement must be part of any AFFH strategy. The current zoning also shows that areas with the lowest development capacity also have the fewest people of color. While this analysis and the City's re-zoning program to address the inequities are a promising start, the Draft must acknowledge the history of unjust land use. Thus, the City should consider including in Chapter 4, current and past policies and programs which have led to these unjust conditions, identify risks of inaction, make a commitment to center community needs and reserve decades of racist land use designations through a robust community engagement process, and conduct additional analysis of the realistic development potential of rezoned sites that subsequently inform the rezoning program. A successful rezone program must include an analysis of realistic development potential in high and highest opportunity areas. The City then should use this analysis to adequately allocate and designate affordable housing through the rezone program. The Housing

[30] CA Govt. Code § 65583.2(i).

Element should also include a wider array of housing models with social housing and community land trusts.

VII. The Draft Housing Element's Summary of Programs

The Draft Housing Element must contain "[a] program which sets forth a schedule of actions during the planning period, each with a timeline for implementation."[31] Each specific action should indicate which agencies and which officials will be responsible for the implementation of the identified actions. Each action must have a timeline for its implementation so that the actions can have "beneficial impacts" during the planning period.[32] This means that programs must be scheduled for completion before the end of the planning period so that they will have their intended effect during the planning period. Although both *Buena Vista*, 175 Cal. App. 3d 289 and the statute recognize that in some cases, it is appropriate for actions to be designated as ongoing without a specific start and finish date, many of the 128 programs described by the City are ongoing programs. Some have been around for over a decade. Some are identified as newly emerging work efforts.

The City indicates each instance where a statutory deadline is imposed on a particular program, but there is not always a clear assessment of the City's predicted ability to meet these deadlines. This prevents the public from keeping the City accountable to its stated programs, goals, and objectives. In addition, the City should strive to set and achieve specific start and finish dates on more of its programs, so that designated lead agencies are aware of collective benchmarks.

a. Community Land Trusts

LAFLA fully supports the ongoing funding for and continuation of Program 4, titled "Shared Equity Models." LAFLA works closely with community land trusts and other nonprofits interested in developing and improving shared ownership models to facilitate affordable homeownership. While LAFLA wholeheartedly supports the lines of inquiry that the City is pursuing through this program, the City should consider creating a timeline of dates by which each study will hopefully be completed. Service providers and advocates should be invited to provide input before policy decisions are made based on the analyses developed under Program 4.

a. No Net Loss and Replacement Housing Obligations

Program 29, titled "Enforcement of No Net Loss and Affordable Housing Replacements Requirement", and Program 28, titled "Replacement Unit Program for Selected Sites", implement state requirements regarding "no net loss"[33] and "least cost zoning."[34] It is excellent that the City

[31] Cal. Gov. Code Section 65583(c).
[32] Cal. Gov. Code Section 65583(c).
[33] Cal. Gov. Code Section 65863.
[34] Cal. Gov. Code Section 65913.1.

has designed programs devoted to implementing and improving enforcement of these laws. Further, the City should explore the possibility of requiring developers of new developments or on ASI sites to include affordable units in excess of what the site historically had or has.

b. Strengthen Local Just Cause Protections

LAFLA wholeheartedly supports Program 85, "Just Cause Eviction Program", which directs exploration into the adoption of a just cause ordinance. The tenants' rights that this program would strengthen would greatly improve housing stability for the most vulnerable in the City. The City should create an intended timeline by which Program 85's stated objectives can be achieved, prefereably during the 6th Cycle. The City should also make some provision for the infrastructure that will inevitably be needed to support implementaiton and enforcement.

c. Strengthen Tenant Anti-Harassment Protections

LAFLA wholeheartedly supports Program 86, "Tenant Anti-Harassment", which directs the adoption of a City Tenant Anti-Harassment Ordinance and the creation of some infrastructure to support implementaiton and enforcement. The City should create an intended timeline by which Program 86's stated objectives can be achieved, prefereably during the 6th Cycle.

d. Fully Funded and Codified Tenants Right to Counsel

The City included in its summary of public comments that the public emphasized establishment of a right to counsel provision to ensure that evictions are fair and do not take advantage of protected classes. Toward that end, LAFLA supports an expansion and extension of Program 88, titled "Eviction Defense Program." This was launched in 2021 as a COVID-response program, providing tenant educational, navigational, and legal assistance resources. The program description states that the City "is now exploring funding options to extend the program in subsequent years."

e. Tenant/Community Opportunity to Purchase

LAFLA wholeheartedly supports Program 90, "Tenant/Community Opportunity to Purchase", which directs an analysis for the City Council on the feasibility of implementing a COPA/TOPA ordinance. The City should create an intended timeline by which Program 90's stated objectives can be achieved, prefereably during the 6th Cycle.

VIII. Conclusion

Thank you for your consideration of our comments. Please feel free to contact LAFLA if you have any questions. We can be reached via email at PYu@lafla.org or via telephone at (213) 640-3952.

Sincerely,



THE LEGAL AID FOUNDATION OF LOS ANGELES
Pui-Yee Yu, Staff Attorney
Angela McNair Turner, Managing Attorney

Housing Element <housingelement@lacity.org>

Livable Communities Initiative

2 messages

Marissa Levin <marissa.levin@gmail.com> Wed, Sep 22, 2021 at 10:49 AM
To: housingelement@lacity.org

Hi, my name is Marissa Levin. I live in Hancock Park. My zip code is 90004. A plan called The Livable Communities Initiative has been submitted to the Department of Planning to be included in the next Housing Element. We think it's a great solution to LA's housing crisis and urge that it be included and approved in the next housing element.

Thank you.
Marissa Levin

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:32 PM
To: Marissa Levin <marissa.levin@gmail.com>

Hello Marissa,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

HousingElement@lacity.org

2 messages

Karl Walter Lindenlaub <kwl@me.com> Wed, Sep 22, 2021 at 9:17 AM
To: HousingElement@lacity.org

I live in the Hollywood/Hollywood Hills area of LA, zipcode 90046. I would like to ask that the Livable Communities Initiative which has been submitted to the Los Angeles Department of Planning, be included in the new Housing Element and approved. It is doable and can better the lives of many in our city.
Thank you,
Karl Walter Lindenlaub

Karl Walter Lindenlaub ASC
kwl@me.com
213 709 1041

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:16 PM
To: Karl Walter Lindenlaub <kwl@me.com>

Hello Karl,

Hope all is well.

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

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Housing Element Staff
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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

MVCC Motion Concerning Housing Element and Public Comment Period CPC-2020-1365-GPA; ENV-2020-6762-EIR

3 messages

Kathryn <kathrynmarvista@gmail.com> Wed, Sep 22, 2021 at 4:27 PM
To: Vince.Bertoni@lacity.org, Matthew.Glesne@lacity.org, Conni.Pallini-Tipton@lacity.org, Blair.Smith@lacity.org, Emily.Gable@lacity.org, Griselda.Gonzalez@lacity.org
Cc: Cally.Hardy@lacity.org, Betty.Barberena@lacity.org, Wajiha.Ibrahim@lacity.org, Ariane.Briski@lacity.org, Linda.Lou@lacity.org, Tal.Harari@lacity.org, Lena.Mik@lacity.org, HousingElement@lacity.org, OurLA2040@lacity.org

Hi All,

Please read the attached PDF from the Mar Vista Community Council.

Thank you for your consideration. Have a great week!

Best,

Kathryn



MVCC Housing Element 90-day Public Comment Period.pdf
889K

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 10:38 AM
To: Kathryn <kathrynmarvista@gmail.com>

Hello Kathryn,

Hope all is well.

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

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



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Betty Barberena <betty.barberena@lacity.org> Thu, Sep 23, 2021 at 12:47 PM
To: Housing Element <housingelement@lacity.org>



Betty Barberena
Planning Assistant
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1194



---------- Forwarded message ---------
From: **Kathryn** <kathrynmarvista@gmail.com>
Date: Thu, Sep 23, 2021 at 12:43 PM
Subject: Re: MVCC Motion Concerning Housing Element and Public Comment Period CPC-2020-1365-GPA; ENV-2020-6762-EIR
To: <Betty.Barberena@lacity.org>

Hi Betty,

Thank you for responding. Your note regarding "that the draft Housing Element is continuing to be refined based on the community feedback we've received to date" is reassuring that you are considering residents. However, as a long-time resident and in contact with thousands of stakeholders, there is a Community Concern (yes, it is capitalized) that the big money and lobbyists who are coming in and presenting a different picture than what is wanted or needed within Los Angeles will get their way.

They present themselves as individuals, but they are not. It is extremely difficult for a true individual (with no funding) to be heard, or even noticed. They work, support and raise families, and struggle to make ends meet. Many work second jobs and have no time to even be aware that such an event (with long lasting consequences) is taking place.

I realize that you have a hard job trying to filter through what is from individuals and what is from an organization with an agenda (but stated through an individual). Anything that you can do to ensure that the residents (not activists) are heard and listened to, will be greatly appreciated. Activists will move out, so will big money once they get what they want. The

rest of us (the residents) will be here long after they leave. Always not because we want to, but we have no other option. Personally, we can't move anywhere--we couldn't afford the property taxes. I am not alone in this situation. And, we just don't want our quality of life to degrade. It will, if many of the proposed ideas from activists come to fruition.

To assist and help in hearing from residents, instead of the activists, I have attached a statistically accurate survey regarding what Mar Vista wants for its downtown location. It has a confidence level of 99% and less than a 4.4% margin of error. It was done last September, so it is relevant. I guarantee you it is accurate and fair. Going into the process, I thought it would have a completely different outcome because, I too, thought those who were speaking the loudest didn't have an agenda. After the results of the survey, I could recognize the language of those with an agenda.

Again, thank you for responding and taking your time and attention to protect those who have no organization to represent them.

Best,

Kathryn

MAR·VISTA COMMUNITY COUNCIL

Kathryn Wheeler
Chair
Community Director
Kathryn.Wheeler@MarVista.org
310-929-0512
MarVista.org
@MarVistaCC

Certified Neighborhood Council
August 13, 2002

[Quoted text hidden]

Outreach Community Plan Survey, September 8, 2020.pdf
2749K

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Mar Vista, CA 90066
424-256-3633
info@marvista.org

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2021-2022

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Kathryn.Wheeler@MarVista.org

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Andrew.Marton@MarVista.org

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Jordan.Paul@MarVista.org

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Charlene.Samiley@MarVista.org

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Drew.Ruesch@MarVista.org

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Certified Neighborhood Council
August 13, 2002

VIA EMAIL

TO: Vince Bertoni, Director of Planning, Vince.Bertoni@LACity.org
Matthew Glesne, Sr. City Planner, Matthew.Glesne@LACity.org
Conni Pallini-Tipton, Sr. City Planner, Conni.Pallini-Tipton@LACity.org
Blair Smith, Unit Head, Blair.Smith@LACity.org
Emily Gable, Unit Head, Emily.Gable@LACity.org
Griselda Gonzalez, Unit Head, Griselda.Gonzalez@LACity.org

CC: Cally Hardy, Cally.Hardy@LACity.org
Betty Barberena, Betty.Barberena@LACity.org
Wajiha Ibrahim, Wajiha.Ibrahim@LACity.org
Ariane Briski, Ariane.Briski@LACity.org
Linda Lou, Linda.Lou@LACity.org
Tal Harari, Tal.Harari@LACity.org
Lena Mik, Lena.Mik@LACity.org

RE: Housing Element (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

Dear Department of City Planning:

At the regularly scheduled meeting held August 18, 2021, the Mar Vista Community Council approved, without objection, a policy motion requesting the release of the full housing element concept document, including a target map with ***an extension of the Public Comment period to be 90 days after the requested items are received.***

Whereas, the City of Los Angeles (City) is required by state law to update the Housing Element of the General Plan every eight years to accommodate the targets set by the Regional Housing Needs Assessment (RHNA); and

Whereas, the City Department of City Planning (DCP) began the process of updating the Housing Element in 2019; and

Whereas, DCP released a draft of the Housing Element in July 2021; and

Whereas, this update process is taking place concurrently with the Community Plan Update; and

Whereas, this draft plan does not include specifications by planning area, neighborhood council (NC) area or by parcel regarding the Housing Element update's impact and policy application;

Therefore, be it resolved that the Mar Vista Community Council Board of Directors request the Los Angeles City Council instruct the Department of City Planning to release target maps by parcel, neighborhood council area and planning area specifying planned zoning changes and allocated housing targets by income level,

Therefore, be it further resolved that a 90-day period for Public Comment be extended after the revised draft with transparent and easily accessible data resources enumerating the aforementioned zoning changes is released.

An open and reasonable Public Comment period is part of The Brown Act which ensures the will of the people. ***A period of 90 days is reasonable for residents to comprehend the plan and respond accordingly. Remember, most residents do not work in your field, and need time to provide input***.

Thank you for your time and attention regarding providing 90-days for the Public to provide input on a matter that will affect them for years.

Thank you for your thoughtful consideration of the matter,



Kathryn Wheeler, Chair
Mar Vista Community Council
Chair@MarVista.org

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

FW: [External] [WHPOA] Comments to Draft 2021-2029 Housing Element & Zoom Hearing TODAY, 11 am

2 messages

Morgan, Margie Ph.D <Margie.Morgan@cshs.org> Wed, Sep 22, 2021 at 12:26 PM
To: "HousingElement@lacity.org" <HousingElement@lacity.org>
Cc: "PaulKoretz@lacity.org" <PaulKoretz@lacity.org>

Comments to Draft 2021-2029 Housing Element

Dear Sirs:

I have the following comments regarding the Draft 2021-2029 Housing Element, for which you have scheduled virtual public hearings for September 21 and 22, 2021. I may also submit additional comments in the future either at a hearing or in writing.

1) Analysis ignores impact of SB 9 and possibly also SB 10 – Governor Newsom signed SB 9 and SB 10 into law last week. These bills will have tremendous impact on housing stock in the coming decade, by adding 4 to 10 or more units on single-family lots. You have taken ADUs into account in your inventory and projections, and now you *must* take SB 9 and SB 10 into account as well. The city must redo projections to take this major change in policy into account.

2) Request extension of deadline – because of the omission of any analysis of the effect that the new state laws SB 9 and SB 10 will have on housing, the City of LA must request that the state grant an extension of the deadline for submission of the Housing Element to enable the city to do this additional analysis.

3) Data made deliberately difficult to review – the Planning Dept. has provided Excel spreadsheets, including in particular Appendix 4.7 - Candidate Sites for Rezoning, in which normal Excel functions such as sort, filter, cut and copy have been restricted. To make matters worse, the spreadsheet has no discernible organization – there are more than 267,000 addresses in Appendix 4.7, which are listed randomly, not organized by zip code, street, Community Plan Area or in any other noticeable manner – and by its restrictions on the spreadsheet the city prevents the public from organizing them in a meaningful way. This is clearly a deliberate attempt to obscure from the public the actual impact of this massive list of addresses targeted for rezoning by the Housing Element – which is so egregious as to amount to a lack of public notice.

4) No maps provided – in addition to the disorganized and restricted manner in which the targeted addresses are listed, the city compounds the effective lack of public notice by further obscuring the list of affected

properties in failing to provide any visual representation of the city's proposal. At a minimum, the city should provide detailed maps for each Council District showing clearly which addresses are being targeted.

5) Biased and baseless projections – the city is relying on biased and baseless projections from one source, the Terner Center, which is heavily financed by real estate, big tech and financial interests, https://ternercenter.berkeley.edu/about-us/supporters/. At a minimum, the city should also take into account projections from other reputable sources, such as the Embarcadero Institute, which exposes the double-counting being done in reaching projected housing needs, see, e.g., https://embarcaderoinstitute.com/portfolio-items/double-counting-in-the-latest-housing-needs-assessment/ and https://embarcaderoinstitute.com/portfolio-items/housing-models-compared/. The state Office of Planning and Research also provides projections.

The projections being used by the city are especially suspect, in light of the fact that California has been *losing* population in recent years – so much so that with the 2020 Census the state has lost a Congressional seat for the first time in its history. These projections also fail to take into account the impacts of the pandemic and the shift to remote working, which no longer require employees to live near their work. Not only does this permit employees to live outside of employment centers, but it will also result in freeing up commercial space as businesses no longer require all their employees to be physically present in the office at the same time.

6) Appendix 4.1 - Housing Element Sites Inventory – in addition to omitting any consideration of SB 9 and SB 10, the Sites Inventory fails to take into account the maximum number of potential units that could be built on each site, including in particular underutilized lots in *existing* commercial and multifamily zones. For example, each lot along a "transit corridor" should be credited with the maximum number of units that could be built there under TOC rules, taking into account all available incentives that could be granted.

7) Westwood Hills inappropriate for multifamily – the city has put on its list of targeted addresses virtually our entire neighborhood of Westwood Hills. Westwood Hills is a single-family neighborhood of 600 homes situated between UCLA and Sepulveda Blvd, and between Sunset Blvd. and the VA Cemetery.

This easily identifiable, compact neighborhood was developed by the Janss family in 1929 and 1930 as part of their master plan for the new UCLA campus in Westwood. The goal of the master plan was to provide a *variety* of housing options near the campus, along with a commercial center (Westwood Village). Today, Westwood is already one of the most densely developed areas in the entire city of Los Angeles – with UCLA, Westwood Village, copious multifamily housing options in the North Village, along Hilgard, Veteran and immediately south of Wilshire, the high-rise office buildings and high-rise residential buildings in the Wilshire Corridor. The intersection of Wilshire Blvd. and Veteran Ave., adjacent to exits and entrances from the 405 Freeway leading to nearby business centers in Brentwood, Westwood, Beverly Hills and Century City, is one of the busiest intersections in the United States.

Further, the word *Hills* appears in the name of our neighborhood *because it is hilly*, with many narrow streets – and therefore it is singularly inappropriate for multifamily development. The neighborhood is already densely packed, surrounded by a densely developed area that cannot reasonably sustain additional density. I notice, for example, that you omit any addresses in adjacent Bel Air from your list of targeted addresses – why is that?

8) Lack of adequate infrastructure – the city has failed to maintain its sewer, power, water and other infrastructure, which is old, crumbling, and simply unable to accommodate the increase in density being proposed.

9) Lack of affordable housing – the city's most glaring housing need is for affordable housing, but the city has no mechanism either for ensuring that the hundreds of thousands of additional units will in fact be affordable when built, or if "affordable" initially, for subsequently keeping track of and enforcing affordability for each unit in the future years.

Thank you for your attention to these serious issues.

Very truly yours,

Margie Ruane

Resident of Westwood Hills

_.-._.-._.-._

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If you would like to POST A MESSAGE to the group, email it to
westwoodhills@groups.io All messages to this group must be approved by the group moderators, and may be rejected or modified in their sole discretion.

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_.-._.-._.-._

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Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 3:12 PM
To: "Morgan, Margie Ph.D" <Margie.Morgan@cshs.org>
Cc: "PaulKoretz@lacity.org" <PaulKoretz@lacity.org>

Hello Morgan,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Your presentation and public comments today...

3 messages

Ingrid Mueller <ingridinvenice@gmail.com> Wed, Sep 22, 2021 at 1:41 PM
To: housingelement@lacity.org
Cc: Naomi Nightingale <nightingalenaomi@yahoo.com>, Laddie Williams <cwilli7269@aol.com>, Lydia Ponce <venicelydia@gmail.com>, Margaret Molloy <mmmolloy@earthlink.net>

...were helpful, indeed!
Thank You!

It's more difficult these years to stay on top of Zooms, drafts, your plans...
Please enlighten this affordable housing advocate, active in Venice Since 1988, re:

=ProtectingPeopleinPlaces, and
=When your Potential Lists of Sites to be UpZoned are made available/public.

Your response is much appreciated, indeed.
Sincerely,
Ingrid Mueller
Venice 90291

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 4:07 PM
To: Ingrid Mueller <ingridinvenice@gmail.com>

Hello Ingrid,

Hope all is well.

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

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[Quoted text hidden]

Lydia Ponce <venicelydia@gmail.com> Wed, Sep 22, 2021 at 11:24 PM
To: Ingrid Mueller <ingridinvenice@gmail.com>
Cc: Laddie Williams <cwilli7269@aol.com>, Margaret Molloy <mmmolloy@earthlink.net>, Naomi Nightingale <nightingalenaomi@yahoo.com>, housingelement@lacity.org

It was so last minute…

I laughed after I spoke and hung up…

Night night
Sweet Ingrid

Sweet dreams,
Lp

On Wed, Sep 22, 2021 at 1:41 PM Ingrid Mueller <ingridinvenice@gmail.com> wrote:
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Comments on the Plan to House LA

2 messages

Matthew Glesne <matthew.glesne@lacity.org> Wed, Sep 22, 2021 at 11:54 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Diana Nave** <diananave@gmail.com>
Date: Wed, Sep 22, 2021 at 11:42 AM
Subject: Comments on the Plan to House LA
To: Matthew Glesne <matthew.glesne@lacity.org>

Matt

I chair the Planning and Land Use Committee for the Northwest San Pedro Neighborhood Council, however I am submitting these comments as an individual. The timeline did not allow for our Board to take action.

- **The Planning Department should provide additional time for comments**. The final draft and Appendix 4.7 were released too late for any significant input. In addition, SB 9 and 10 were just signed into law by the Governor. Due to these two new laws, the City should request an extension in time from the state in order to adequately analyze their impact and incorporate appropriate changes into the plan.
- As just noted, the City must now **analyze the effect that these new laws will have** on housing and the programs contained in the plan and redo the Programs and Appendices 4.1 and 4.7 accordingly.
- The **ability of the community and neighborhood councils to comment on the plan has been hampered** by the way in which Appendix 4.7 has been organized. It appears to have been made particularly obtuse to prevent close examination. Furthermore, it has been locked to prevent normal Excel sorting.

- **Detailed maps should be provided** to show both the sites in the Housing Elements Inventory and the Candidates for Rezoning.
- The Plan as written does not **take into consideration the ways in which COVID is impacting both work and housing**. This needs to be added. In addition, the increase in remote working will free up additional commercial space that can be used for housing. This increase should be accounted for.

- **Infrastructure is not adequately addressed.** There is no indication of how the City plans to accommodate the sewage, power, water, transportation and other infrastructure needs that would be created by the additional housing units. This is a HUGE oversight given the condition of our current infrastructure.
- **A Program needs to be added to prevent any reduction in tree canopy**
- **Program 121 should be amended** to require that rezoning and repurposing of underutilized malls, commercial areas, shopping centers, and parking lots be completed prior to consideration of any additional rezoning or the application of other programs.
- **Add language to programs related to TOC and Density Bonus** to require that the resulting structures be in conformance with existing Community Character.

Thank you for your consideration of these comments

Diana Nave
310-831-1975
310-930-0217

--

Matthew Glesne
Preferred Pronouns: He, Him, His
Senior City Planner
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-2666

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 3:10 PM
To: Diana Nave <diananave@gmail.com>

Hello Diana,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
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T: (213) 978-1302

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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element (CPC-2020-1365-GPA; ENV-2020-6762-EIR) & Safety Element / Plan for a Healthy LA (CPC-2021-5499-GPA, ENV-2020-6762-EIR)

2 messages

nussbaum3@earthlink.net <nussbaum3@earthlink.net> Wed, Sep 22, 2021 at 4:23 PM
To: housingelement@lacity.org, ourla2040@lacity.org
Cc: Koretz Paul <paul.koretz@lacity.org>, joan.pelico@lacity.org, daniel.skolnick@lacity.org

Housing Element (CPC-2020-1365-GPA; ENV-2020-6762-EIR) housingelement@lacity.org

Safety Element / Plan for a Healthy LA (CPC-2021-5499-GPA, ENV-2020-6762-EIR)
ourla2040@lacity.org

Comments to Draft 2021-2029 Housing Element

Please see attached comments.

Debbie Nussbaum

Nussbaum3@earthlink.net

Housing Element 9-2021.docx
15K

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 4:45 PM
To: nussbaum3@earthlink.net

Hello,

Hope all is well.

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

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[Quoted text hidden]

Housing Element (CPC-2020-1365-GPA; ENV-2020-6762-EIR) housingelement@lacity.org
Safety Element / Plan for a Healthy LA (CPC-2021-5499-GPA, ENV-2020-6762-EIR) ourla2040@lacity.org

Comments to Draft 2021-2029 Housing Element

Dear Sirs,

Housing Elements 2021 – 2029 targets up zoning more than 267,000 parcels of land of which most are single family home R1 neighborhoods and older affordable apartments under rent control, across Los Angeles. I have many concerns if this is implemented:

1) Lack of affordable housing – the city's most glaring housing need is for affordable housing, but the city has no mechanism either for ensuring that the hundreds of thousands of additional units will in fact be affordable when built, or if "affordable" initially, for subsequently keeping track of and enforcing affordability for each unit in the future years. Consider what has been recently been built along the Expo Line, it's mostly high-end luxury apartments.

2) Lack of adequate infrastructure – the city has failed to maintain its sewer, power, water and other infrastructure, which is old, crumbling, and simply unable to accommodate the increase in density being proposed.

3) Build "mixed use" along transit corridors, build retail on the bottom and apartments/condo above. Increase the height requirements on buildings in Transit Oriented Centers (TOC). This is a win for Los Angeles' housing problems and transportation congestion problems. Require that these building be built for low-income residents.

4) Climate change crisis, LA's tree canopy mostly located in R1 neighborhoods, removing trees to build density in R1 neighborhood will have an adverse effect on temperatures in Los Angeles. Trees are critical for cooling down warming cities like Los Angeles, where temperatures are expected to increase an average of 4 to 5 degrees Fahrenheit by 2050. The shade that trees produce can cool surfaces like soil and pavement. But trees can also lower the surrounding daytime summer air temperature up to 10 degrees, thanks to water evaporating from their leaves.

5) Lack of green space and parks, when residential lots are split or rezoned for more units per lot, the city loses green space and places for children to play or experience nature. Housing elements 2021 – 2029 does NOT addresses adding parks or green spaces.

6) Data made deliberately difficult to review – the Planning Dept. has provided Excel spreadsheets, including in particular Appendix 4.7 - Candidate Sites for Rezoning, in which normal Excel functions such as sort, filter, cut and copy have been restricted. It was virtually impossible to glean an accurate view of what was intended and where it was targeted with the more than 267,000 entries.

Thank you for your attention to these serious issues.
Very truly yours,
Debbie Nussbaum

Debbie & Howard Nussbaum 516 Cashmere Terrace Los Angeles, CA 90049 Tel: 310 476-4342
Email: nussbaum3@earthlink.net

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

FW: Comments on Housing Element

3 messages

Frances Offenhauser <offenhauser@oma-la.com> Thu, Sep 23, 2021 at 4:43 PM
To: "housingelement@lacity.org" <housingelement@lacity.org>

Dear Planning Staff- this was returned to me yesterday for invalid email address.

-Will you kindly confirm receipt; confirm that it met the deadline if any; and pass along to the proper staff persons?

Thanks so much!

From: Frances Offenhauser
Sent: Wednesday, September 22, 2021 9:47 PM
To: Housing.Element@lacity.org
Cc: vince.bertoni@lacity.org
Subject: Comments on Housing Element

Dear Planning Staff: Please confirm receipt of this letter and route to the responsible person/

Thanks so much.

Frances Offenhauser

Heritage Properties

8330 Hillside Ave

Los Angeles, CA 90069

V 310.659.6600

LA Housing Element Commentary.pdf
154K

Housing Element <housingelement@lacity.org> Tue, Sep 28, 2021 at 7:25 AM
To: Frances Offenhauser <offenhauser@oma-la.com>

Hope all is well.

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

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org> Tue, Sep 28, 2021 at 7:26 AM
To: Linda Lou <linda.lou@lacity.org>

FYI.

Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
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T: (213) 978-1302

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

[Quoted text hidden]

LA Housing Element Commentary.pdf
154K

To: Housing.Element@lacity.org
Cc: Vince.Bertoni@lacity.org
Re: Citywide Housing Element release September 2021
Date: September 22, 2021

Dear Planning Staff:

I am writing to respond to the concepts and the reality of the update of the Los Angeles Housing Element, and to relate this new data to your recent Hollywood Community Plan population analysis.

I attended the summer Webinar, but had schedule conflicts preventing my attending your most recent Webinar

- As there may be changes or corrections based on your September 2021 changes, I respectfully request that I may provide an update to this letter and have it accepted.

For the Hollywood portion of the Plan I calculated population and housing units separately from your calculations, parcel by parcel, by tracking and mapping entitlements, D conditions, building permits and demolition permits. I used the time horizon from 2016-2021, as the HCPU EIR stopped at 2016.

- Please respond and identify the start and end date for the calculations for each of the appendices of Chapter 4.
- As there are new numbers available in Chapter 4 of the Housing Element for Hollywood, I respectfully request that I may provide an update to this letter which will be considered as compliant with your Update comment period.
- Please inform us about who is the appropriate staffer for reviewing Chapter 4 calculations. These underpin the Housing Element, we want to be sure we are analyzing it properly and applying it properly to Hollywood. We use 7% as Hollywood's proportion of city population..
- Please provide us with the eviction-for-demolition addresses for Hollywood, divided between RSO and other, for 2016-2021, so we can compare with our list.
- Please provide the Chapter 4 tables sorted just for the Hollywood Community Plan area

Operative part is zoning: It appears that the operative part of this Housing Element is proposed upzoning, as noted below—attempting to densify and grow Los Angeles in 8 years by a massive 20% against a backdrop of declining population. We can assume that-- with the state and local focus on lessening of regulation, review, required public improvements, and public involvement-- wealthy areas will see a lot of growth.

The rationale for this massive upzoning is equity, solving overcrowding, eliminating displacement, and providing a high proportion of affordable housing, but we are missing where any of this is mandated. We haven't seen any proof of "naturally" affordable housing. We see objectives, programs, or goals on paper, but not incorporated into the operative zoning.

This Housing Element appears to be missing those critical operative parts—zoning which makes the 40% affordable RHNA numbers mandatory as inclusionary zoning?; mandates for each upzoned high opportunity area to meet equity targets—perhaps requiring 100% affordable?; prohibitions on evictions, displacement etc of rent stabilized and other tenants; mandatory, monitored, and reported housing replacement and right-of-return; prohibitions on unsustainable demolitions to make way for new construction; realistic zoning to enable adaptive reuse of motel, hotels, and other commercial properties citywide; etc. There are assumptions built into Chapter 4 – for example of what sites can be expected to

■8630 Hillside Ave ■Los Angeles, California 90069 ■Tel: 310 659 6600 ■Fax: 310 659 6001

be redeveloped—with stated limitations which don't match actual zoning. Mills Act and historic district sites being proposed for upzoning- for example. It also appears that the results of SB #9 and 10, while very recent—do change numbers substantially and models should be updated..

CITYWIDE HOUSING ELEMENT UPDATE-

1. **Massive shift in housing policy—**the United States has never met housing goals. Lower income housing has required subsidies, or has been alternative housing types—SRO, mobile homes, etc.
    a. For California, RHNA legislation represents a massive shift in housing policy—a shift from tax-funded subsidies to elimination of subsidies. In government's avoidance of funding this housing, the new tools of choice are "incentivizing" luxury and market rate real estate developers to add in low income units. Or mandating densification, while eliminating the usual reviews and public improvements—in hopes of "trickle down" economics. The voters have been ahead of their legislators by approving funding for housing.
    b. The Housing Element represents an expansion of the definition of housing need—newly considering it a right for younger people to live independently; considering it the obligation of zoning to resolve rent burdens and overcrowding, rather than public tax policy; and conflating housing issues with homelessness, which is on the rise while population is shrinking, but resolved through a wide variety of temporary and permanent shelter subsidies and solutions—not solved by zoning.
    c. The Housing Element reflects an expansion of the definition of "housing need"-- to be now met by through developer incentives needs that formerly were met by religious and other non-profit housing groups and subsidies--especially housing for seniors and people living with AIDS.
2. **Massive loss of housing subsidies**:
    a. Subsidies formerly came from California redevelopment areas (RDAs) with mandatory low income housing 15%, covering 20% of LA's land area; and from Federal funding. Federal funding has dropped 72% in roughly 12 years; and California uses almost all the former redevelopment tax increment proceeds to balance the State budget, and returns only around 11%-14% to cities—roughly the amount which formerly was used for low income housing. This tax money is now coming to Los Angeles and not being spent on housing.
3. **RHNA artificially focuses solely on upzoning for new construction as a way to get 40% "affordable" units- a mathematical impossibility:** Upzoning guarantees that in luxury areas more luxury product will be built. Unless you are a devotee of Reagonomics and trickle down**,** and looking for affordability in 40 years**,** development now will simply stop if its not profitable.
    a. At $690,000 per dwelling unit (per City Controller) it is a fantasy to believe that density bonus or upzoning will produce an appreciable amount of affordable housing, especially compared to the new definition of need, which is overwhelmingly income-related.

    Many other more productive and successful options exist—
    a. adaptive reuse of hotels, motels, and commercial buildings is far more sustainable and less costly.
    b. Section 8 type rent subsidies are the most equitable approach to housing, and could last 100 years for the cost of one apartment;
    c. inclusionary zoning is in effect in a number of California jurisdictions
    d. differing types of shelter can meet certain needs
4. **RHNA targets are unreachable- why is City not challenging RHNA calculations:** RHNA is mandating construction of between $250 and $314 billion of housing construction in 8

years, of which roughly $125 billion must be "affordable"—either subsidized or built under density bonus..

a. Currently Los Angeles has high apartment vacancy rates and Airbnb type empty units.
b. Who are the 920,000 new people to inhabit 456,643 new housing units required by RHNA? Our unhoused people are 41,000. The remaining 880,000—if rent burdened, they need money- they are already housed. So are 880,000 overcrowded?. Building only 40% of the new housing as affordable won't resolve that.
c. Our City budget is $4 billion annually
d. The new housing required by RHNA in 8 years adds 20% growth for our entire City. If the expectation is that Los Angeles will attract 660,000 new people in 8 years to inhabit that 60% market-rate housing, how are the parks, schools, and infrastructure going to be paid for? by current taxpayers?
e. Is our population actually declining?.

5. **CHAPTER 4 Appendices—Upzoning "mandate" entirely depends on accuracy of these tables:** We are reviewing data for the Hollywood Community Plan area, as that is the area we are familiar with. Our review is ongoing based on your recent data. As the data is protected, we either need a passcode or City Planning will need to issue it sorted in multiple ways—for us that is by community plan area.
6. **Displacement and demolitions—where calculated?** We have calculated this for Hollywood- will you show us where this is calculated in the Housing Element?
7. **Demolition and new construction is not sustainable—**The notion that building near transit is sustainable is misleading. Right now GHG are not currently counted for new construction; if all this new construction is quantified, the carbon footprint is huge. Current "green building" concentrates on lowering energy use in building operations, not on the carbon effects of new construction. The Preservation Green Lab found it takes the planet 8-30 years to recover from demolition. We are reviewing Chapter 3 to propose a GHG new construction analysis.
8. **Developing "high-opportunity areas" entrenches disinvestment in our neighborhoods:** The Housing Element promotes disinvestment in areas formerly understood in social policy to need special investment—areas with lower educational attainment, earnings, health markers, and literal transportation access and mobility mobility.
    a. AB 686 is reported to require an Assessment of Fair Housing ;Chapter 4 Adequate Sites for Housing is one of the metrics
    b. This policy of building dense housing near transit among high earning neighborhoods may have some merit, but we are not finding anyt mandates in the proposed zoning so this will ever happen.

HOLLYWOOD COMMUNITY PLAN POPULATION AND HOUSING APPROACH

We have retained and consulted with experts to produce the required calculations missing from the Hollywood Community Plan DEIR and FEIR. We are currently reviewing the EIR Appendix B Methodology

1. **Current 1988 Hollywood Community Plan capacity calculated- no upzoning needed:** The upzoning in the Hollywood Community Plan is unnecessary, based on our calculations of the current Plan's capacity for growth, and growth since 2016. Promoting unneeded demolitions is not sustainable or equitable
    a. We have calculated existing 1988 Plan capacity. We provided it to City Planning prior to the start of the EIR; in response to the DEIR; and will again herein. In 1988 the stated capacity of the zoning was a purposely reduced value, meaning more capacity exists in the 1988 Plan than was cited in 1988.

   b. Housing capacity in the 2021 HCPU will include development of commercially zoned areas, which was not calculated in 1988
   c. Chapter 4 tables in the Housing Element may have been used for some aspects of the Hollywood Community Plan. We ask that you share where calculations were used, and where we may find your calculation of existing Plan capacity.
2. **Comply with State General Plan law—**
   a. Must calculate existing Plan capacity—not population, but Plan capacity.
   b. Must assess whether upzoning will reduce preservation of affordable housing
3. **All housing quantities proposed by SCAG or RHNA can be achieved without ANY proposed upzoning.**
   a. In 1988 the population capacity of the Community Plan residential areas was 231,395 persons, with the EIR finding an areawide capacity of 272,000 persons.
   b. Since 1988, housing production to accommodate added population is occurring largely in commercial areas, which were not counted in 1988. Also major growth has occurred through discretionary actions by LA City Planning and the City Council with densities granted from 20% to 500% of that allowed by zoning; by State legislation for ADU's; by Los Angeles voters approving TOC density bonuses for affordable housing; and recently for SB 9 and 10.
   c. Our conservative calculation that the existing 1988 Plan capacity is at very least 330 persons, before SB #9 and 10.
4. **Even the RHNA outsized number can be reached without upzoning a single piece of land in Hollywood**!:
   a. In 2016 Hollywood had 104,000 dwelling units (SCAG interpolated census data).(ACS averaged 105,000)
   b. 10,900 units have been built and entitled in the Hollywood plan area between the time of the Hollywood Community Plan EIR data collection in 2016 and 2021 . These of course can be included in "reasonably expected development" because they happened.
   c. 26,570 units capacity remains in existing commercially zoned land areas which appear very developable – vacant or 1 story building. (There is no shortage of commercially developable land unsing the metric of .6 acres per 1,000 people.) We have mapped these locations and they qualify as reasonably expected development".
   d. 11,000 units capacity remains in residential zones with no zone changes. This is based on calculations from 1988.
   e. City Planning has reduced the computation of population per dwelling unit for Hollywood down to 2.0; citywide we calculated the number at 2.6; in Hollywood if vacancy is calculated the metric is around 2.2.
   f. Current capacity of the 1988 Community Plan is at minimum 152,470 units, or a population of 330,000 or over—when population is expected to be 226,000 persons, or 264,000 with incentives, TOCs, ADUs, etc etc.
5. **Utilize 2020 census data for "Population and Housing" projections:** Hollywood DEIR used 12 year old census data.
   a. We used ACS data and Department of Finance data – which conflicts with City pronouncements.
   b. Population decreased between 2016 and 2019.
   c. Very high luxury housing production in Hollywood (7,000 added units calculated in FEIR)—but "excused" as evading consistency with other Plan Elements because they are vacant! (High vacancy rate is not an indication of a need for more density and more construction!. Buildings waiting for a C of O cited—vacancy rates in studies reviewed by us were calculated after C of O..)

6. **Elemental math shows the CPIO will not deliver appreciable affordable housing.** The CPIO "affordable housing" density bonus is built on flawed assumptions. Its density bonus mechanism is shown in the City's own economic study to fail in central dense Hollywood with current land costs. (TOC "success" to date does not translate into the high FAR areas). CPIO cancels TOCs and local hiring etc. Basic calculations show that 10% VLI housing required of a 1.35 x luxury housing production will not meet RHNA targets of affordable housing EVER..
7. **Displacement statements in Plan text and City Planning handouts untrue,, directly conflict with data**— Evictions and demolitions in the Plan area between 2016 and 2021 exceed the number of "affordable" housing units built without full subsidy. The Plan includes no mechanism to end evictions or loss of existing affordable housing, while stating it does. Data on evictions and displacement are necessary to comply with laws cited—that Community Plans must assess whether the Plan proposals—in this case uniformly upzoning—will reduce the preservation of affordable housing.
    a. We have calculated this. As noted above, Ellis Act evictions exceed the amount of new "affordable" housing that is not fully subsidized.
    b. Actual quantities likely exceed even CES numbers—cash for keys and non Ellis Act displacements are not quantified anywhere City tracks its TOC and other (???) deed restricted or publicly subsidized units
    c. It appears the Community Plan and the Housing Element fails to track evictions and demolitions.
    d. If this is not the case, please contact me and show me where this is quantified.
8. **Monitoring absent** – as required under General Plan framework--every 5 years required--City justifications are not supported or verifiable because City doesn't monitor openly. If these reports are available, please alert me.
9. **Infrastructure improvements not properly synchronized with "expected" growth–** General Plan law requires infrastructure coordination with planned increases in population/density. The conclusion that no infrastructure improvements for transportation or utilities are needed because proposed housing is close to transit and utility companies will make do – without supporting calculations or evidence—in untenable.
10. **FEIR inadequate**: The City Planning Commission reviewed a vastly different project than what is now being proposed. The CPIO was not even proposed at the time of the 2016 data in the DEIR. Having an undefined project as a whole at the time City Council votes is a problem, as it was in 2012.
11. **Growth inducing impacts of this Plan are very real when transit ridership is declining** according to statistics—this is the principal justification for the location of very high FARs in central Hollywood

I look forward to the opportunity to discuss these issues in more detail with you. I believe the citizens of Los Angeles are committed to housing and equity, but need straight information and need to know whether there is any reality to this, and to RHNA. What is effective in the Element's zoning to affect homelessness and to house people comfortably and equitably? Or is just a land grab in wealthy areas and abandonment of long-standing commitments—however imperfect--to lower income people and communities, and to public involvement, livable communities, sustainability, investment, and equity?

Respectfully submitted,



Fran Offenhauser

■8630 Hillside Ave ■Los Angeles, California 90069 ■Tel: 310 659 6600 ■Fax: 310 659 6001

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Comment re Housing Element

2 messages

Elizabeth A Pollock <eliz.pollock@gmail.com> Wed, Sep 22, 2021 at 12:03 PM
To: housingelement@lacity.org

Good morning.

The only way the City can ensure that housing for lower income residents will actually be built is if the City only issues building permits for projects that are already authorized by existing zoning and that will meet the need for inexpensive housing. We have enough land that is zoned for residential units, but developers need to know that they will not be allowed to charge what the market will bear.

Best regards,

.
Elizabeth Pollock
eliz.pollock@gmail.com
11923 Bray Street
Culver City, CA 90230
Mobile: (310) 699-5165

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 3:11 PM
To: Elizabeth A Pollock <eliz.pollock@gmail.com>

Hello Elizabeth,

Hope all is well.

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

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



Housing Element Staff
Los Angeles City Planning

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



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Housing Element <housingelement@lacity.org>

Comments on Draft Housing Element

4 messages

Eric Ritter <eritter547@gmail.com> Wed, Sep 22, 2021 at 4:41 PM
To: HousingElement@lacity.org
Cc: MARSUE MACNICOL <marsue@mac.com>, Sara Boroomi <saraboroomi@aol.com>

Thank you for this opportunity to comment on the LA City Draft Housing Element.
Reading the document, one is confronted with imposing lists of objectives and proposed policy changes to address this huge and complex topic.
Nonetheless, there may be some utility in identifying a few recommendations to increase the housing stock within the City, without destroying established and functioning single family (R1) zoned neighborhoods.
My suggestions are as follows:
1. Make an inventory of underutilized and under performing commercially zoned (C2) properties in the City. Pico Blvd., within the WLA Community Plan is an example, there are many lots developed between 1940-1960 which are ready for redevelopment. These lots are zoned C2, which would allow for R3 residential development today. In fact, if developed as mixed use projects, the first floor could be utilized for commercial uses, with upper floors providing multiple residential units. An additional positive factor is that there is existing public transit available on Pico Blvd. What exists on Pico Blvd. for potential residential development, exists on numerous commercially zoned transit corridors throughout the City.
2. An inventory of City, County and Federal properties zoned PF within the City of Los Angeles may identify parcels of land which are available for redevelopment or adaptive reuse for residential purposes at minimal cost to taxpayers. If the City government is proposing that residents absorb the pain of densification, the City should also share that burden.
3. The City has large expanses of land dedicated to freeways and highways. In Berlin, Germany a highway was capped and the air rights were redeveloped with urban apartment blocks, i.e., Schlangenbader Strasse. Similar utilization of the air rights above highways have been utilized in New York City, such as above FDR Drive, i.e., the UN Building, and in Seattle, WA for public park purposes. It's time the City recaptured land that is not being fully exploited for their full potential as residential areas, i.e., over the Los Angeles River, at shopping centers, huge parking lots, such as sporting venues like Dodger Stadium, and parking structures among other possibilities.
4. The City must build affordable public housing for those most in need. This would address homelessness and provide access to housing and stable neighborhoods for the economically disadvantaged.

The thoughtless desire to intensify density within the City may lead to unforeseeable consequences. Manhattanization of Los Angeles is not the answer. Rather, thoughtful
and well considered development, which ensures a positive future for all residents should be of paramount consideration. Ensuring the quality of life for all residents,
is the City's main responsibility. Thank you,
Eric Ritter
10393 Tennessee Avenue
Los Angeles, CA 90064
eritter547@gmail.com

MARSUE MACNICOL <marsue@mac.com> Thu, Sep 23, 2021 at 9:39 AM
To: Eric Ritter <eritter547@gmail.com>
Cc: HousingElement@lacity.org, Sara Boroomi <saraboroomi@aol.com>

Needless to say, this is fantastic. So well written. Am I allowed to cut and paste?

Marsue
[Quoted text hidden]

Housing Element <housingelement@lacity.org> Wed, Sep 29, 2021 at 10:56 AM
To: MARSUE MACNICOL <marsue@mac.com>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be added to the case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date.

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Housing Element <housingelement@lacity.org> Wed, Sep 29, 2021 at 10:57 AM
To: Eric Ritter <eritter547@gmail.com>

Hello,

Hope all is well.

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

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Housing Element <housingelement@lacity.org>

City of L.A. draft Housing Element--comment letter

3 messages

Robin Rudisill <wildrudi@icloud.com> Wed, Sep 22, 2021 at 11:50 AM
To: Housing Element <housingelement@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Haydee Urita-Lopez <haydee.urita-lopez@lacity.org>, faisal.roble@lacity.org, vince.bertoni@lacity.org
Cc: Christine Saponara <christine.saponara@lacity.org>, Jason Douglas <jason.p.douglas@lacity.org>, Aksel Palacios <aksel.palacios@lacity.org>, Steve Hudson <Steve.Hudson@coastal.ca.gov>, Alison Becker <alison.becker@lacity.org>, "Ainsworth, John@Coastal" <john.ainsworth@coastal.ca.gov>, Andrew.Willis@coastal.ca.gov, Jordan.Sanchez@coastal.ca.gov, "Schwartz, Noaki@Coastal" <Noaki.Schwartz@coastal.ca.gov>, "Vaughn, Shannon@Coastal" <shannon.vaughn@coastal.ca.gov>, "Stevens, Eric@Coastal" <eric.stevens@coastal.ca.gov>, Bill Przylucki <bill@power-la.org>, Noel Gould <aquarianstudios@hotmail.com>, JRG <jrgposte@aol.com>, Doug Epperhart <epperhart@cox.net>, David Ewing <moreseriousbus@gmail.com>, David Ewing <SeriousBus@aol.com>, Sue Kaplan <sueakaplan@gmail.com>, Sabrina Venskus <venskus@lawsv.com>, "Ziff, Dani@Coastal" <Dani.Ziff@coastal.ca.gov>, Zach.Rehm@coastal.ca.gov, "Lee, Vince@Coastal" <vince.lee@coastal.ca.gov>, "Seifert, Chloe@Coastal" <chloe.seifert@coastal.ca.gov>, "Spencer, Amrita@Coastal" <Amrita.Spencer@coastal.ca.gov>, "Doyle, Jennifer@Coastal" <jennifer.doyle@coastal.ca.gov>, "Alvarado, Marlene@Coastal" <Marlene.Alvarado@coastal.ca.gov>, betsy.butler@cwlc.org, Roberto Uranga <roberto.uranga@longbeach.gov>, Effie.Turnbull-Sanders@coastal.ca.gov, dayna.bochco@coastal.ca.gov, Susanne Browne <SBrowne@lafla.org>, Danielle Local 11 <danielle.wilson@unitehere11.org>, Louis Mirante <louis@cayimby.org>, Rosanna.Xia@latimes.com, Amanda Seward <amandaseward@artvista.net>, "Wilson, Mike@Coastal" <mike.wilson@coastal.ca.gov>, SMyers@lafla.org, Robin Abcarian <robin.abcarian@latimes.com>, Sumi.Selvaraj@coastal.ca.gov, Diana Nave <diananave@gmail.com>, Joshua Yeager <josh.yeager@lacity.org>, "Christie, Sarah@Coastal" <Sarah.Christie@coastal.ca.gov>, Lisa.Haage@coastal.ca.gov, Margaret Molloy <mmmolloy@earthlink.net>, Mike Feuer <Mike.Feuer@lacity.org>, David.zahniser@latimes.com, Councilmember Buscaino <councilmember.buscaino@lacity.org>, councilmember.lee@lacity.org, councilmember.harris-dawson@lacity.org, Hakeem.parke-davis@lacity.org, Councilmember Bonin <councilmember.bonin@lacity.org>, Belem.lamas@lacity.org, councilmember.ridley-thomas@lacity.org, councilmember.blumenfield@lacity.org, Gilbert.Cedillo@lacity.org

Dear Planning and Housing officials,

I am concerned that we are not seeing adequate policies in the City's draft Housing Element to support its priority to prevent displacement and protect Angelenos.

One significant way to prevent displacement in the Coastal Zone is to assure that demolition or conversion of existing 100% residential structures for purposes of non-residential mixed use projects is prohibited, as required by the Mello Act. The draft Mello Act Ordinance must be modified accordingly prior to submission to PLUM and the City Council. This is a significant issue in the Coastal Zone as there are well over 2,000 housing units in residential structures that would be at risk of commercialization by demolition or conversion for purposes of mixed use projects if this correction to the draft Mello Act Ordinance is not made.

Also, of upmost importance to consider in the Coastal Zone is that an area that provides existing coastal housing for low- and moderate-income persons is considered a sensitive coastal resource and must be protected from the displacement of such persons (Coastal Act Section 30116).

The entire Planning Department must consistently work towards the City's priorities and goals. The City desperately needs to both protect existing residents and provide net new housing units and so must protect existing housing. For the draft Mello Act Ordinance to allow residential structures to be demolished or converted for purposes of mixed use development is not only a violation of the Mello Act state law but at best the result would be the same number of residential units and no net gain in housing. And in the process Angelenos would be displaced, usually residents in older buildings at lower rents, with no opportunity for a local, lateral move into similar lower income housing. This disrupts neighborhoods and residents' lives at a time when we need housing stability.

This dichotomy is an example of the left hand and the right hand of Planning not working together towards the same City goals and priorities and this must be corrected.

Please do not allow the Mello Act Ordinance to encourage the commercialization of housing and cause the displacement of Angelenos at the same time that the City is working to protect Angelenos and dramatically increase housing stock!

Please work with City Planning policy staff to correct the draft Mello Act Ordinance to assure that that the Mello Act prohibition of demolition or conversion of housing structures for purposes of mixed use projects is enforced.

I understand that the City likes mixed use development and I support it too. But instead of allowing residential structures to be replaced by mixed use development, I urge you to encourage mixed use development to only replace existing commercial uses, so that we can gain housing while at the same time protecting existing residents!

Lastly, please also assure protection of existing housing by including a policy in the Housing Element for prohibition of zone changes from residential to commercial. This is a significant issue in the Venice Coastal Zone where efforts are underway to commercialize certain existing residential zones.

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

Flora Melendez <flora.melendez@lacity.org> Wed, Sep 22, 2021 at 11:53 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
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E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Sep 22, 2021 at 11:53 AM
Subject: Fwd: City of L.A. draft Housing Element--comment letter
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
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---------- Forwarded message ---------
From: **Robin Rudisill** <wildrudi@icloud.com>
Date: Wed, Sep 22, 2021 at 11:50 AM
Subject: City of L.A. draft Housing Element--comment letter
To: Housing Element <housingelement@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Haydee Urita-Lopez <haydee.urita-lopez@lacity.org>, <faisal.roble@lacity.org>, <vince.bertoni@lacity.org>
Cc: Christine Saponara <christine.saponara@lacity.org>, Jason Douglas <jason.p.douglas@lacity.org>, Aksel Palacios <aksel.palacios@lacity.org>, Steve Hudson <Steve.Hudson@coastal.ca.gov>, Alison Becker <alison.becker@lacity.org>, Ainsworth, John@Coastal <john.ainsworth@coastal.ca.gov>, <Andrew.Willis@coastal.ca.gov>, <Jordan.Sanchez@coastal.ca.gov>, Schwartz, Noaki@Coastal <Noaki.Schwartz@coastal.ca.gov>, Vaughn, Shannon@Coastal <shannon.vaughn@coastal.ca.gov>, Stevens, Eric@Coastal <eric.stevens@coastal.ca.gov>, Bill Przylucki <bill@power-la.org>, Noel Gould <aquarianstudios@hotmail.com>, JRG <jrgposte@aol.com>, Doug Epperhart <epperhart@cox.net>, David Ewing <moreseriousbus@gmail.com>, David Ewing <SeriousBus@aol.com>, Sue Kaplan <sueakaplan@gmail.com>, Sabrina Venskus <venskus@lawsv.com>, Ziff, Dani@Coastal <Dani.Ziff@coastal.ca.gov>, <Zach.Rehm@coastal.ca.gov>, Lee, Vince@Coastal <vince.lee@coastal.ca.gov>, Seifert, Chloe@Coastal <chloe.seifert@coastal.ca.gov>, Spencer, Amrita@Coastal <Amrita.Spencer@coastal.ca.gov>, Doyle, Jennifer@Coastal <jennifer.doyle@coastal.ca.gov>, Alvarado, Marlene@Coastal <Marlene.Alvarado@coastal.ca.gov>, <betsy.butler@cwlc.org>, Roberto Uranga <roberto.uranga@longbeach.gov>, <Effie.Turnbull-Sanders@coastal.ca.gov>, <dayna.bochco@coastal.ca.gov>, Susanne Browne <SBrowne@lafla.org>, Danielle Local 11 <danielle.wilson@unitehere11.org>, Louis Mirante <louis@cayimby.org>, <Rosanna.Xia@latimes.com>, Amanda Seward <amandaseward@artvista.net>, Wilson, Mike@Coastal <mike.wilson@coastal.ca.gov>, <SMyers@lafla.org>, Robin Abcarian <robin.abcarian@latimes.com>, <Sumi.Selvaraj@coastal.ca.gov>, Diana Nave <diananave@gmail.com>, Joshua Yeager <josh.yeager@lacity.org>, Christie, Sarah@Coastal <Sarah.Christie@coastal.ca.gov>, <Lisa.Haage@coastal.ca.gov>, Margaret Molloy <mmmolloy@earthlink.net>, Mike Feuer <Mike.Feuer@lacity.org>, <David.zahniser@latimes.com>, Councilmember Buscaino <councilmember.buscaino@lacity.org>, <councilmember.lee@lacity.org>, <councilmember.harris-dawson@lacity.org>, <Hakeem.parke-davis@lacity.org>, Councilmember Bonin <councilmember.bonin@lacity.org>, <Belem.lamas@lacity.org>, <councilmember.ridley-thomas@lacity.org>, <councilmember.blumenfield@lacity.org>, <Gilbert.Cedillo@lacity.org>

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I understand that the City likes mixed use development and I support it too. But instead of allowing residential structures to be replaced by mixed use development, I urge you to encourage mixed use development to only replace existing commercial uses, so that we can gain housing while at the same time protecting existing residents!

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For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 3:00 PM
To: Robin Rudisill <wildrudi@icloud.com>

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Housing Element Staff
Los Angeles City Planning

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T: (213) 978-1302

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On Wed, Sep 22, 2021 at 11:50 AM Robin Rudisill <wildrudi@icloud.com> wrote:

> Dear Planning and Housing officials,

I am concerned that we are not seeing adequate policies in the City's draft Housing Element to support its priority to prevent displacement and protect Angelenos.

One significant way to prevent displacement in the Coastal Zone is to assure that demolition or conversion of existing 100% residential structures for purposes of non-residential mixed use projects is prohibited, as required by the Mello Act. The draft Mello Act Ordinance must be modified accordingly prior to submission to PLUM and the City Council. This is a significant issue in the Coastal Zone as there are well over 2,000 housing units in residential structures that would be at risk of commercialization by demolition or conversion for purposes of mixed use projects if this correction to the draft Mello Act Ordinance is not made.

Also, of upmost importance to consider in the Coastal Zone is that an area that provides existing coastal housing for low- and moderate-income persons is considered a sensitive coastal resource and must be protected from the displacement of such persons (Coastal Act Section 30116).

The entire Planning Department must consistently work towards the City's priorities and goals. The City desperately needs to both protect existing residents and provide net new housing units and so must protect existing housing. For the draft Mello Act Ordinance to allow residential structures to be demolished or converted for purposes of mixed use development is not only a violation of the Mello Act state law but at best the result would be the same number of residential units and no net gain in housing. And in the process Angelenos would be displaced, usually residents in older buildings at lower rents, with no opportunity for a local, lateral move into similar lower income housing. This disrupts neighborhoods and residents' lives at a time when we need housing stability.

This dichotomy is an example of the left hand and the right hand of Planning not working together towards the same City goals and priorities and this must be corrected.

Please do not allow the Mello Act Ordinance to encourage the commercialization of housing and cause the displacement of Angelenos at the same time that the City is working to protect Angelenos and dramatically increase housing stock!

Please work with City Planning policy staff to correct the draft Mello Act Ordinance to assure that that the Mello Act prohibition of demolition or conversion of housing structures for purposes of mixed use projects is enforced.

I understand that the City likes mixed use development and I support it too. But instead of allowing residential structures to be replaced by mixed use development, I urge you to encourage mixed use development to only replace existing commercial uses, so that we can gain housing while at the same time protecting existing residents!

Lastly, please also assure protection of existing housing by including a policy in the Housing Element for prohibition of zone changes from residential to commercial. This is a significant issue in the Venice Coastal Zone where efforts are underway to commercialize certain existing residential zones.

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Livable Communities Initiative

2 messages

Alex Sale <alexritcheysale@gmail.com> Wed, Sep 22, 2021 at 8:02 AM
To: housingelement@lacity.org

Hi, my name is Alex Sale and I live in Palms (in between Mar Vista and Culver City). My zip code is 90034.

A plan called The Livable Communities Initiative has been submitted to the Department of Planning to be included in the next Housing Element.

I think it's a great solution to LA's housing crisis and urge that it be included and approved in the next housing element. Thank you.

Alex

3578 Greenfield Ave

LA, CA 90034

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:13 PM
To: Alex Sale <alexritcheysale@gmail.com>

Hello Alex,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Livable Communities Initiative

2 messages

Scott Sale <scottsale28@gmail.com> Wed, Sep 22, 2021 at 7:34 AM
To: Los Angeles City Planning <housingelement@lacity.org>

Hi, my name is Scott Sale MD

I live in Windsor Square(part of Hancock Park). My zip code is 90004 A plan called The Livable Communities Initiative has been submitted to the Department of Planning to be included in the next Housing Element.I think it's a great solution to LA's housing crisis and urge that it be included and approved in the next housing element. Thank you.

Scott

100 N Irving Blvd

LA

90004

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:12 PM
To: Scott Sale <scottsale28@gmail.com>

Hello Scott,

Hope all is well.

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Draft of 2021-2029 Housing Element - Livable Communities Initiative

2 messages

Al Septien <wickedmonkey2@me.com> Wed, Sep 22, 2021 at 1:06 PM
To: HousingElement@lacity.org

My name is Alfredo Septien, I live in the Holly Dell area of Hollywood. My zip code is 90068 and I have a business at 90028. The homeless and affordable housing problem in all of Los Angeles, but particularly in the Hollywood Area, is ATROCIOUS!! We need to do something about it!

With that in mind, I am reaching out to support a creative new idea. A plan called The Livable Communities Initiative has been submitted to the Department of Planning to be included in the next Housing Element. We think it's a great solution to LA's housing crisis and urge that it be included and approved in the next housing element. Thank you.

Sincerely,

Alfredo Septien

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 3:17 PM
To: Al Septien <wickedmonkey2@me.com>

Hello,

Hope all is well.

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

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Housing Element <housingelement@lacity.org>

Sturman/Gittleson plan

2 messages

Ruth Silveira <merryones@ca.rr.com> Wed, Sep 22, 2021 at 2:44 PM
To: housingelement@lacity.org

I saw the presentation by Lindsay Sturman and Tony Gittleson about their Livable Communities Initiative plan.

I thought it made a lot of sense.

I strongly oppose rezoning R1 properties. I believe that what is now allowed by SB9 will make very little difference in the housing supply and will cause unhappiness and crushed expectations in those adjacent to a larger development. In addition, in my area of Los Angeles, St Andrews Square, there are still many lots that have single family homes (beautiful ones) but are zoned higher than R1. Every year or so one of these houses is purchased and torn down and a multi-dwelling is built in its place. There is no need to infringe on the R1 lots while these other lots are still in play. And I feel sure there are many other such lots throughout the city. SB9 is intrusive and unnecessary in LA.

There is a lot of building of luxury apartments and condos going on at the moment in LA. We are not doing so well with mid-level housing and low income housing. The Sturman/Gittleson plan addresses this and also imagines streets where people can naturally mingle and the sense of a neighborhood can flower.

My two areas of concern are the parking and the maintenance.

People need parking for their cars and their visitors, including friends, caretakers, and workers. There is rarely too much parking. Excess parking can always be rented out to businesses or neighbors or provide space for visitors and get parked cars off the streets. Which is always good! Do not skimp on parking!

Trees and landscaping need attention and water and feeding. I am all in favor of tree lined streets!!! But their maintenance must be part of the plan.

Lastly, there may come a point, and sooner rather than later, when, because of how much water is available, people should go elsewhere to live and not crowd into Los Angeles. There are limits. Any discussion of and plans for livable communities should address this, I think. Sustainability should be part of the discussion and not just growth.

Sincerely,

Ruth Silveira

149 N Gramercy Place
LA 90004

merryones@ca.rr.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 4:29 PM
To: Ruth Silveira <merryones@ca.rr.com>

Hello Ruth,

Hope all is well.

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Additional Comments to Draft 2021-2029 Housing Element

2 messages

Terry Tegnazian <terrteg@outlook.com> Wed, Sep 22, 2021 at 10:26 AM
To: HousingElement@lacity.org
Cc: Paul.Koretz@lacity.org, joan.pelico@lacity.org, daniel.skolnick@lacity.org, james.bickhart@lacity.org, board@westwoodhills.groups.io, Barbara Broide <bbroide@hotmail.com>, sandy10778@yahoo.com, J Reichmann <jreichmann@sbcglobal.net>, terikor1@gmail.com, saresnick@gmail.com

Adding to my comments below, I have now learned that the City Planning website has posted the HCD letter of comment to the City re: draft Housing Element. Regarding deadlines, it says:

> *To remain on an eight-year planning cycle, the City must adopt its housing element within 120 calendar days from the statutory due date of October 15, 2021 for Southern California Association of Governments (SCAG) localities. If adopted after this date, Government Code section 65588, subdivision (e)(4), requires the housing element be revised every four years until adopting at least two consecutive revisions by the statutory deadline.*

So clearly the Housing Element does NOT need to be complete by Oct. 15th, and apparently the City does not even have to request an extension! Therefore, the City must allow more time to analyze the impacts of SB 9 and SB 10, and maximum number of units that could be built on underutilized lots in existing commercial and multifamily zones, to consult and incorporate projections from reputable sources other than the Terner Center, and to provide the public with spreadsheets and maps in a format that can be seen and understood, in order to allow for meaningful community input.

Thank you,

Terry Tegnazian

From: Terry Tegnazian <terrteg@outlook.com>
Sent: Tuesday, September 21, 2021 6:35 PM
To: 'HousingElement@lacity.org' <HousingElement@lacity.org>
Cc: 'Paul.Koretz@lacity.org' <Paul.Koretz@lacity.org>; 'joan.pelico@lacity.org' <joan.pelico@lacity.org>; 'daniel.skolnick@lacity.org' <daniel.skolnick@lacity.org>; 'james.bickhart@lacity.org' <james.bickhart@lacity.org>; 'board@westwoodhills.groups.io' <board@westwoodhills.groups.io>
Subject: Comments to Draft 2021-2029 Housing Element
Importance: High

Dear Sirs:

I have the following comments regarding the Draft 2021-2029 Housing Element, for which you have scheduled virtual public hearings for September 21 and 22, 2021. I may also submit additional comments in the future either at a hearing or in writing.

1) Analysis ignores impact of SB 9 and possibly also SB 10 – Governor Newsom signed SB 9 and SB 10 into law last week. These bills will have tremendous impact on housing stock in the coming decade, by adding 4 to 10 or more units on single-family lots. You have taken ADUs into account in your inventory and projections, and now you *must* take SB 9 and SB 10 into account as well. The city must redo projections to take this major change in policy into account.

2) Request extension of deadline – because of the omission of any analysis of the effect that the new state laws SB 9 and SB 10 will have on housing, the City of LA must request that the state grant an extension of the deadline for submission of the Housing Element to enable the city to do this additional analysis.

3) Data made deliberately difficult to review – the Planning Dept. has provided Excel spreadsheets, including in particular Appendix 4.7 - Candidate Sites for Rezoning, in which normal Excel functions such as sort, filter, cut and copy have been restricted. To make matters worse, the spreadsheet has no discernible organization – there are more than 267,000 addresses in Appendix 4.7, which are listed randomly, not organized by zip code, street, Community Plan Area or in any other noticeable manner – and by its restrictions on the spreadsheet the city prevents the public from organizing them in a meaningful way. This is clearly a deliberate attempt to obscure from the public the actual impact of this massive list of addresses targeted for rezoning by the Housing Element – which is so egregious as to amount to a lack of public notice.

4) No maps provided – in addition to the disorganized and restricted manner in which the targeted addresses are listed, the city compounds the effective lack of public notice by further obscuring the list of affected properties in failing to provide any visual representation of the city's proposal. At a minimum, the city should provide detailed maps for each Council District showing clearly which addresses are being targeted.

5) Biased and baseless projections – the city is relying on biased and baseless projections from one source, the Terner Center, which is heavily financed by real estate, big tech and financial interests, https://ternercenter.berkeley.edu/about-us/supporters/. At a minimum, the city should also take into account projections from other reputable sources, such as the Embarcadero Institute, which exposes the double-counting being done in reaching projected housing needs, see, e.g., https://embarcaderoinstitute.com/portfolio-items/double-counting-in-the-latest-housing-needs-assessment/ and https://embarcaderoinstitute.com/portfolio-items/housing-models-compared/. The state Office of Planning and Research also provides projections.

The projections being used by the city are especially suspect, in light of the fact that California has been *losing* population in recent years – so much so that with the 2020 Census the state has lost a Congressional seat for the first time in its history. These projections also fail to take into account the impacts of the pandemic and the shift to remote working, which no longer require employees to live near their work. Not only does this permit employees to live outside of employment centers, but it will also result in freeing up commercial space as businesses no longer require all their employees to be physically present in the office at the same time.

6) Appendix 4.1 - Housing Element Sites Inventory – in addition to omitting any consideration of SB 9 and SB 10, the Sites Inventory fails to take into account the maximum number of potential units that could be built on each site, including in particular underutilized lots in *existing* commercial and multifamily zones. For example, each lot along a "transit corridor" should be credited with the maximum number of units that could be built there under TOC rules, taking into account all available incentives that could be granted.

7) Westwood Hills inappropriate for multifamily – the city has put on its list of targeted addresses virtually our entire neighborhood of Westwood Hills. Westwood Hills is a single-family neighborhood of 600 homes situated between UCLA and Sepulveda Blvd, and between Sunset Blvd. and the VA Cemetery.

This easily identifiable, compact neighborhood was developed by the Janss family in 1929 and 1930 as part of their master plan for the new UCLA campus in Westwood. The goal of the master plan was to provide a *variety* of housing options near the campus, along with a commercial center (Westwood Village). Today, Westwood is already one of the most densely developed areas in the entire city of Los Angeles – with UCLA, Westwood Village, copious multifamily housing options in the North Village, along Hilgard, Veteran and immediately south of Wilshire, the high-rise office buildings and high-rise residential buildings in the Wilshire Corridor. The intersection of Wilshire Blvd. and Veteran Ave., adjacent to exits and entrances from the 405 Freeway leading to nearby business centers in Brentwood, Westwood, Beverly Hills and Century City, is one of the busiest intersections in the United States.

Further, the word *Hills* appears in the name of our neighborhood *because it is hilly*, with many narrow streets – and therefore it is singularly inappropriate for multifamily development. The neighborhood is already densely packed, surrounded by a densely developed area that cannot reasonably sustain additional density. I notice, for example, that you omit any addresses in adjacent Bel Air from your list of targeted addresses – why is that?

8) Lack of adequate infrastructure – the city has failed to maintain its sewer, power, water and other infrastructure, which is old, crumbling, and simply unable to accommodate the increase in density being proposed.

9) Lack of affordable housing – the city's most glaring housing need is for affordable housing, but the city has no mechanism either for ensuring that the hundreds of thousands of additional units will in fact be affordable when built, or if "affordable" initially, for subsequently keeping track of and enforcing affordability for each unit in the future years.

Thank you for your attention to these serious issues.

Very truly yours,

Terry Tegnazian

Terry A. Tegnazian

10850 Wilshire Blvd., Suite 300

Los Angeles, CA 90024

Tel: 310-470-0770

Fax: 310-470-0782

Email: terrteg@outlook.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:17 PM
To: Terry Tegnazian <terrteg@outlook.com>

Hello Terry,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
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T: (213) 978-1302



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Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Sep 22, 2021 at 8:15 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Sep 22, 2021 at 8:12 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Brian Trautman** <dynamique@everyactioncustom.com>
Date: Wed, Sep 22, 2021 at 8:11 AM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I want to encourage us to take our housing element seriously, and do whatever it takes to implement it.

This includes rezoning enough for 300,00 new homes, and making sure the growth is evenly distributed across neighborhoods.

Let's do whatever we can do end the housing crisis!

Sincerely,
Brian Trautman
6355 De Soto Ave Apt B130 Woodland Hills, CA 91367-2634
dynamique@gmail.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:15 PM
To: Brian Trautman <dynamique@gmail.com>

Hello Brian,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

RE: Housing Element Update -- Comment Letter from United Neighborhoods Neighborhood Council (UNNC) attached

5 messages

Laura Meyers <lauramink@aol.com> Wed, Sep 22, 2021 at 10:34 AM
Reply-To: Laura Meyers <lauramink@aol.com>
To: "HousingElement@lacity.org" <HousingElement@lacity.org>
Cc: "matthew.glesne@lacity.org" <matthew.glesne@lacity.org>, "blair.smith@lacity.org" <blair.smith@lacity.org>

September 22, 2021

Good morning, Matt, Blair and the Housing Element team.

Attached is UNNC's (long ~ 19 pages) comment letter on the Draft Housing Element Update / The Plan to House LA.

We applaud all your hard and innovative work on this project.

This comment letter was collaboratively researched and written by UNNC's board members and stakeholders, and is the result of six Brown Act-compliant public meetings held over several months. The UNNC Governing Board has voted to adopt this comment letter.

Our participating UNNC stakeholders represented a diverse group of interests, including homelessness advocacy; economic development; an architect whose firm specializes in multi-family residential design (affordable, mixed income and market rate); historic preservation advocacy; social justice advocacy; environmental concerns; among others.

We together have addressed 8 key topics, as you will see:

1. Addressing the Unique Needs of Families and Individuals Experiencing Homelessness
2. The “Missing Middle”
3. Creating Generational Wealth for Historically Marginalized Communities
4. Preserving Affordable and Rent Stabilized Housing
5. Equitable and Proportionate Distribution of Housing Throughout the City
6. The Importance of Los Angeles’ Shade Tree Canopy
7. Conserving Character Neighborhoods
8. Historic Preservation Initiatives and Incentives

We are aware that this is, at the moment, a "living document" that in fact was revised recently, so UNNC may need to provide additional comments to CPC. We are also hopeful that after the two public hearings on September 21 and September 22, and the comment letter deadline of September 22, staff will take our comments and others into fuill account and that there will be a resulting additional revision to the draft Housing Element Update.

That said: UNNC requests that Staff forward any new addition immediately upon its approval so that we do have a chance to re-review and perhaps update our comments for the City Planning Commission hearing. Please do not wait until a CPC agenda packet is made public on a Google Drive to reach out to interested parties; that may be too late for neighborhood councils in particular to respond.

Thank you very much.

Laura Meyers
UNNC President and co-chair, UNNC Planning and Zoning Committee

UNNC_Housing Element Comments_9-21-2021.pdf
316K

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:19 PM
To: Laura Meyers <lauramink@aol.com>

Hello Laura,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302

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

[Quoted text hidden]

Laura Meyers <lauramink@aol.com> Wed, Sep 22, 2021 at 1:34 PM
Reply-To: Laura Meyers <lauramink@aol.com>
To: "housingelement@lacity.org" <housingelement@lacity.org>

Thank you.

Not that UNNC intends to add any more comments...but I cannot find the appendix that shows the actual list of proposed sites for either suitability or rezoning. People have been referencing it or "them" if these are two separate lists.

Laura

[Quoted text hidden]

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 2:14 PM
To: Laura Meyers <lauramink@aol.com>

Appendix 4.1 is the Inventory of Sites with existing capacity and 4.7 is potential Candidate Sites for Rezoning. These are described in Chapter 4.



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



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[Quoted text hidden]

Laura Meyers <lauramink@aol.com> Wed, Sep 22, 2021 at 2:20 PM
Reply-To: Laura Meyers <lauramink@aol.com>
To: "housingelement@lacity.org" <housingelement@lacity.org>

Thank you!

[Quoted text hidden]

United Neighborhoods NEIGHBORHOOD COUNCIL

UNNC

September 22, 2021

TO: Housing Element Staff
Matthew Glesne, Senior City Planner
Blair Smith, City Planner
City of Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

CC: Cally Hardy, Jackie Cornejo, Maya Abood, Nancy Twum-Akwaboah, and Ann Sewill

Comments on the 2021-2029 Draft Housing Element via email: HousingElement@lacity.org

Dear City of Los Angeles Housing Element Team:

Please accept the comments below regarding the Draft Housing Element Update/The Plan to House LA (2021-2029) provided by the United Neighborhoods of the Historic Arlington Heights, West Adams and Jefferson Park Communities Neighborhood Council (UNNC).

Introduction

UNNC consistently supports a balance between the past, present and future: we value our historic neighborhoods, our existing communities, and look to a prosperous future that includes change, growth and new residents.

UNNC is one of the original neighborhood councils in the Los Angeles Neighborhood Council program. We were chartered in May, 2002, and held our first board elections in October of that year, initiating a land use committee in January 2003. We have been consistently recognized as thoughtful, organized, and providing service to the City to affect positive change in our community.

Our neighborhood council area spans broadly diverse neighborhoods in the heart of the City, inclusive of multiple ethnic, racial, cultural, and economic demographic groups. The Council has a slate of active committees that engage in outreach, sponsor community events, and support local initiatives and non-profits. We actively participate in the development process with a rigorous Planning and Zoning committee. Our history with reviewing and supporting new development, which often includes housing, has been nothing short of most often finding a way to "yes" when developers work in good faith and open minds to address community input and concerns.

UNNC has proudly supported the construction of housing at all market levels and types. In the time period beginning in 2009 (where our records begin), we have actively worked with developers to help shape, and then approve, over 1,000 total units in that timeframe, with 540 of those being affordable, including senior housing, family housing and permanent supportive housing for those who have special needs and/or were formerly homeless. In addition, another 768 units in two large projects are in the pipeline which together may contribute at least another 118 affordable units. These are only discretionary projects where UNNC has a voice.

We have also taken an active stance regarding the retention of RSO units – there is no point in creating new affordable units if previous tenants have been displaced and there is no net GAIN of affordable housing units. We have an enduring interest in the creation of new housing while balancing the important goal of conserving UNNC's character neighborhoods. This is one of the reasons that UNNC stakeholders and Planning and Zoning committee members have actively participated in the two most recent Housing Element updates.

This letter is UNNC's official response to the Draft Housing Element. The basic concepts were approved by the UNNC Governing Board on September 2, 2021, with this final version ratified by UNNC's officers on September 21, 2021. This letter is the culminations of work of many meetings of the UNNC's Planning and Zoning Committee over several months. Our approach has been to read the Draft Housing Element individually among committee members, and come to the table to discuss ideas and concerns about what issues in the Element are pertinent to UNNC stakeholders. We have combined, consolidated, and fleshed out eight topics, listed below, being careful to always wrap the discussion back to concerns that directly affect UNNC and its stakeholders.

We do want to mention that our efforts were recently hampered when the Planning Department released a new, revised Draft Housing Element in mid-September. The document is nearly 100 pages longer than the original draft, and paginated differently, thus rendering it nearly impossible for UNNC (and other neighborhood councils) to quickly re-review the material. Our comments below do include a few notes about these new additions.

The main discussion topics UNNC developed are as follows:

1. **Addressing the Unique Needs of Families and Individuals Experiencing Homelessness**
2. **The "Missing Middle"**
3. **Creating Generational Wealth for Historically Marginalized Communities**
4. **Preserving Affordable and Rent Stabilized Housing**
5. **Equitable and Proportionate Distribution of Housing Throughout the City**
6. **The Importance of Los Angeles' Shade Tree Canopy**
7. **Conserving Character Neighborhoods**
8. **Historic Preservation Initiatives and Incentives**

Each topic has a reference to specific Goals, Policies, and/or Programs in the Draft Element that was the seed of the discussion. Each topic was championed by one committee member to research, write, and present the topic to the group. The whole committee then contributed to the discussion of each topic and the final drafting of this letter.

Comments

1. TOPIC: Addressing the Unique Needs of Families and Individuals Experiencing Homelessness

REFERENCE: Housing Element Goal # 5: A City that is committed to preventing and ending homelessness

The City of Los Angeles has approximately 42,000 women, men and children experiencing homelessness.

Chapter 2 addresses "constraints" on new housing development, including constraints related to inadequate public funding for homelessness housing (2-6). Chapter 6 describes goals, policies, objectives and programs, including multiple programs proposed (or existing) related to providing housing for those who are unhoused.

However, UNNC has identified some additional opportunities, and therefore offers these additional comments and proposed programs:

The unhoused are diverse in their housing needs. Although 40% are chronically homeless, and will need permeant supportive housing, the remaining 60% are able to thrive in the community using shallow subsidies and Housing Choice Voucher (formerly known as "section 8"). Regrettably, many housing providers (landlords/ landladies) find taking housing vouchers cumbersome. In addition, voucher and shallow subsidies rates are below market rate.

The Housing Authority of the City of Los Angeles and the Housing & Community Investment Development Department offer holding fees and increased security deposits that make the cumbersomeness of vouchers easier to deal with, this does not address the lower rent amounts.

The City can make renting to a household with a housing vouchers and shallow subsidies more affordable to housing providers by:

- Eliminating Housing and Community Investment Development Rent Stabilization Ordinance fees for all units rented to a household with a housing voucher or taking shallow subsidies.
- Partnering with the County of Los Angeles to eliminate property tax for apartments that are rented to a household using a shallow subsidy or housing choice voucher.
- Do a better job focusing on the benefits to landlords of accepting housing vouchers (including an emphasis on the guaranteed, regular, on-time rent payments)

2. TOPIC: The "Missing Middle"

REFERENCES: Chapter 4, Adequate Sites for Housing; Goal 1 ~ Policy 1.1.8; Program 63; new Program 103

It is important not to confuse *people* with *places*. UNNC applauds staff for adding a one-page section on "The Missing Middle" but we were surprised to see that the expanded Draft Housing Element clarifies that the Planning Department's idea of the Missing Middle – in this evaluation – is about Housing Typology, and not about Los Angeles' moderate income and middle income residents.

The Housing Element document recognizes that middle income and even some higher income Angelenos are struggling to find affordable rentals and homes for purchase (page 6-1). There is a Policy (1.1.8) and Program (63) referencing the so-called "missing middle," but this refers to an architectural and urban-planning strategy of increasing housing density. It does not directly refer to the housing stock that is "missing" for middle income Angelenos. We would like to see more programs that address the lack of housing stock for those families of middle income for the city ($61,424 to $184,271 [Pew Research Center]). A diversity of programs beyond some of the targeted down payment assistance programs are needed as even a down payment will not help if one's income does not qualify them for a mortgage. The median home sale price in Los Angeles was $923,000 in August (Redfin), and the demand at the lowest end of the price spectrum continues to be intense. Without targeted intervention, Los Angeles will struggle to retain middle income families contemplating moving to the Inland Empire or leaving the region altogether.

UNNC suggests that the updated Housing Element be more specific about both the current challenges facing housing creation and retention for the Missing Middle *people*, and also be specific about possible strategies and solutions.

It is important to define this category. It is not clear, for example, on page 4-29, if the reference to "moderate income Workforce housing (150% AMI)" – or Area Median Income – is the same thing as the "Missing Middle"? Or would a "middle income family" be at the Median (in other words, in the exact middle) level?

A young teacher starting out might be expected to earn circa $55,000 – below Los Angeles's median income. The average pay for a restaurant chef in Los Angeles is $48,000. The average pay for graphic designers is $55,000. An MTA bus driver earns $65,000 (about median income). At the City itself, entry level librarians earn less than $55,000; service employees earn between $34,000 and $50,000; and City Planning Assistants appear to achieve the city's median income, not the "moderate income" 150% of median.

This is the Missing Middle.

It is people, not just the type of housing. Moreover, it is not reasonable to assume that new "duplexes" that may be constructed would automatically not be market rate or even luxury units. UNNC's current experience is that many new duplexes are three and four stories in height, with large square footage under roof and many deluxe amenities.

However it is properly defined, there is little or no "Workforce Housing" actually being built, and there are no requirements for new housing developments to consider such construction. The Housing Element should expand its evaluation of the challenges and potential solutions for this category.

Policy 1.1.8 points to the creation of new housing for the Missing Middle "particularly in High Opportunity Areas." UNNC's footprint is not included within the High Opportunities Areas map, and yet it is clear that our neighborhoods include – and communities throughout Los Angeles include – many residents who are a part of the large Missing Middle. New rental and sale housing for the Missing Middle should be spread throughout the city, as one of the most important challenges for families is for the next generation (if they so choose) to be able to settle in the neighborhoods where they grew up, near family.

UNNC also suggests re-evaluating the effectiveness of the Small Lot Subdivision Ordinance, which originally was intended to help create more affordable ownership solutions for the Missing Middle. But currently most of these projects result in homes fetching well over $1 million, and some of these projects are actually being designed as rental housing crowding multiple individual renters into shared housing suites (often for student housing).

Our view is different than the staff view, which calls for an expansion (Innovations in Subdivisions, page 236) of the number of approved subdivisions to provide "90" lower income Small Lot Subdivision units annually. How exactly would the City help finance/subsidize one unit (much less 90 units each year) of *for-sale housing* when the new owner(s) not only would need to pay mortgages but also likely some form

of homeowner association dues to maintain any common areas of the subdivision? The idea that the City would compel or even influence the purchase of 90 Small Lot Subdivision units each year by "qualified nonprofits" (which would then rent or sell them on a subsidized basis to lower income Angelenos) doesn't seem rational unless a source of funds is also identified.

UNNC supports the idea of creating shared-equity models, including a citywide Community Land Trust (CTL) program, but we do note that one already-announced privately-generated CLT program is focusing on The Missing Middle – people, not places – which we applaud. As described on page 237 of the Draft Housing Element, it would appear that if public funds end up involved, then the focus would be on the much-needed affordable housing units, but not The Missing Middle.

In this same discussion of "shared equity" in the Draft Housing Element, somehow the "TICs" (Tenants In Common) are referenced. This could be troubling, because although currently this new model does offer lower prices for sale units derived from existing smaller multi-family buildings, likely that is because there are no subdivision entitlement requirements at this time and, worse, very little (or no) oversight of previous tenant displacements. This housing typology needs to be added to the zoning code, and then regulated – although, again, it does seem to provide First Time Buyer opportunities.

UNNC stakeholders have also identified City-owned surplus property as a possible source for adaptive reuse as Workforce/Missing Middle housing (that is, expand the focus beyond low income housing and create housing solutions for all levels of Angelenos.)

3. TOPIC: Creating Generational Wealth for Historically Marginalized Communities

REFERENCE: Chapter 1 page 1-33

> *Ownership trends vary significantly by age and race/ethnicity. Homeownership is becoming particularly out of reach for younger families, with a 13% decline in the number of owner-occupied households headed by individuals under 45 years old since 2010. With regards to race and ethnicity, the number of Black homeowners has decreased by 11%, while the number of Asian homeowners increased by 14% and Latinx*
>
> *by 4%. White homeownership fell by about 1%, while White renters increased by 14%.*

REFERENCE: Chapter 6, Objective 2.2

> Policy 2:
> *Promote more affordable ownership opportunities and ownership retention strategies, with an emphasis on stability and wealth building for underserved communities.*

Policy 4:
A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present.

Homeownership continues to be a viable opportunity for the creation of generational wealth. Previous redlining efforts prevented many people of color from achieving this American dream. The continuation of creative efforts to encourage and prepare citizens for homeownership, with an emphasis on those in minority and immigrant communities, should persist with the expectation of and consequences for, future prosperity for families.

First time homeownership programs: Home ownership builds family wealth and community stability. But when the cost of a condominium or "starter home" in Los Angeles is over $500,000, it is very difficult for the average family to save for the 20% down payment let alone cover the monthly mortgage payment. First time home buyer programs that assist with down payments, rebates that help lower the monthly mortgage payments and waving of city fees associated with buying a home, can help our middle and lower middle class community members become homeowners.

UNNC specifically supports Program No. 1 (Chapter 6, pg. 235) but we would like to see the goal expanded well beyond the current objective of just 75 loans over eight years to first-time low income buyers (80% AMI) and another mere 75 loans over eight years for first time moderate income buyers (80-150% AMI). These numbers – 150 loans total over eight years -- are a drop in the bucket. Even this number annually would be a drop in the bucket.

UNNC believes first-time homeownership programs are essential for our children to be able to purchase homes in the neighborhoods where they grew up, and to allow a new generation of UNNC stakeholders thrive and prosper.

4. TOPIC: Preserving Affordable and Rent Stabilized Housing

REFERENCES: Program 122, Anti-Displacement Strategies; and Program 125, Transit Oriented Communities

It is important to prioritize anti-displacement strategies along with the preservation of naturally occurring affordable units, not limited only to "RSO" units (given that there are many apartment buildings in the City constructed after the effective date of the Rent Stabilization Ordinance more than four decades ago, and single family homes that are essentially co-living arrangements with lower rents).

UNNC embraces several of ACT-LA's proposals regarding the preservation of affordable units. ACT-LA wrote, "Preserving affordable housing—whether subsidized or naturally-occurring—is necessary to achieve housing policy goals and to ensure an equitable and inclusive city. This requires specific Housing Element goals, policies and programs aimed at eliminating the loss of affordable and rent stabilized units due to demolition or conversion, adequately monitoring our affordable housing inventory, and carefully assessing and mitigating the risk of homelessness before it occurs."

And specifically UNNC signs on to the following ACT-LA recommendations:

>> Regulate demolition and condo conversions.
Demolitions and condo conversions are city-regulated processes that often precede the direct displacement of tenants, often low-income renters of color. The City should follow the lead of other jurisdictions in California and set an annual allowance for the number of demolitions and condo conversions in a given area, such as a Community Plan Area. In addition, HCIDLA and the Planning Department should work with the LA Department of Building and Safety to ensure that demolitions are properly tracked and labeled. Currently, it is difficult for the data to be tracked from Planning Application to demolition and construction as permits go through various agencies such as DCP, LADBS and HCIDLA. Furthermore, to protect against premature demolition, the City should require that demolition permits be granted only after all building permits have been issued. The Housing Element should include policies and programs to effectively regulate demolitions and condo conversions, including but not limited to the following.
● Residential Conversion Annual Allowance. Establish an annual allowance for the number of condo conversions in a given Community Plan Area.
● Residential Demolition Annual Allowance. Establish an annual allowance for the number of residential units demolished in the Community Plan Area.
● Limit Residential Conversions. Residential Conversion Projects, as defined in LAMC Section 12.95.2, shall be denied if the vacancy rate in the Community Plan Area is five percent or less or if the cumulative effect on the rental housing market is significant.
● Restrict Residential Demolition Permits. No permit for residential demolition in the Community Plan Area shall be issued unless all necessary building permits have been issued for new construction on the site.

Conversely, UNNC would also like to see a program or programs that encourage(s) the creation of condominium and other ownership frameworks that do not also encourage displacement, and do help foster new homeownership opportunities for existing residents. Is it possible for the City to find home ownership opportunities for multi-generational community residents so the next generation can stay in our neighborhoods?

>> Reduce barriers for production of all affordable housing that does not result in the removal of existing units and/or displacement of tenants and that does not expose low-income communities of color to environmental harms.

● Affordable Housing on Vacant and Underutilized Land. Explore a citywide program that allows the production of affordable housing on vacant land, commercial buildings, or in some buildings that have not been occupied in the last 10 years. We advocate for tighter restrictions and regulations around Ellis Act or other methods, such as land banking and Cash For Keys, that contribute to evictions and displacement.

>> Replacement of 100% of demolished RSO units in addition to affordable units required by a Density Bonus Program

In addition to our support for these specific ACT-LA initiatives, UNNC is also already on record as supporting not just a one-to-one replacement of any demolished RSO housing in TOC or other Density Bonus projects, but also a requirement that this replacement be additive to the number of specified affordable units required by the respective Density Bonus program in order to achieve incentives. Demolished units should not be included in the base affordable units.

UNNC has experienced a net loss of "naturally occurring affordable units" in several of the recent TOC or DB projects approved by the City. In one TOC case (pre-SB 330), five RSO units were demolished but only three affordable units are a part of the approved project. In another case, nine RSO units are planned for demolition, to be replaced by only 4 (or perhaps 5) new affordable units – with the developers each achieving incentives that dramatically increase the number of total market-rate units, the height, the massing and the FAR of the two respective buildings.

This is not the way UNNC believes it should be. The calculation should be: Replace all RSO units at their previous rental amount (with a right of return component) and add to that the required handful of dedicated affordable units in order to achieve the bonus incentives.

Specifically, the Planning Department in its presentations about the Housing Element is still saying that it has as its goal "minimizing the loss of RSO units." UNNC believes this has not been an effective approach at all as we continue to lose more RSO units without adequate replacement units. We believe the goal needs to be a zero loss of "naturally occurring affordable units," including but not limited to designated RSO units.

>> Density Bonus Programs Should Limit the Number of Additional Incentives and/or Waivers for Projects That Are Not 100% Affordable

As an additional note, except for 100% affordable units, these density bonus programs should limit the number of allowable incentives and should **not** allow "waivers" of development standards. A housing

producer may always apply through different land use processes for waivers and multiple additional incentives (including zone changes), but for those who are not providing a significant number of affordable units the City should not have a simple "green light" program in the Housing Element.

To avoid abuse of the incentive system, the use of multiple off-menu or additional incentives should be reserved for those projects which offer significantly more affordable units than the bare minimum.

>> Carefully Consider Allowing the Utilization of TOC or Other Affordable Housing Density Bonus Incentive Programs for For-Sale Housing

UNNC would like to have the City explore the possibility of building moderate income and even low income for-sale housing, such as the Community Redevelopment Agency did decades ago in Monterey Hills, which provided first-time buyers with homeownership opportunities. However, the City should reconsider whether or not For-Sale projects (condominiums, and Tenants-In-Common/TIC projects) should be allowed density bonus incentives for affordable housing, at least not unless it is pre-defined as to whether the proposed affordable units will be subsidized and sold (and then, who will pay the HOA fees?), OR if the developer is planning to continuously own the units, renting them through HCIDLA.

5. TOPIC: Equitable and Proportionate Distribution of Housing Throughout the City

REFERENCES: Chapter 4, Adequate Sites for Housing (page 4-53), Affirmatively Furthering Fair Housing (AFFH) Analysis

REFERENCE: New Section in Updated Draft) Rezoning Program and Candidate Sites Inventory to Accommodate the Rezoning Need -- 50% Density Bonus (page 4-44); Faith-Based Owned Properties (FBO) (page 4-47)

In the past decade, UNNC has been highly supportive of new housing within our footprint. We have approved an estimated 1000 to 1,100 new units that had entitlement processes, and of those, fully half of the units are affordable.

That said, UNNC is committed to the idea of a "fair share" of housing being geographically distributed throughout all 35 Community Plans in order to take advantage of the resources that are today distributed throughout the city, and to ensure proportionate impacts to all communities.

We would like to remind the Planning Department that we have written about this important concept previously. UNNC lies with the South Los Angeles and West Adams-Baldwin Hills-Leimert Community Plan areas; when these two Community Plans were updated, together the new zoning represented 25% of the City's entire potential new housing capacity, and that zoning capacity was concentrated between Pico and Exposition Boulevards, straddling the 10 Freeway.

Another 15% of the City's housing unit capacity was within the Hollywood Community Plan. 40% of zoning capacity resting in just three Community Plans is clearly the opposite of "equitable distribution of housing throughout the city."

There needs to be zoned capacity for new housing spread throughout the City in a fair manner.

Per the Draft Housing Element, State Guidelines require that the lower-income portion of the mandatory housing unit allotments are not to be "concentrated in low-resourced areas (lack of access to high performing schools, distance from jobs centers, location disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty."

And the City's draft does say that housing will be equitably distributed, based on this guideline.

However, the Draft Housing Element is in conflict with itself. Although the majority of the High Opportunity Areas are well to the west of UNNC's footprint, and to the north in the San Fernando Valley, the document actually still shows about 200,000 units (of circa 450,000 RHNA) being targeted for low income areas. It appears that more than a third of the new units (capacity) are targeted to a handful of Community Plan Areas.

UNNC certainly recognizes that there are market constraints and barriers (e.g., much higher land acquisition costs) that especially impact the production of affordable housing (pages 2-3 – 2-4). But we do not see suggested solutions to this issue that would help achieve the goal of equitable distribution of housing to meet the needs of all, everywhere in the City. It is true that high land values are a factor in the location of housing, however, construction costs typically consume a much large portion of the final project cost. Is there a creative way for the City to help offset the cost of the land? Perhaps a program similar to Metro's Joint Development Program, where Metro retains ownership of the land, thereby eliminated that barrier to development?

When housing is distributed fairly, and to High Opportunity Areas, then residents are not just nearer to amenities, including schools, parks, transit – they are nearer to jobs. UNNC supports Goal No. 3, putting housing where it makes sense and where new housing can be sustainable, livable and resilient – noting that we are concerned about creating sustainable, livable and resilient neighborhoods and not just buildings.

We are concerned, when looking at the zoning analysis in Chapter 4 (page 4-65), at the discrepancy (that is, *historic discrimination*) on display. According to the Draft Housing Element, looking at "all land zoned to allow residential uses, approximately 76% of residential parcels in High and Highest Resource Areas are limited to single-family uses and approximately 20% are zoned to allow multi-family (see Table 4.28). In contrast, just 18% of the residentially zoned land in the areas considered High Segregation and Poverty is allocated to single-family uses, whereas over 80% allows multi-family development."

And yet, the clear solution of creating more zoning capacity in communities other than our own – on and along such major thoroughfares as Ventura Boulevard in the Valley, and in High Opportunity Areas in West Los Angeles, is also meeting resistance. UNNC doesn't see a section on "overcoming resistance" in this document. Programs such as Number 67 (Chapter 6, page 286), involving training neighborhood council leaders on "Housing Topics," doesn't really feel like a practical strategy to effect real change.

In the most recent revision of the Draft Housing Element, staff has added several sections that would only further the imbalance rather than furthering the stated goal of evenly and fairly distributing new housing units among all 35 Community Plan areas, and specifically focusing new housing capacity in High Opportunity high resource neighborhoods.

Specifically, the rezoning proposals that would eliminate most development restrictions on "Faith-Based Owned Properties" and the unrestricted citywide proposal of 50% density bonuses (DB50) to allow for the "maximum" amount of affordable units would seem to target South Los Angeles more than they would target High Opportunity Areas.

The DB50 initiative would have an outsized impact on UNNC's footprint and, indeed, much of the geography bounding the 10 Freeway, the Expo Light Rail Line, and the new LAX/Crenshaw Light Rail Line. Why? Simply for the same reasons that we in South Los Angeles have long experienced an over-abundance of affordable housing construction compared to units for moderate-income Angelenos: The land is less expensive. But if the City's goal is to build in High Opportunity communities – where the land is not less expensive, then a new citywide ordinance/zoning code amendment must carve out exceptions to help guarantee that developers do not only utilize these bonuses in Low or Moderate Resource areas. This would be similar to the proposed Affordable Housing Overlay Zone (AHOZ) recommendation that it only apply in High Resource communities.

We would also urge staff to consider fine-tuning this DB50 recommendation to limit the use of a 50% density bonus to projects that offer at least 50% of the new units as RSO replacements *combined* with new affordable units. And some sort of disincentive for such developments in areas that are not High Opportunity neighborhoods.

UNNC also notes that most of the truly affordable (e.g., 100% affordable) projects do NOT ask to use the current bonuses (25-35%), because the construction costs become prohibitive.

Regarding Faith-Based Owned Properties (the "FBO" program): UNNC understands and applauds the social contract faith-based institutions have with their communities, and a desire to be able to provide the land for affordable housing projects that help fulfill their missions. Within UNNC's boundaries there are many examples of churches which have built housing on their grounds, creating senior and special needs complexes.

So, while we agree with the intent of the idea behind the "FBO" program, we are also concerned about unintended consequences that might have neighborhood-specific impacts depending on the site and situation, which is so often the case with city-wide planning initiatives in such a diversely developed city. As such, this initiative may have an outsized impact on South Los Angeles, where we have scores of faith-based institutions located in lower density residential zones.

For example, advocating for parking is not popular now, but if a religious institution with a large congregation cannot provide parking it becomes a problem for an entire neighborhood each time there is a function at the building. The Draft Housing Element refers to "parking lots that are empty most of the time." Some churches meet only weekly. Some meet 5 nights a week and on Sunday. Some faith-based organizations rent their facilities to multiple other faith-based organizations. So at first blush (noting this proposal is brand new in the revised Draft), UNNC would ask that as a part of an Affordable Housing Overlay, approvals would still be project-based to allow, on a case-by-case basis, a parking needs assessment and perhaps some other operational requirements.

6. TOPIC: The Importance of Los Angeles' Shade Tree Canopy

REFERENCE: Chapter 6, Objective 3.1.5

> *Develop and implement environmentally sustainable urban design standards and pedestrian centered improvements in development of a project and within the public and private realm such as shade trees, parkways and comfortable sidewalks.*

REFERENCE: Programs #74 City Plants and **#79 Housing and Ecology**

Increasing the shade tree canopy is essential to the health and vitality of our residents. The parkways, street medians, and areas banking our interstates are all viable areas for planting trees and broadening our tree canopy. Every effort must be made to reduce the urban heat island effect and increase carbon sequestration. Additionally, mitigating pollutants is a top concern to our UNNC residents adjacent to Interstate 10. Each of these conditions can be combatted with an increase in our tree canopy. However, the greatest encumbrance to maintaining a newly planted tree and guaranteeing its survival is the required 15 gallons per week of water necessary for the first 5 years. This financial burden should not be placed upon our residents, many of whom are on fixed incomes. We request the development of a tree watering program to fund the watering of trees during this vulnerable 5-year period. Similarly, we recognize site conditions can present limitations for the planting of many large native trees. We therefore would like the city to increase curb bump-outs to accommodate the planting of large canopied native trees which in turn would provide sidewalk shade along commercial corridors with the hopes of increasing pedestrian traffic.

UNNC would like to see the City exploring and proposing additional strategies and programs to conserve and grow our tree canopy citywide.

For example, the City should require that if trees are required to be planted, either on a property or as a public realm street tree, at the time of a housing development's approval, then this should be a more permanent requirement, such as covenants, with timed inspections to verify that required trees are present and thriving – to help guarantee the creation and maintenance of a tree canopy.

And please consider what the requirements ought to be when new developments request the removal of mature trees, and/or protected trees. The City's shade tree canopy is an important resource, and it includes trees on private properties as well as the public realm. But as more and more multi-family projects (both by-right and discretionary) are approved with waivers of required Open Space, what should be the appropriate equation for replacement of removed trees? The Draft Housing Element at this time does not seem to address this issue.

7. TOPIC: Conserving Character Neighborhoods

REFERENCE: Goal No. 3, A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos;

REFERENCE: Chapter 5 and **Appendix 5.1**, Evaluation of 2013-2021: Goals, Policies, Objectives and programs, which assess the "effectiveness" of the current Housing Element's programs, policies and strategies;

REFERENCE: Policy 3.1.2 and **Program 58**.

A key goal of the 2013-2021 Housing Element was placing "a strong focus on complete communities, illustrating the role of housing in creating and preserving vibrant neighborhoods." This was a part of Prior Goal No. 2, "Creating Safe, Livable Communities," which sought to "preserve, stabilize and enhance livability [and] sustainability in all neighborhoods throughout the City."

UNNC has been a longtime advocate for the conservation of neighborhood character, along with the creation of new housing opportunities, especially along commercial corridors and major street arteries, in balance with that mission. So we are concerned with the current Draft Element's change in direction to exclude the phrase (along with the concept) of neighborhood character. In reviewing Chapter 5, which evaluates the effectiveness of the prior 2012-2021 (page 5-10), UNNC notes that the authors state that *"*References to 'neighborhood character,' which have been criticized as being too vague, have been replaced with language about architectural context and diverse cultural heritages within communities."

UNNC wholeheartedly embraces the adoption of language which reflects diverse cultural heritages within communities. However, **we strongly object to the deletion of the phrase "neighborhood character,"** and find the comment that it is "vague" somewhat disingenuous, given that it was clearly defined in previously-adopted Citywide design guidelines.

This is problematic for a number of reasons. *First*, "architectural context" is even more ambiguous than "neighborhood character." Neighborhood character is historically well-defined as new buildings and developments that are compatible in terms of scale, massing, style, setback, height, lot coverage, **and/or** architectural materials with existing structures in the surrounding neighborhood. Within the context and definition of "neighborhood character," architecture does not need to be exactly "matching" in style but rather an infill project can be a contemporary yet sympathetic design so long as it also is compatible with scale, massing, setbacks and lot coverage.

Conversely, do the authors of the Housing Element really mean that new development in a neighborhood dominated by, say, Craftsman or Spanish Revival styles must also be the same style exactly? If that's not what is meant, then "architectural context" should not be the standard in the Housing Element.

Second, an emphasis on architecture is not only somewhat elitist, but it also **condemns the City to repeat the errors of the past by not allowing history and diverse cultural heritage to be easily designated and protected.**

UNNC and its stakeholders have experienced multiple cases over the years where the cultural heritage of a place was stigmatized because the building may not have had full "integrity" related to the date of its construction. For example, the Bank of Tokyo building in Jefferson Park was designed by a Japanese American architect who had endured relocation during WWII, studied architecture at USC after his repatriation to Los Angeles, and went on to design a building associated with Japanese-American families' financial recovery in the 1950s. However, during a project's entitlement case, Planning staff determined the building would not be considered a historic resources because A). it wasn't the "best" example of the mid-century modern architectural style, and B). there were other examples of the architect's work. Staff was unconcerned with the historical and cultural legacy of the building. UNNC and our stakeholders worked to counteract this approach from Planning by working with the developer proactively and creatively, ultimately saving the Bank of Tokyo building and integrating it into the proposed commercial project.

If we are to be a City that values the history of place, then an emphasis on architectural context is misplaced.

Third, by changing the phrase from neighborhood character to architectural context, the Housing Element opens the door for future interpretation by both staff and project developers that if a project is proposed in a neighborhood that does not have architectural distinction, then there is nothing to "balance" in terms of designing projects to further Citywide Housing Priorities (3.1.2, page 229). This would be harmful to neighborhoods throughout the city.

The ambiguity comes into focus in Program 58 (page 278), which promotes "Development and Design Standards" for Community Plan updates, and calls out for designs at a neighborhood level to "protect existing architectural context" – but offers no definitions at all.

UNNC strongly urges that the Housing Element Update revert to an objective or goal of conserving neighborhood character, perhaps inclusive of architectural context, and define neighborhood character specifically as "scale, massing, setbacks, lot coverage, height, architectural context, and/or architectural materials." If language in the Housing Element must be "objective," then add language about *prevailing setbacks as measured and calculated*; *average lot coverage of adjacent properties within a specified radius*; *adherence to the height district of the zone*; and so on.

8. TOPIC: Historic Preservation Initiatives and Incentives

REFERENCE: Program 43. Historic Preservation; Goal #3: A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos.

SPECIFIC SECTION:

- *"General Fund Objective: Expand the number of HPOZs and HCMs. Process 25 Mills Act applications each year. Conduct an assessment of the Mills Act program to inform new implementation and processing strategies (including a consideration of waiving fees to lower income applicants). Expand the use of objective standards. Study the provision of a historic rehabilitation grant program for low-income homeowners in HPOZs. Partner with a non-profit to create a historic property rehabilitation technical assistance program to encourage and facilitate maintenance and restoration of historic properties in lower income communities. Designate historic and culturally significant neighborhoods as Historic Preservation Overlay Zones (HPOZs) and individual buildings as Historic-Cultural Monuments (HCMs). Such designations allow historic residential buildings to qualify for tax incentives and other incentives for their rehabilitation and adaptive reuse. Prioritize the initiation of proactive nominations of new Historic-Cultural Monuments that reflect the histories of communities of color within Los Angeles. Explore the provision of additional incentives for the rehabilitation of affordable housing and for low-income homeowners of historic properties in HPOZs. Expand the use of objective review*

standards in HPOZ Preservation Plans for Accessory Dwelling Units and other entitlements that require ministerial review. Administer the Mills Act to allow qualifying owners of historic properties to receive a potential property tax reduction and use the savings to help rehabilitate, restore and maintain their homes. Utilize the results of Survey LA to inform DRAFT 2021-2029 Housing Element 6-41 City of Los Angeles Chapter 6 Housing Element 2021-2029 Housing Goals, Policies, Objectives and Programs future preservation decisions including identifying future HPOZs, conservation districts or HCM designation for single-family and multi-family buildings.

Much of UNNC's footprint is either designated as an HPOZ (we are home to four HPOZs: Western Heights, Harvard Heights, Jefferson Park and West Adams Terrace) or, now, as Character Residential CPIO Districts (Arlington Heights and Angelus Vista), while the remaining few not-so-designated residential blocks are nonetheless filled with period/character residences. Our main east-west commercial corridors date from the City's Streetcar Commercial heyday. One of our own policies set forth in our UNNC bylaws is preservation advocacy.

We support the expansion of the HPOZ/HCM programs, especially with the inclusions outlined in the Draft Housing Element. We recognize that our historic neighborhoods are not only architecturally significant, but also provide housing to the communities and families that have preserved them over the decades. It is correct to look at these resources not just as buildings, but as communities that add to the fabric of the city and which should be given the opportunity, and priority, to remain in place while also providing support to maintain their historic structures.

We also support, as we have in many of our existing HPOZs over the years, to include broader statements of significance for historic communities that include the cultural contributions of communities of color to their respective neighborhoods. We support the implicit idea in this Housing Element program that HPOZs should have tools to encourage preservation without gentrification, and that the essential character and history of many Los Angeles neighborhoods run deeper than the accepted hegemony of what is architecturally important or significant. In Jefferson Park, we were proud to have supported one of the earliest context statements and preservation plans in the HPOZ program that included broader cultural statements of the contributions of the Japanese American and African American communities that had significant contributions in the neighborhood's history long after most of the contributing structures were built.

However, UNNC has some concerns and some suggestions to make Historic Preservation in our community more equitable, and to provide greater financial incentives.

First: The entire idea that the Office of Historic Resources can easily engage in practicing "objective standards" without first evaluating – with community input – each Preservation Plan essentially creates an irony: a Subjective Approach to so called "Objective Standards." And, new State laws did not require that historic preservation review be subject to this – somehow City Planning has created a nexus between SB330's mandate to utilize subjective standards in development project evaluations as applying to historical situations. There is a lot of controversy swirling around this concept, and it hardly seems a fitting inclusion in the Housing Element, much less an edict to expand the use of (*not objective*) objective standards.

Second: UNNC absolutely supports the idea of "Explore the provision of additional incentives for the rehabilitation of affordable housing and for low-income homeowners of historic properties in HPOZs" – so long as "and elsewhere" is added as a caveat (why just HPOZs? Why not Character Overlay Districts? What about individual HCMs? Or California Register or National Register Districts, including Thematic Districts?)

The City should fulfill its promise to treat the Character Residential CPIO Districts as "HPOZ Lite" Overlay Districts – as was stated by Planning Department staff that the City would do when these overlays were proposed to community members during the Community Plan Update process for both West Adams-Baldwin Hills-Leimert and South Los Angeles. Treat them as local historic districts. Make it clear on ZIMAS. Make the property owners eligible for incentives.

That said, there currently there are no real incentives for the majority of owners of historical properties, with the exception of a few (in context of the sheer volume of historical properties) higher-income owners with higher-market-value residences who have qualified for the Mills Act. Noting that the Mills Act no longer confers much in the way of tax savings to most owners of these properties, due to rising area rents and other factors.

The City should provide incentives that do not rely on either County or State decision-making or oversight. It could, for example, identify funds for grants or low/zero interest loans to help lower-income residents maintain their historical homes.

Regarding the Mills Act program, setting a target of 25 new contracts a year – or ten, or 50 – doesn't matter, so long as the program itself suffers from high expenses to Mills Act property owners (application fees, contract fees and inspection fees now reaching well past $5,000 and in some cases $10,000) and a complete lack of any guarantees that qualifying for the Mills Act will result in any tax savings. There are some possible solutions. For instance, why doesn't the City lobby Sacramento lawmakers to change the underlying Mills Act statute to delink the annual valuations from a rental revenue concept and instead simply have any and all approved Mills Act properties receive a standardized percentage decrease in their property tax rate? This would both eliminate the extreme complexities in the current California Revenue Code for Mills Act properties and at the same time offer certainty to both owners and municipalities.

In addition, historic preservation (along with the preservation of cultural heritage sites) should become a housing strategy that plans for and maintains our older and historic buildings, many of which already serve as affordable housing. Historic preservation initiatives should not be seen as barriers to development, since a very small percentage of Los Angeles's parcels are currently designated as historic resources.

That being said, the City at this point has spent well over a decade conducting "SurveyLA" citywide (geographic) historic resources surveys along with multiple focused Context Statements on topics ranging from ethnicity heritage to subject matter (example: Industrial) that have identified many potential historic resources that are likely eligible and deserving of designation. It is important to teach our history to future generations while also retaining, per above, those properties that also constitute naturally occurring affordable housing.

UNNC agrees with other public comments that because SurveyLA helps identify individual historic resources and areas of contributing resources that qualify as potential historic districts, its data should be fully incorporated into the city's new Housing Element Update.

Conclusion

There is much to applaud in the 2021-2029 Draft Housing Element. UNNC is especially pleased with the City's attempt to help right the wrongs of past zoning patterns and decisions. Many of the ideas in this document are innovative and even ground-breaking.

UNNC would be grateful if there can be more focused language throughout the *final* Housing Element that makes it clear that the City recognizes that there are always neighborhood-specific impacts, and that proposed citywide initiatives may still evaluate specific sites and neighborhoods. As mentioned above, UNNC advocates for a balance between growth and change, while also conserving the livability and character of the diverse neighborhoods that together make up the United Neighborhoods of the Historic Arlington Heights, West Adams and Jefferson Park Communities Neighborhood Council.

Thank you very much for considering UNNC's thoughts and concerns.

Laura Meyers

Laura Meyers
UNNC President
president@unnc.org
laura.meyers@unnc.org
323-868-0854

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Sep 22, 2021 at 1:34 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Sep 22, 2021 at 1:30 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Antoine Wakim** <tonywakim96@everyactioncustom.com>
Date: Wed, Sep 22, 2021 at 1:28 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. But additional bold action and specific implementation measures are needed to make the housing element update successful.

I urge the City to:
- Rezone enough new capacity to result in the creation of 300,000 new homes, enough to close the RHNA gap.
- Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods, and would require wealthy, high-opportunity areas to accommodate the most new housing.
- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Allow "missing middle" multifamily housing citywide.
- Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
- Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Sincerely,

Personally sent by Antoine Wakim using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Antoine Wakim
342 S Cochran Ave Los Angeles, CA 90036-3320
tonywakim96@gmail.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 3:20 PM
To: tonywakim96@gmail.com

Hello,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing ELement Comment Letter - Westside Neighborhood Council

2 messages

Kimberly Christensen <kimwncseat4@gmail.com> Wed, Sep 22, 2021 at 5:06 PM
To: HousingElement@lacity.org
Cc: Terri Tippit <westsidenc@ca.rr.com>, Barbara Broide <bbroide@hotmail.com>

Please confirm receipt.

KIm Christensen, AICP
Land Use Co-Chair
Westside Neighborhood Council

WNC letter 2021 Housing Element Update and Safety Element Update comments.09.23.2021.signed.pdf
786K

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 11:01 AM
To: Kimberly Christensen <kimwncseat4@gmail.com>

Hello,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: 2021-2029 Housing Element and Safety Element Update - WNC Comment letter

3 messages

Daniel Skolnick <daniel.skolnick@lacity.org> Mon, Sep 27, 2021 at 11:32 AM
To: Housing Element <HousingElement@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

Paul Koretz
Councilmember • 5th District • City of Los Angeles

Daniel Skolnick
Senior Planning Deputy
Councilmember Paul Koretz, Fifth District
200 North Spring Street, Room 440, Los Angeles, CA 90012
(213) 473-7005 Los Angeles City Hall Office
Email: daniel.skolnick@lacity.org

PLEASE NOTE: All email correspondence with the office of Councilmember Paul Koretz (including any attachments), along with any associated personal identifying information, is considered a public record under the California Public Records Act and may be subject to public disclosure under the Act.

---------- Forwarded message ---------
From: **Kimberly Christensen** <kimwncseat4@gmail.com>
Date: Wed, Sep 22, 2021 at 5:17 PM
Subject: 2021-2029 Housing Element and Safety Element Update - WNC Comment letter
To: <paul.koretz@lacity.org>, <daniel.skolnick@lacity.org>, <angel.izard@lacity.org>
Cc: Terri Tippit <westsidenc@ca.rr.com>, Barbara Broide <bbroide@hotmail.com>

Please find attached our comment letter regarding the 2021-2029 Housing Element and Safety Element Update.

It is not all inclusive of our comments but this is what we submitted to meet today's deadline. We will be submitting a second letter before the City Planning Commission hearing that will include comments regarding the Chapter 6 Goals, Policies, Objectives and Programs and the Adequate Sites and Candidate Sites Inventories, any other changes in the revised Housing Element that come to our attention due to the limited time provided for review of the changes which should have been provided in a track changes format as well for ease of review) and the Safety Element.

Please let us know if you have any questions or wish to discuss any of our comments.

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

WNC letter 2021 Housing Element Update and Safety Element Update comments.09.23.2021.signed.pdf
786K

Housing Element <housingelement@lacity.org> Mon, Sep 27, 2021 at 3:46 PM
To: Jackie Cornejo <jackie.cornejo@lacity.org>, Nancy Twum-Akwaboah <nancy.twum@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>, Betty Barberena <betty.barberena@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Marisol Romero <marisol.romero@lacity.org>, Maya Abood <maya.abood@lacity.org>, Wajiha Ibrahim <wajiha.ibrahim@lacity.org>, Joel Montano <joel.montano@lacity.org>

FYI

Housing Element Staff
Los Angeles City Planning

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

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

WNC letter 2021 Housing Element Update and Safety Element Update comments.09.23.2021.signed.pdf
786K

Housing Element <housingelement@lacity.org> Tue, Sep 28, 2021 at 8:17 AM
To: Cally Hardy <cally.hardy@lacity.org>

FYI some comments about the EIR in this one.

Housing Element Staff
Los Angeles City Planning

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

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

---------- Forwarded message ---------
From: **Daniel Skolnick** <daniel.skolnick@lacity.org>
Date: Mon, Sep 27, 2021 at 11:32 AM
Subject: Fwd: 2021-2029 Housing Element and Safety Element Update - WNC Comment letter
To: Housing Element <HousingElement@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

[Quoted text hidden]

WNC letter 2021 Housing Element Update and Safety Element Update comments.09.23.2021.signed.pdf
786K

WESTSIDE NEIGHBORHOOD COUNCIL
P.O. Box 64370 Los Angeles CA 90064
www.wncla.org (310) 474-2326

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Mary Williams
Jae Wu

September 23, 2021

City of Los Angeles Department of City Planning
Citywide Policy Bureau
200 North Spring Street, Room 750
Los Angeles, CA 90012
Via email: HousingElement@lacity.org

RE: Los Angeles Citywide Housing Element 2021-2029 Update and Safety Element Update

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

Dear City Council, City Planning Commission and Planning Department Staff:

The Westside Neighborhood Council (WNC) reviewed and considered the Citywide Housing Element 2021-2029 Update and Safety Element Update. This letter is submitted on behalf of the Westside Neighborhood Council and our 80,000 stakeholders on the Westside of Los Angeles. We have a history of being a Neighborhood Council active in land use policy considerations and in the review of development projects in our area. We have been supportive of quality new housing and commercial projects sensitive to our community's character. We invested significant time and effort working with our partners in the Planning Department not so long ago to craft the EXPO Corridor Neighborhood Transit Plan to recognize new potentials for development in proximity to the two EXPO transit stations that are located in our area. We view the EXPO Plan as having been a successful application of good planning principles and active community engagement. As the Housing Element Update has been conducted during the COVID pandemic it is important to note that outreach efforts were severely compromised. We value the importance of the Housing Element and its role in guiding housing issues in our community. Our comments are in the spirit of developing a Housing Element with goals, policies, objectives and programs that are implementable, realistically, fairly and equitably guide the future of our community and address our stakeholders concerns as well as the broader citywide needs.

PROCESS COMMENTS:

It is understood that it was the State that established the due date for the Update document. However, given that the date was established prior to COVID, once we strongly recommend that the City go to the State to request an extension of the due date for a final Housing Element /Safety Element Update document. The fact that the revised Update draft was circulated just last week on September 15th at 7:45 pm (and without a redline version), without providing community members with adequate time to review the document less than a week before the scheduled public hearings is more than troublesome. To have the formal staff presentations about the Update made in the same program as the public hearing is also problematic. There will be no opportunity for those participating to ask questions and to apply the information gained from the presentation to their planned testimony. There will be no opportunity to incorporate ideas heard/learned in the public hearing into one's own testimony if relevant. Having the due date for written comments on the draft document on the same day as one of the two public hearings is not good practice and places tremendous burdens on volunteer community representatives responsible for leading the review of this major document.

In summary, the public engagement process has been generally troublesome and vulnerable to much criticism. The State should have realized that during a pandemic adjustments were called for – not just to allow for adequate time for quality community engagement, but equally important to allow for cities to be able to begin to understand the nature and impact of the changes experienced as to how we live, work and conduct our daily lives. Some of the changes experienced will become permanent and to create an eight your plan without the adequate time to begin to address these changes is to create a plan out-of-date before it is finished. The City should now seek to obtain an extension on the submission of the Update document to enable more time for review of the draft and revisions to reflect public input. As the State continues to operate under a COVID-related emergency order, the Governor could be lobbied to extend the submission deadline. (Since the legislature has adjourned for this session, a legislative fix is not possible.) As it is, the Planning Dept. has inadequate time to consider the comments that are being submitted. And, if the City Planning Commission is presented with the draft on October 14th, what time does that allow for any level of robust engagement or conversation to meet a State October 15 deadline? When will the PLUM Committee and full Council consider the document and what opportunity might there be for public comment to be heard and seriously considered? The answer given the timeframe before us is not an encouraging one. We will have given and submitted testimony that will not be adequately considered.

As we noted in our comment letter submitted to the Update DEIR, we believe that the entire Housing Element and draft EIR process has been grossly out of compliance with State laws (both CEQA and Planning laws relating to General Plans). The process has not been transparent with the public and City stakeholders. We have repeatedly asked for information from the City regarding population projections, housing demand, and the candidate sites information through the course of the Housing Element Update process. The WNC adopted a motion at its August 12, 2021 meeting asking for the missing sections of the Housing Element (including the Candidate Sites maps) and for the City to ask the State to extend the deadline for the Housing Element Update process to allow adequate time to complete the draft Housing Element and Safety Element Updates, Draft EIR, and to allow appropriate pubic participation in the process. CEQA is integral to agency decision making as discussed in Public Resources Code Section 21006. When the Housing Element Update is not released in its entirety and with one of the most significant pieces of information relevant to the CEQA process and adequate review of all required issue areas

missing, we believe that recirculation of the DEIR will be required because additional analysis will be required.

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

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

When the all-important Appendices were released, they were presented as documents which were extremely difficult to read (if they could be opened and viewed). Understanding that the tables were to contain many columns, it would have been important to format the documents so that the public could actually see the defining first column while attempting to access the data further along the table. The manner in which the information in the spreadsheets/tables was formatted makes it as difficult as possible to see what addresses are being proposed for rezoning. The failure to acknowledge the differences between streets designated as “north” and those designated “south” is not seen. The absence of any maps showing visually what is being proposed, and the fact that the City appears to have relied upon projections from the Terner Center raises criticisms and concerns. The release of undecipherable tables does not meet the spirit of meeting compliance requirements. There is a need to create some order in the listing of properties, Appendix 4.7 is nearly impossible to decipher. No doubt the Planning Department was rushed in compiling this information, but the final product must be better organized – by Neighborhood Council preferably so that the table becomes usable. It is neither usable or truly accessible to the public in its current format. Many members of the public who attempted to open Appendix 4.7 were greeted with a computer-generated message that indicated the workbook would not display in a browser window because its file size is too big. The community must have true access to these tables to enable us to understand exactly what is being proposed in the Housing Element Update.

No summary of the changes to the Housing Element have been provided to the public upon the revised version’s release on Sept. 15th. No redline version of the Update was or has been provided to facilitate review of the document’s changes. Public comments drafted might be rendered irrelevant but without a redline version, the public must slog through the entire document once again. The notice indicated that two public hearings would be held on September 21, 2021 (the day before written public comments are due) and on September 22, 2021 (just hours before written public comments are due). Additionally, the notice indicated that the first part of each hearing would be to explain the changes to the Housing Element to the public. If the public is not provided the information and not told what the changes are until the meeting, how is that due process and

how is the public supposed to have the time to evaluate the new information and provide comment within a matter of hours?

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

Finally, as it pertains to process, this document does not address the impacts that will be associated as a result of the recent passage of SB 9 in Sacramento. The current review of single-family zoned parcels must be revisited and methodologies developed to project the impact this measure will have in Los Angeles.

The EIR for the Housing Element and Safety Element Updates will need modifications to address the incomplete nature of the EIR analysis due to the incompleteness and modifications to the Housing Element after the preparation and release of the EIR. We provided draft EIR comments in a letter submitted to the City by the earlier September 7, 2021 deadline for comments on the Draft EIR to the extent feasible.

Chapter 1: Housing Needs Assessment and Chapter 2: Constraints on Housing Maintenance, Improvement and Development

The discussion on governmental and non-constraints does not address several critical issues. The Chapter is very vague and uses the term “public opposition to new housing” and very limited in its discussion of CEQA as a barrier to housing production or at least delays in housing production and increased costs. The term public opposition” and the discussion in the chapter implies community resistance. It does not account for legitimate concerns about neighborhood character, quality of life and constructing the best possible housing development for all involved. And yet Chapter 2 does not address the effects of CEQA litigation from labor unions for lawsuits that are about protection of jobs and wages of workers and has nothing legitimate to do with CEQA. This is an issue that needs to be addressed where the City could encourage legislation to address this issue. Seminars have even been held as recently as September 9th relating to the recently published Rand Study about the effects of project Labor Agreements on Affordable Housing Production. As stated in Chapter 1 Housing Needs, Chapter 5 and Appendix 5.1 in evaluating the status of the achievements of the current 2013-2020 Housing Element the greatest unmet need is the affordable housing categories. In fact, the City has already achieved its above moderate category requirements for the 2013-2020 Housing Element 5th housing cycle 92,40 units where 35,412 units are required) with one year remaining in the cycle and even with the impacts of the pandemic for the past 1 ½ years. In fact, housing production was highest during 2020 especially with the construction of mixed developments. However, the affordable income levels are significantly below the RHNA numbers for the cycle. All constraints need to be considered and addressed not just the ones that are politically expedient.

Another non-governmental constraint that needs to be addressed more fully is increased land costs and housing costs caused by speculative buyers purchasing housing solely for investment and speculative purposes whether for leasing, for use in the short-term rental and vacation home market or for holding until higher density housing can be constructed with changes in laws. On page 1-35 and 1-36 in Chapter 1 it indicates that 12.7% of the housing supply is used for seasonal, recreational, or occasional use and 4.1% of housing is sold but not occupied. Tablle1.19 on page

1-36 indicates that 109,239 units are vacant. This is a significant number of units that could go a long way to housing the homeless and our lowest income residents. Intentional holding of housing vacant is a constraint that is not discussed or addressed and should be.

It should be further emphasized that some of the constraints are beneficial such as the preservation of open space and park space, wildlife protection, tree preservation (that helps with air quality impacts and GHG reduction) which can be offset by implementation of many of the other goals, objectives, policies, and programs.

Chapter 3: Opportunities for Conservation In Residential Development

Infrastructure is a critical issue to conserving particularly relating to water and sewer. The City needs to look at increasing usage of grey water where feasible for construction, for landscaping and other allowable categories. The City should be evaluating new/additional sources of water (any groundwater/aquifer opportunities?) to support the existing housing and the 1.4 million new units in the RHNA allocation as there is great uncertainly with the unprecedented impacts to our water sources in the last few years because of climate change. You cannot add housing unless you address water and infrastructure needs which are discussed further the Chapters below.

Chapter 4: Adequate Sites for Housing

Page 4-7 (page 148):

While we are unable to perform an analysis of the econometric approach for estimating realistic development potential as created by the Terner Center and MetroSight at this time, we have some questions related to the Methodology:

Given that the model was based upon experience going back to 2015, how valid can its assumptions be given that density incentives since that time have been vastly increased and will continue to increase. More projects are now entitled as ministerial or “by right” which should increase projects brought to completion. Interest rates for financing of projects continue to be at all-time lows. Does the model underestimate the chance that a property will be redeveloped? It is noted in the draft that “the outcome of the model is that each site is assigned an anticipated development potential that is well below the zoned capacity for the site, as there are many factors which make it difficult to identify precisely which sites will develop with housing over the 8-year period. It is not expected that all sites identified using this model will redevelop with their identified realistic development potential; rather, the much more likely outcome is that a smaller number of sites are developed with their expected build out (outcome of step 2 of the model).” As there are economies of scale to be obtained from the construction of larger projects, how “likely” are these assumptions to be proven to be valid? What is the rationale for assuming that development will take place well below the zoned capacity for a site?

Additionally, as SB 9 and SB 10 had not been adopted at the time of modeling, what impact does their passage have on the results of this modeling and the estimated units to be generated particularly as they relate to the added capacity on single-family zoned lots where development does not require the provision of any affordable units?

An underestimation of realistic development potential will lead to the unwarranted up-zoning of parcels throughout the city.

On pages 4-22 and 4-23, is the process used to determine project completion for projects in the pipeline reasonable (if based on experience going back to 2015 when there were very different conditions and programs in force)?

Other Pipeline Residential Development

Given that many types of development are now "by right" or ministerial, is it reasonable to assume that the removal of procedural delays could increase the numbers of projects as well as completion rates? Having certainty is an extremely important factor in the development of new projects. Providing developers with the knowledge that their projects will be processed more efficiently and quickly will in itself provide added interest in pursuing projects in Los Angeles as it is well acknowledged that the time to obtain entitlements was a source of much criticism from the development community and, as "time is money" that delay factored into the feasibility of some projects.

Additionally, if data generated during any part of the COVID pandemic was included, should that data be viewed as so unusual that it should be removed from calculations made? Do State guidelines permit modifications that have a sound rationale?

On page 4-26 there are estimates of ADU projections. The annual average 2018-2020 figure reflects and includes the reduced number of units permitted in 2020 which one could reasonably attribute to COVID-related impacts. The trend prior to 2020 was one of growing increases in activity. Therefore, is it reasonable to calculate the annual average with the apparent acceptance of the dip (rather than a continuing increase in the numbers of ADUs / year)? *Again, how does the State formula restrict the City's ability to adjust for conditions such as the dip seen in ADUs during the height of the pandemic?*

Page 4-31 refers to government code 65583.2(i) that allows for rezoning to accommodate the shortfall for lower-income households to allow a minimum density of 20 units / acre and 16 units/site (sites identified in Appendix 4.7).

Page 4-33 indicates that an additional 267,498 sites were selected in the Candidate Sites Inventory based "on a variety of criteria and with many different characteristics into the development assumptions as possible to promote accuracy. The various rezoning strategies also include their own set of individualized assumptions regarding availability and suitability of sites and overall capacity." *Have all those criteria been shared with the public? We are not aware of the availability of this information.*

Page 4-34 notes:

"The sites have been analyzed to ensure they have sufficient water, sewer, and dry utilities available and accessible. In an urbanized area like Los Angeles, the only sites that lack availability for basic infrastructure are located in remote, fire-prone undeveloped hillside areas, which have been removed from the rezoning inventory by excluding all parcels located in Very High Fire Severity Zone Areas. In addition, sites in environmentally sensitive areas susceptible to sea level rise or located in zones that do not already allow for residential development (such as Open Space, Public Facilities or Manufacturing) were generally removed (exceptions include areas that are anticipated to be rezoned to allow residential use, as described below). Adequate water and sewer service is required to obtain building permits in Los Angeles, with a priority for developments with units affordable to lower-income households."

When it is noted that the "sites" have sufficient water, sewer, and dry utilities available and accessible, there is no reference made to the cumulative impacts across blocks, neighborhoods, planning areas, or even the City as a whole as to the sufficiency of such resources. We must challenge the sufficiency of the infrastructure and there is data to show that water supplies are already projected to be an issue.

The draft Housing Element EIR references the DWP's 2020 Urban Water Management Plan (UWMP) in the chapter on Utilities & Service Systems. What it did not say is that the number of new units to be built under the Housing Element is far beyond what the UWMP anticipates. This means the claim that there is ample water for all the new construction must be questioned.

With regard to water usage, the Initial Study section re: Utilities and Service Systems asks:

Would the project:

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

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

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

While the DEIR says that the Project could have potentially significant impacts in all three of these areas, the chapter Utilities & Service Systems ultimately finds that impacts in these areas would be less than significant. To make this argument, the EIR references LA City's 2020 Urban Water Management Plan (UWMP). Unfortunately, the residential growth projected by the Housing Element goes far beyond the growth projections given in the 2020 UWMP.

Page 4.16-47 states that:

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

On page 4.16-49 we find Table 4.16-4 Estimated Water Demand Compared to Water Supply

	Dwelling Units
Single-family Residential	*76,920 du*

Multi-family Residential	*343,407 du*
Total	***420,327***

The EIR states that of the RHNA Allocation of 456,643 units, 420,327 units will be physically connected to the City's potable water supply system

But while the EIR references the City of LA's 2020 Urban Water Management Plan (UWMP), the City's RHNA Allocation is far beyond the housing projections given by the UWMP. Under Demographics and Climate, on page ES-5 of the Executive Summary, the UWMP states:

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

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

	2030
Single-Family	*639,280*
Multi-Family	*969,198*
Total	***1,608,479 [sic]***

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

1,608,479
\- 1,440,000
168,479 **Net growth in housing units per 2020 UWMP**

. Does it take into account water needed during housing construction activities?

This shows that the growth projected for the year 2030 by the UWMP is far below the 420,327 units projected by the Housing Element by 2029. **The UWMP's calculations regarding projected water usage by 2030 are based on a net gain of 168,479 new units. The Housing Element's 2029 projection is about 2.5 times that number. The Housing Element's projection is so far beyond the number that the UWMP assumes, the EIR's claim that LADWP has sufficient supplies to accommodate projected growth is clearly not credible. This means that the statements made in the draft Housing Element cannot be supported.**

Table 4.16-4 also makes the following assumption regarding additional water demand:

Total 2029 Housing Element Update Water Demand: 100,992 AFY (acre feet per year)

But if we divide 100,992 by 420,327, we see that the Housing Element anticipates that new units built will only consume about 0.24 AFY. While water usage per household varies greatly

depending on a number of factors, the assumption of 0.24 AFY per unit is very much on the low end. The UWMP does project that water usage will decline over time, but this figure is extremely optimistic, and there is no data given to support this assumption. It also does not appear to take into account water consumed by residents outside the home. Does it take into account water needed during housing construction activities?

Relevant tables:

Exhibit ES-C
Demographic Projections for LADWP Service Area

Demographic	2025	2030	2035	2040	2045
Population	4,243,478	4,374,240	4,520,870	4,670,693	4,806,396
Housing					
Single-Family	628,359	639,280	647,403	657,614	667,311
Multi-Family	906,120	969,198	1,037,051	1,100,361	1,157,553
Total Housing	1,534,479	1,608,479	1,684,455	1,757,976	1,824,864
Persons per Household	2.77	2.72	2.68	2.66	2.63
Employment					
Commercial	1,897,438	1,953,634	2,011,968	2,066,096	2,105,798
Industrial	94,073	91,003	87,910	84,264	79,680
Total Employment	1,991,511	2,044,637	2,099,878	2,150,360	2,185,478

Source: 2020 Regional Transportation Plan, Southern California Association of Governments

Exhibit ES-F
Breakdown in Historical Water Demand by Sector for LADWP's Service Area

Fiscal Year Ending Average	Single-Family		Multi-Family		Commercial		Industrial		Government		Non-Revenue*		Total
	AF	%	AF	%	AF	%	AF	%	AF	%	AF	%	AF
2016-2020	**170,660**	**34%**	**141,088**	**28%**	**88,680**	**18%**	**14,938**	**3%**	**39,628**	**8%**	**40,690**	**8%**	**495,685**
2011-2015	206,652	37%	161,592	29%	96,832	18%	17,855	3%	43,573	8%	26,139	6%	552,768
2006-2010	236,154	38%	180,277	29%	106,964	17%	23,196	4%	42,956	7%	30,617	5%	620,165
2001-2005	239,754	37%	190,646	29%	109,685	17%	21,931	3%	41,888	6%	52,724	8%	656,628
1996-2000	222,748	36%	191,819	31%	111,051	18%	23,560	4%	39,421	6%	33,696	5%	622,295
1991-1995	197,322	34%	177,104	30%	110,724	19%	21,313	4%	38,426	7%	39,364	7%	584,253
30-Year Average	**212,215**	**36%**	**173,755**	**30%**	**103,990**	**18%**	**20,465**	**3%**	**40,982**	**7%**	**37,205**	**6%**	**588,611**

Exhibit ES-H
LADWP Water Demand Projections by Sector

Year	Single-family	Multi-family	Commercial/ Government	Industrial	NRW	Additional Conservation Savings*	Total
2025	228,529	192,727	156,407	13,651	51,321	133,133	509,501
2030	233,366	205,728	157,341	12,902	50,826	133,506	526,658
2035	237,297	219,798	158,236	12,171	51,334	142,688	536,148
2040	242,761	233,602	159,030	11,418	51,026	143,351	554,486
2045	246,779	244,853	157,680	10,503	50,687	144,752	565,751

Table 4.16-4 Estimated Water Demand Compared to Water Supply

Land Use	Dwelling Units or Jobs in Plan Area	Daily Water Use Rate (gpd/unit)	Daily Water Demand (gpd)	Annual Water Demand (afy)
Single-family Residential	76,920 du	326	25,075,920	28,088
Multi-family Residential	343,407 du	189	64,903,923	72,702
Total 2029 Housing Element Update Water Demand			89,979,843	100,992
Current Citywide Water Demand (Year 2020)				495,668
Total Water Demand (Citywide + 2029 Housing Element Update)				**596,660**
Projected Year 2030 Water Supply				**693,200**

Water demand numbers are rounded to the nearest thousand. Totals may not add up due to rounding.
du – dwelling unit
gpd – gallons per day
afy – acre feet per year (1 af = 325,850 gallons)
Source: Water demand rates were obtained from the LADWP's 2020 UWMP, Exhibit 2I.. Per the 2020 UWMP, per unit water demand is forecast to decline over time; the forecast 2030 rates are assumed to apply to new development.

The adequacy of water supplies relates not only to the ability to provide potable water to the growing population, but a shortage of water from a regional perspective threatens the ability of providers to generate needed electrical power as many sources of our electricity are provided via generators associated with the release and/or flow of water that produces electricity. During the current drought we are seeing water levels at major reservoirs dropping to record low levels threatening power production associated with those facilities. One must ask whether water supply estimates took into account the severe drought conditions not only in Southern California but throughout the State and Western States (where electrical power is often purchased when needed). Excessive heat episodes experienced as a result of climate change is another factor that will affect the availability of electric power to be purchased from sources outside of the State. How has this been evaluated in terms of new demands associated with projected housing and the increases in density?

While the Housing Element is currently being written in conjunction with revisions to the Safety Element, it is very clear that it is insufficient to merely state that "the sites have been analyzed to ensure they have sufficient water, sewer, and dry utilities available and accessible." The recent failures at the Hyperion Sewage Treatment Plant on the coast demonstrate the fragile nature of this major infrastructure facility. A plan of this scope must consider the planning and provision of infrastructure in preparation for development. How can it be assumed that infrastructure will somehow be built without a specific plan that requires the construction of infrastructure prior to

build out of housing? Should there be triggers that ensure that adequate infrastructure exists before units have been added? Areas of the City already are subject to regular power outages and cannot absorb new development without experiencing even more failures of the system which should be viewed as unacceptable. A plan of this scope must surely require a review and updating of not only the Safety Element, but also amendments to the elements that specifically address: Utilities and Infrastructure, Public Facilities including schools, Open Space and Recreational Facilities. And the Land Use Element must scrutinize the need to maintain land available for future jobs, impacts of loss of open space on residentially zoned land which will have impacts on the urban forest canopy, the ability to recharge the water aquifers, and maintaining a viable and sustainable habitat for wildlife.

It is our understanding that the elements of our city's general plan should form an integrated, internally consistent plan. No one element is meant to have precedence over any others. The revision of the Housing Element, must trigger the revision of other general plan elements to avoid internal inconsistencies. The statutory elements call for interrelated content.

The language in the City's general plan has always valued and protected neighborhood character. What in this housing element proposes to do so? Where are design standards and the creation of model developments that will advance density but still play an important role in preserving what makes individual communities unique? The aesthetics of permitting cheaply built boxy structures across the city in order to incentivize housing will have long-lasting negative impacts on the attractiveness of the city to attract residents, businesses and to retain the image of Los Angeles as a dynamic and world-class city. The general plan must establish both a vision and expectations that will result in a more sustainable and well-functioning city.

The area within the Westside Neighborhood Council community boundaries is considered to be a High Opportunity Area. All of the LAUSD elementary schools within the WNC boundaries are operating at capacity. We are not aware of plans to construct new schools in the area nor is there land readily available to do so. How can the plan assume that there is capacity at these facilities or that adding the numbers of new residents can be done without a negative impact on the quality of the education offered? Many current residents of our community bought their homes or condominiums and rented houses or apartments in order to enroll their children in the local schools. Schools serve as a focus point not only for education, but for community building. Any suggestion that school boundaries would need to be changed breaking up a defined community, or that relocation of students to schools in other areas of the city would be viewed as unacceptable impacts of this plan.

Page 4-35 says:

"The model considers the extent to which existing uses may constitute an impediment by incorporating the city's past experience with converting existing uses to higher density multifamily housing, including market-based factors. It also is based on the overall set of regulatory standards and incentives that already exist and are being designed in conjunction with the Rezoning Program, to encourage additional residential development on these sites. Assumptions regarding affordability levels are built into specific rezoning programs as described below but will be individually tailored based on the results of a feasibility analysis the City has secured through a REAP grant to carry out as part of the rezoning. Generally, the aim is to require more affordable housing than is typically achieved through existing incentive programs, particularly in Higher Opportunity Areas."

It is clear that the COVID pandemic has resulted in changes as to how Angelenos live, work and shop. The pandemic has ushered in changes over a much shorter period of time than would have more naturally occurred; these changes will serve to weaken and/or remove former impediments related to conversions of uses of properties. In fact, conversions may now be viewed very favorably by property owners who have lost office and/or retail tenants that will not be returning to past occupancy levels.

The text then goes on to discuss the modeling used to calculate maximum potential units.

Pages 4-35 - 4-36 have some conclusions about construction of lower-income housing through high-rise development. It is worth noting that a recent RAND study found that the reason that Measure HHH projects tended to cluster at the 49-unit level has to do with the requirement added to the program by the City Council that required union fair wage labor agreements on projects consisting of over 49 units. (It could very well be that without that requirement the City would have seen a significantly larger number of larger low income / affordable housing projects.) The Rand Study observed that by remaining under 50 units in size, the projects were unable to take advantage of some of the efficiencies of scale experienced in larger projects. This would suggest that there should be strategies to incentivize the construction of larger projects (sensitive to their surroundings by virtue of design elements) so that the value of the land beneath them can be better utilized.

The discussion of the City's Rezoning Program is discussed on page 4.38. It touts the results of affordable housing incentives. But, now with the passage of SB 9 and SB 10 that provide no requirements for affordable housing, is it realistic to believe that incentives will be sought at the same rates if affordability must be maintained over many years when projects can be built without affordability on R1 lots?

For those of us in the process of updating our community plans, there is a preview of what is in store for us as noted on page 4-42:

"Plan Updates in earlier phases have not yet established whether they intend the proposed maximum densities found in Appendix 4.7 to be achieved through an adjustment to base zoning, or through a CPIO community benefits system. For all these reasons, it would be inappropriate to rely upon base densities in determining realistic capacities for the Plan Updates. Maximum allowable densities are therefore utilized in determining the total capacity because the City has clear reason to assume projects subject to rezoning will be built at densities higher than the base densities when bonuses are being provided. However, the usual adjustment factors, including the standard 80% maximum capacity reduction and standard suitability/availability discount factors are also still applied. *If the City has clear reason to assume projects subject to rezoning will be built at densities higher than the base densities when bonuses are being provided, why then is the usual adjustment factor (standard 80% maximum capacity reduction and standard suitability/available discount factors are "also still applied?*

The Plan Updates will continue to be refined and developed through an extensive community outreach over the next three years. Site locations and proposed development standards may vary from those proposed in Appendix 4.7, as a result of continued plan development."

It has been very difficult to review key attachments to this document. For those of us reviewing this document for our neighborhood council areas, it would be helpful to have Attachments 4.1 and 4.7 broken down by neighborhood council geographic area (or at the very least by planning area). We want to be able to readily view the inventory of adequate sites so that we may comment on it. It is

very difficult to view all the fields across a computer screen. A way to view all the frames (or all frames with easy reference to what is being looked at) should be considered when formatting such information. Likewise, Attachment 4.7 that lists candidate sites to be rezoned to accommodate shortfall housing is even more difficult to access and understand because its entries are very scattered from throughout the city and there appears to be no organization as to the order of the entries.

It is noted that in the Hollywood and Downtown draft plans, increased development rights are being built in via Community Plan Implementation Overlay with CPIO community benefits systems. Those two plans will have new 200-unit thresholds for discretionary review under Site Plan Review, which otherwise is required for 50-unit sites and more. "In areas targeted for growth, the CPIO benefits system often results in the doubling (or more) of allowable density and/or floor area."

Page 4-44 describes an update to "the City 's Density Bonus ordinance to allow for up to 50% density increases citywide in exchange for the maximum amount of affordable housing economically feasible (as determined by a feasibility study)." (What feasibility study?)

Is there the potential for some properties to being subject to up-zoning via their community plan and then be subject to an additional density bonus under a citywide density bonus program? Double jeopardy? We would strongly oppose such impacts. It is merely by the luck of the draw (lack of luck of the draw) that certain communities find themselves undergoing their community planning process at the same time that the City is completing the Housing Element and must prepare rezoning maps for the State. There is not enough time to complete any additional community plan cycles nor to revisit those already approved. In a time when all seek equity and justice, we must insist that those communities in the process of completing their community plans must not bear a greater burden of rezoning than other areas of the City. Being a High Opportunity Zone, being part of a current community plan process AND being subject to additional up-zoning by virtue of additional strategies to be employed Citywide to meet RHNA goals is completely unacceptable and will destroy our community and others that could fall under such a scenario. **Areas that have community plans underway should not be subject to any additional rezoning or density incentive programs implemented to bring Citywide total numbers up to meet RHNA goals.**

Page 4-45 discusses adaptive re-use opportunities but in doing so indicates that "uses like existing shopping centers, big box stores, theatres, restaurants, small buildings and other uses not as likely to turn into housing were removed altogether."

What determined which sites were “not as likely to turn into housing?” We know that the pandemic has brought about a shift in live, work and shopping patterns and it is expected that many brick-and-mortar shopping locations were already in excess before the pandemic, but in coming years will be replaced by other uses. Given that Sen. Portantino has introduced legislation to incentivize the conversion of big box and shopping center-type locations to housing, is it appropriate to remove these types of locations entirely from the inventory of potential housing sites? Larger sites provide ideal opportunities to provide for a mix of uses that include residential and retail as well as other uses. Larger parcels also provide excellent opportunities for mixes of types of housing.

Page 4-46 makes reference to "if SB 9 passes..." in relation to ADU construction on R2RD zoned land. Now that SB 9 has passed, adjustments/increases as to projected units must be made.

Page 4-47 makes reference to LAUSD interest in building affordable housing on their land. That plan has met with considerable community resistance for many reasons. It should also be noted

that parents of LAUSD students have criticized the outreach and community engagement on this initiative as being inadequate. Although first proposed as housing for teachers and LAUSD personnel, later discussions revealed that there was no intent to focus any proposed housing built as being for LAUSD staff. As Los Angeles is a park poor city and has growing needs for open space and recreational space, there is a need to preserve open space and space suitable for recreational uses... which includes school yards. Furthermore, it is critical that adequate recreational space be available for school uses as populations increase. What might be viewed as surplus land at the current time may very well be needed to accommodate growing student populations. The need for students (and the general public) to exercise and avoid obesity has only increased from critical levels seen before the pandemic. Those needs are greater now. We challenge the taking of school property for housing. The description of Public Facility Zones does not detail all the types of public facilities that are being considered as appropriate sites for housing. We are aware of a legislative measure that was introduced to permit housing on municipal golf courses. It is imperative that parkland and municipal open space (such as golf courses) remain as open space. If golf courses were to be repurposed, they should be designated as public parkland for the benefit of all Angelenos and the wildlife and ecosystems they support. As the urban tree canopy is compromised as a result of growing residential density and development, the City's parks and golf courses will provide shelter for the insects, birds and animals that call Los Angeles its home. As a park poor city, Angelenos will not give up our open space. Furthermore, while golf courses may be looked at by some as elitist, public golf courses provide a recreational opportunity for all to engage in the sport and to do so without having to join a country club at great expense. Municipal golf courses provide recreational opportunities otherwise not available to the general public.

Page 4-48 concludes with the results of the rezoning program and state law compliance:

"At least 39,121 sites containing 656,114 units have been identified as meeting the state law criteria as lower-income, meaning they can accommodate at least 16 units per site and can include minimum densities of at least 20 units/acre. At least 130,543 units will be rezoned as lower-income sites at these densities and will permit a multi-family use by right when at least 20% of the total units are dedicated as lower-income affordable housing. More than fifty percent of the lower-income shortfall is accommodated on sites designated for residential use (R zones). As shown in Maps 4.4 and 4.5, the Rezoning Program primarily creates new development potential in areas located within a Regional Center (such as Downtown Los Angeles, near public transit, and in areas of high opportunity (such as in West Los Angeles and the South Valley)."

Page 4-59 Adequate Sites Inventory is done by Census Tracts. Table 4.20 shows total expected unit potential broken down into three categories, from the lowest capacity neighborhoods to the highest. In that chart, the total unit potential for a "low-capacity neighborhood" is listed as 0-15, for medium capacity neighborhoods 15-50, and for higher capacity neighborhoods 50+. This shows that the expected unit potential is over three times as great for higher capacity neighborhoods than for low-capacity neighborhoods. In the same chart, the difference between low-capacity neighborhoods and higher capacity neighborhoods re: total lower-income unit potential is even greater. Total lower-income unit potential in the low-capacity neighborhoods is 0-5, while medium capacity neighborhoods is 6-25 and higher capacity neighborhoods 26+.

Concentration of Development Potential is summarized in Table 4.21 where it is shown that **"Most of the expected development potential identified in the Adequate Sites Inventory is concentrated in a relatively small proportion of neighborhoods in the city. The higher capacity neighborhoods account for 67% of the city's expected production of new units, despite comprising just 30% of the total census tracts in the city. Meanwhile, the low-**

capacity neighborhoods comprise a larger share of the city's geography (33%) but have very little expected development potential (5%). "

Page 4-60: Table 4.22 shows that the neighborhoods with the highest capacity for lower-income housing account for 64% of the city's expected production of new units, despite comprising just 19% of the total census tracts of the city. The neighborhoods with the lowest capacity for lower-income housing comprise nearly half of the city's geography (41%) but have very little expected potential for lower-income housing (4%).

Page 4-61: Table 4.23 Existing Conditions Analysis: Racial/Ethnic Composition of Neighborhoods Identified in Existing Sites Inventory: This chart compares the current racial/ethnic composition broken down by race across current neighborhood capacity levels.

Page 4-62: Table 4.24 shows the percentage of renter household by neighborhood capacity along with the median household income, median household income of renter households, and percent of low/moderate income households. It compares the citywide average to each category of capacity: low capacity, medium capacity and higher capacity neighborhoods. The citywide average percent of renter households is 63%; in low-capacity neighborhoods it is 44%, in medium capacity neighborhoods it is 58% and in higher capacity neighborhoods it is 76%.

Page 4-63: Table 4.25 shows the share of development potential located in what are described as "racially/ethnically concentrated areas of poverty (R/ECAPs)," compared to those within "racially concentrated areas of affluence (RCAAs)."

It concludes that "compared to the overall share of the city located within a R/ECAP (10.5%), the total development potential and lower-income development potential identified in RCAAs, which comprise over 7 percent of the city but less than 3 percent of the identified development potential." QUESTION: Does the percent of the city' census tracts in racially concentrated areas of affluence include HILLSIDE areas and those in HFSZ? If so, is it reasonable to make this kind of comparison?

When the City presents data re: the percentage area of land dedicated to R1 zoning, does it include all the hillside areas and those in HFSZ? If so, does that create a misleading picture as those lands are not considered to be appropriate sites for higher density development?

How are census tracts distributed over the hillside areas? Does this skew any of the data presented?

Page 4-63: Transit Access. *When the plan refers to High Quality Transit Areas and defines those as being those within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours, it does not make any reference to the carrying capacity of that transit. For those census tracts that lie along the EXPO Line, it is a fact that there is a defined limit as to the length of EXPO trains and their frequency due to the manner in which the line was built. (It shares a portion of its track with the Long Beach light rail line.) It cannot absorb an unlimited number of passengers. Likewise, for bus stops on heavily traveled corridors, given the frequency of service (even with a 15-minute or less service frequency during peak commute hours), is it realistic or accurate to assume that the level of density envisioned can be serviced adequately by those bus lines? At rush hour on some lines during pre-COVID times, there were many examples of buses failing to stop for additional (waiting) passengers because they were full. Light rail trains were also seen to be "full" at peak travel hours. How can an area be deemed "transit rich" if the capacity of the transit is limited and cannot*

service added population density? 99% of total unit potential is being placed in HQTAs. There is no information to define levels of service and capacity as it relates to population goals within those HQTAs.

Page 4-64 to 4-65 Opportunity Areas: Table 4.27 notes that the "high segregation and poverty tracts are overrepresented in terms of overall unit potential as well as lower-income unit potential and that the moderate, high and highest resource tracts are underrepresented in terms of lower-income development potential."

Page 4-64 and 4-65 have charts that compare TCAC/HCD Opportunity areas by resource levels against the existing percentage of city census tracts, percent of sites on inventory, percent of total unit potential and percent of lower-income unit potential.

Page 4-66: Table 4.28 shows Existing Conditions Analysis-Pipeline Development by TCAC/HCD Opportunity Area and reflects "actual locations of anticipated pipeline development expected to occur during the 6th cycle. Table 4.30 and 4.31 are said to suggest "that while the Sites Inventory does not actively improve conditions, it does not exacerbate them. Rather, it is a fairly accurate representation of existing conditions in the city."

It is not surprising to find that disparities exist when looking at the overall Opportunity Area scores (Table 4.29) where lower capacity neighborhoods are found to have higher environmental domain and educational domain scores than the rest of the city. The economic domain score is relatively consistent across all neighborhood types but is slightly higher in the medium capacity neighborhoods. *(What does this mean?)*

The differences in Average Environmental and Educational Domain Scores between low capacity and higher capacity neighborhoods should trigger a city focus on programs that remove the barriers to improved scores in all communities. Rather, this plan has behind it the philosophy that it appears to be OK to have lower scores in higher capacity neighborhoods and seeks, instead to move people from higher capacity neighborhoods into current low-capacity neighborhoods - - a massive social engineering effort. We continue to believe that all neighborhoods deserve and should have access to good high quality local public educational opportunities. METRO is in the process of completing the Crenshaw Line that will provide connectivity to a growing segment

Page 4-67: Existing Conditions: Analysis of Zoning -- The text states that "Considering all land zoned to allow residential uses, approximately 81% of residentially zoned land in the Highest Resource Areas is limited to single-family uses and approximately 19% is zoned to allow multi-family (see Table 4.30). In contrast, just 18% of the residentially zoned land in the areas considered High Segregation and Poverty is allocated to single-family uses, whereas 82% allows multi-family development. This disparity is starker when considering residentially zoned land in Racially Concentrated Areas of Affluence, where 95% is limited to single-family use and only 5% permits other residential uses.

Again, these figures need to be reviewed to determine what percent of the High Segregation and Poverty areas and the Racially Concentrated Areas of Affluence are located in hillside areas and in High Fire Severity Zones. Those lands are not suitable for multi-family development and should not be used to demonstrate the high proportion of land zoned for single family housing alone. It creates a distorted picture as to the total amount of land that permits only R1 zoning.

Finally, the text acknowledges the above by stating: **"Much of the city's single-family zoning is in ecologically sensitive and hazardous areas of the city. In fact, approximately 35% of the**

parcels of the city's single-family zoning are in Very High Fire Hazard Severity Zones (VHFHSZ) or areas with vulnerability to Sea Level Rise (SLR) exposure. In addition, the prevalence of single-family housing in Los Angeles means that this component of the housing stock exists across nearly all communities in the city, including many established Black communities and communities of color."

This text appears to acknowledge the false premise underlying much of the City's approach to presenting its existing housing status which seeks to show that massive land has been removed from the marketplace as potential sites for multi-family development by virtue of its R-1/single family zoning status when, in fact, that land is unsuitable for such uses.

Why isn't this fact noted prior to doing analysis?
This omission, hidden almost as an afterthought, leads the reader to believe that there are massive areas of land zoned R1 across the City in high opportunity areas available for rezoning when, in fact, the areas that will be the focus of rezoning are very limited and the impact and level of rezoning needed to implement the proposed Housing Element plan on the available land suitable for multi-family housing is massive and will inequitably and impossibly impact the areas targeted. It appears that there is no recognition that communities have a carrying capacity and that the opportunities in these areas are assumed to be limitless when, in fact, they are not.

Page 4-68:

Despite the recognition above, Table 4.30 continues to include hillside areas and VHFSZ in the percentage of residentially zoned land restricted to single-family housing. *Again, that figure is skewed and does not acknowledge the suitability of land to allow multi-family zoning. Further, land zoned ("restricted") to single-family zoning has, by State Law, been allowed to host both an ADU and Jr. ADU which means that it is no longer restricted to single-family housing. Further, with the passage of SB 9 and SB 10, the land zoned for single-family housing is no longer restricted to having an ADU and Jr. ADU. The new laws now allow up to 12 units per property under SB 10 and up to 6 units per lot under a current R1 zoned lot under SB 9. (At the time of the writing of this commentary, it is not known as to whether or when the LA City Council will adopt provisions of SB 10.)*

The recent legislative changes suggest that the State should revise its deadline for cities to complete their Housing Elements and should allow time for revisions to reflect the new state laws. There essentially is no R1 / single-family zoning in California any longer.

In the analysis of development trends, the fact that "relatively little affordable housing has been developed in Higher Opportunity Areas" is not followed by any discussion as to the factors that resulted in that pattern. Indeed, "Overall, subsidized affordable development are overwhelmingly located in lower resourced neighborhoods." Why isn't there discussion about the impact of land costs and the need for greater levels of financial subsidy needed to build affordable housing and have it "pencil out" when the cost of land is high? In a residentially zoned neighborhood with high property values without subsidies and/or tax credits, it will not be feasible to offer the types of incentives needed to result in the production of meaningful numbers of low income housing units. While it has been too easy to blame homeowners for the lack of low-income housing production in high opportunity areas, it is the economic forces that define profitability that govern where housing is built.

Likewise, while exclusionary CC&Rs, redlining and other systemic institutional forces promoted segregation over many years, today the forces that place barriers toward more racial diversity are

not the doing or fault of current homeowners -- most of whom were not alive when redlining and exclusionary policies were in force. They are not party to the creation of racial segregation. It is the economics of the housing marketplace that establishes who may buy and who may live in any neighborhood of the City of Los Angeles. If one has the resources (if one can afford) to purchase a home at the beach, one may own a home at the beach --likewise a home in the hills of Bel Air or Baldwin Hills. Current homeowners are neither to blame or to be punished for the current realities of housing availability and distribution based on affordability. The same forces are in place when one goes to buy a car, a pair of shoes, etc. What one pays determines what one can buy. The fact that the City or LAUSD fails to provide equal services to different areas of the City is an entirely different but very much related issue. ALL areas of the City should have equal educational opportunities with good teachers and good schools. People should not have to be relocated outside of the neighborhoods where they live in order to access a good education. Likewise, with the ability to access transportation. For many years, until the EXPO Line opened, it was the Westside that lacked access to any fixed rail transit while experiencing some of the worst congestion in the nation. However, the EXPO Line as a result of the sharing of track with the Long Beach Blue Line, is limited in its capacity to board passengers. Both the number of cars that make up a train and the frequency of service are physically limited. This would suggest that the City's desire to greatly increase density based upon access to good transit may not be based on an entirely accurate assessment as to the capacity of that transportation. While the Purple Line subway will soon come west from its Western Avenue terminus, it is not planned to be the "subway to the sea" as originally envisioned. It will end service at the Wadsworth VA which means that it is the EXPO Line and local buses that will remain as the main transit offerings for the growing Westside population. This would suggest that there are limits as to the ability of transit to serve the growing Westside population. This has not been acknowledged in this Housing Element.

The City, in its policies, including policies that could be adopted in conjunction with this Housing Element that can reduce forces that inflate the cost and availability of housing. Such policies should include strategies to reduce the speculative buying and selling of properties, the influence of foreign investors in the housing marketplace, the participation of institutional investors in buying up housing as an investment vehicle to generate profits for others (thus escalating not only the cost of buying a home but also the future cost of rentals). The City fails to take action to support legislative solutions at the State level and instead often supports State legislation that will incentivize the transfer of local housing to absentee institutional investors -- such as SB 9 and SB 10. There has been no acknowledgement of the billions of dollars being raised by institutional/Wall Street investors to purchase R1 properties. And, now with the adoption of SB 9 and SB 10, these investors will likely flock to California realizing that their rental portfolios will grow many times faster through the purchase of R1 properties in California than anywhere else in the country. While this may produce new units, as neither of these bills requires any affordable housing units, this will just go to advance the imbalance in the production of market rate and luxury units while making homeownership further out of reach to the local family or individual who seeks to buy a home. The failure to acknowledge these forces and how they behave in our real estate marketplace will result in countless negative impacts and unintended consequences. Strategies to address these forces should and must be adopted as part of this plan. It does no good to offer down payment assistance if the cost of housing is controlled by deep-pocketed institutional investors who bid up housing prices in order to build their share of the rental market.

How does the City plan to answer to the demonstrated behavior of institutional investors who have shown that they establish fees due by tenants that previously did not exist, that they rent rents more often than traditional landlords and evict tenants at higher rates than those in similar locations/cities/states? Will this City stand by as new classes of landless tenants are evicted when unable to meet growing rent demands to feed Wall Street profitability goals via increased rents?

Allowing housing to be treated as a commodity like pork bellies will not work to address our affordability needs. On the contrary, it may serve to exacerbate them. What can the Housing Element do to further the treatment of housing as an essential element of building and having a sustainable community?

The lack of production of 100% affordable housing projects in Higher Opportunity Areas is a result of the costs of land in those areas. It is not the result of forces that seek to racially segregate communities. Any policies that are based upon a premise of intentional segregation are divisive and avoid addressing the economic forces at play.

On Table 4.31, there is reference made to 13 census tracts not evaluated because of insufficient data. Where were those census tracts? Do they share any common characteristics?

Page 4-71: Analysis of Additional Alternative Means of Meeting the RHNA

The calculation of ADUs may be underestimated based upon the fact that the calculations of future ADU construction considered activity during the active Covid pandemic which very likely had impacts on the construction of such units citywide.

The expansion of Project Homekey will be significantly impacted by the infusion of State and/or Federal funding that seeks to address the homeless challenges faced throughout the State and nation. The distribution of these units is related to the availability of targeted motel and hotel sites. Is it reasonable to assume that there may be more supply of affordable hotel/motel properties in less built out areas of the City? If so, might that suggest that the distribution might be distributed differently than "in a manner consistent with the overall distribution of expected development potential?"

Page 4-72: In defining what is being characterized as “Higher” and especially “Highest Capacity Neighborhoods,” this draft plan does not address the reality that there are carrying capacities for all neighborhoods and ecosystems – and that a neighborhood to thrive and provide a healthy environment for its residents, has a limit to how much density it can absorb.

Page 4-73: Any discussions that focus on median household income of neighborhoods and the relationship of income to housing opportunity must draw attention to the role of wages, wage growth relative to inflation and issues related to livable wages. What keeps people out of so-called “high-resource” neighborhoods are economic factors—highest among these is poverty. Yes, while there has been and likely may still be discrimination in the mortgage industry, economic inequality is the major factor. That would suggest that associated with this plan should be an analysis of and action plan to address income inequality. Such a plan would likely focus upon efforts to raise the minimum wage, to pass progressive taxation, and to remove barriers to unionization. But, instead, policymakers attempt to blame homeowners for the very real and contributing elements to the conditions in the housing marketplace. Are there models upon which the City and State’s current strategy and direction are based upon that have documented success in achieving an increase in affordable housing?

Page 4-74: If the proposed rezoning efforts move forward and are implemented by developers, it appears that current residents of neighborhoods across the City where lower-income residents live will see little addition of housing thus forcing residents of those areas to relocate away from their communities. Is that something that residents of those areas and individuals who grew up in those communities’ desire? Do they wish to have more housing options to enable them to establish roots in communities in which they have lived?

By avoiding the entire issue of infrastructure capacity and the cost of increasing/improving infrastructure in the areas that are targeted for significant density increases, has any effort been made to estimate the costs of those improvements and to consider what might be accomplished should such funds be invested in what are now considered to be lower resource areas of the City? We continue to advocate for the provision of equal services and amenities in all neighborhoods of Los Angeles. The education provided to LAUSD students should be no different in quality from neighborhood to neighborhood. If any disparity is a cause to suggest that residences must be relocated and that neighborhoods saddled with out-of-scale development and density, then something is very wrong.

The allocation of transit investments historically has left the Westside out of the picture. Because those in the Westside were not viewed as having a significant number of regular resident transit users, transit did not come west. (That ignored the fact that many who work on the Westside would use it or that a connection, for example, from the San Fernando Valley to the Westside would serve Angelenos from throughout the region. Instead, it was looked at for many years as a Westside-serving initiative. Significant resources have been and are being invested in transit across the basis. While "high resource" areas do have good transit access, many areas deemed as low resource areas also have excellent access to transit – which will only grow with the completion of the Crenshaw Light Rail Line and expansion of the Green Line (Norwalk to LAX). Those living in high resource or high opportunity areas will not necessarily have jobs in those areas. It would be difficult for planners to assume that the proximity of residents to jobs will be better if one lives in a higher resource or lower resource area. Each individual and family situation is different and opportunities for housing should be available across a broad spectrum of communities while implementing policies that guard against the gentrification of neighborhoods.

On page 4-77, reference is made to the Downtown and Boyle Heights Community plans now in progress "that reflect additional policy priorities such as promoting a jobs/housing balance, reducing VMT, and planning for additional housing capacity near transit." It should be noted that of the many constraints expressed by affordable housing developers, compliance with new VMT standards is listed high amongst factors that delay projects and add considerable costs in the entitlement process. An analysis of the costs of implementation of VMT standards should be associated with any analysis of the barriers to affordable housing production. Impacts on housing costs should be address in a review of the Mobility or Transportation Elements of the City's General Plan. Documentation should be adopted as part of the City's legislative agenda to seek modifications to the program that hinder affordable housing production, as needed.

Page 4-78: It is noted that the result of the focus of development in HQTA that "there may be a slight dip in overall transit access." What will the impact of such a dip be? Who will be most affected?

Page 4-79: In the Mayor's Office's Innovation Team development of a Displacement Pressure Index, how did they define "affordable units at risk of converting to market rate?" Did they adopt the distinction between Affordable units (those currently protected) and those that are in fact more affordable units constructed after 1978 but still operated under market rates and considered by their inhabitants to be affordable? This is an important distinction, because policies that ignore the protection of those living in naturally occurring affordable housing are very much at risk as a result of rezoning strategies particularly those located in high resource areas. The Housing Element draft notes that the analysis as currently reported is already outdated given changes subsequent to its completion. Prior to updating, an outside independent analysis of the methodology used in the

Mayor's Innovation Team's Displacement Pressure Index would be wise if the City and Planning Dept. intend to use it in conjunction with the formulation of future housing policy.

Page 4-81 notes that the concentration of 55% of the total added development potential, and 66% of the total added lower-income potential that will be achieved by rezoning primarily in the high and highest resource areas via community plans now underway will "create a balanced strategy that would create significant new housing capacity in high resource areas, while accounting for existing housing need in neighborhoods." In the view of those living in the community plans targeted for significant new density, the plan is not viewed as a "balanced strategy." The overconcentration of density in certain areas of the City as the result of happening to be the community plans currently under revision does not result in a "balanced strategy." Nor does the accelerated loss of naturally occurring affordable housing in these community plan areas.

Chapter 5: Review of the 2013-2021 Housing Element

Achieving 34.3% for very low income housing, 29.97% for low income housing and 6% for moderate income housing levels for new construction from 2014-2020 just emphasizes the deficiency of affordable housing construction even though it improved in 2020. Developers still build more above moderate rate units and have already exceeded the RHNA allocation for the current housing cycle.

One of many ways that improvement in construction of affordable housing levels can be achieved is for the City to change the manner in which the City implements the requirements of SB 330. The City has opted to treat the replacement of units in a manner that results only in the replacement of lost units rather than to create the maximum number of affordable units possible in conjunction with new developments that obtain density bonuses per the TOC program's affordability standards in addition to replacement of the units lost as required by SB 330. A new policy need to be adopted on interpreting SB 330 and requiring developers to replace RSO units in full with affordable units of like size and then require additional units to meet the SB 1818 requirement to receive incentives granted in conjunction with programs implemented under SB 1818 like the TOC program. The City has the discretion of making the provision of affordable units is additive. The Housing Element should specifically state that the City shall not include the bonus units as inclusive of the units being replaced so that there would actually be a net gain in affordable units.

General Comments-Organization of Document

Since the document is provided and accessed individually by Chapter and separated from a Table of Contents it would be helpful for the user if the cover page for each Chapter had the Chapter number as well as the name of the Chapter. This is only done for Chapter 4.

The definitions that are provided in Chapter 5 are relevant throughout the document such as the distinction between "Affordable Housing" and "affordable housing" as an example. We recommend that the definitions are incorporated into the Executive Summary, Chapter 1 or as an Appendix with a reference to it very early in the document before the various terms in the definition are used.

General Comments and Concerns

The Update of the Housing Element, the production of housing units, and the locational decisions for candidate sites and the amount of up-zoning that will be proposed to comply with the RHNA requirement for the 2021-2029 planning period cannot be done in a vacuum. It is our understanding that areas with Community Plans in progress may experience both up-zoning as a

result of the modification of the Community Plans as well as general citywide up-zoning including the increased capacity that will be created by the recent passage of SB 9 rather than more even distribution throughout the City. There will be tremendous impacts to infrastructure (especially water and sewer), police and fire services, schools, parks and open space and schools in order to add more than 1.4 housing units both in terms of construction and permanent impacts. As stated in comments throughout this letter, police and fire facilities and services and school capacity are already heavily impacted and at capacity. The update of the Housing Element should entail an update of other relevant General Plan Elements (Open Space, Conservation, Public Services, Utilities and Infrastructure at a minimum) that will be affected and the Housing Element EIR should include an evaluation of additional impacts/cumulative impacts if housing is not evenly distributed throughout the City.

Closing Comments

This letter is not exhaustive of all of our comments since we have not had adequate time to fully review the recently released revised draft Housing Element including the newly released information, especially in Appendix 4.1 *Inventory of Adequate Sites for Housing* and Appendix 4.7 *Candidate Sites Identified to be Re-zoned to Accommodate Shortfall Housing Need*. We will submit a supplemental letter to address Chapter 6 and aspects of the revised draft Housing Element further including the above Appendices.

We appreciate consideration and response to the comments and concerns raised in this letter relating to the draft 2021 Housing Element Update and Safety Element Update.

Please keep us informed of future meetings and hearings associated with this matter during all phases of future consideration. Please do not hesitate to contact us with any questions.

Sincerely,

Terri Tippit

_____

Terri Tippit, Chair
Westside Neighborhood Council

Barbara Broide

_____

Barbara Broide, Land Use Committee Co-Chair
Westside Neighborhood Council

Kimberly Christensen, AICP

_____

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

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

Housing Element <housingelement@lacity.org>

Fw: Re: Case No. ENV-2020-6762-EIR / CPC-2020-1365-GPA -ATTACHMENT TO SUBMITTED COMMENTS - HOUSING ELEMENT

2 messages

Barbara Broide <bbroide@hotmail.com> Wed, Sep 22, 2021 at 5:15 PM
To: Housing Element Update <housingelement@lacity.org>
Cc: Cally Hardy <cally.hardy@lacity.org>, Daniel Skolnick <daniel.skolnick@lacity.org>, Angel Izard - CD 5 <angel.izard@lacity.org>

Please include/attach this compilation of article as an addendum to our comments submitted earlier for the Housing Element Update. It appears that the file was too large to accompany the earlier submission.

It is important that the Planning Dept. recognize the extent of institutional investor activity in the low density / R1 real estate marketplace so that protections to help level the playing field for Angelenos wishing to purchase a property can be incorporated into the Housing Element policies.

From: Barbara Broide
Sent: Wednesday, September 22, 2021 5:00 PM
To: HousingElement@lacity.org <HousingElement@lacity.org>
Cc: Cally Hardy <cally.hardy@lacity.org>; Daniel Skolnick <daniel.skolnick@lacity.org>; Angel Izard - CD 5 <angel.izard@lacity.org>
Subject: Re: Case No. ENV-2020-6762-EIR / CPC-2020-1365-GPA - HOUSING ELEMENT

As attached

20+Articles documenting institution investors purchase of R1 properties for rentals.pdf
2154K

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 11:10 AM
To: Barbara Broide <bbroide@hotmail.com>

Hello Barbara,

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

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

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

23 ARTICLES OF INTEREST RE: INSTITUTIONAL INVESTMENTS IN R1 PROPERTIES (6 Articles on other land-use related issues follow these 23)

CURRENT ARTICLES THAT DOCUMENT THE INVESTMENTS BEING MADE BY WALL STREET / INSTITUTIONAL INVESTORS / HEDGE FUNDS / VENTURE CAPITALISTS / PENSION FUNDS TO MONOPOLIZE OWNERSHIP OF R1 PROPERTIES FOR USE AS RENTAL (INCOME) PROPERTIES.

EDITORIAL NOTE: At the recent June 22nd Assembly Housing Committee hearing on SB 8, 9, 10, and 478, one of the Assembly members commented that he did not believe that corporate investment was an issue associated with increasing development rights on such land as "only 17%" of California single-family homes are currently owned by such investors – inferring that adding density to R1 lots will not have an impact on attracting institutional investors dedicated to generating profits for investors (who will also be absentee landlords). As institutional/corporate investors buy up R1 land, prices will rise as will the cost of housing. The following articles document the current growing involvement of corporate investors in the single-family home marketplace. The proposed laws that seek to increase density on R1 properties will make those California properties the prime targets of investments from these well-funded R1 focused Wall Street entities seeking to generate good returns for their investors. Potential homeowners will be competing with these wealthy investment funds in their efforts to purchase a home making homeownership harder to come by. A major danger to affordable housing in CA is not NIMBYs, it is WIMBYs – Wall Street in my backyard! Investments in these properties are deemed to be safe investments with reliable returns--- but what does that mean for the tenants living in these rental properties? If good returns are defined as being 8-10%/year, what does that mean for tenants facing rent increases? Does this create a new landowning vs. tenant class and increasing displacement of those who cannot meet steadily increasing rents? These articles should be shared with City Council members and elected STATEWIDE legislators who will be voting on SB 9 and SB 10 and the Weiner/Atkins bills.

Articles have been copied as access may be an issue for some..

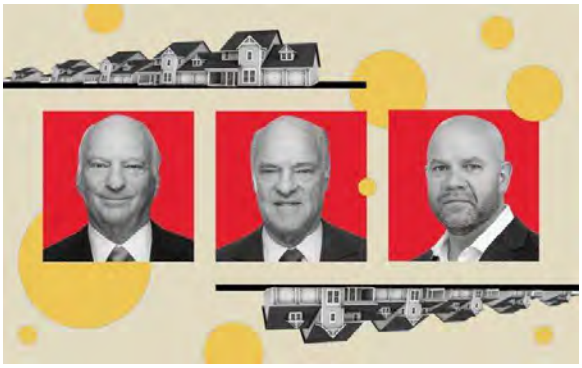
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1) https://therealdeal.com/la/2021/06/25/another-investment-firm-dips-into-single-family-rentals/?tpcc=LA-Daily-Elert&utm_source=Sailthru&utm_medium=email&utm_campaign=LA%20Daily%20%7C%2006.26.2021&utm_term=Los%20Angeles%20Daily

Another investment firm dips into single-family rentals

KKR's My Community Homes will buy and manage rentals nationwide

National / June 25, 2021 11:50 AM / TRD Staff



KKR CEOs George R. Roberts and Henry Kravis with My Community Homes CEO Marcos Egipciaco (Linkedin, iStock)

There's a new single-family landlord on the block — and it's another investor.

KKR & Co. will invest real estate and private credit funds in the Miami-based platform My Community Homes, which will buy and manage rentals nationwide, Bloomberg reported.

The platform's debut follows a flood of investment into the single-family housing market by firms looking to buy and flip or rent properties to a growing number of millennials looking for larger spaces without the mortgage payment.

A Redfin report from May showed investors had spent $77 billion on houses over the last six months, up 40% from the second and third quarters of 2020.

It's unclear, Bloomberg said, where in the U.S. KKR will focus its acquisitions and how many homes the firm plans to scoop up. The company declined a request for comment.

Marcos Egipciaco is the platform's chief executive officer. He previously held the top job at Sovereign Real Estate Group, which helps institutional investors expand single-family portfolios.

Before My Community Homes, the credit arm of KKR financed the single-family rental company Home Partners of America. This week, Blackstone agreed to acquire the company for $6 billion.

Home builder Lennar Corp. launched a $4 billion project — Upward America Venture — to buy single-family homes, then turn them into rentals. Centerbridge Partners and Allianz Real Estate committed $1.25 billion to the endeavor in March. And this month, Invesco Real Estate supported Mynd Management's move to spend as much as $5 billion on 20,000 single-family homes over the next three years.

Read more

- Covid-19 brings single family rentals into investor spotlight
- Venture capital fund closes fund to invest in "rent tech"
- Invesco-backed Mynd to spend $5B on single-family rentals

[LADN] — *Dennis Lynch*

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2) https://therealdeal.com/2021/06/02/invesco-backed-mynd-to-spend-5b-on-single-family-rentals/

Invesco-backed Mynd to spend $5B on single-family rentals

Partnership makes Mynd one of the biggest players in the single-family market

National / June 02, 2021 05:00 PM / TRD Staff



Mynd CEO and co-founder Doug Brien and Invesco Real Estate CEO Scott Dennis (Mynd, Twitter via CBRE)

Mynd Management is gearing up to dominate the single-family rental market with help from one major investor.

Thanks to Invesco Real Estate, Mynd will receive $5 billion to purchase 20,000 single-family rental homes in the U.S. over the next three years, Bloomberg News first reported.

The partnership will make Mynd one of the largest purchasers and managers of those homes in the U.S., the company said in a press release. The company will focus on buying for Invesco as it builds out its management platform of more than 7,000 homes across 25 cities.

Mynd operates a platform that aims to democratize real estate access and help investors buy, sell or manage single-family rentals across the country.

Invesco is also leading a $40 million financing round for Mynd, which will be spent on technology and acquisitions, according to Bloomberg News.

Mynd has been acquiring about 50 homes per month and hopes to up that number to 1,000 by next year, the publication reported.

The partnership comes at a time when more than half of the country's multifamily properties are owned by institutional investors. Meanwhile, ownership of single-family rentals makes up 2-3 percent, Bloomberg News reported.

Traditional commercial real estate investors whose key strategy was to invest in multifamily have since focused on single-family rentals, the publication reported.

"We're seeing the market flooded with institutional capital," Mynd CEO and co-founder Doug Brien told the publication.

This will make it more competitive for Mynd to find those properties, but its data-driven technology should give it a boost when it comes to making offers across the country, the publication reported.

Thomvest, Common Fund, Squarepoint and other investors also participated in the financing round, valuing Mynd at $300 million.

[Bloomberg News] — *Cordilia James*

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3) https://therealdeal.com/la/2021/07/02/single-family-data-startup-entera-raises-32m/?utm_source=internal&utm_medium=widget&utm_campaign=feature_posts

Single-family data startup Entera raises $32M

Goldman Sachs Asset Management leads funding round

National / July 02, 2021 07:09 AM / TRD Staff



Entera CEO Martin Kay (Entera, iStock)

A data startup that helps investors buy single-family homes got $32 million in backing led by Goldman Sachs.

Entera, founded by CEO Martin Kay, develops software that lets investors analyze property records to find homes that match their purchase criteria. Its clients include single-family-rental giant Invitation Homes. Entera's software has helped buyers acquire about $1 billion worth of properties since it launched in 2018, Bloomberg News reported.

"We've had insatiable demand from our customers, who want to spend a whole bunch of money," Kay told the publication. "We are trying to build everything we need to service existing customers and continue to grow."

Read more

- Another investment firm dips into single-family rentals
- Invitation Homes may double its single-family portfolio
- Blackstone to acquire single-family rental firm for $6B

Goldman's investment arm, Goldman Sachs Asset Management, led the funding round, which included Bullpen Capital, Craft Ventures and Valuestream Ventures, according to Bloomberg.

Until recently, institutional investors stayed away from single-family homes because they were difficult to acquire and costly to manage. But the foreclosure crisis during the Great Recession changed the equation, providing investors with cheaper options. The emergence of big data companies such as Entera is further advancing the single-family investing trend.

Goldman is backing Entera because its software allows investors to choose homes to buy and to complete transactions, said Paul Pate, a vice president in the growth equity business at Goldman Sachs Asset Management, in an email to the outlet.

"As a result, Entera is both a beneficiary and an enabler of the growing single-family rental asset class," he said.

[Bloomberg News] — *Akiko Matsuda*

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4) https://therealdeal.com/2021/06/14/meet-the-20-somethings-funneling-their-crypto-millions-into-real-estate/

Article on the movement of earnings from crypto currency trading to real estate

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5) https://www.globest.com/2021/06/29/reits-adopt-a-new-strategy-diversification/?kw=REITs%20Adopt%20a%20New%20Strategy:%20Diversification&utm_source=email&utm_medium=enl&utm_campaign=thoughtleadertemp&utm_content=20210629&utm_term=rem

REITs Adopt a New Strategy: Diversification

The pandemic sent commercial real estate portfolios into disarray, but the recovery has REITs expanding their investment strategy.

By Bendix Anderson | June 29, 2021 at 03:45 AM Globe Street.com

The pandemic sent commercial real estate portfolios into disarray. The recovery is restoring some of that order, but leaving investors to sort out which sectors were temporarily disrupted or permanently altered. The same held true for real estate investment trusts, says Brian Sutherland, VP of commercial at Santa Barbara-based Yardi, and it's led some to revisit their investment strategy.

"The biggest change is portfolio diversification," says Sutherland.

Traditionally, most REITs specialized in a single category of commercial real estate. Today, however, REITs that previously focused on office are expanding into coworking. Those who primarily invested in multifamily are diversifying into industrial. In addition to observing these trends in the market, Sutherland says that Yardi has also partnered with clients seeking to diversify their portfolios. "Our solutions cross all asset classes, giving us a unique breadth of perspective into the various sectors of real estate," says Sutherland. "As our clients' strategic direction changes we can help them understand and navigate new markets."

Behind this shift is a common motivation: growth. But chasing it was complicated by the pandemic, making the current speed of diversifications in the recovery somewhat unprecedented. “It is happening at a much faster pace than we have ever seen before,” notes Sutherland. “REITs need to continually grow. And if in their sector they have capital and they can’t deploy it because there are no available deals, they need to adapt.”

Many of these REITs already have some experience in managing real estate other than their core specialty. Others in recent decades have taken advantage of whole, master-planned neighborhoods composed of different property types.

“That trend in some capacity has been going on for a while, with the live, work, play and stay centers,” says Sutherland. “We will see more of that.”

REITs also own a growing number of individual buildings that mix more than one property type under one roof. Downtown areas are lined with office and apartment towers that have retail space on the first floor. As their neighborhoods evolve, those mixed-use towers are including increasingly varied kinds of real estate.

“I suspect we are going to see more multifamily build-outs happening in current office towers. We are going to see hospitality mixed in,” says Sutherland. “We are going to see coworking in office buildings as well, potentially as an amenity within the property.”

Retail properties are also diversifying. Some will include retail space in front, along the sidewalk, and industrial space in back that helps the retail tenants fulfill orders more quickly and potentially compete more effectively with pure online retailers like Amazon.

As REITs own and manage more of these mixed-use properties, it becomes less and less of a leap for them to simply add different types of real estate to their portfolios.

“It has to do with answering to their investors and continuing to grow,” says Sutherland. “As things evolve, it is important to put capital where the market is moving. Paying attention to market trends, in this case the increase in portfolio diversification, helps identify where the best results will come from.”

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6) https://therealdeal.com/2021/05/21/institutional-buyers-are-flooding-single-family-market/

Institutional buyers are flooding single-family market

Dropped record $77B on homes in past 6 months, according to Redfin

National / May 21, 2021 12:15 PM / TRD Staff



(iStock)

UPDATED, May 24 2021, 12:00 p.m.: Institutional buyers are in spending mode.

Investors dropped a record $77 billion on homes in the past six months, according to Business Insider, citing a Redfin report. That compares to the $55 billion spent on homes in the second and third quarters of 2020, when buying dropped as Covid cases surged and cities imposed restrictions.

Overall, the number of homes acquired by investors jumped 2.7% in the first quarter compared to the same period last year.

The massive purchases have added to the nationwide housing crunch amid what has been a red-hot market.

Investors are most focused on single-family homes, which made up the biggest share of acquisitions and first-quarter growth, year over year. Nearly 39,000 of the 55,000 homes investors bought in Q1 were single-family properties, up 4.8% from last year.

Read more

- Investors increasingly compete with first-time buyers for homes
- Institutional investors, higher material costs lead to rising home prices
- Investors building single-family rentals to meet demand

Among the investors cited in the Redfin report were Invitation Homes and American Homes 4 Rent, both single-family-rental behemoths. Redfin's report also included iBuyer Opendoor snapped up 3,594 homes in Q1, Business Insider reported. Others like Offerpad and Zillow, have taken to gobbling up houses, sight unseen.

Small real estate companies and individuals looking to flip properties accounted for a portion of investors in cities like Miami, Atlanta, Las Vegas, Phoenix, and Charlotte, North Carolina.

Redfin chief economist Daryl Fairweather said he expects the buying momentum to accelerate.

"Investors took a huge pause during the pandemic, and they still haven't made up for all the homes they didn't purchase during that period," she told the publication.

With a larger institutional presence, an already tight housing market could grow tighter. Single-family-rental companies can also overshadow smaller buyers with all cash deals and a more aggressive approach to closing.

[BI] — *Suzannah Cavanaugh*

Correction: An earlier version of this story stated that Opendoor bought 55,000 homes in Q1; the company bought 3,594 homes.

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7) https://therealdeal.com/2021/04/05/investors-increasingly-compete-with-first-time-buyers-for-homes/%E2%80%9D

Investors increasingly compete with first-time buyers for homes

1 in 5 homes sold to someone who never lives there

National / April 05, 2021 12:15 PM / TRD Staff



(iStock/Illustration by Kevin Rebong for The Real Deal)

Another housing bubble is inflating — but unlike the one that burst in 2008, buyers contributing to this bubble are less likely to live in those properties. This time, investors are pouring money into the growing single-family home rental market.

Investors have been gobbling up distressed single-family homes in the wake of the Great Recession, which led to foreclosures on hundreds of thousands of homes. But as the supply of those distressed properties dried up, investors — including private equity firms and pension funds — are competing with first-time homebuyers in the resale market, the Wall Street Journal reported.

"You now have permanent capital competing with a young couple trying to buy a house," John Burns, CEO of John Burns Real Estate Consulting, told the publication, noting that about one in every five houses sold is bought by someone who won't live there. "That's going to make U.S. housing permanently more expensive."

Home prices are expected to climb 12 percent this year, on top of last year's 11 percent hike, according to Burns' firm, which told the publication that another 6 percent increase will follow in 2022. The pace of appreciation is akin to what happened in 2004 and 2005.

For an extreme example, look to Conroe, Texas, where D.R. Horton recently built 124 rental homes. The homebuilder rented those homes out and subsequently put the entire subdivision up for sale. A bidding war broke out in December, and Fundrise LLC, an online property-investing platform, won with its $32 million bid, which was submitted on behalf of about 150,000 individual investors.

The price tag was about twice as much as D.R. Horton typically makes by selling homes to the middle class, its CFO told the Journal. [WSJ] — *Akiko Matsuda*

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- Home sale prices near 100% of asking prices
- D.R. Horton pays $14M for land in Jupiter and Florida City for two housing projects
- Investors building single-family rentals to meet demand

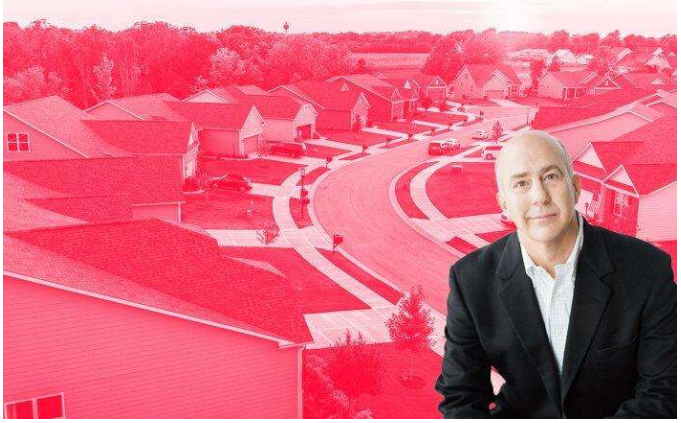
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8) https://therealdeal.com/2021/06/09/venture-capital-fund-closes-fund-to-invest-in-rent-tech/

Venture capital fund closes fund to invest in "rent tech"

Participants included Invitation Homes, Greystar Real Estate Group and Starwood Capital Group

National / June 09, 2021 05:47 PM / By Keith Larsen



John Helm of RET Ventures

Big money is pouring into single-family rentals.

RET Ventures, a Utah-based venture capital firm, raised $165 million for a fund that plans to invest in technology for single-family rental and multifamily owners and operators across the U.S.

The company surpassed its initial target of $130 million. Participants included affiliates of some of the largest apartment and single-family rental operators in America, among them Essex Property Trust,

Invitation Homes, Mid-America Apartment Communities, Greystar Real Estate Group, Starlight Capital and Starwood Capital Group.

Investors are increasingly betting on the single-family rental market, where demand has exploded thanks to remote work and rising costs of home ownership. Large single-family rental companies such as Invitation Homes Inc. and American Homes 4 Rent are increasing their share of the housing market.

Critics worry, however, that single-family rentals could worsen the affordability crisis or lead to more evictions.

Read more

- Invesco Backed Mynd to spend $5B on single family rentals
- Covid-19 brings single-family rentals into investor spotlight
- This is your home on tech

Christopher Yip, a partner at RET Venture, said the fund is investing in early-stage companies. A particular focus is on something he calls "rent-tech", which involves technology tied to rental properties.

He said the strategy is to address "pain points" for rental owners and operators.

RET Ventures is among the growing number of funds to invest in proptech. For many of these companies, the goal is to "modernize" technology-resistant parts of the real estate industry such as home closings, title insurance and construction.

Valuations for these firms have skyrocketed as many seek to go public through special purpose acquisition companies. RET Ventures has backed SmartRent, a home automation company for property managers and renters that plans to go public through a SPAC at an initial valuation of $2.2 billion.

RET Ventures has also invested in Passive Logic, an autonomous building platform, and Kasa Living, a short-term rental company, according to CrunchBase.

RET Ventures was founded in 2017 by John Helm, who was previously chief financial officer of the commercial brokerage Marcus & Millichap.

Contact Keith Larsen

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9) https://therealdeal.com/national/2021/03/05/covid-19-brings-single-family-rentals-into-investor-spotlight/



Commercial real estate investors are sinking their teeth into the hottest new asset class: single family rentals (SFRs). An intense demand for the product along with technology that makes managing complex single family portfolios easier than ever is bringing institutional investment from the nation's largest brokerages and asset managers to the sector. Long considered a niche asset class for local players, major firms are going big, vying for dominance in one of commercial real estate's fastest growing asset classes.

Read more

- Pit stop: How gas stations as a real estate asset class are being disrupted
- The new reality in commercial construction due to Covid-19
- The "office-pocalypse" might spark the great repurposing

Investing in single family homes is nothing new. Home flipping shows like Fixer Upper and Flip Or Flop have popularized the method for small time investors looking to earn something on the side. The problem has always been scalability. Flipping homes may be good money, but relying on appreciation for profit isn't guaranteed (remember 2008?). Managing even a few single family homes can be a headache as problems pile up like in Tom Hanks' classic The Money Pit. Managing renters can be even more difficult. https://therealdeal.com/national/2021/03/05/covid-19-brings-single-family-rentals-into-investor-spotlight/That's all changing.

"The industry was cynical about the ability to manage these single family homes. The early operators like Colony Starwood and Invitation Homes cracked the code," RET Ventures Partner John Helm said. "They did this with tech. Once they demonstrated that you could do this, it has taken off."

Rockpoint Group partnered with Invitation Homes on a $1 billion JV aimed at operating SFR across the Western US and Sunbelt regions. Rangewater put together an $800 platform to build and manage 15 SFR communities. JLL, one of the largest commercial brokerages in the United States, launched an entire team dedicated to SFR. JLL's team has already pulled the trigger on a $133.7 million deal on behalf of Haven Realty Capital for a six-property portfolio of new and to-be-built homes in the greater Atlanta area.

"Demand for less-dense environments, more space for work and school, and a desire for the 'lock-and-leave' lifestyle support substantial demand for single-family rental homes," JLL Senior Director Matthew Putterman said. Putterman helps lead recently established JLL's National Multi-Housing Group. "Since the Great Financial Crisis, the adoption of new management and leasing technologies has enabled investors and operators to aggregate substantial portfolios in ways that didn't previously exist."

JLL said creating a SFR was in "direct response to the increase in institutional investor interest, which traditionally consisted of mom-and-pop investors." A nationwide housing shortage coupled with older millennials looking to leave big city life to start families has bolstered single family rental demographics. COVID has created an intense demand for more space, driving shifts to suburban living, which has

created the strongest housing rally since the 2008 crisis. Rents in institutionally owned SFR portfolios have grown more than 3 percent annualized in 2020, according to DBRS Morningstar. Retention rates have also been improving, which are now similar to self-storage.

Warren Buffet famously said if he had a way to manage single-family homes, he'd buy a couple hundreds thousand. Managing multifamily properties is far simpler. Hundreds of units can be managed by a single person. That many homes would be far too spread out to provide the same level of tenant experience. Technology is changing that. The entire SFR process has been reinvented. Early on during showings, virtual tours are helping renters narrow down choices to make decisions faster. When they're ready to view, digital lockboxes make it so a property manager can unlock a home remotely. If they're ready to sign, renters can apply, pay their deposit and sign their lease using their mobile phone. Once they're moved in, mobile apps allow tenants to place maintenance requests, which fleet of service fans across the market respond to using digital inventory management and route optimization. Connected devices are helping to prevent maintenance requests, signaling to owners when there's a water leak, open door or other issue. The improvements are win-win for both landlords and tenants. Renters feel less pain with a seamless experience making them more likely to sign and stay while owners have a powerful tool for managing assets they can't always be near.

Assembling homes into an investment portfolio requires deep market knowledge and plenty of local experience. In major metros, being even just two streets down the block can dramatically impact a homes' value. It takes experience to know that and that knowledge is hardly applicable in other markets. Tracking down housing data is much harder than commercial real estate. For one, single family homes are built at a rate most commercial operations can hardly fathom. In the last 4 yours alone, 90 million homes have been built in the United States. Tracking ownership, market intelligence and rental rates for just the homes built in the last four years is a feat. Sites like Roofstock and Zillow have been doing just that.

A major reason institutional investment is in a rush to move into the sector is that major players have yet to be established. Unlike multifamily, where huge corporations and REITs control the vast majority of assets, each with hundreds of complexes and tens of thousands of units, SFR is still a small time game. Institutional owners, who own more than 100 homes, comprise less than 3 percent of total inventory, according to JLL data. Establishing dominance won't be easy. Beyond their competition, SFR is still a tough business to be in even with technology. Supply is a major issue. A booming housing market means investors assembling a portfolio are competing with families who want a home. Properties built specifically for renting are still a sliver of America's overall housing stock. Though the number has been steadily increasing for nearly 20 years, new starts only totaled 14,000 during the third quarter of 2020, a 27 percent jump over the previous year, according to the National Association of Home Builders. The large percentage increase is directly related to the few number of starts.

With the push of institutional money into single family rentals we are likely to see even more tech sprout up to help them manage large portfolios. If the trend gets large enough it might even be able to sap some of the investment and human capital from the multifamily industry. Owning a single family rental is not for everyone but more and more large commercial real estate shops are deciding that it is in their wheelhouse and is a better asset type than their other options. [Propmodo]

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10) https://torrancedailybreeze-ca-app.newsmemory.com/?publink=2cd408b96_1345e37

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11) CalMatters, Sacramento's go-to publication, published Rick Johnson's article entitled, "More housing and more drought calls for more thought." https://calmatters.org/category/commentary/

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12) Single-Family Home Rentals Are Excelling in the Pandemic | GlobeSt

Single-Family Home Rentals Are Excelling in the Pandemic

Stay-at-home orders tied to the COVI/D-19 pandemic have not tamped down the demand for single-family house rentals, executives from two REITs said…

By **Cheryl Miller** | May 12, 2020 at 05:33 PM

Stay-at-home orders tied to the COVI/D-19 pandemic have not tamped down the demand for single-family house rentals, executives from two REITs said in recent first-quarter earnings calls.

Dallas Turner, president and CEO of Invitation Homes, said occupancy climbed to a record-high 97.2% in April as the company increased its access to working capital and paused sourcing new acquisitions to be ready for the pandemic's many uncertainties.

"Shelter-in-place has not impacted our ability to lease homes," Turner said. In fact, he said, residents have been moving into the company's properties at the same rate as last year and at a faster clip than they have been moving out.

David Singelyn, CEO of American Homes 4 Rent, said that while first-quarter home occupancy slightly lagged last year's numbers, demand for homes increased significantly in April and generated record levels of showings. Singelyn said he anticipates good leasing and occupancy numbers in May.

Demand for single-family rental homes is increasing as would-be buyers are postponing or canceling purchases during the economic downturn, Singelyn said. Single-family homes are also a draw to residents living in multi-family housing who are now looking for lower-density options in light of the pandemic and recommendations to maintain physical distancing, he said.

"Today's story is the COVID-19 crisis," said Singelyn.

Rent collections have not dropped precipitously, according to the executives, despite a national unemployment rate that has jumped to 14.7%, the highest since the Depression era. Charles Young, chief executive officer of Invitation Homes, said rent collection in April topped 95% of the company's historical average. Half of those missed rents have been paid since the April books were closed, Young said.

Rent payment numbers improved in May with collection rates through the fifth day of the month topping 100 percent of the pre-COVID-19 average, according to the company.

"We like our high-quality, sticky resident base, and we believe that the ripple effects of this pandemic could make the option to lease a single-family home even more attractive," Young said.

At American Homes 4 Rent properties, 82% of rent payments had been made through May 5, which tracks with April figures and falls within six percent of the company's historical rate, said chief operating officer Bryan Smith.

American Homes is not forgiving rent but it has suspended late fees and has stopped evictions. About four percent of residents in company properties have requested hardship assistance, Smith said. "The longer this crisis continues, the more difficult it may be for some of our residents to maintain regular rent payments," Smith added.

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13) https://www.kqed.org/news/11880453/fire-experts-warn-of-dangers-of-proposed-safety-regulations

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14)) https://www.wsj.com/articles/if-you-sell-a-house-these-days-the-buyer-might-be-a-pensionfund-11617544801

If You Sell A House These Days The Buyer Might Be A Pension Fund ($32 Million, Fundrise LLC)

By Ryan Dezember | Photographs by Jeff Lautenberger for The Wall Street Journal

A bidding war broke out this winter at a new subdivision north of Houston. But the prize this time was the entire subdivision, not just a single suburban house, illustrating the rise of big investors as a potent new force in the U.S. housing market. D.R. Horton Inc. built 124 houses in Conroe, Texas, rented them out and then put the whole community, Amber Pines at Fosters Ridge, on the block. A Who's Who of investors and home-rental firms flocked to the December sale. The winning $32 million bid came from an online property-investing platform, Fundrise LLC, which manages more than $1 billion on behalf of about 150,000 individuals. The country's most prolific home builder booked roughly twice what it typically makes selling houses to the middle class—an encouraging debut in the business of selling entire neighborhoods to investors. "We certainly wouldn't expect every single-family community we sell to sell at a 50% gross margin," the builder's finance chief, Bill Wheat, said at a recent investor conference.

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15) https://prospect.org/infrastructure/housing/blackrock-buying-houses-meme-single-family-rentalmarket/

Blackrock Invests in Buying Single Family Houses (June 16, 2021)

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16) https://www.washingtonpost.com/opinions/2020/08/06/nation-is-facing-housing-crisis-private-equityfirms-just-see-dollar-signs/\

Families See a Looming Catastrophe, Private Equity Firms See Dollar Signs (8/6/2020)

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17) https://ideas.repec.org/a/gam/jsoctx/v8y2018i4p93-d171162.html

The Impact of Single Family Rental REITS on Regional Housing Markets: A Case Study of Nashville, TN (transfer of wealth to investors instead of individuals and further exacerbates property wealth concentration and polarization.)

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18) https://www.theatlantic.com/technology/archive/2019/02/single-family-landlords-wall-street/582394/

When Wall Street is Your Landlord (2/13/2019) *By Alana Semuels*

With help from the federal government, institutional investors became major players in the rental market. They promised to return profits to their investors and convenience to their tenants. Investors are happy. Tenants are not.

This article chronicles the problems experienced by tenants of the investment company managed homes and notes the fees and increased evictions experienced by the tenants. Go to the article for full text.

"As the rental companies continue to acquire more real estate, they are competing with people who have repaired their credit in the decade since the recession, socked money away, and are now finally ready to buy again. "Our fear is that any home that goes into [an] investor's portfolio isn't just about homeownership today—it is locking that home out of potential homeownership for decades to come," says John O'Callaghan, the president and CEO of the Atlanta Neighborhood Development Partnership, a nonprofit that promotes affordable housing.

In some areas, renters say that it is difficult to find properties that *aren't* owned by the big institutional investors. Heather Bryant's Invitation Homes property in suburban Georgia had unreliable air-conditioning, a sewage system that frequently backed up, and a rodent problem that the company refused to address, she told me. But she and her husband kept re-signing the lease. "So many of the rental houses in Georgia are owned by them that it is nearly impossible to find someone who owns privately," she told me. Iyesha Stringer moved out of one Colony American house in the Atlanta area, disgusted with the company because it had withheld 60 percent of her deposit and didn't fix mold or flooding issues in the house. "I said I'd never rent from a big company again," she told me. She moved into another property, only to find out a few months later that Colony American had bought the house and was going to start managing it. It's now managed by Invitation Homes."

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19) Mega Landlords Are Snapping Up Zillow Homes Before the Public Can See Them - Bloomberg https://www.bloomberg.com/news/articles/2021-05-21/mega-landlords-are-snapping-up-zillowhomes-before-the-public-can-see-them

"A parade of investors, including JPMorgan Chase & Co.'s asset-management arm, Nuveen Real Estate and Brookfield Asset Management Inc. have committed billions in new capital to single-family rentals since the pandemic began."

Hot housing market drives alliance with real estate tech firms as landlords flush with cash tap iBuyers to find properties

By Patrick Clark / May 21, 2021, 11:00 AM PDT

Wall Street firms scouring the frenzied U.S. housing market are tapping a new source of properties that regular buyers can't reach.

Cerberus Capital Management and related entities bought more than 200 houses in the first quarter through next-generation home flippers called iBuyers, including 138 from Opendoor Technologies Inc. The pipeline to Wall Street from Silicon Valley often means the homes never hit the open market.

Other single-family landlords, flush with cash to bet on the demand for suburban rentals, are applying the same strategy. Their purchases come as many Americans can't afford to buy houses -- a side effect of the pandemic-driven real estate rush that's sparked bidding wars for a shortage of available properties.

"At a moment when we have once-in-a-generation low inventory, we have for-profit companies making the decision to withhold houses from the market," said Mike DelPrete, a real estate tech strategist who follows the iBuyers. "As a society, are we cool with that?"

Cerberus, which manages $53 billion in assets, operates more than 24,000 rentals through a portfolio company called FirstKey Homes. The firm recently borrowed $2.5 billion against a portion of the property portfolio at a fixed rate of 1.99%, according to Kroll Bond Rating Agency.
In addition to the homes it bought from Opendoor in the first quarter, Cerberus purchased 52 from Zillow Group Inc., the listing site that started flipping homes in 2018, and 28 from Offerpad, according to analytics firm PropertyRadar. The data, which was compiled from public records, may not be complete.

"Homes purchased through iBuyers are a minimal 1% of our entire portfolio of homes," a representative for FirstKey said in a statement.

IBuyers have sprung up in recent years seeking to profit by streamlining the notoriously complex process of selling a home. They use software to estimate values and make rapid offers to homeowners who express interest in selling their properties. When an owner accepts, the iBuyers make light repairs and put the home back on the market, seeking to profit by charging convenience fees.

Read more: Opendoor Faces an Expensive Path to Profitability in Real Estate

Cerberus isn't the only large landlord turning to the tech companies. Invitation Homes Inc., the largest single-family landlord, tapped iBuyers for more than 5% of the 700 homes it purchased in the first quarter, Chief Executive Officer Dallas Tanner said on a recent conference call. Tricon Residential Inc. and Donald Mullen's Pretium also bought homes through this emerging channel.

For the iBuyers, selling to Wall Street can offer better economics and a leg up in the race to get bigger. It limits expenses, cutting out commissions to real estate agents, and lets the tech firms move homes quickly and benefit from economies of scale. But in a tight housing market, there's increasing competition for the entry-level properties sought by first-time buyers and landlords alike.

“We’re in housing shortage, and whatever inventory institutional landlords are gobbling up means there’s less available to first-time homebuyers,” said Lawrence Yun, chief economist at the National Association of Realtors. “In that sense, the investors are an obstacle to the everyday buyer.”

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20) A $60 Billion Housing Grab by Wall Street - The New York Times (nytimes.com)
Hundreds of thousands of single-family homes are now in the hands of giant companies — squeezing renters for revenue and putting the American dream even further out of reach.

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21) Corporations are buying houses — robbing families of American Dream (nypost.com)
https://nypost.com/2020/07/18/corporations-are-buying-houses-robbing-families-of-american-dream/

How corporations are buying up houses — robbing families of the American Dream

By Larry Getlen / July 18, 2020 | 8:51am



Homes in Spring Hill, Tenn., have quickly been bought up by corporations, their rents raised.Luke Sharrett

One morning in 2012, Phoenix real-estate developer Geoff Jacobs was playing golf when he got a surprising phone call.

One of his employees, trying to bid on a house they wanted at auction, told him the price had reached their agreed-upon ceiling of $85,000 — a rare occurrence, since they usually snagged the homes they wanted without competition.

Jacobs told his employee to go up to $87,000. But the price kept rising.

“The price jumped to $90,000. Then $95,000. The home wound up selling for about $100,000,” writes Ryan Dezember in his new book, “Underwater: How Our American Dream of Homeownership Became a Nightmare” (Thomas Dunne Books), out now.

“Jacobs was bewildered. Who was this aggressive bidder? By the end of the day, he had a name. The bidder was from an outfit called Invitation Homes.”

Invitation Homes, it turned out, was owned by Blackstone Group, the world’s largest real-estate investor. Created after a company called Treehouse Group was folded into Blackstone, then renamed in 2012, Invitation Homes was on a $10 billion spree, purchasing $150 million worth of houses per week.

“At an auction in Sacramento, a house flipper named Ryan Heck was bewildered by a bidder who bought every house that hit the block,” Dezember writes, noting that the bidder went one dollar over every other bid until the other bidders conceded.

Since 2010, 700 houses in Spring Hill, Tenn., have been purchased by just four companies, who together own about 5 percent of the houses in the town.

“Neither Heck nor the other regulars recognized the dollar-over guy. It turned out he was with an out-of-town concern called Treehouse and had instructions to buy everything that cost less than what it would cost to build a similar house. Every house auctioned that day fit the bill.”

Moving forward, Heck tried to compete, sometimes even peeking over other bidders’ shoulders to “run the dollar-over routine on them.” But he was outmatched.

“He had a handful of cashier’s checks,” Dezember writes. “The new guys had duffle bags full.”

‘Underwater” describes how, in the wake of the 2008 financial crisis, corporations began buying suburban houses en masse and then renting them out, often for more than residents would have otherwise paid in rent or mortgage.

This has become so common that, while the phenomenon “didn’t exist a decade ago,” corporations bought one out of every 10 suburban homes sold in 2018.

Corporate homeownership can not only subject tenants to higher living costs, but often destroys their ability to buy these homes themselves, as companies pay top dollar to take them off the market.

As a result, America is quickly becoming a renter nation.

“Between 2006 and 2016, when the homeownership rate fell to its lowest level in fifty years, the number of renters grew by about a quarter,” Dezember writes.

Rich investors like Warren Buffett (left) and B.W. Hughes are buying up many of the single-family homes that have long sustained the US middle class.Getty Images (2)

While he notes that companies own around 300,000 US homes so far, this is just the tip of the iceberg, as they're wealthy enough to buy, and tech-savvy enough to manage, "multiples more" with "ruthless efficiency."

These companies aren't just depriving potential homeowners of a place to call their own, he writes: they're destroying the ability for thousands of middle-class American families to accumulate wealth.

"Home-price appreciation has historically been how Americans achieve financial prosperity," Dezember writes. "Unlike stocks and bonds, ownership of which is concentrated at the top, houses are widely held. Roughly half of housing wealth is owned by America's middle class."

The bonanza really took off in 2011, when Morgan Stanley issued a report called "A Rentership Society." With over 1.6 million foreclosed homes in the United States and more on the way, the report forecast "a surge in the number of renters and a potentially massive opportunity for investors to convert the glut of repossessed homes into rental properties."

America's investment managers were all in. By 2012, "more than $1 billion had been raised by investors for the purpose of doing just that. Some of the biggest names in finance were hoarding houses."

Individual investors were soon mostly gone or absorbed into larger companies with investors like Warren Buffett, KKR of "Barbarians at the Gate" fame, and investment behemoth The Carlyle Group. Heck himself wound up joining American Homes 4 Rent, which was founded by billionaire self-storage magnate B. Wayne Hughes, and would own about 48,000 houses by the end of 2016. There is even a lobbying organization, the National Rental Home Council, to look after their interests in the government, such as defeating rent-control laws.

> Unlike stocks and bonds . . . houses are widely held. Roughly half of housing wealth is owned by America's middle class.
>
> - Ryan Dezember in new book 'Underwater'

As the industry grew, foreclosure auctions in certain cities became major affairs. The first Tuesday of every month is auction day throughout Georgia, and corporate homebuyers fly in "for what was known among investors as Super Tuesday."

"Heck and others of B. Wayne's bidders would gather at a Sheraton Hotel the evening before, and divvy up $20 million or so of cashiers checks," Dezember writes.

Their mission was to buy homes near good schools that families would feel comfortable in, nothing older than 20 years or smaller than three bedrooms and two bathrooms.

The industry's ideal buyer was well-defined. Dezember notes that a company called Progress Residential, which owned around 20,000 homes, sought to provide "an aspirational living experience to tenants who were typically about 38 years old and married, with a child or two, annual income of about $88,000, less-than-stellar FICO credit scores around 665, and a hobbling $45,000 of debt. If they wanted to live the middle-class lifestyle to which they were accustomed, they'd have to rent."

Buying foreclosed homes had its pitfalls, as buyers couldn't see inside the homes before the purchase. While occasionally they'd get a treat, like marble countertops, often the surprises were more horrific.

"There were wild stories," Dezember writes. "A corpse in the Carolinas. Basement marijuana farms. A turnover crew that renovated the wrong house in California, surprising a family just back from vacation with a new kitchen and news that their possessions were in a landfill."

As investors realized the extent of their gold mine, they branched out beyond simply buying foreclosures and hit the open market, competing with everyday homebuyers.

{Image }

As more corporations buy up homes, they are also forcing up rental prices, making it harder for Americans to save — and eventually buy a home themselves.Getty Images

Dezember recalls a three-bedroom, two-bath home in Spring Hill, Tennessee, that went on the market in April 2017. In the strong, fast-growing market, the seller had four bids on the house within hours.

"The high bid of $208,000 came from a couple with a child looking for their first house," Dezember writes. "American Homes 4 Rent matched their offer, all cash."

American Homes got the house, the seventh it had purchased on that street.

In fact, since 2010, 700 houses in Spring Hill have been purchased by just four companies, including American Homes 4 Rent and Progress Residential, Dezember writes. Together, the four owned about 5 percent of the houses in the town.

As a result, rents skyrocketed. When Dezember visited with the town's vice mayor, Bruce Hull, in April 2017, he was told that, "It hasn't been that long since you could get a three-bedroom, two-bath for $1,000 a month."

Those houses were now closer to $1,800 a month, and this was by design.

At a real-estate investing conference, American Homes CEO David Singelyn said that the average income for applicants to his company's homes had risen from $86,000 to $91,000 in one year, and that this was a sign that "rents had room to rise," Dezember writes.

"This is a choice they make to pay rent, and their wherewithal to pay rent today as well as pay rent in the future, with increases, is sufficient," Singelyn said. "It's just up to us to educate tenants on a new way, that there will be annual rent increases."

{ Image}

"American Homes raised [their tenants'] rent by hundreds of dollars a month with little notice," Dezember writes.

And since the company had bought so many homes in the area, "there wasn't much-disgruntled tenants could do but pay up if they wanted to rent in Spring Hill and keep their kids in its top-rated schools."

One Spring Hill man's rent had grown by 35 percent over three years after American Homes 4 Rent bought the house he lived in.

"He and his wife wrote to the company repeatedly to appeal for more modest increases. There was no response.

"Not long after they signed [their lease], American Homes responded to their earlier pleas and knocked $20 off the monthly rent."

On a large scale, the trend of corporations buying up homes and renting them out could have a drastic long-term effect on the ability of many families to own a piece of the American Dream.

"Many Americans save money only unintentionally, when they make their mortgage payments each month and accrue equity in their homes," Dezember writes.

"If homeownership falls out of fashion for even a generation, there could be dire economic consequences unless renters become diligent savers and prudent investors. If that happened on a grand scale, it would be as momentous a shift in American behavior as abandoning homeownership en masse."

FILED UNDER FAMILIES , HOUSING , REAL ESATE , 7/18/20

…."On a large scale, the trend of corporations buying up homes and renting them out could have a drastic long-term effect on the ability of many families to own a piece of the American Dream.

"Many Americans save money only unintentionally, when they make their mortgage payments each month and accrue equity in their homes," Dezember writes.

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22) The new American Dream: rent your home from a hedge fund. | Sovereign Man
Disappearing Middle Class: The new American Dream: rent your home from a hedge fund. By Simon Black.

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23) https://www.swfinstitute.org/news/86983/see-the-wall-street-investors-buying-single-family-american-homes

See the Wall Street Investors Buying Single Family American Homes

Posted on 06/12/2021

As the COVID pandemic prompted the Federal Reserve to flood the country with U.S. dollars, the price of single-family homes in the U.S. have increased as there remains a tight supply in single-family housing. Inflation has crept in and there is increased speculation in American real estate in 2020 and

2021. The Wall Street Journal issued a story on BlackRock and their activities in buying homes. Single-family homes are widely regarding among the populace as the American dream, the idea of owning property. Furthermore, Wall Street banks' greed on underwriting risky loan products drove the housing bubbles in 2006 and 2007, which ended up as the global financial crisis of 2008. Then taxpayers bailout out Wall Street and other companies like AIG, General Motors, and Ally Financial. In the ashes of the financial crisis, private equity firms like BlackRock created Invitation Homes to buy up cheap homes and rent them out. Other investors followed suit such as GI Partners backing Waypoint, and the Alaska Permanent Fund Corporation backing American Homes 4 Rent.



Note: Top of Twitter for search tag "BlackRock".

The article by the WSJ is giving BlackRock substantial press attention its its single-family home investing strategies.

In a Fox News television interview, Pedro Gonzalez, an associate editor of Chronicles Magazine, said, "Homeownership gives people a stake in a society. It's a way to build generational wealth."

Single-Family Homes

According to data from Invitation Homes, there are 128 million households and 62% are owned homes, while 38% are rented. Out of the rental batch of 49 million units, 35% are Single-family rentals, 62% are

apartments, and 4% are mobile homes and others. In the investor presentation, institutional owners are just at 300,000 units for single-family homes vs. 16.2 million which are called “Moms and Pops”.

Major Players

Invitation Homes
Dallas-based Invitation Homes Inc. is a listed company with origins with the Blackstone Group Inc. In the first quarter of 2021, Invitation Homes acquired 696 homes for US$ 233 million worth of homes and is part of a US$ 1 billion acquisition target in 2021.

In November 2017, Invitation Homes acquired listed company Starwood Waypoint Homes to create largest single-family landlord company. At the time, the merger created a company that owned approximately 82,000 single-family rentals. Earlier, Starwood Waypoint Residential Trust merged with Colony American Homes two years ago to form Colony Starwood Homes to create a single-family rental giant. Colony Starwood Homes changed its name to Starwood Waypoint Homes.

Invitation Homes has housing investment joint ventures with Rockpoint Group, L.L.C. (80% Rockpoint, 20% Invitation JV ownership) and the Federal National Mortgage Association (FNMA) (90% FNMA, 10% Invitation JV ownership).

American Homes 4 Rent, L.P.
American Homes 4 Rent originally had backing from the Alaska Permanent Fund Corporation. American Homes 4 Rent in February 2020 formed an operating venture with investors advised by J.P. Morgan Asset Management focused on constructing and operating newly built rental homes. American Homes 4 Rent, holds a 20% ownership interest in the joint venture, which has an evergreen term. Subsequent to March 31, 2020, as contemplated by the joint venture agreement, the parties entered into an amended agreement to increase the size of the partnership to US$ 625 million.

Tricon Capital Group
In February 2017, Tricon Capital Group Inc. acquired listed company Silver Bay Realty Trust Corp. by transaction that had a total enterprise value of approximately US$ 1.4 billion, comprised of the equity purchase price of approximately US$ 820 million and approximately US$ 600 million of Silver Bay debt.

Mynd
Invesco Real Estate has giving Mynd Management a financial line to spend up to US$ 5 billion in order to buy 20,000 single-family rental homes in the U.S. in the next three years. Mynd is founded by an executive from Waypoint.

Front Yard Residential Corporation (acquired)
In January 2021, Pretium and a group of its investors, and funds managed by the Real Estate Equity and Alternative Credit strategies of Ares Management Corporation announced the completion of their acquisition of Front Yard Residential Corporation (NYSE: RESI), a company headquartered in the U.S. Virgin Islands. The completion of the transaction makes Pretium the second-largest owner and operator of SFR properties in the United States with a portfolio of over 55,000 cash-flowing single-family rentals. Pretium will manage the venture and partner with Ares to further optimize and expand Front Yard’s attractive and well-diversified portfolio of SFR assets.

Georgia-based HavenBrook Homes was run by Patrick Whelan, the former CEO of Beazer Pre-Owned Rental Homes platform. On August 8, 2018, Front Yard Residential Corporation acquired property manager HavenBrook Partners, LLC as well as the portfolio of 3,236 properties managed by HavenBrook. The combined purchase price of the properties and the property manager was US$ 485 million. HavenBrook Homes went on a buying spree in 2014 and purchased 400 homes in the Twin Cities in Minnesota. The HavenBrook Homes deal was backed by Freddie Mac through a affordable single-family rental pilot program for large property owners and a guaranteed, interest only loan. Freddie Mac then sold that loan to Wall Street investors as securities. However, on the same day, the Federal Housing Finance Agency (FHFA), which oversees Freddie, shut the pilot program down.

Pretium
Pretium is a specialized alternative investment management firm focused on U.S. residential real estate, residential credit, and corporate credit. Pretium was founded in 2012 to capitalize on secular investment and lending opportunities arising as a result of structural changes, disruptions, and inefficiencies within the economy. In January 2021, the Public Sector Pension Investment Board (PSP Investments) and Pretium launched of a joint venture that will initially invest US$ 700 million into single-family rentals across major markets in the southeastern and southwestern United States.

Other competitors include:
BlackRock
Amherst Residential

In late May 2021, Goldman Sachs Group Inc. provided a US$ 300 million credit facility to Washington, D.C.-based Fundrise, a real estate company that lets small investors invest in single-family homes.

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24) https://www.globest.com/2021/01/19/institutional-capital-is-remaking-the-sfrh-asset-class/?kw=Institutional%20Capital%20is%20Remaking%20the%20SFRH%20Asset%20Class&utm_source=email&utm_medium=enl&utm_campaign=nationalamalert&utm_content=20210119&utm_term=rem&enlcmp=nltrplt4

Institutional Capital is Remaking the SFRH Asset Class

SFRH 2.0 includes large institutional portfolios.

By **Les Shaver** | January 19, 2021 at 07:50 AM

After collecting single-family homes all around the country during the Global Financial Crisis, large institutions figured out how to manage these scattered-site properties.
That process of collecting and managing those assets is Michael Carey, Senior Director at Altus Group, calls SFR 1.0. In that period, he says a lot of investors were buying homes one at a time "on the courthouse steps."

“The ability to manage the space, which you couldn’t do at the initial phases post-GFC, has led to an institutional asset class,” Carey says. “The evolution of this asset class has happened a lot faster than anyone predicted, and it’s just accelerated with COVID.”
Now, that sector has evolved, we moved into SFR 2.0. In addition to figuring out the management riddle, the sector’s metrics are a lot more transparent now, contributing to institutional acceptance.

Right now, Carey says the SFR space offers a premium over multifamily yields, which is drawing a lot of investors. That delta may not be there forever, though.

“We’re seeing that gap close because there’s so much money coming into this [SFR] space right now,” Carey says. “There are billions of dollars coming in, just from who we track and our clients. We were looking at $5 to $6 billion coming into the market from March to September, and there’s more than that. That’s just our clients and what we know. So it’s a lot bigger than that.”

Carey expects to see “an explosion” in the number of homes owned by institutional investors.

In 2018 and 2019, Carey says institutional investors purchased about 46,000 homes. In 2020, even with the COVID pause in the Spring, he tracked about 55,000 to 65,000 homes purchased by institutions.

“We think easily there will be 70,000 to 100,000 homes being purchased and constructed in 2021 and 2022,” Carey says. “There are about 50,000 build-for-rent homes that are under construction or planned for development. So that’s a big number.”

As institutions have moved into the space, Carey says there is a greater focus on NOI margins. Ten years ago, they were about 55%. Now, they are 62% to 65% in some of the newer properties. In build-for-rent homes, they are at 70%.

“They’re [the builders] are really focusing on technology,” Carey says. “It’s not just the management of the home, but the repairs, the work orders that come through and the leasing. For example, you see self-showings or contactless move-ins. “

These efficiencies and scale are partially why purpose-built single-family rental communities are taking off in SFR 2.0. Carey says the big players will look for portfolios of up to 2,000 homes.

“Whether it’s build-for-rent or a scatterplot single-family homeownership, you need to have scale in a market,” Carey says. “You need scale in order to operate it efficiently. You can’t go in and own a hundred homes. It does not work.”

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25) https://www.globest.com/2021/07/20/5b-tricon-jv-targets-single-family-rental-homes/?kw=%245B%20Tricon%20JV%20Targets%20Single-Family%20Rental%20Homes&utm_source=email&utm_medium=enl&utm_campaign=nationalamalert&utm_content=20210720&utm_term=rem&enlcmp=nltrplt4

$5B Tricon JV Targets Single-Family Rental Homes

The joint venture is targeting the middle-market demographic in the US Sun Belt.

By **Les Shaver** | July 20, 2021 at 06:38 AM

Tricon Residential has entered into a joint venture arrangement with three institutional investors to acquire single-family rental homes targeting the middle-market demographic in the US Sun Belt. The joint venture, referred to as SFR JV-2, will have an initial equity commitment of $1.40 billion.

Investors will have the ability to increase the vehicle size to $1.55 billion, including Tricon's co-investment of $450 million. That represents approximately $5 billion of purchasing power with leverage. Over three years, SFR JV-2 is expected to acquire more than 18,000 single-family rental homes primarily from resale channels. The JV will complement Tricon's other investment vehicles, which target new single-family rental homes. Tricon will be the asset manager and property manager of the joint venture, the largest JV in its history.

"With the closing of this joint venture, Tricon is well-positioned to accommodate the incredible demand we are seeing across the US Sun Belt for high-quality single-family rental homes at an accessible rental price point," Gary Berman, president and CEO of Tricon Residential said in a prepared statement.

Berman says Tricon has now raised $2 billion of third-party equity commitments year-to-date and has the capital in place to grow its single-family rental portfolio to nearly 50,000 homes over the next three years. "We anticipate growing our portfolio by over 6,000 homes in the coming year and are already well on track with more than 1,500 homes acquired in Q2," Berman said.

Tricon's existing single-family rental joint venture preceded SFR JV-2 and has acquired over 9,000 homes and is now fully invested. Investors in this vehicle include the Teacher Retirement System of Texas, Pacific Life Insurance Company and one of Tricon's existing global investors.

Tricon's new joint venture comes at a time when SFR rents are surging (link to: https://www.globest.com/2021/07/19/sfr-rents-are-also-surging/ copied below). In June, rents rose 11.1% and occupancy increased 1.1% year-over-year in the single-family rental sector, according to Yardi Matrix.

"The demand for the SFR sector is holding strong as people continue to seek more space," according to Yardi. "The competitive housing market, driven in part by a lack of supply, is also sending would-be buyers to the SFR space."

25b) https://www.globest.com/2021/07/19/sfr-rents-are-also-surging/

SFR Rents Are Also Surging

Showing the massive appeal of sunbelt markets, Tampa, Phoenix and Miami posted the strongest YOY rent increases in June.

By **Les Shaver** | July 19, 2021 at 07:36 AM

In June, rents rose 11.1% and occupancy increased 1.1% year-over-year in the single-family rental sector, according to Yardi Matrix.

“The demand for the SFR sector is holding strong as people continue to seek more space,” according to Yardi. “The competitive housing market, driven in part by a lack of supply, is also sending would-be buyers to the SFR space.”

The sector’s strength was widespread. Each of the 30 top metros tracked by Yardi posted YOY rent growth in June. Seventeen of those markets had double-digit rent growth, while 24 had flat or increasing occupancy on a YOY basis in May. Showing the massive appeal of sunbelt markets, Tampa (31.3%), Phoenix (23.9%) and Miami (23.6%) posted the strongest YOY rent increases in June.

Single-family landlords are following a similar trajectory for multifamily rent growth. Apartment asking rents jumped 6.3% on a year-over-year basis in June, which was the most significant YOY national increase in the history of Yardi’s dataset.

Other sources also show that June was a top-performing month for multifamily. Realtor.com, for example, just reported that the US median rent price rose 8.1% year-over-year and 3.2% month-over-month to a new high of $1,575 in June.

RealPage also noted strong rent growth. The company said that effective US asking rents are up 2% in June alone, an uptick that pushed year-over-year pricing increases up 6.3%. That’s the highest 12-month increase recorded since early 2001. And the average US monthly apartment rent rings in at $1,513, also a high watermark.

Still, don’t expect these sharp increases to continue forever. “Rent growth will not be able to continue at these levels indefinitely, but conditions for above-average growth are likely to persist for months,” according to Yardi.

Many factors have driven the astronomical rent growth we’ve seen this summer, Yardi also notes. One of those is migration to the Southwest and Southeast. Just look at apartment rent growth in Phoenix (17.0%), Tampa and the Inland Empire (both 15.1%), Las Vegas (14.6%) and Atlanta (13.3%).

“These metros were lower cost compared to larger gateway metros, but with double-digit rent increases, the affordability of these metros has begun to decline,” according to Yardi. The unprecedented amount of government stimulus hitting the economy over the last year-and-a-half has also driven rent growth. Yardi says this stimulus led to consistent levels of collections across the country. As lockdowns limited travel and spending, household

savings are also rising, increasing by more than $2.5 trillion since the beginning of the pandemic.
Supply and demand factors are also playing a role in these rent increases. According to the S&P Case-Shiller, home prices are up 14% year-over-year through June. These sharp increases are keeping people out of the home buying market and in rentals. Supply is also an issue with the US is on track to build 1.5 million units in 2021, according to the Census Bureau, which is not enough to meet demand.

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Estimates of Wall Street investments in SFR market from the reference materials above:

Fundrise LLC $320 million
Invitation Homes (82,000 properties) $ 6 billion.. In the first quarter of 2021, Invitation Homes acquired 696 homes for US$ 233 million worth of homes
American Homes 4 Rent LP (52,000 properties) $ 2 billion
Invesco RE and Mynd Management $ 5 billion
Canadian Private Wealth Fund $ 700 million
First Key Homes $ 2.5 billion
Blackrock
Amherst Residential
Pretium (with PSP Investments) $700 million
Front Yard Residential Corporation (55,000 properties) Purchased by Pretium and funds managed by the Real Estate Equity and Alternative Credit strategies of Ares Management Corporation

In the last 2 quarters of 2020: 55,000 homes were bought by private investment vehicles (hedge funds, institutional investors) totaling $77 billion

Mynd has $5 billion available to purchase 20,000 SRF in the next 3 years.

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Related topics:

https://www.globest.com/2021/07/21/rising-lumber-prices-add-92-per-month-to-apartment-rents/

Rising Lumber Prices Add $92 Per Month To Apartment Rents

Softwood lumber product costs have risen to $42,882 in an average single-family home, and $14,631 in an average multifamily project.

By **Ted Knutson** | July 21, 2021 at 07:26 AM



Increases in softwood lumber prices have raised the average rent apartment tenants would pay on new construction between April 17, 2020 and July 8, 2021 by $92 per month and $9,990 to the market value of a new rental unit, according to a new report by the National Association of Home Builders.

The increase is somewhat less than the April 2020-April 2021 of $119 monthly NAHB reported three months ago.

The trade group noted the total cost to a builder for all the softwood lumber products going into a home was $5,940 for the products in an average multifamily home Random Lengths reported on April 17 of this year.

At first glance, the latest estimates might seem high relative to recent declines in framing lumber prices, but NAHB said there are a several factors to keep in mind:

First, framing lumber prices are still roughly twice as high as they were in April 2020.

Second, framing lumber is only one of the softwood lumber products used in the average home. The softwood prices NAHB uses in its figures include plywood, oriented strand board (OSB), particleboard, fiberboard, shakes and shingles along with framing lumber.

Third, unlike framing lumber, prices of the other softwood items have not declined substantially in recent weeks.

That all said, prices have been clearly on the rise for the last 15 months.

Based on Random Lengths prices reported on July 8, 2021, the costs have risen to $42,882 for the softwood lumber products in an average single-family home, and $14,631 for the products in an average multifamily home. These numbers represent a 153% ($25,955) and 146% ($8,691) increase in single-family and multifamily builders' softwood lumber costs, respectively.

Housing Element <housingelement@lacity.org>

Re: Case No. ENV-2020-6762-EIR / CPC-2020-1365-GPA - HOUSING ELEMENT

2 messages

Barbara Broide <bbroide@hotmail.com> Wed, Sep 22, 2021 at 5:00 PM
To: "HousingElement@lacity.org" <HousingElement@lacity.org>
Cc: Cally Hardy <cally.hardy@lacity.org>, Daniel Skolnick <daniel.skolnick@lacity.org>, Angel Izard - CD 5 <angel.izard@lacity.org>

As attached

WSSM Housing Element Draft letter 9-22-21.docx
153K

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 10:52 AM
To: Barbara Broide <bbroide@hotmail.com>

Hello Barbara,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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

On Wed, Sep 22, 2021 at 5:00 PM Barbara Broide <bbroide@hotmail.com> wrote:

> As attached

Westwood South of Santa Monica Blvd Homeowners' Association
P.O. Box 64213, Los Angeles, CA 90064
wssmhoa.org • info@wssmhoa.org
Est. 1971

September 22, 2021

Los Angeles City Planning Dept.
Attn: Cally Hardy, City Planning Associate
200 N. Spring Street, Room 750
Los Angeles, CA 90012
VIA EMAIL: housing.element@lacity.org / cally.hardy@lacity.org

Re: Case No. ENV-2020-6762-EIR / CPC-2020-1365-GPA

Dear Ms Hardy:

On behalf of the constituents of Westwood South of Santa Monica Blvd. Homeowners Association (WSSM), I wish to submit the following comments in response to the release of the draft Housing Element Update for the 6th Cycle. WSSM represents an area that is bounded by Pico and Santa Monica Blvds. on the south and north, and by Beverly Glen and Sepulveda Blvds. on the east and west. We have approximately 3800 single family and condominium homeowners in our area, and there is also a significant renter's population in multi-family housing properties located on the northern area of our community primarily in the blocks immediately south of Santa Monica Blvd. and on Beverly Glen Blvd. We also have many single-family homes occupied by tenants. Our community lies entirely within CD 5 and within the boundaries of the Westside Neighborhood Council and the West Los Angeles Community Plan.

Process: We have no doubt that the staff has worked tremendously hard to meet deadlines established by the State to complete the draft document as the October 15 deadline approaches. However, as the City approaches the State's due date, there has not been adequate time or outreach to the public related to the contents of the revised document prior to the Sept. 22nd deadline to submit comments. Those written comments, as you know, are due on the same day as the public hearing is being held to provide information about the revisions and to hear public testimony. We have serious concerns related to communications to the public regarding the release of the revised Update draft, and its appendices.

In short, there has not been adequate (or legally mandated) periods of review for the documents distributed. The revised draft was sent at 7:45 pm on September 15th. We learned today that the City has an extended grace period for submission of the Update to the State. We are even more frustrated to learn that this grace period was known to staff and that the current deadlines with rushed distribution of undecipherable tables were still enforced. With the arrival of Covid as this entire process began, it should have been acknowledged that outreach in general was a challenge and additional time should have been allocated to this process. Efforts should have been made at both the local and state levels to expand the timeline given the appearance of the Covid pandemic. A "time out" in the process would also have provided time for the City to incorporate observations about the changes that have come about as a result of the Covid pandemic. These changes are seen in the manner in which Angelenos live and work and it is yet to be determined as to which of these changes will be permanent changes relevant to this plan.

We are unable to decipher (and I am personally unable to open) the all-important Appendix 4.7 – Candidate Sites for Rezoning. The file is completely disorganized with more than 267,000 addresses - none of which are organized by Council District, Community Plan area, zip code, neighborhood council territory or…. It is too large to maneuver. Further, those who were able to open and inspect the file have found that the traditional tools used to manipulate Excel tables and that would allow the public to organize the list in some way have been disabled. The message that this sends to us is that the tables have been deliberately made difficult to review. The fact that the table was not released when the draft Update was first released was also an issue of concern. As of this writing at the time that oral testimony and written comments are due, we have no idea how the proposed Update is proposed to be implemented in our community. We have no idea if the input that we previously provided to the Planning Dept. was heard and whether earlier input into the Community Plan process was incorporated.

To add to the difficulty in accessing the information about proposed upzoning on the Excel table, we find that there are **no maps provided** to clearly show what is being proposed. The Update contains many maps within its body. We must insist that mapping (that can be read and zoomed in and out) be provided which conveys a visual representation of the zoning schemes proposed in Table 4.7. We were promised "story maps" some time ago and have waited to receive them. We believe that they exist and fear that they are being intentionally withheld.

We requested additional time to prepare written comments following the hearings of Sept. 21 and 22. We received no reply. Not only are we in need of additional time to generate comments and review Update revisions, but with the passage and signing of SB 9 and Sb 10 it appears that the Planning Dept. also needs time to incorporate at least SB 9 into the document and relevant calculations.

DATA: When we began the revision of the WLA Community Plan we made what we thought was a simple request of staff for some basic data. In October 2020, having failed to receive such data earlier, we requested it again in written correspondence to the Planning Dept. A copy of the data requested is included at the end of this letter. We have never received a response. We and our neighbors west of the 405 Freeway have done calculations of housing capacity under current zoning and you may or may not be surprised to learn that our area has much unused capacity – in our multi-family zone, on our commercial corridors where C2 properties can be used for R4 density. Our one and two-story commercial corridors can accommodate 4-5 story mixed use buildings. While the advocates for the Livable Communities Initiative support development of commercial corridors at the 2-3 story level, we would support higher structures on our east-west corridors in order to preserve R1 single-family blocks nearby. It is our opinion that there is need in the City for all forms of housing to match the needs of its residents throughout the different ages and stages of life. While affordability is often mentioned as the reason that some families choose to leave Los Angeles, we would surmise that many families will leave Los Angeles if they cannot find a place to live where their child/children can run out the door and play outside. Families with young children covet having a place to live with access to a yard. We do not want to become a city viewed as unfriendly to families. We are already part way there with a school district that is challenged with bringing quality education to all communities.

We wish to raise questions as to the modeling and formulas used to determine housing needs and of our concern that the **Terner Center** was the consultant used to develop the modeling

used by the City that determined our available and potential housing sites. The Terner Center is not viewed as an objective provider of information. They are advocates and are heavily funded by those who also support California YIMBY and all its many affiliates including Abundant Housing here is Los Angeles. We have raised questions about the model created in the letter being submitted by the Westside Neighborhood Council. We are also seeking an independent review of the model by an outside consultant qualified to do so. We are not qualified to analyze the model ourselves.

We have, however, made calculations of our own to document the housing capacity that exists in our area. That capacity has only increased with the passage of recent legislation. Depending upon the population projections that the Planning Dept. seeks to assign to our area, we believe we may have adequate zoning to meet general RHNA numerical goals. HOWEVER, anyone familiar with the process of creating affordable housing will tell you that without government financing and/or tax credits, there will not be significant growth in affordable housing units. It is not possible to build ourselves out of the affordability crisis. Building affordable housing requires financial tools that help these projects to pencil out. Density bonuses will not be enough in most cases and we shudder to think that the City would even attempt to make up for lost financing by allowing density so great that it destroys our community. There is such a thing as enough. There is such a thing as too much. Equity means that housing density should be shared across the City.

Appendix 4.1 - Housing Element Sites Inventory – in addition to omitting any consideration of SB 9 and SB 10, the Sites Inventory fails to take into account the maximum number of potential units that could be built on each site, including in particular underutilized lots in *existing* commercial and multifamily zones. For example, each lot along a "transit corridor" should be credited with the maximum number of units that could be built there under TOC rules, taking into account all available incentives that could be granted.

Upon the passage of SB 9 and SB 10, the residential capacity in former single-family neighborhoods quadrupled. This must taken into account in the housing element calculations for capacity.

How does LADCP base its housing element capacity assumptions when using the new zoning typologies [ReCodeLA] that have yet to be implemented in community plans? Estimates of future acreages? Estimates of future square footages? The methodology should be outlined in the housing element.

What are the housing capacity assumptions made for mixed use zoning? Industrial? Commercial? How is LADCP factoring in the number of bedrooms and the projected occupancy per BR? Are Q conditions and height districts considered when manipulating assumptions for density? This is critical for accuracy in the housing element.

What is the basis for employment assumptions and where do they come from? Have they been updated to reflect remote work?

How can stakeholders be sure these assumptions are accurate across all LA?

Homeowners have feelings, too: We are troubled by the demonization of homeowners that often dominates conversations about housing. There appears to be little understanding or sympathy for the struggles and sacrifices made by many homeowners in order to buy and maintain a home of their own. The homeowners of today were not responsible for the CC&Rs developed decades ago. The homeowners of today did not participate or condone redlining practices employed by the government and financial institutions decades ago. When individuals make a significant investment and commitment to buy a property – whether it be a home, a condo, a co-op they are investing not only in a property, but they are investing in more than a property. They are investing in and planting root in a community.

We support fair housing initiatives and the provision of opportunities to diversity the City's neighborhoods. But we do not believe that it is appropriate to blame and seek to penalize current homeowners for the mistakes of the past.

We are particularly concerned that the mere fact that our WLA Community Plan is in process of being revised is serving to allow the Planning Dept. to place a disproportionate amount of new density in our community We understand that we are identified as a "High Opportunity" area but that, coupled with the fact that we are in the midst of a Community Plan update should not mean that we are subject to an unequitable share of new density. We are very concerned that areas now undergoing community plan revisions will be subject to an even higher burden should the proposed additional citywide rezoning policies to be implemented to reach RHNA goals are applied to our area. That simply cannot be. It is difficult to listen to speaker after speaker suggesting that density be moved to "High Opportunity" areas on the Westside. It is almost as there is an assumption that the Westside has unlimited capacity to make up for all the housing shortfalls around the City. It is important to ask: How much is enough? How much is too much? And how will we know when those markers have been reached? What monitoring will be done to trigger a "time out" if it is found that the levels of density are eroding the safety and quality of life of all the residents in the community. Emergency vehicles still need to access low and high density properties. Buses still need to be able to travel down streets. Some commuters and residents still will rely on our arterials to access work, medical care and other needs that cannot be met via transit. In order to facilitate a successful implementation of density in any and all areas of the City where it is proposed, we recommend the establishment of a **staging process/ plan with criteria that trigger advancement or re-evaluation of planned activities.** Eight years is a fairly long time to continue on if it is realized fairly early on in the Update's implementation that things are not working out as planned. Perhaps new funding mechanisms for certain types of housing develop. Perhaps environmental factors change. Embarking on a plan that some may believe is unsound is not a way to build confidence and buy in into that plan. Establishing benchmarks that serve as check-in points with prescribed follow-up may go far in gaining support and buy in to the plan.

Recommendation: Chapter 6, Objective 2.2 / Policy 2: *Promote more affordable ownership opportunities and ownership retention strategies , with an emphasis on stability and wealth building for underserved communities.*

With the passage of SB 9 and the potential of SB 10 being adopted in Los Angeles, we have significant concerns that its implementation over time will result in an accelerated commodification of housing and the transfer of housing from individuals and families to **institutional investors.** The opportunity to add density without the requirement to provide affordable housing will undermine existing housing programs like the TOC that require

affordability in order to obtain density bonus opportunities. This makes no sense whatsoever. There will be incentive to avoid building under bonus density programs that require affordability and the covenants that go along with those programs.

There are many articles that document the billions of dollars being raised and gathered by venture capital funds, REITs, pension funds in the institutional investment arena to purchase single-family residential properties. After having purchased bundles of foreclosed properties following the mortgage meltdown, these investment groups learned that the management of homes was a lucrative and reliable source of revenues for their funds. The pandemic only served to heighten their interest in single family properties when the Covid pandemic demonstrated that commercial office and retail properties were no longer the reliable investments that they had been in the past. While the institutional investors have always had sunbelt properties on their priority list, the passage of SB 10 will be an overwhelming draw for them to come to California to buy our homes. Not only are these homes potential rental income sources, but they will now have the potential of generating 10 times the rental income AND will be able to do so without any requirement to provide affordable housing. Whether they choose to redevelop the property or not, their presence in other states has shown that their buying activities increase the cost to buy a property as they come forth with deep pockets and a desire to capture a targeted percentage of the marketplace. While SB 10 is an option provided to cities, in Los Angeles it is likely that its implementation is more a question of when – rather than "if." It is therefore critical that the City act to create a level playing field for those selling and buying homes here in order to remove any advantages available to institutional buyers. We recommend that the City support its goals to promote homeownership by adopting policies that:

- Require the full disclosure of bidders and buyers of residential properties in the City.
- Establish regulations that limit the use of electronic tools/software programs in the listing and selling of homes so that institutional investors do not have an unfair advantage in accessing housing supply yet unavailable to the general homebuyer.
- Establish data gathering mechanisms or programs within existing data resources to monitor and measure the behavior of properties owned by institutional investors to understand how they behave and how or whether their presence in the marketplace is having a positive or negative impact on Angelenos. (Would it be possible to enact different sets of rules for owners of large numbers of residential properties?)
- Establish monitoring mechanisms to determine the impact of institutional investors on the cost of buying residential properties in Los Angeles.

A collection or articles that documents the current activities of the institutional investors vis a vis the residential single family market is attached to this submission. It is a source of concern not only as it impacts the ability of families and individuals to purchase homes, but as it affects the experience of tenants that may face rent increases that answer to Wall Street expectations, whose rent increases may lead to a growing population of tenants facing eviction and being at risk for homelessness. We have fears that any significant shift of homeownership –the commodification of our housing stock—will result in a permanent tenant class of Angelenos never able to become property owners. Will this transfer of ownership result in the manufacturing of a new generation of landless and perhaps homeless Angelenos?
Recommendation: Lobbying at the State and Federal levels to make available tax credits and the establishment and funding of Affordable Housing Trust Funds. (There must be reliable funding sources to replace and augment the lost redevelopment agency funds.)

Recommendation: Work with financial lenders and investment specialists to develop independent financing sources for supportive housing projects.

A model has been created for such a fund in California by SDS Capital that has provided and is providing financing for 6 projects to date with one developer. 22 projects are slated for LA out of 30 to be funded. The fund is focused on scale and relies solely on capital raised in the private sector. The structure of the fund allows capital for a project to be funded within 60 days. This model has worked for projects that come in with a per unit cost of less than $200,000 and is currently building their first modular project.

We are very troubled by the current characterization that homeowners are the cause of the affordable housing crisis. Those who advocate for the removal of R1 housing should not demonize current homeowners for either the lack of affordable housing. Calculations have shown that Los Angeles is currently zoned to accommodate not only current housing needs, but to meet future projections as well. The real issue has to do with understanding that housing gets built when and where an investor, speculator or investor chooses to build housing. And that decision is not based solely on what transpires in the LA marketplace. That may involve factors that reach far beyond this city, this state and perhaps even this country. Institutional investors already hold a majority share of multi-family housing in many cities. They have recently increased their activities in the student housing marketplace as well. Online crowdsourcing of funds for real estate purchases have introduced a new source of fund interested in purchasing residential properties. Their incentive is not to build community. Their incentive is not to meet the City's housing goals. Their incentive is to generate maximum profit for their shareholders and/or investors. If they can do so in Los Angeles, they will do so. But if they can get a better return on their investment in Austin, Texas, off they will go. So, it is a complete oversimplification of the behavior of the housing marketplace for LA stakeholders to believe that it is homeowners who stand in the way of housing production. It is a complete red herring to blame CEQA for the lack of housing production. (See the Rose Foundation study that did research and documented the very minimal impact of CEQA litigation on housing costs: https://rosefdn.org/wp-content/uploads/2016/08/CEQA-in-the-21st-Century.pdf).

In an article reporting on the Rose Foundation study, it was noted by Dan Dunmoyer, president and CEO of the California Building Industry Association that CEQA is "the boogeyman or the poster child for housing delays, but it's an oversimplification of our challenges."

WSSM does not support policies that seek to weaken or eliminate CEQA protections. CEQA not only provides the structure for larger projects to evaluate and compare project alternatives, and to identify and mitigate against negative impacts of proposed projects,

Goal #5 A City that is committed to preventing and ending homelessness

The City can make renting to a household with a housing voucher and shallow subsidies more affordable to housing providers by:

Eliminating Housing and Community Investment Development Rent Stabilization Ordinance fees for all units rented to a household with a housing voucher or taking shallow subsidies.

Partnering with LA County to eliminate property tax for apartments that are rented to a household using a shallow subsidy or housing choice voucher.

Promoting to landlords / prospective landlords the advantages and benefits to landlord of accepting housing vouchers. These include an emphasis on on-time, guaranteed rent payments.

There is a critical need for clinical housing support for the homeless who are experiencing mental illness. There is also a need for such housing for those with housing to go when in crisis situations. There is a recognized shortage of such facilities which has led to an inhumane situation on our streets. Our society takes better care of stray dogs than it does some of the mentally ill homeless that wander our streets in clear distress. We understand that there are State and Federal laws that govern individuals' rights; however, as part of the Housing and Health and Safety Elements a commitment must be made to lobby for whatever changes are needed to permit those unable to care for themselves to be brought in off the streets to be housed in a clinical setting and to be offered and/or given medical support and assistance.

If there are administrative impediments to the establishment of such facilities then the General Plan elements should address them. If there are financing impediments, the Health Element should address them. Individuals who are in need of mental health services are not good or appropriate candidates for permanent supportive housing until their mental health needs have been met. It would be counterproductive to place them in permanent supportive care for the outcome would not be expected to be a successful one.

Goal 1 – Policy 1.1.8; Program 63 – Housing and the Missing Middle

Given that middle income wage earners often struggle to find affordable rentals and homes to buy, it is important that additional strategies be developed that focuses specifically on the production of housing stock for middle income Angelenos. While there is discussion in the State legislature to introduce the establishment of a fund to provide down-payment assistance to first-time homebuyers, this will not be enough to address the challenges faced by those homebuyers -- particularly if deep-pocketed institutional investors become a growing presence in Los Angeles to bolster their rental portfolios (to have homes to rent and/or to redevelop R1 lots for multi=family rentals). In cities where institutional investors are actively buying homes, they outbid individual and families attempting to buy a home.

It is important that the Housing Element acknowledge the outside forces that can contribute to inflating housing costs.

We have not seen acknowledgement of factors that contribute to inflating housing costs such as speculator activity, the purchase or renting of properties for the operation of short -term rentals, etc. We understand that a measure will be on the ballot to consider a vacancy tax on those housing units left vacant by absentee landlords as a "safe" investment. All these factors add to the cost of housing and remove units from the marketplace.

While there are specific requirements for certain types of developments to provide "affordable / low-income" housing, there are no requirements to provide "workforce housing" despite the clear need.

Policy 1.1.8 points to the creation of new housing for the Missing Middle "particularly in High Opportunity Areas." This seems an odd focus because those in the middle income range most certainly have jobs and a way to access those jobs. Why should they be forced into living in a more densely populated area of the City when Missing Middle housing can be made available all across the City? People should be able to choose to live near their work, their family or return to a neighborhood where they grew up. New rental and sale housing for Missing Middle should be spread throughout the City and not focused on High Opportunity Areas.

We recommend an analysis of the Small Lot Subdivision Program which was originally touted as a tool to provide Missing Middle housing. In our community the Small Lot Subdivision Program has resulted in naturally occurring affordable housing being replaced with luxury and market-rate units in buildings that tower over their neighbors.

City-owned properties are being used for homeless and low-income housing projects. There should also be consideration given to using such land for workforce/missing middle housing.

Another model for consideration for missing middle housing is the promotion of the formation of housing cooperatives. The City could create an action plan for incentivizing and removing barriers to the creation of housing cooperatives. In conjunction with that effort, policies that will improve access to loans for the purchase of cooperative units are needed. (There are vastly limited numbers of financial institutions that lend for the purchase of a co-op unit as compared to lenders for the purchase of more conventional properties.)

Creating Generational Wealth for Minority and Immigrant Communities / Chapter 1 page 1-33

Efforts to reduce declines in home ownership trends should be an important part of the Housing Element. Opportunities to purchase one's residence, as opposed to renting, should be more readily available. A mortgage has been shown to be one of the best mechanisms to promote savings and property ownership is one of the best ways for families to generate generational wealth.

Reference: Chapter 6, Objective 2.2: *Promote more affordable ownership opportunities and ownership retention strategies, with an emphasis on stability and wealth building for underserved communities.*
Policy 4: A City that fosters racially and socially inclusive neighborhood and corrects the harms of historic racial, ethnic, and social discrimination of the past and present.

The promotion of programs that encourage and prepare citizens for homeownership, with an emphasis on immigrant and minority communities should be offered in conjunction with financial institutions and relevant government agencies. Financial literacy programs will also be valuable to provide guidance to support sustained ownership.

The creation of housing cooperatives which typically reduce homeownership costs should be explored as a housing typography for middle and lower income Angelenos.

Program No 1 (Chapter 6 page 6-14) outlines an eight-year loan program to assist 75 first-time low-income buyers and an additional 75 loans for first time moderate income buyers. Perhaps it

would be possible to leverage additional loans from financial institutions with whom the City does business and make participation in such a loan program one of the conditions of doing business with the City. If State legislation creates a more robust loan program, it may be that Los Angeles can put these funds to better use implementing programs to increase homeownership and retention.

Preserving Affordable and Rent Stabilized Housing
Program 122, Anti-displacement strategies; and Program 125, Transit Oriented Communities

Given that many apartment buildings in the City constructed after 1978 (the effective date of the Rent Stabilization Ordinance (RSO)) provide the bulk of naturally occurring affordable housing, it is critical to preserve these units. Their loss is a significant factor in the gentrification of neighborhoods with market rate and luxury units that take their place. These buildings are especially attractive to developers because the displacement of their tenants does not carry with it requirements to rehouse those tenants when new units are built. Because there is no duty to offer a replacement unit to tenants displaced by demolition of these buildings, it is especially important to develop tracking systems that monitor this housing inventory type and to mitigate the risk of homelessness when such buildings are targeted for demolition.

Regulate demolition and condo-conversions-- The WNC supports the following ACT-LA recommendations:

Demolitions and condo conversions are city-regulated processes that often precede the direct

displacement of tenants, often low-income renters of color. The City should follow the lead of other jurisdictions in California and set an annual allowance for the number of demolitions and condo conversions in a given area, such as a Community Plan Area. In addition, HCIDLA and the Planning Department should work with the LA Department of Building and Safety to ensure that demolitions are properly tracked and labeled. Currently, it is difficult for the data to be tracked from Planning Application to demolition and construction as permits go through various agencies such as DCP, LADBS and HCIDLA. Furthermore, to protect against premature demolition, the City should require that demolition permits be granted only after all building permits have been issued. The Housing Element should include policies and programs to effectively regulate demolitions and condo conversions, including but not limited to the following.

- Residential Conversion Annual Allowance. Establish an annual allowance for the number of condo conversions in a given Community Plan Area.

- Residential Demolition Annual Allowance. Establish an annual allowance for the number of residential units demolished in the Community Plan Area.

- Limit Residential Conversions. Residential Conversion Projects, as defined in LAMC Section 12.95.2, shall be denied if the vacancy rate in the Community Plan Area is five percent or less or if the cumulative effect on the rental housing market is significant.

- Restrict Residential Demolition Permits. No permit for residential demolition in the Community Plan Area shall be issued unless all necessary building permits have been issued for new construction on the site.

Reduce barriers for production of all affordable housing that does not result in the removal of existing units and/or displacement of tenants and that does not expose low-income communities of color to environmental harms.

● Affordable Housing on Vacant and Underutilized Land. Explore a citywide program that allows the production of affordable housing on vacant land, commercial buildings, or in some buildings that have not been occupied in the past 10 (5?) years.

Replacement of 100% of demolished RSO units in addition to affordable units required by a Density Bonus Program

WSSM supports not just a one-to-one replacement of any demolished RSO housing in TOC or other Density Bonus projects, but also a requirement that this replacement be additive to the number of specified affordable units required by the respective Density Bonus program in order to achieve incentives. Demolished units should not be included in the base affordable units.

Communities across the City have experienced a net loss of "naturally occurring affordable units" in several of the recent TOC or DB projects approved by the City. In one TOC case (pre-SB 330), five RSO units were demolished but only three affordable units were a part of the approved project. In a current Westwood case, eight RSO units are planned for demolition with only eight to be replaced despite the fact that additional incentives that dramatically increase the number of total market-rate units, the height, the massing and the FAR of the planned building.

The City's policy and practice should be to replace all RSO units at their previous rental amount (with a right of return component) and add to that the required handful of dedicated affordable units in order to achieve the bonus incentives.

Specifically, the Planning Department in its presentations about the Housing Element is still saying that it has as its goal "minimizing the loss of RSO units." That is clearly not good enough. The ***goal*** should be a ZERO loss of "naturally occurring affordable units," including but not limited to designated RSO units. And when bonus densities are granted, additional affordable units should be required.

Density Bonus Programs Should Limit the Number of Additional Incentives and/or Waivers for Projects That Are Not 100% Affordable

As an additional note, except for 100% affordable units, these density bonus programs should limit the number of allowable incentives and should not allow "waivers" of development standards. A housing producer may always apply through different land use processes for waivers and multiple additional incentives (including zone changes), but for those who are not providing a significant number of affordable units the City should not have a simple "green light" program in the Housing Element.

To avoid abuse of the incentive system, the use of multiple off-menu or additional incentives should be reserved for those projects which offer significantly more affordable units than the bare minimum.

Carefully Consider Allowing the Utilization of TOC or Other Affordable Housing Density Bonus Incentive Programs for For-Sale Housing

As a mechanism to promote homeownership, WSSM would like to have the City explore the possibility of building moderate income and even low income for-sale housing, such as the Community Redevelopment Agency did decades ago, which provided first-time buyers with homeownership opportunities. However, the City should reconsider whether or not For-Sale projects (condominiums, co-ops, and Tenants-In-Common/TIC projects) should be allowed density bonus incentives for affordable housing, at least not unless it is pre-defined as to whether the proposed affordable units will be subsidized and sold (and then, who will pay the HOA fees?), OR if the developer is planning to continuously own the units, renting them through HCIDLA. These issues are all worthy of serious discussion and exploration.

TOPIC: Equitable Distribution of Housing Throughout the City /REFERENCES: Chapter 4, Adequate Sites for Housing (page 4.27)

Although our community has seen many new housing units built in our area, the overwhelming majority of those units have been market rate and luxury housing units. We endorse the idea of a "Fair Share" of housing being geographically distributed throughout all 35 Community Plan areas.

We are concerned that through the Housing Element, the City seeks to place an inequitable distribution on new density in our Community Plan area which is already a congested area with very little open space. Our proximity to UCLA places many demands on our housing – as the campus is both a significant employer and a magnet for students from around the world. While the University has recently expanded on-campus housing opportunities, there are still significant numbers of students who seek housing in the community. That added demand no doubt factors into the high rents in the area. The incentivizing of more market rate and luxury housing will not address the current lack of affordable housing in this area. The City will not build its way out of the affordability challenges faced. Without funding and/or tax credits to help affordable housing "pencil out," it will not be built. We question whether that distribution of density represents an "equitable distribution of housing throughout the city."

There needs to be zoned capacity for new housing spread throughout the City in a fair manner. If new housing is not spread throughout the City then the areas that do not receive new housing will also fail to attract new economic activity in the forms of the types of businesses and services that make for a vibrant and walkable community. We recognize that there is a need to prevent gentrification in our communities and especially in our most vulnerable communities. However, residents in all areas of the City deserve to have access to healthful food sources, good schools, pedestrian friendly commercial districts, etc.. Supporting a healthy business community often requires a certain level of population density in a community.

The failure to provide for high quality affordable housing in lower opportunity areas would be unfortunate because it could result in people who wish to remain or return to the community being unable to do so.

Per the Draft Housing Element, State Guidelines require that the lower-income portion of the mandatory housing unit allotments are not to be "concentrated in low-resourced areas (lack of access to high performing schools, distance from jobs centers, location disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty." And the City's draft does say that housing will be equitably distributed, based on this guideline.

WSSM supports Goal No. 3, putting housing where it makes sense and where new housing can be sustainable, livable and resilient – noting that we are concerned about creating sustainable, livable and resilient neighborhoods and not just buildings.

According to the Draft Housing Element, looking at "all land zoned to allow residential uses, approximately 76% of residential parcels in High and Highest Resource Areas are limited to single-family uses and approximately 20% are zoned to allow multi-family (see Table 4.28). Those figures may be misleading in that there is a large area of land zoned single-family that is not appropriate for multi-family development. In fact, with rising impacts of climate change, growing drought and wildfire risk, it may be reasonable to question whether any new residential development in the hillside high fire severity zones should be permitted. When the land in the hillsides and HFSZ is removed, how much land remains zoned R1 in the City?

The economics of the housing marketplace are a major contributing factor to the cost of housing in Los Angeles. In areas near the cost, land costs are valued at a much higher level than those inland. This is not only true in Los Angeles, but it is true around the world. Therefore when building any housing – affordable or luxury – the base cost of the land is a major contributing factor to the eventual cost of the housing built. That is a difficult factor to overcome when seeking to maximize the construction of affordable housing.

The addition of zoning capacity in our community meets resistance when new buildings are built without regard and respect for adjacent property owners' and tenants' rights to naturally occurring light, some sunlight, and retaining some ability to preserve a measure of privacy. There is tremendous concern about development out of scale with the streetscape. (Is it appropriate to place multi-family units on a narrow residential hilly street with limited visibility? The Planning Dept. proposed to do so in the community planning process.) While the concept of "neighborhood character" has fallen out of favor and has been used to criticize those who challenge out-of-scale development, there is an important factor to consider when introducing new density; that concept is **neighborhood identity**. That may include architectural context, preservation of historic and cultural resources, protection of open space and outstanding geographical features. It is critical to understand the elements that define a neighborhood or community. Without that understanding, efforts to introduce density will be resisted. It is too easy to accuse homeowners of resisting change and new density because they do not want "others" moving into their neighborhood. We suggest that the concern is not one based upon the people who will come so much as it is about the buildings, the way they are designed, situated and built that raises the concerns of many stakeholders. We have no design standards. With growing numbers of entitlements being granted ministerially / "by right" we have lost the opportunity to negotiate with developers to make suggestions to improve projects and to reduce perceived negative impacts. How do we stop the degradation of the neighborhood with the construction of poorly designed cheap boxy buildings? Will the emphasis

on affordable units bring even less sustainable and attractive buildings? Do we want every corridor in the City to have the same cookie cutter multi-story buildings oblivious to the settings in which they are located? If the City seeks to succeed with the densification of neighborhoods, there must be policies and strategies that influence what gets built (and where).

We wish to note that while we are a "high opportunity area" the resources that result in that designation are not unlimited. The EXPO Line by virtue of its design has limited capacity. During peak hour travel (pre-pandmic) there were times when trains were full and unable to take on new passengers. Educational resources are limited. The campuses of our local elementary schools currently operate at capacity and over capacity. They do not have additional land for new buildings. (One of the schools does not have parking for its teachers and staff who must park in the adjacent residential neighborhoods and their school yard is small having already installed numerous bungalows.) This returns us to the need to evaluate capacity in an area before permitting development to exceed infrastructure and public service capacity. How does the City plan to establish systems to monitor physical, social and economic conditions in our community and others to determine when capacity is reached?

TOPIC: The Importance of Los Angeles' Shade Tree Canopy / REFERENCE: Chapter 6, Objective 3.1.5

Develop and implement environmentally sustainable urban design standards and pedestrian centered improvements in development of a project and within the public and private realm such as shade trees, parkways and comfortable sidewalks.

(Programs #74 City Plants and #79 Housing and Ecology)

Planned development and housing policies threatens the existing urban forest and the potential for growing and maintaining an urban forest with a canopy adequate to protect us from the impacts of climate change and urban heat island effect. Maintaining the current mature street tree canopy and mature trees on private property is the most obvious way to provide shade to our City. And yet, both street trees and mature trees on private property are in great jeopardy despite the fact that an increasing shade tree canopy is essential to the health and vitality of our residents. The parkways, street medians, and areas banking our highways/ freeways are all viable areas for planting trees and broadening our tree canopy. Every effort must be made to reduce the urban heat island effect and increase carbon sequestration. Trees play a key role in mitigating pollutants which are prevalent in areas adjacent to major arterials (streets and freeways). These conditions can be combatted with an increase in our tree canopy. A successful tree canopy strategy should be included as a plan required in conjunction with the Housing Element. Such a plan should focus on maintaining the current urban forest and creating regulations that seek to preserve trees at sites targeted for redevelopment. Policies that permit lot line to lot line development leaving no room for trees to establish should be changed to accommodate trees. Construction on one lot should not doom the survival of a mature tree on an adjacent lot. The City must require better protections of trees during project construction periods.

We have experience with community street tree planting initiatives and wish to note that the greatest danger to the survival of a newly planted tree is the lack of water during the first 3 years following planting. As part of the infrastructure programming of the City, a tree watering program should be established. This financial burden should not be placed upon residents who

may come and go or be on fixed incomes. We request the development of a tree watering program to fund the watering of trees during this vulnerable 3-year period. Similarly, we recognize site conditions can present limitations for the planting of many large native trees. We therefore would like the city to increase curb bump-outs to accommodate the planting of large canopied native trees which in turn would provide sidewalk shade along commercial corridors with the hopes of increasing pedestrian traffic.

When projects are required to plant trees, there is no mechanism to see that the trees have been planted or that if planted, they have survived. There are no mechanisms to replace trees that have died. Trees must be included in property inspections currently being done by HCID for residential properties or a new mechanism for such inspections should be developed. We must treat our trees as the valuable resources they are.

The City should consider supporting State legislation that would address the issue of project setbacks for developments. Side and rear yard setbacks are now granted by right often resulting in a project that does not have any undeveloped land for water permeation, upon which trees can be planted. We would argue that good policy would increase the size of required rear setbacks so that that land can be considered a viable habitat for the growth of mature trees. If, on commercial properties or in locations where setbacks suitable for tree plantings are not included, the City should establish a program that requires the planting of trees in the immediate neighborhood to help to address climate change and related environmental concerns. A developer could be required to make a deposit in a local tree bank to make up for the loss of habitat on site. When projects offer to grow trees in pots, this may be considered to be a project amenity for residents but it does not in any way substitute for the need to plant trees with roots in the ground. Potted trees all have a limited life expectancy and may perish well before that time if not well tended.

The Neighborhood Council Sustainability Alliance's Trees Committee has done much good work in this area and should be consulted in the development of practices and policies governing the growing of the City's tree canopy.

For example, the City should require that if trees are required to be planted, either on a property or as a public realm street tree, at the time of a housing development's approval, then this should be a more permanent requirement, with timed inspections to verify that required trees are present and thriving – to help guarantee the creation and maintenance of a tree canopy.

TOPIC: Conserving Character Neighborhoods

REFERENCE: Goal No. 3, A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos; **Chapter 5** and **Appendix 5.1**, Evaluation of 2013-2021: Goals, Policies, Objectives and programs, which assesses the "effectiveness" of the current Housing Element's programs, policies and strategies; **Policy 3.1.2;** and **Program 58**.

A key goal of the 2013-2021 Housing Element was placing "a strong focus on complete communities, illustrating the role of housing in creating and preserving vibrant neighborhoods." This was a part of Prior Goal No. 2, "Creating Safe, Livable Communities," which sought to "preserve, stabilize and enhance livability [and] sustainability in all neighborhoods throughout the City."

WSSM has long advocated for the conservation of neighborhood character, along with the creation of new housing opportunities. We have met with developers to seek design improvements of projects so that they might be a better fit in their setting. While some would look at our local business corridors as "underutilized," a number of buildings on those streets help to define our neighborhood character and have a place in the history and growth of our community. Long gone is the Picwood Bowl and Picwood Movie Theater but we still have the Apple Pan! As one of the housing developments designed and built by the Janss Brothers to provide housing for the new UCLA campus, our area has many homes that were built at the same time and by the same developer. That resulted in a very unifying architectural presence seen both in single-family and multi-family residences. While most of the original multi-family properties have been redeveloped (with some 2, 3, and 4-unit buildings still peppered throughout the area, the majority of our single-family housing stock remains original to the area. Many of our residents moved here specifically because they value older homes built primarily in the 1930's. **We are therefore greatly concerned with the current Draft Element's change in direction to exclude the phrase (along with the concept) of neighborhood character.** In reviewing Chapter 5, which evaluates the effectiveness of the prior 2012-2021 (page 5-10), we note that the authors state that *"*References to 'neighborhood character,' which have been criticized as being too vague, have been replaced with language about architectural context and diverse cultural heritages within communities."

While we embrace the adoption of language which reflects diverse cultural heritages within communities, we strongly object to the deletion of the phrase "neighborhood character," and find the comment that it is "vague" somewhat disingenuous, given that it was clearly defined in previously-adopted Citywide design guidelines.

This proposed change is problematic for a number of reasons. *First*, "architectural context" is even more ambiguous than "neighborhood character." Neighborhood character is historically well-defined as <u>new buildings and developments that are compatible in terms of scale, massing, style, setback, height, lot coverage, **and/or** architectural materials with existing structures in the surrounding neighborhood</u>. Within the context and definition of "neighborhood character," architecture does not need to be exactly "matching" in style but rather an infill project can be a contemporary yet sympathetic design so long as it also is compatible with scale, massing, setbacks and lot coverage.

Conversely, do the authors of the Housing Element really mean that new development in a neighborhood dominated by, say, Craftsman or Spanish Revival styles must also be the same style exactly? If that's not what is meant, then "architectural context" should not be the standard in the Housing Element.

Second, an emphasis on architecture is not only somewhat elitist, but it also condemns the City to repeat the errors of the past by not allowing history and diverse cultural heritage to be easily designated and protected.

There is often emphasis on "place making" as new buildings are proposed. We would argue that it is the elements that have historical context and cultural importance to the community that are essential to defining community. The standard for designating historical resources is often too steep to allow for communities to achieve such designations which is more than unfortunate. Our communities may not have "the best" example of an architect's work or the only example of his/her work but that structure may mean more to the community that should result in its protection. Policies that seek to save and incorporate structures that contribute to neighborhood

character should be developed and embraced. We have mentioned it before but will say it again: As a result of adding and incentivizing new density, the result of such activity should not be to create a city wherein every street and every neighborhood looks exactly alike – where one does not know whether one is in Koreatown or Van Nuys or Palms when standing on an arterial with mixed use or residential housing. It is very possible to meet one's RHNA goals but have as a result of poorly conceived housing programs, a very ugly and unattractive city. Further, if construction is incentivized and build "on the cheap" we will also have a city that rapidly deteriorates over time bringing urban blight to densely populated areas.

If we are to be a City that values the history of place, then an emphasis on architectural context is misplaced.

By changing the phrase from neighborhood character to architectural context, the Housing Element opens the door for future interpretation by both staff and project developers that if a project is proposed in a neighborhood that does not have architectural distinction, then there is nothing to "balance" in terms of designing projects to further Citywide Housing Priorities (3.1.2, page 6-9). This would be harmful to neighborhoods throughout the city.

The ambiguity comes into focus in **Program 58** (page 6-51), which promotes "Development and Design Standards" for Community Plan updates, and calls out for designs at a neighborhood level to "protect existing architectural context" – but offers no definitions at all.

WSSM strongly urges that the Housing Element Update revert to an objective or goal of conserving neighborhood character, perhaps inclusive of architectural context, and define neighborhood character specifically as "scale, massing, setbacks, lot coverage, height, architectural context, and/or architectural materials." If language in the Housing Element must be "objective," then add language about prevailing setbacks as measured and calculated; average lot coverage of adjacent properties within a specified radius; adherence to the height district of the zone; and so on.

Lack of adequate infrastructure – The city has failed to maintain its sewer, power, water and other infrastructure, which is old, crumbling, and simply unable to accommodate the increase in density being proposed. There is no evidence of a companion plan to upgrade infrastructure and provide the levels of services required to support new density and areas where significant increases in density are being targeted. There is so many needs that remain unaddressed and there appear to be no plans to do so. Infrastructure plans must be made before density descends upon us.

Our schools are operating now at over-capacity. We must hear from LAUSD and the City as to how educational resources are to be expanded to accommodate planned density.

A QUALITY HOUSING ELEMENT MUST INSIST ON A QUALITY QUALITY OF LIFE FOR ITS CITIZENS THAT FOSTERS QUALITY CONSTRUCTION IN NEW DEVELOPMENT.

We have additional thoughts and suggestions and they will be forwarded to the CPC with a copy sent to Planning as well.

Yours sincerely,

Barbara Broide

Barbara Broide
President, Westwood South of Santa Monica Blvd. HOA

cc: Councilmember Paul Koretz, CD 5
Daniel Skolnick, Planning Deputy, CD 5

THE DATA WE REQUESTED TO HAVE AS PART OF THE WLA COMMUNITY PLANNING PROCESS

What level of population growth should be used to establish 2016 (or later) population from the base of 2010 census figures? Growth rate per year? Historical ACTUAL growth rate? Projected growth rate and numbers?

For each of the following land use categories, we must have accurate data upon which to make future land use planning / zoning decisions:

R1 Low Residential (Single family)
R2/R3 combined (Low Medium/Medium
R4 High Medium
Commercial up to C4/R4
TOC Available (Low/Low Medium)
TOC Available (Commercial)

DATA NEEDED per category:

Dwelling units per net acre
Net acres of zoning
Number of dwelling units ? Persons per dwelling unit
Capacity before bonuses
Capacity after ADU bonus (applied to only 25% of R1 parcels and that percent may change over time as experience is gained)
Capacity after SB 1818 Bonus (Assume at 35%/maximum bonus)
Capacity after TOC bonus

How many more of each needed by 2030? 2040? How many of each, allowed by 1997 Community Plan Zoning, remain un-built? How many Accessory Dwelling Units allowed by State 2017 law remain un-built? Up-zoning is normally used to rejuvenate undervalued, dying neighborhoods. Why is City even thinking about Up-zoning Westside R1 neighborhoods?

Current and historical vacancy factors in the area?
Vacancy rates of rental units?
Percent of unoccupied homes?
Percent of overcrowded residences?
Current RSO units
Data to describe percent of different tiers of affordable housing: ELI, LI….
Profile of housing built in last RHNA cycle
Job data: Current employment
Future jobs targets

Jobs to housing ratio (1 residence for every ___ jobs)
Housing goals (total and per income category

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element/Zoning Comments 09/22/21

3 messages

Tom Williams <ctwilliams2012@yahoo.com> Wed, Sep 22, 2021 at 12:47 PM
To: "housingelement@lacity.org" <housingelement@lacity.org>
Cc: Fernando Campos <fernando.campos@lacity.org>, Vince Bertoni <vince.bertoni@lacity.org>

#1. More than 1000 parcels are shown in ZIMAS as vacant of any structures although Zoned for R1-RE40. Most of these lots were zoned and platted more than 20 years ago and only generate some land assessment by LACo Assessor as they are without any infrastructure support.
Several years ago the City Engineer requested budget approval by the BPW for costs of construction of street infrastructure for "Elephant Hill" which activated the owners of such properties to sell.

#2 Housing Element must incorporate infrastructure implementation for zoned/counted/vacant properties in 90032 and elsewhere in the City. No properties and zoning must be counted for housing unless the parcels are served by fully functional infrastructure along with LACo Assessor's increased land assessment to recover costs for such infrastructure construction and availability.
Do no count parcels, housing, households, and populations which are NOT developed and served with physical infrastructure within 5 years of the update and completed within the time frame of the projection 2029 and 2045

#3 Coordinate all housing and households into ZIMAS and assure a quantified/numerical projections within the ZIMAS data/graphical base

#4 Provide schedule for required appeal dates and legal document receivers.

More comments will be submitted to the CPC

Dr Clyde Thomas Williams
ctwilliams2012@yahoo.com
4117 Barrett Rd LA, Ca 90032-1712
Citizens Coalition for A Safe Community, President

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 3:14 PM
To: Tom Williams <ctwilliams2012@yahoo.com>

Hello,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Blair Smith <blair.smith@lacity.org> Wed, Sep 29, 2021 at 10:55 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Flora Melendez** <flora.melendez@lacity.org>
Date: Wed, Sep 22, 2021 at 1:51 PM
Subject: Fwd: Housing Element/Zoning Comments 09/22/21
To: Matthew Glesne <matthew.glesne@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Blair Smith <blair.smith@lacity.org>
Cc: Arthi Varma <arthi.varma@lacity.org>, Nicholas Maricich <nicholas.maricich@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
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[Quoted text hidden]

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886



Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Sep 22, 2021 at 11:53 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Sep 22, 2021 at 11:22 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Los Angeles City Planning
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---------- Forwarded message ---------
From: **Stella Yoo** <stella0704@everyactioncustom.com>
Date: Wed, Sep 22, 2021 at 11:15 AM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. But additional bold action and specific implementation measures are needed to make the housing element update successful.

I urge the City to:
- Rezone enough new capacity to result in the creation of 300,000 new homes, enough to close the RHNA gap.
- Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods, and would require wealthy, high-opportunity areas to accommodate the most new housing.
- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Allow "missing middle" multifamily housing citywide.
- Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
- Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Sincerely,

Personally sent by Stella Yoo using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Stella Yoo
3131 Mcclintock Ave Los Angeles, CA 90007-3560
stella0704@gmail.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 3:08 PM
To: stella0704@gmail.com

Hello Stella,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Sep 22, 2021 at 7:26 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Sep 22, 2021 at 7:25 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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---------- Forwarded message ---------
From: **Supriya K** <supriyaknair@everyactioncustom.com>
Date: Tue, Sep 21, 2021 at 5:53 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Sincerely,

Personally sent by Supriya K using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Supriya K
11748 Mayfield Ave Los Angeles, CA 90049-5711
supriyaknair@gmail.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:09 PM
To: supriyaknair@gmail.com

Hello Supriya,

Hope all is well.

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

PUBLIC COMMENT

3 messages

Paulette Light <paulette@lightrake.com> Tue, Sep 21, 2021 at 6:49 PM
To: housingelement@lacity.org

I am Paulette Light and I live on Beachwood drive in the 90004 area. I urge you to include the Livable Communities Initiative in the next Housing element and hope that it will be approved as well. It is smart, thoughtful and actionable and will create a stronger Los Angeles community.
Thank you

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:07 PM
To: Paulette Light <paulette@lightrake.com>

Hello Paulette,

Hope all is well.

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

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Los Angeles City Planning

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[Quoted text hidden]

Paulette Light <paulette@lightrake.com> Wed, Sep 22, 2021 at 1:27 PM
To: Housing Element <housingelement@lacity.org>

What a nice note! Thank you so much.

Paulette Light
@paulettelight
310.721.7951

Sent from my iPhone

On Sep 22, 2021, at 1:07 PM, Housing Element <housingelement@lacity.org> wrote:

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Sep 22, 2021 at 7:26 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Sep 22, 2021 at 7:25 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Los Angeles City Planning
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---------- Forwarded message ---------
From: **Roshan Vyas** <roshanvyas@everyactioncustom.com>
Date: Tue, Sep 21, 2021 at 8:44 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Sincerely,

Personally sent by Roshan Vyas using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Roshan Vyas
4488 Don Milagro Dr Los Angeles, CA 90008-2832
roshanvyas@gmail.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:11 PM
To: roshanvyas@gmail.com

Hello Roshan,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Add the Livable Communities Initiative to the Housing Element

2 messages

Louis Abramson <leabramson@gmail.com> Tue, Sep 21, 2021 at 6:37 PM
To: HousingElement@lacity.org

Hello,

I chair the Central Hollywood Neighborhood Council's Homelessness Committee, but am writing only on behalf of myself. I live in Hollywood (zip code 90028).

A plan called *The Livable Communities Initiative* has been submitted to the Dept of Planning for inclusion in the next Housing Element. Beyond presenting a great vision for the solution to our housing crisis, it presents a great vision for a more equitable, more sustainable, more beautiful, and safer Los Angeles. I urge it to be included and approved in the new Housing Element.

Thank you very much,
Louis Abramson, PhD

--
He/him
leabramson.wordpress.com
773 383 3576
@lab_rams

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:06 PM
To: Louis Abramson <leabramson@gmail.com>

Hello Louis,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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T: (213) 978-1302

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Support for The Livable Communities Initiative

2 messages

Meghan Bishop <mbbishop@me.com> Tue, Sep 21, 2021 at 3:50 PM
To: housingelement@lacity.org

Hi, my name is Meghan Bishop. I live in Westwood - in Little Holmby. My zip code is 90024.

A plan called The Livable Communities Initiative has been submitted to the Department of Planning to be included in the next Housing Element. I think it's a terrific solution to LA's housing crisis.

I support it being included and approved in the next housing element.

Thank you,

Meghan

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 12:31 PM
To: Meghan Bishop <mbbishop@me.com>

Hello Meghan,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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T: (213) 978-1302

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element comment!

2 messages

Lane Jensen <lanejensen@me.com> Tue, Sep 21, 2021 at 2:43 PM
To: housingelement@lacity.org

Hi, my name is Lane Jensen. I live in Valley Glen, CA. My zip code is 91401.

A plan called The Livable Communities Initiative has been submitted to the Department of Planning to be included in the next Housing Element. We think it's a great solution to LA's housing crisis and urge that it be included and approved in the next housing element.

Thank you!

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 12:15 PM
To: Lane Jensen <lanejensen@me.com>

Hello Lane,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Tue, Sep 21, 2021 at 4:00 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Tue, Sep 21, 2021 at 4:00 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Sami Khamis** <khamissami@everyactioncustom.com>
Date: Tue, Sep 21, 2021 at 3:55 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. But additional bold action and specific implementation measures are needed to make the housing element update successful.

I urge the City to:
- Rezone enough new capacity to result in the creation of 300,000 new homes, enough to close the RHNA gap.
- Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods, and would require wealthy, high-opportunity areas to accommodate the most new housing.
- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Allow "missing middle" multifamily housing citywide.
- Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
- Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Sincerely,

Personally sent by Sami Khamis using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Sami Khamis
3155 S Sepulveda Blvd Los Angeles, CA 90034-4220
khamissami@yahoo.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 12:38 PM
To: khamissami@yahoo.com

Hello Sami,

Hope all is well.

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Tue, Sep 21, 2021 at 4:19 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Tue, Sep 21, 2021 at 4:19 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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Director of Planning
Los Angeles City Planning
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Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Nicholas Klein** <nicholasaklein@everyactioncustom.com>
Date: Tue, Sep 21, 2021 at 4:17 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. But additional bold action and specific implementation measures are needed to make the housing element update successful.

I urge the City to:
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- Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods, and would require wealthy, high-opportunity areas to accommodate the most new housing.
- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Allow "missing middle" multifamily housing citywide.
- Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
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Sincerely,

Personally sent by Nicholas Klein using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nicholas Klein
1539 Beloit Ave Los Angeles, CA 90025-6679
nicholasaklein@gmail.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 12:40 PM
To: nicholasaklein@gmail.com

Hello Nicholas,

Hope all is well.

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

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Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element

4 messages

Raymond Klein <rklein908@gmail.com> Tue, Sep 21, 2021 at 6:41 PM
To: housingelement@lacity.org

The presentation was not accurate.

There are addresses in Table B that are in the VHFHSZ.

Raymond Klein <rklein908@gmail.com> Tue, Sep 21, 2021 at 6:43 PM
To: housingelement@lacity.org

Table B is deficient without N. and S. in the address.
For example, there are two 615 Bundy Dr addresses -- one N. and one S.

Raymond Klein <rklein908@gmail.com> Tue, Sep 21, 2021 at 6:45 PM
To: housingelement@lacity.org

It is not possible to make meaningful comments without knowing how SB 9 & 10 will be incorporated into the Housing Element

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 9:18 AM
To: Raymond Klein <rklein908@gmail.com>

Hi Raymond, thank you for your comment. We will be revising Table B to include N, S, E and W. In the meantime, in table B are APNs which are address locators and can be used to identify specific parcels. To look up an APN, go to http://zimas.lacity.org/ and select search by Assessor Parcel Number.

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

In Support of The Livable Communities Initiative in The HOUSING ELEMENT

2 messages

Jennifer Levin <jentwelve@gmail.com> Tue, Sep 21, 2021 at 1:54 PM
To: HousingElement@lacity.org

This is Jennifer Levin. I live in Hancock Park. My zip code is 90004. A plan called **The Livable Communities Initiative** has been submitted to the Department of Planning to be included in the next Housing Element.
I think it's a wonderful solution to LA's housing crisis and urge that it be included and approved in the next housing element. Thank you.

Jennifer Levin
310 849 2265

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 12:14 PM
To: Jennifer Levin <jentwelve@gmail.com>

Hello Jennifer,

Hope all is well.

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

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Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element

2 messages

Beth Miller <bethmillerla@gmail.com> Tue, Sep 21, 2021 at 1:34 PM
To: housingelement@lacity.org

Hi,

My name is Beth Miller. I live in Studio City. My zip code is 91604. A plan called the Livable Communities Initiative has been submitted to the Department of Planning to be included in the next Housing Element. I think it's a brilliant solution to LA's housing crisis. It's a proposal that will help the moral crisis we face around our city's homeless population while increasing the quality of life for all Angelino's. I encourage that it be included and approved in the next housing element.

Thank you .

Beth Miller
310-994-8908

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 12:13 PM
To: Beth Miller <bethmillerla@gmail.com>

Hello Beth,

Hope all is well.

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Support The Livable Communities Initiative

2 messages

Susan Mullins <susan@drsueso.com> Tue, Sep 21, 2021 at 6:14 PM
To: HousingElement@lacity.org

PLEASE SUPPORT THE LIVABLE COMMUNITIES INITIATIVE. My husband and I have been residents of various parts of the city for 50 and 40 years respectively. We've seen the City deteriorate further and further. Los Angeles has become a shameful backward city. The lack of affordable housing is a failure of imagination of City leaders, bad City management and policies, payoffs, and an inertia to accept the need for lovely diverse housing that regular folks can live in. It ignores that this can uplift and enliven our City and be a model for beautiful model urban neighborhoods. YOU JUST NEED TO BEGIN TO IMAGINE WHAT IS POSSIBLE, DROP YOUR TIRED EXCUSES, HOLD CITY AND DEVELOPERS ACCOUNTABLE AND GET GOING!! We are not going to put up with these excuses from the Mayor, City Council, Developers and all who want to continue to rollback LA into a failed City.

Susan and Tom Mullins
Los Angeles, CA 90046

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 12:46 PM
To: Susan Mullins <susan@drsueso.com>

Hello Susan and Tom,

Hope all is well.

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

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Yes to Livable Communities Initiative!

2 messages

Alexa Pogue <ajlmdpogue@gmail.com> Tue, Sep 21, 2021 at 1:51 PM
To: housingelement@lacity.org

Hi, my name is Alexa Pogue. I live in Beverly Grove. My zip code is 90046. I am writing to encourage you to include a plan called The Livable Communities Initiative (which has already been submitted to the Department of Planning)
in the next Housing Element. I think it's a great solution to LA's housing crisis and urge you to consider it's inclusion. Thanks.

Sincerely,
Alexa Pogue
ajlmdpogue@gmail.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 12:14 PM
To: Alexa Pogue <ajlmdpogue@gmail.com>

Hello Alexa,

Hope all is well.

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

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Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Sep 22, 2021 at 7:28 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
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Planning4LA.org
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---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Sep 22, 2021 at 7:24 AM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Natalya Zernitskaya** <nzernitskaya@everyactioncustom.com>
Date: Tue, Sep 21, 2021 at 11:28 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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I urge the City to:
- Rezone enough new capacity to result in the creation of 300,000 new homes, enough to close the RHNA gap.
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Sincerely,

Personally sent by Natalya Zernitskaya using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Natalya Zernitskaya
2508 Kansas Ave Santa Monica, CA 90404-5243
nzernitskaya@gmail.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:11 PM
To: nzernitskaya@gmail.com

Hello Natalya,

Hope all is well.

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

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Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Public Comment - The Livable Communities Initiative - 90019

2 messages

Nicole Beaudoin <nicole_m_beaudoin@yahoo.com> Tue, Sep 21, 2021 at 12:51 PM
To: "housingelement@lacity.org" <housingelement@lacity.org>

Hi, my name is Nicole Beaudoin, and I live in Mid-City neighborhood of Los Angeles. (My zip code is 90019).
There is a plan called The Livable Communities Initiative that has been submitted to the Department of Planning to be included in the next Housing Element. I think this is a viable solution to LA's housing crisis and urge that it be included and approved in the next Housing Element.

Thank you,

Nicole Beaudoin

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 9:25 AM
To: Nicole Beaudoin <nicole_m_beaudoin@yahoo.com>

Hello Nicole,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Support for the LCI

2 messages

Lindsay Jamieson Gallagher <lindsaygallagher@me.com> Tue, Sep 21, 2021 at 5:34 PM
To: housingelement@lacity.org

Hi. My name is Elizabeth Gallagher. I live in Windsor Sq. My zip code is 90004 A plan called The Livable Communities Initiative has been submitted to the Department of Planning to be included in the next Housing Element. We think it's a great solution to LA's housing crisis and urge that it be included and approved in the next housing element. Thank you.

Sent from my iPhone

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 12:45 PM
To: Lindsay Jamieson Gallagher <lindsaygallagher@me.com>

Hello Elizabeth,

Hope all is well.

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Submitting Written Public Comment for the Public Hearing on the 2021-29 Housing Element - in support of the Livable Communities Initiative

2 messages

Tony Gittelson <tonygittelson@gmail.com> Tue, Sep 21, 2021 at 8:07 PM
To: Housing Element <housingelement@lacity.org>

Housing Element Drafting Committee
Department of City Planning

Dear Housing Element Team,

Thanks so much for organizing--and running so efficiently--tonight's Public Comment Housing Element meeting. I wish to submit my written comments in support of **The Livable Communities Initiative**:

My name is Tony Gittelson, I live in mid-Wilshire, CD4, zip code 90036. I represent the Housing Team that is part of a large, grassroots neighborhood coalition, called Hang Out, Do Good.

We recently submitted to the City Planning Department the Livable Communities Initiative, a standalone affordable housing program that we hope will be included in the next Housing Element.

The Livable Communities Initiative (LCI) is a combination of existing City programs, explicitly stated in the new draft of the Housing Element, but one that holistically addresses equitable and affordable housing, mobility and transit justice, and climate, as one idea, rather than piecemeal. By linking the issues of housing equity and mobility together, we believe we have created a comprehensive vision that has far greater impact than each component part. It is an approach to affordable housing based on the **City's Equitable Distribution Plan** (of May 21, 2021), that ensures high-opportunity neighborhoods finally provide their fair share of affordable housing.

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

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

Los Angeles has hundreds of miles of down-zoned commercial arterials -- Pico, Venice, Western, Westwood Blvd, to name just a few. By creating **Livable Community Zones**—allowing for streamlined "gentle density"—Livable Communities will give all Angelenos, at all socioeconomic income levels, a safe, dignified way to live in LA without requiring a car. It will enhance our City, creating better, more livable communities—to be shared by all.

For these reasons, we urge that the Livable Communities Initiative be included in the next Housing Element. Thank you.

Tony Gittelson
922 S. Highland Ave.
Los Angeles, CA 90036 (CD4)
Tel. (323) 938-5535
Cell (213) 400-1494
TonyGittelson@gmail.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:08 PM
To: Tony Gittelson <tonygittelson@gmail.com>

Hello Tony,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: nice to talk again & Housing Element Chapter 6 notes

3 messages

Blair Smith <blair.smith@lacity.org> Mon, Sep 27, 2021 at 5:39 PM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **sluch20@aol.com** <sluch20@aol.com>
Date: Tue, Sep 21, 2021 at 10:04 AM
Subject: Re: nice to talk again & Housing Element Chapter 6 notes
To: matthew.glesne@lacity.org <matthew.glesne@lacity.org>
Cc: blair.smith@lacity.org <blair.smith@lacity.org>, benjamin.verheiden.246@my.csun.edu <benjamin.verheiden.246@my.csun.edu>, daniel.skolnick@lacity.org <daniel.skolnick@lacity.org>, sonjaluchini@gmail.com <sonjaluchini@gmail.com>

Good Morning, Matt

If you recall, we spoke through a google meet with you, Blair Smith, my son Ben Verheiden, and myself on April 23, 2021 that was set up by Daniel Skolnick. You had given us suggestions on how to approach researching the Housing Element that included using state level examples among other things.

My son, Benjamin Verheiden, Daniel Skolnick and I had a final zoom meeting September 10th to go over our notes made for more inclusive language regarding our developmentally disabled population in Chapter 6 of the Housing Element. My son and I have been working on this since the 2021 draft was available to the public. These are our thoughts and opinions. Mr. Skolnick provided input on language in some instances, but the majority of the work was Ben's. As I've learned through my advocacy with families of disabled children; if it isn't written down - it doesn't happen. This is an accumulation of my son's volunteer work with Mr. Skolnick from February 2021 to date.

I believe Mr. Skolnick has already shared Ben's draft proposal letter regarding the request to have more inclusive language. If not, I can send that at your request as well.

Thank you, again for your help and guidance in answering questions during this process and please consider more inclusive language in the upcoming Housing Element.

Take care,
Sonja Luchini
Ben's mom
310-230-1606

-----Original Message-----
From: sluch20@aol.com <sluch20@aol.com>
To: matthew.glesne@lacity.org <matthew.glesne@lacity.org>
Sent: Fri, Jun 11, 2021 12:08 pm
Subject: Re: nice to talk again

Thanks so much!

I hope we can help create a document that has strong protections for developmentally disabled with existing housing and in building new developments with equitable units in every neighborhood.

Appreciate your help and taking time to speak with me.

Sonja Luchini

-----Original Message-----
From: Matthew Glesne <matthew.glesne@lacity.org>
To: sluch20@aol.com
Sent: Fri, Jun 11, 2021 11:58 am
Subject: nice to talk again

Link for the City of Los Angeles Affordable and Accessible Housing Registry

And please see our recently released report on the (not very) *Equitable Distribution of Affordable Housing* is attached. You'll see a reference under Key Recommendation 1.a that talks about opportunities for housing streamlining through expansion of... additional incentives for 50-100% affordable projects, senior housing, and special needs housing.

SOunds like you are well aware of HCIDLA's Accessible Housing Program (AcHP) run by Ashley. But here's a link in case it is helpful.

Take care, and look forward to talking more.

Matt

--

Matthew Glesne
Preferred Pronouns: He, Him, His
Senior City Planner

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--

Blair Smith
City Planner
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T: (213) 978-1886

Chapter 6 - 9-12-21 Goals, Policies Objectives and Programs Final Group Notes.pdf
758K

Blair Smith <blair.smith@lacity.org> Mon, Sep 27, 2021 at 5:39 PM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Daniel Skolnick** <daniel.skolnick@lacity.org>
Date: Tue, Sep 21, 2021 at 1:50 PM
Subject: Re: nice to talk again & Housing Element Chapter 6 notes
To: sluch20@aol.com <sluch20@aol.com>
Cc: matthew.glesne@lacity.org <matthew.glesne@lacity.org>, blair.smith@lacity.org <blair.smith@lacity.org>, benjamin.verheiden.246@my.csun.edu <benjamin.verheiden.246@my.csun.edu>, sonjaluchini@gmail.com <sonjaluchini@gmail.com>

Hi Matt:

For context, here is the associated text.

Re: 2021-2029 Draft Housing Element Update and Disabled Communities.

The City of Los Angeles is currently facing an extreme affordable housing shortage, and even more so for the physically and developmentally disabled population.

Summary

The city is currently under a Voluntary Compliance Agreement (VCA) with the Department of Housing and Urban Development (HUD) finalized in 2019. Under the agreement in Section III. REMEDIAL ACTIONS, part C. Requirements for Existing Housing Developments, number 15, the city is required to "retrofit Three Thousand One Hundred (3,100) existing affordable housing units, with Two Thousand Two Hundred and Fifteen (2,215) Housing Units with Mobility Features and Eight Hundred and Eighty Five (885) Housing Units with Hearing/Vision Features." With the construction of new affordable housings units, the agreement under the section mentioned requires that "fifteen (15%) percent of all Housing Units in Future Housing Developments, Housing Developments Currently Under Construction, and Housing Developments Subject to Substantial Alterations are Accessible Housing Unit with 11% Housing Units with Mobility Features and 4% Housing Units with Hearing/Vision Features."[1] As of July 1, 2020, The HUD VCA agreed to by City of Los Angeles also includes accessibility incentives to affordable housing applicants in the city.[2]

Under the Los Angeles City Municipal Code Section 12.03, supportive housing is defined as "Housing with no limit on length of stay for persons with low incomes who have one or more disabilities and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people. The housing is linked to onsite or offsite Supportive Services, and any Floor Area used for the delivery of Supportive Services shall be considered accessory to the residential use." Under Section 12.03, future supportive housing must be "in perpetuity" (no expiration date on affordability) to comply with addressing the affordable and accessible housing crisis in LA City.[3]

As stated in the Urgency Clause of LA City ORDINANCE NO. 185489: "A significant portion of people experiencing homelessness in the City of Los Angeles experience multiple health issues, trauma and disability… 19% have a physical disability… Furthermore, approximately 31% of this population are experiencing chronic homelessness."[4]

Rationale for additional Housing Goals, Objectives, Policies, and Programs

In the "A Crisis within a Crisis: Housing for Californians with Developmental Disabilities, November 2019" Report, "Less than 16% of adults with developmental disabilities own or rent their own homes, others are

unhoused or at risk of losing their housing in the near future. This creates a large population that is vulnerable to displacement or homelessness. A single event — such as the death of a parent or guardian, closure of a group home, or eviction because of behavioral issues in unsupportive housing — could leave them with nowhere to go. They are the only population for whom independent, community-based housing can be required to receive vital services."[5] According to the June 2021 data by the California Department of Developmental Services, there are currently 45,657 clients of all ages receiving services in LA City, of which 37,600 of them reside in their parent's and/or guardian's house. Only 2,788 of them are living independently with supportive living.[6]

Under the Lanterman Act, section 4501: "The State of California accepts a responsibility for persons with developmental disabilities and an obligation to them which it must discharge. Affecting hundreds of thousands of children and adults directly, and having an important impact on the lives of their families, neighbors, and whole communities, developmental disabilities present social, medical, economic, and legal problems of extreme importance."
"An array of services and supports should be established which is sufficiently complete to meet the needs and choices of each person with developmental disabilities, regardless of age or degree of disability, and at each stage of life and to support their integration into the mainstream life of the community. To the maximum extent feasible, services and supports should be available throughout the state to prevent the dislocation of persons with developmental disabilities from their home communities."
"Services and supports should be available to enable persons with developmental disabilities to approximate the pattern of everyday living available to people without disabilities of the same age. Consumers of services and supports, and where appropriate, their parents, legal guardian, or conservator, should be empowered to make choices in all life areas. These include promoting opportunities for individuals with developmental disabilities to be integrated into the mainstream of life in their home communities, including supported living and other appropriate community living arrangements. In providing these services, consumers and their families, when appropriate, should participate in decisions affecting their own lives, including, but not limited to, where and with whom they live, their relationships with people in their community, the way in which they spend their time, including education, employment, and leisure, the pursuit of their own personal future, and program planning and implementation. The contributions made by parents and family members in support of their children and relatives with developmental disabilities are important and those relationships should also be respected and fostered, to the maximum extent feasible, so that consumers and their families can build circles of support within the community."
"The Legislature finds that the mere existence or the delivery of services and supports is, in itself, insufficient evidence of program effectiveness. It is the intent of the Legislature that agencies serving persons with developmental disabilities shall produce evidence that their services have resulted in consumer or family empowerment and in more independent, productive, and normal lives for the persons served. It is further the intent of the Legislature that the Department of Developmental Services, through appropriate and regular monitoring activities, ensure that regional centers meet their statutory, regulatory, and contractual obligations in providing services to persons with developmental disabilities. The Legislature declares its intent to monitor program results through continued legislative oversight and review of requests for appropriations to support developmental disabilities programs."[7]

Section 4502 Under the Lanterman Act creates a bill of rights for developmentally disabled individuals:
"(a) Persons with developmental disabilities have the same legal rights and responsibilities guaranteed all other individuals by the United States Constitution and laws and the Constitution and laws of the State of California. An otherwise qualified person by reason of having a developmental disability shall not be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives public funds.
(b) It is the intent of the Legislature that persons with developmental disabilities shall have rights including, but not limited to, the following:
(1) A right to treatment and habilitation services and supports in the least restrictive environment. Treatment and habilitation services and supports should foster the developmental potential of the person and be directed

toward the achievement of the most independent, productive, and normal lives possible. Such services shall protect the personal liberty of the individual and shall be provided with the least restrictive conditions necessary to achieve the purposes of the treatment, services, or supports.
(2) A right to dignity, privacy, and humane care. To the maximum extent possible, treatment, services, and supports shall be provided in natural community settings.
(3) A right to participate in an appropriate program of publicly supported education, regardless of degree of disability.
(4) A right to prompt medical care and treatment.
(5) A right to religious freedom and practice.
(6) A right to social interaction and participation in community activities.
(7) A right to physical exercise and recreational opportunities.
(8) A right to be free from harm, including unnecessary physical restraint, or isolation, excessive medication, abuse, or neglect.
(9) A right to be free from hazardous procedures.
(10) A right to make choices in their own lives, including, but not limited to, where and with whom they live, their relationships with people in their community, the way they spend their time, including education, employment, and leisure, the pursuit of their personal future, and program planning and implementation.
(11) A right to a prompt investigation of any alleged abuse against them."[8]

Addressing this issue therefore requires the use of accessibility standards built into the city code above the current state and federal laws. The nearby City of Long Beach California has such standards built into the city code, but it only applies to single family and duplex dwellings that receive assistance from the city.[9] Expanding these standards to apply to multi-family, apartments, mixed-used, non-residential developments, and those that do not receive city assistance besides the current dwelling units covered under the code will result in the physically and developmentally disabled population being able to live an independent life in the community of their choosing. Such standards will reinforce the current "Purposeful Aging Los Angeles Initiative."[10]

Proposed Options and Recommendations

The proposed 2021-2029 Housing Element for the City of Los Angeles, Chapter 6 Housing Goals, Policies and Objectives is comprehensive, yet the lack of specific language does not address all areas of disability and unintentionally excludes an entire population in the disabled community – those with intellectual and developmental disabilities. This population is served through our Regional Center system created through the Lanterman Act. This population also tends to be last considered (or included, if at all) in any form of policy discussion. It would benefit all to clarify the inclusion of our intellectually and developmentally disabled in the proposed Housing Element by changing the phrasing used throughout "mental and physical disability" to "mental, physical, and developmental disability". The use of "developmental" covers "intellectual" disabilities as well under the Lanterman Act so that would be appropriate.

It appears in the proposed Housing Element for the City of Los Angeles that the use of the term mental disability is based on Social Security Administration's (SSA) category listing to encompass the developmentally disabled in "mental disorders' when in fact they should be in the "neurological disorder" category. Social Security Disabling Conditions (disabilitybenefitscenter.org) Asperger's Syndrome and autism are considered developmental disabilities from birth – organic brain disorders by specialists, yet the SSA has incorrectly included these into "mental" rather than "neurological" disorders. While we cannot change the SSA descriptions, it would be helpful to clarify for inclusiveness throughout the proposed Housing Element, the addition of "developmental" whenever using the phrase "mental and physical disabilities" – changing to "mental, physical and developmental" disabilities.

In addition to that specific change in descriptive language, it would be beneficial to also incorporate wording from the preliminary draft of the County of Los Angles Housing Element (2021-2029) that includes specific recognition of developmentally disabled similar to their referencing of Regional Center data for their unincorporated areas of Los Angeles.[11] Regional Centers should be front and center with the needs

assessments for the City of Los Angeles yet not mentioned in a meaningful way that shows the true crisis regarding housing for developmentally disabled.

Recommendations

By incorporating "developmentally" disabled throughout the proposed Housing Element for the City of Los Angeles, it will be a truly inclusive document reflecting all residents served by the City. It will be a documented reminder to landlords and builders that this population does not fall through the cracks, but has housing needs that should be accommodated. Flaws of the Lanterman Act's structuring of the Individual Personal Plan (IPP) itself (where housing data is collected) need to be considered. A majority of their clients live in the homes of their parents – never having an opportunity to be independent with supports. Cost, parent fears and lack of proper supported housing are some reasons. These parents are ageing and will need supportive services themselves in the future, making it impossible for them to continue caring for their disabled adult children in their homes. Clients are not asked "Do you feel safe where you live?" "Would you like to live somewhere else?" and other more specific questions regarding their wishes to be living with peers in the community. That is an issue to be addressed at the state level and until it is corrected, we'll never really know the true housing need of disabled individuals.

A highlighted and notated version of Chapter 6 is attached showing the areas that need more inclusive language. It is strongly recommended that such suggestions are considered and incorporated into the proposed Housing Element for the City of Los Angeles.

---

[1] https://lahousing.lacity.org/AAHR/Documents/RequiredPolicies/VCA%20-%20HUD.pdf

[2] https://hcidla2.lacity.org/wp-content/uploads/2021/04/Exh_08-AcHP-EAP-NOFA-formv2.pdf

[3] https://planning.lacity.org/ordinances/docs/InterimMotelConversion/Adopted/17-1432_ORD_185489_04-20-2018.pdf

[4] https://planning.lacity.org/ordinances/docs/InterimMotelConversion/Adopted/17-1432_ORD_185489_04-20-2018.pdf

[5] https://www.lantermanhousingalliance.org/research

[6] Data from https://www.dds.ca.gov/transparency/facts-stats/ "Quarterly Consumer Report by age group and residence type EXCEL sheet," and filtered to LA City ZIP Codes.

[7] https://www.dds.ca.gov/wp-content/uploads/2021/04/Revised_LantermanAct_Jan2021.pdf

[8] https://www.dds.ca.gov/wp-content/uploads/2021/04/Revised_LantermanAct_Jan2021.pdf

[9] http://longbeach-ca.elaws.us/code/mc_title18_ch18.66_sec18.66.020 and http://longbeach-ca.elaws.us/code/mc_title18_ch18.66_sec18.66.040

[10] https://www.purposefulagingla.com/

[11] Preliminary Draft Housing Element Update Pages 83-86

Paul Koretz
COUNCILMEMBER • 5TH DISTRICT • CITY OF LOS ANGELES

Daniel Skolnick
Senior Planning Deputy
Councilmember Paul Koretz, Fifth District
200 North Spring Street, Room 440, Los Angeles, CA 90012
(213) 473-7005 Los Angeles City Hall Office
Email: daniel.skolnick@lacity.org

PLEASE NOTE: All email correspondence with the office of Councilmember Paul Koretz (including any attachments), along with any associated personal identifying information, is considered a public record under the California Public Records Act and may be subject to public disclosure under the Act.

[Quoted text hidden]
[Quoted text hidden]

Housing Element <housingelement@lacity.org> Wed, Sep 29, 2021 at 11:21 AM
To: sluch20@aol.com

Hello Sonja,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Comments to Draft 2021-2029 Housing Element

2 messages

Terry Tegnazian <terrteg@outlook.com> Tue, Sep 21, 2021 at 6:35 PM
To: HousingElement@lacity.org
Cc: Paul.Koretz@lacity.org, joan.pelico@lacity.org, daniel.skolnick@lacity.org, james.bickhart@lacity.org, board@westwoodhills.groups.io

Dear Sirs:

I have the following comments regarding the Draft 2021-2029 Housing Element, for which you have scheduled virtual public hearings for September 21 and 22, 2021. I may also submit additional comments in the future either at a hearing or in writing.

1) Analysis ignores impact of SB 9 and possibly also SB 10 – Governor Newsom signed SB 9 and SB 10 into law last week. These bills will have tremendous impact on housing stock in the coming decade, by adding 4 to 10 or more units on single-family lots. You have taken ADUs into account in your inventory and projections, and now you *must* take SB 9 and SB 10 into account as well. The city must redo projections to take this major change in policy into account.

2) Request extension of deadline – because of the omission of any analysis of the effect that the new state laws SB 9 and SB 10 will have on housing, the City of LA must request that the state grant an extension of the deadline for submission of the Housing Element to enable the city to do this additional analysis.

3) Data made deliberately difficult to review – the Planning Dept. has provided Excel spreadsheets, including in particular Appendix 4.7 - Candidate Sites for Rezoning, in which normal Excel functions such as sort, filter, cut and copy have been restricted. To make matters worse, the spreadsheet has no discernible organization – there are more than 267,000 addresses in Appendix 4.7, which are listed randomly, not organized by zip code, street, Community Plan Area or in any other noticeable manner – and by its restrictions on the spreadsheet the city prevents the public from organizing them in a meaningful way. This is clearly a deliberate attempt to obscure from the public the actual impact of this massive list of addresses targeted for rezoning by the Housing Element – which is so egregious as to amount to a lack of public notice.

4) No maps provided – in addition to the disorganized and restricted manner in which the targeted addresses are listed, the city compounds the effective lack of public notice by further obscuring the list of affected properties in failing to provide any visual representation of the city's proposal. At a minimum, the city should provide detailed maps for each Council District showing clearly which addresses are being targeted.

5) Biased and baseless projections – the city is relying on biased and baseless projections from one source, the Terner Center, which is heavily financed by real estate, big tech and financial interests, https://ternercenter.berkeley.edu/about-us/supporters/. At a minimum, the city should also take into

account projections from other reputable sources, such as the Embarcadero Institute, which exposes the double-counting being done in reaching projected housing needs, see, e.g., https://embarcaderoinstitute.com/portfolio-items/double-counting-in-the-latest-housing-needs-assessment/ and https://embarcaderoinstitute.com/portfolio-items/housing-models-compared/. The state Office of Planning and Research also provides projections.

The projections being used by the city are especially suspect, in light of the fact that California has been *losing* population in recent years – so much so that with the 2020 Census the state has lost a Congressional seat for the first time in its history. These projections also fail to take into account the impacts of the pandemic and the shift to remote working, which no longer require employees to live near their work. Not only does this permit employees to live outside of employment centers, but it will also result in freeing up commercial space as businesses no longer require all their employees to be physically present in the office at the same time.

6) Appendix 4.1 - Housing Element Sites Inventory – in addition to omitting any consideration of SB 9 and SB 10, the Sites Inventory fails to take into account the maximum number of potential units that could be built on each site, including in particular underutilized lots in *existing* commercial and multifamily zones. For example, each lot along a "transit corridor" should be credited with the maximum number of units that could be built there under TOC rules, taking into account all available incentives that could be granted.

7) Westwood Hills inappropriate for multifamily – the city has put on its list of targeted addresses virtually our entire neighborhood of Westwood Hills. Westwood Hills is a single-family neighborhood of 600 homes situated between UCLA and Sepulveda Blvd, and between Sunset Blvd. and the VA Cemetery.

This easily identifiable, compact neighborhood was developed by the Janss family in 1929 and 1930 as part of their master plan for the new UCLA campus in Westwood. The goal of the master plan was to provide a *variety* of housing options near the campus, along with a commercial center (Westwood Village). Today, Westwood is already one of the most densely developed areas in the entire city of Los Angeles – with UCLA, Westwood Village, copious multifamily housing options in the North Village, along Hilgard, Veteran and immediately south of Wilshire, the high-rise office buildings and high-rise residential buildings in the Wilshire Corridor. The intersection of Wilshire Blvd. and Veteran Ave., adjacent to exits and entrances from the 405 Freeway leading to nearby business centers in Brentwood, Westwood, Beverly Hills and Century City, is one of the busiest intersections in the United States.

Further, the word *Hills* appears in the name of our neighborhood *because it is hilly*, with many narrow streets – and therefore it is singularly inappropriate for multifamily development. The neighborhood is already densely packed, surrounded by a densely developed area that cannot reasonably sustain additional density. I notice, for example, that you omit any addresses in adjacent Bel Air from your list of targeted addresses – why is that?

8) Lack of adequate infrastructure – the city has failed to maintain its sewer, power, water and other infrastructure, which is old, crumbling, and simply unable to accommodate the increase in density being proposed.

9) Lack of affordable housing – the city's most glaring housing need is for affordable housing, but the city has no mechanism either for ensuring that the hundreds of thousands of additional units will in fact be affordable when built, or if "affordable" initially, for subsequently keeping track of and enforcing affordability for each unit in the future years.

Thank you for your attention to these serious issues.

Very truly yours,

Terry Tegnazian

Terry A. Tegnazian

10850 Wilshire Blvd., Suite 300

Los Angeles, CA 90024

Tel: 310-470-0770

Fax: 310-470-0782

Email: terrteg@outlook.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 12:47 PM
To: Terry Tegnazian <terrteg@outlook.com>

Hello Terry,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

2021 - 2029 Housing Element Update

2 messages

President of RVNC <rampartvillage@gmail.com> Tue, Sep 21, 2021 at 9:18 PM
To: Vince Bertoni <vince.bertoni@lacity.org>
Cc: housingelement@lacity.org, craig.bullock@lacity.org, Ronald Reece <roneereecervnc@gmail.com>, David Rockello <rockello@gmail.com>

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

Dear Mr. Bertoni:

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

Thank you.

Diversity Is Our Strength!

Philip Armstrong, President
Rampart Village Neighborhood Council
155 N. Occidental Blvd. Suite 236
Los Angeles, CA 90026
(o) 213.568.3086
(c) 213.275.9322
www.RVNC.org
f: realRVNC

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

9.21.2021RVNCComments.pdf
580K

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:08 PM
To: President of RVNC <rampartvillage@gmail.com>

Hello Philip,

Hope all is well.

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

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[Quoted text hidden]

Comments on 2021 - 2029 Housing Element Update

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

Date: September 21, 2021

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

From: Rampart Village Neighborhood Council

Subject: 2021 - 2029 Housing Element Update

The Rampart Village Neighborhood Council (RVNC), at its duly noticed General Board meeting on September 21, 2021, considered motions based on its agenda, Item VII(I), to ask that the following considerations be addressed in the 2021 – 2029 Housing Element Update:

- Consideration of the impact of implementing a tax on vacant unoccupied multi-family residential properties and using the revenue produced to support the protection of existing housing and production of new housing affordable to lower income households.
- Consideration of the impact of putting in place legislation to give renters the right of first refusal and the right to purchase from the owner if their apartment buildings or single family homes are put on the market.

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

- The Housing Element Update is the vehicle for the City to set targets over an 8-year period for construction of new housing, including affordable housing (for very low income, low income, and moderate income levels) and market rate or "above moderate income level" housing as well as to document the preservation of existing affordable housing.
- In the prior 8-year period (2013 - 2021), as of the 2020 Annual Element Progress Report, the City of Los Angeles achieved 34% of the RHNA (Regional Housing Needs Assessment) for very low income, 30% of the RHNA for low income, 6% of the RHNA for moderate income, and 298% of the RHNA for above moderate income (market rate) housing based on information provided in the 2020 Annual Element Progress Report.
- As for the next 8 years (2021 - 2029), the following information is provided on pages 21 and 22 of the Executive Summary of the Revised Draft Housing Element: “While the RHNA allocation suggests that almost 260,000 units affordable to households earning less than 120% AMI will be needed, it is anticipated that approximately 51,000 affordable units may be constructed within the eight year RHNA period at this range (about 20% of the target). This is a reflection that total housing needs for lower and moderate income households greatly exceeds the ability to meet those needs with existing financial resources and incentive programs.”

- Between October 1, 2011 and September 30, 2021, there were 4,406 housing units located in 225 projects whose affordability restrictions expired or were terminated ("Units Expired in the Last 10 Years" on page 3 of Appendix 2.2)**.** Table 2.2.2 in Appendix 2.2 of the draft Housing Element Update provides information on the cost to preserve at risk units. Table 2.2.1 in Appendix 2.2 puts the cost of acquisition and rehabilitation of existing affordable units at $465,000 per unit compared to the cost of new construction at $571,000 per unit.
- As shown in the linked data visualization, of the 8,671 occupied housing units paying rent in the 6 census tracts that make up Rampart Village, 4,650 or approximately 54% of the households occupying those housing units are rent burdened based on the most recent data available from the American Community Survey: rvnc_rent_burden | Tableau Public

After consideration and having provided an opportunity for public comment, the RVNC General Board voted in favor of the motion (7-1) to *support* asking that the following considerations be addressed in the 2021 – 2029 Housing Element Update:

- Consideration of the impact of implementing a tax on vacant unoccupied multi-family residential properties and using the revenue produced to support the protection of existing housing and production of new housing affordable to lower income households.
- Consideration of the impact of putting in place legislation to give renters the right of first refusal and the right to purchase from the owner if their apartment buildings or single family homes are put on the market.

These comments are in addition to the comments the RVNC provided to you on August 17, 2021. Please notify the RVNC of any future meetings and/or hearings on this item.

Sincerely,

Rampart Village Neighborhood Council

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

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

2021 - 2029 Housing Element Update

2 messages

President of RVNC <rampartvillage@gmail.com> Tue, Sep 21, 2021 at 9:18 PM
To: Vince Bertoni <vince.bertoni@lacity.org>
Cc: housingelement@lacity.org, craig.bullock@lacity.org, Ronald Reece <roneereecervnc@gmail.com>, David Rockello <rockello@gmail.com>

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

Dear Mr. Bertoni:

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

Thank you.

Diversity Is Our Strength!

Philip Armstrong, President
Rampart Village Neighborhood Council
155 N. Occidental Blvd. Suite 236
Los Angeles, CA 90026
(o) 213.568.3086
(c) 213.275.9322
www.RVNC.org
f: realRVNC

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

9.21.2021RVNCComments.pdf
580K

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 1:08 PM
To: President of RVNC <rampartvillage@gmail.com>

Hello Philip,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Comment on Housing Element

2 messages

Joanne DAntonio <cfac.cd2alt@aol.com> Tue, Sep 21, 2021 at 4:48 PM
Reply-To: Joanne DAntonio <cfac.cd2alt@aol.com>
To: "housingelement@lacity.org" <housingelement@lacity.org>

To: housingelement@lacity.org

My Housing Element Update comment is attached.

Joanne D'Antonio
Community Forest Advisory Committee Alternate Representative, CD 2
Neighborhood Council Sustainability Alliance, Trees Committee Chair
NCSA Representative, Urban Forestry Management Plan Working Group
Sustainability Representative, Greater Valley Glen Council
CFAC.CD2alt@aol.com
montaggiojoanne@yahoo.com
https://www.ncsa.la/trees
(818) 387-8631

Comment to Housing Element 9-21-2021.pdf
9753K

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 4:35 PM
To: Joanne DAntonio <cfac.cd2alt@aol.com>

Hello Joanne,

Hope all is well.

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

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[Quoted text hidden]

Comment to Housing Element Update 9-21-2021

A few years ago, when many of us who understand the importance of trees voiced objections to the omission of a “Trees Element” in the new Los Angeles City General Plan outline, we were assured at the Congress of Neighborhoods and at the Community Forest Advisory Committee that there would be trees incorporated throughout the other elements. This is not happening, and the Housing Element irresponsibly ignores the necessity for **TREE PRESERVATION** in our increasingly hot city.

We can’t solve heat island effect just with new landscaping because mature trees take close to two decades to produce shade. Tree removals by developers are routine, and there is very little protection to prevent them. Street trees offer no real compensation because they get removed for driveways, sidewalk repair, staging construction equipment, utility access and decline from lack of care. According to David Miranda, Urban Forestry Division Manager, Los Angeles has 100,000 empty tree wells. That is 100,000 lost trees. Replacement trees are nearly always of a smaller canopy size. There is no movement to favor large species, and the City Forest Officer’s recent Draft Tree List for the Public Right of Way) does not include some of the city’s largest street trees like liquidambar and sycamore: https://drive.google.com/file/d/1pdtZoNqC0qhR1JtyBsBeNotbwewzvt-g/view

Not only are we downsizing the urban forest when it comes to public trees, but in this Housing Element there is no attempt to require property owners to preserve existing significant trees when they create housing. City Council did make an effort to remedy this when they passed CF 20-0470 in August 2020 -- this is the wording of the motion: https3://clkrep.lacity.org/onlinedocs/2020/20-0720_mot_06-09-2020.pdf But their attempt waits in limbo for a report from the City Forest Officer, which she says she plans to incorporate into an Urban Forest Management Plan – a project that is five years away from adoption. How many significant trees will be lost from the rampage of developers with a free ticket to cut down any tree on their property? In the name of increasing housing, they are building without setbacks, often constructing to the property lines, and paving front yards. We will need a lot more air conditioning and people will need stay inside for the sake of their health. US Weather Service sends alerts, and we got a warning this year **for the first day of fall** in the San Fernando Valley of Los Angeles:



Valley Glen, CA

START	END
10:00 AM	8:00 PM
Tuesday, September 21	Wednesday, September 22

...HEAT ADVISORY NOW IN EFFECT FROM 10 AM THIS MORNING TO 8 PM PDT WEDNESDAY...

* WHAT...Temperatures from 98 to 105 degrees expected.

* WHERE...San Fernando Valley.

* WHEN...From 10 AM this morning to 8 PM PDT Wednesday.

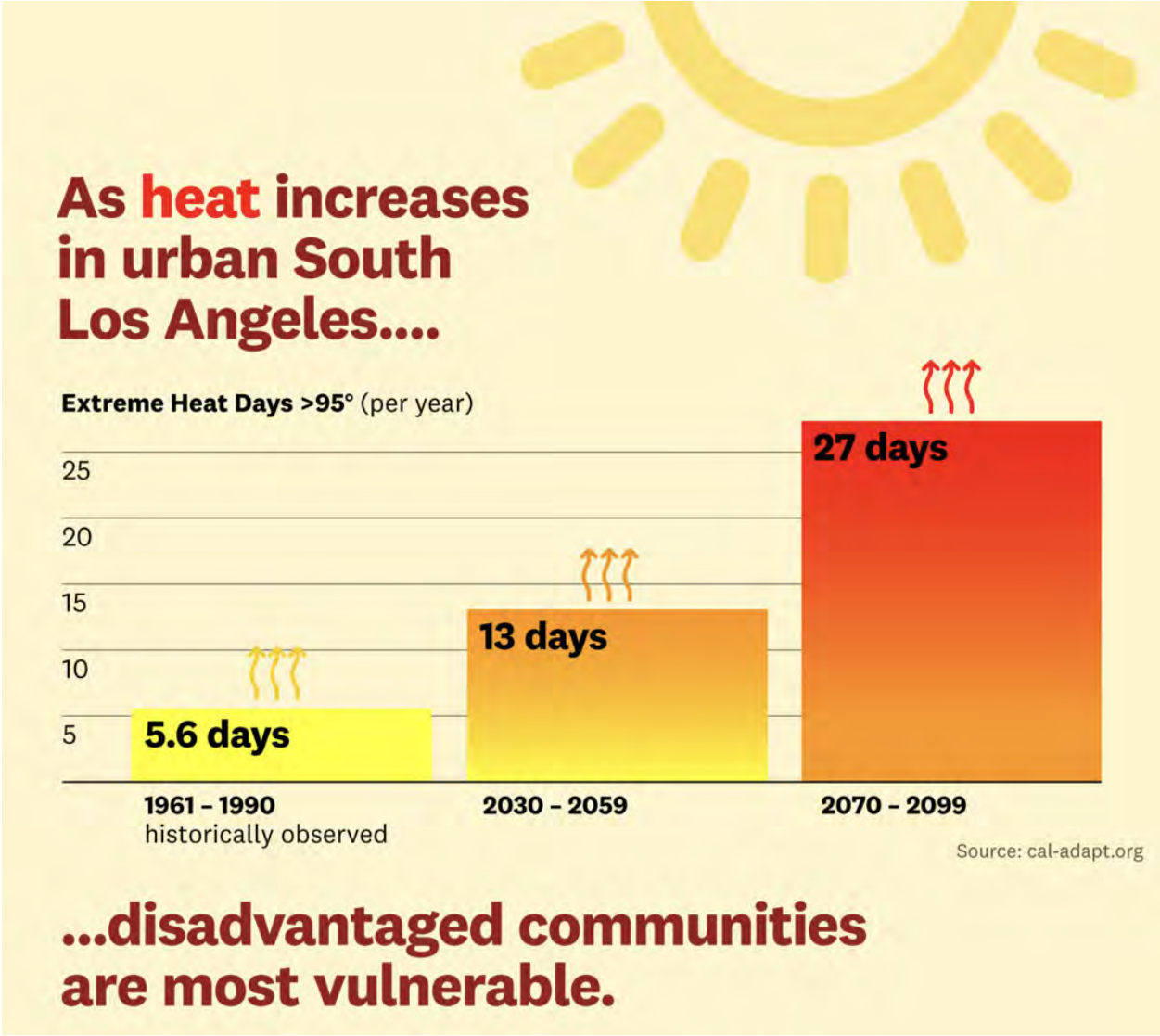
* IMPACTS...Hot temperatures may cause heat illnesses to occur.

PRECAUTIONARY/PREPAREDNESS ACTIONS...

Drink plenty of fluids, stay in an air-conditioned room, stay out of the sun, and check up on relatives and neighbors. Young children and pets should never be left unattended in vehicles under any circumstances.

Take extra precautions if you work or spend time outside. When possible reschedule strenuous activities to early morning or evening. Know the signs and symptoms of heat exhaustion and heat stroke. Wear lightweight and loose fitting clothing when possible. To reduce risk during outdoor work, the Occupational Safety and Health Administration recommends scheduling frequent rest breaks in shaded or air conditioned environments. Anyone overcome by heat should be moved to a cool and shaded location. Heat stroke is an emergency! Call 9 1 1.

Our City is experiencing extreme heat and has had the worst air pollution in the United States for at least 10 years in a row. The Los Angeles Urban Cooling Collaborative found that one in four lives currently lost during heat waves could be saved, largely in low income communities and communities of color. Trees provide shade and can cool ambient temperatures. Trees also clean our air and provide much needed storm water maintenance services. Not only do trees make a city more beautiful, welcoming and comfortable, they promote well being, reduce crime, and provide much needed infrastructure services at a low cost.



Trees are the cheapest mitigation to heat. We have recorded 30 degrees cooler temperature on a hot day under a shade tree:



115 degrees
(no shade)

82 degrees
(under shade of tree)

NEIGHBORHOOD COUNCIL SUSTAINABILITY ALLIANCE

Yet trees are **IGNORED** in this Housing Plan save for a buried mention of free tree availability from City Plants in item 73. Not one effort proposed to build around trees! Yet this is done routinely in Santa Monica, and by law in Pasadena, which has a very easy to understand large tree protection ordinance. https://www.cityofpasadena.net/wp-content/uploads/sites/29/TPO_2-Pasadena-Tree-Ordinance-Municipal-Code-8.52.pdf?v=1631917158971

The LA Sanitation City Biodiversity Report outlines the importance of trees in addressing Los Angeles's "biodiversity hotspot" issue:
https://www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-si/s-lsh-es-si-bd;jsessionid=4Hrmg7qYpb53LJ2wEK2QHXi5nk_pzZjQVT75bNMY9MOUeV_z9aUi!218290852!-1425929749?_afrLoop=4368959765568023&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=ad5t3kh63_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D4368959765568023%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dad5t3kh63_5
The City Council in its adoption of the Biodiversity Report in August 2021 added an amendment to direct City departments to follow it. Will you be doing that?

The City of Los Angeles is considered to be one of the most progressive cities yet its green infrastructure policies are outdated compared to other cities, and they fail to reflect the policies being articulated to the public. The Housing Element fails to reflect not only the biodiversity goals set forth by LA Sanitation Biodiversity Report and Index, but also the Green New Deal, the City's Dudek Report (produced by a working group of primarily City officials and department heads that ranked Los Angeles with the worst tree scores): p.25
https://www.cityplants.org/wp-content/uploads/2018/12/10939_LA-City-Plants_FirstStep_Report_FINAL_rev12-7-18.pdf

The Housing Element also ignores the environmental justice commitment to reverse shade inequity and protect the trees that do exist in those communities. It treats valuable woodlands as infill areas to build housing, not as a valuable asset to be preserved to provide quality of life. The Housing Element reflects the existing cultural practices within the City that fail to reflect the importance of Trees and the ecosystem services they provide. **DENSITY IS PRIORITIZED WITH NO CONNECTION TO TREES AND GREENERY THEREBY SACRIFICING LIVABILITY.**

Chapter 3 Conservation has not a single mention of **TREE PRESERVATION**. What has happened to the original meaning of "conservation" that conserves nature. We are losing our bird population as we cut down our trees. Adel Hagekhalil when he was Director of Streets LA, which oversees the Urban Forestry Division, reported at a meeting of the Community Forest Advisory Committee that the CAO had calculated the cost of watering one tree for a year

at roughly $5.00. What an inexpensive way to get shade, yet this is completely ignored in this chapter! It is possible to preserve trees and create housing. In Santa Monica a developer designed a doughnut-shaped parking garage to allow the tree roots to stay in the ground. The tree was protected during construction and became the centerpiece of the courtyard of a new apartment building.

The Community Forest Advisory Committee's Building Around Trees Subcommittee, that includes architects, could help you add a CONSERVATION OF SIGNIFICANT TREES section to the Conservation Chapter. It is a missed opportunity that could begin to try to **compensate for large tree canopy loss that is evident in LIDAR spatial studies**. The LIDAR information is available both in the LMU Tree People 2016 study https://www.treepeople.org/los-angeles-county-tree-canopy-map-viewer/
and more recently from Google https://smartcitiesconnect.org/google-introduces-tree-canopy-lab-pilots-tree-mapping-in-los-angeles/
The City Forest Officer presented how to access the data at her Lunch and Learn webinar.

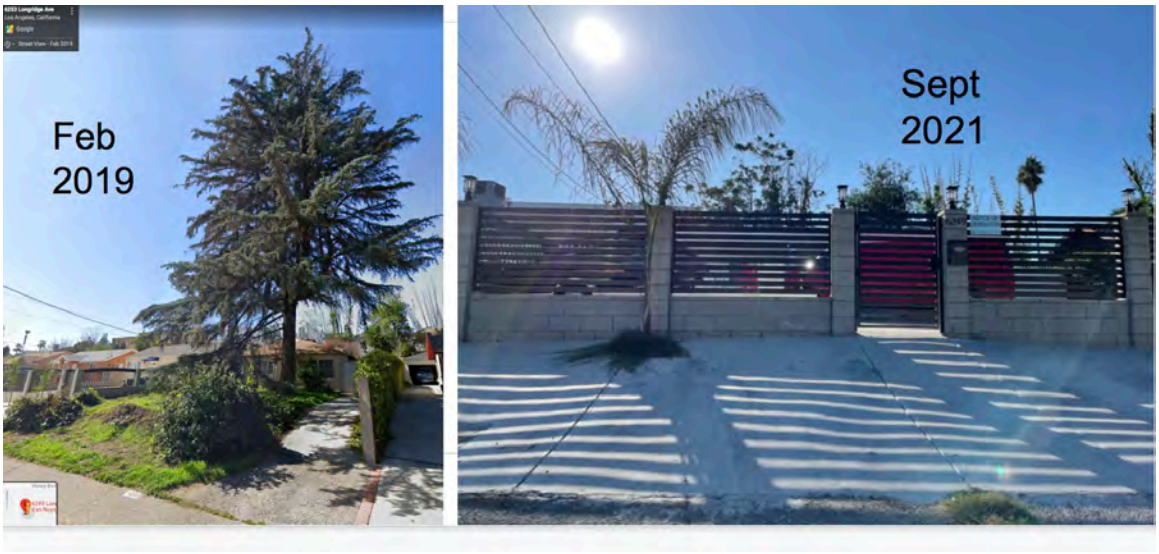
If you let go of this opportunity to include trees in the Housing Element, you are going to be responsible for creating housing in an unlivable city. Technology alone will not solve it. We need trees and nature to insure the health of the people who will occupy the housing.

Los Angeles Urban Forestry tree removal requests are available to the public (usually with photos) at this site:
https://www.ncsa.la/proposed_tree_removal_listings
But what you won't see there are an accounting of all the trees removed by developers. No one knows how many they routinely take out. Here is just one example of what is being done to our city: this devastating "by right" project on Erwin and Woodman was completely legal, and yet the perimeter trees could have been saved had there been any controls in place:



We have vacant lots like the one in the above photo that sit for years creating eyesores in my neighborhood. The above demolition happened in the summer of 2020 and looks the same a year later. There are others like it in walking distance that have sat vacant and barren for five years, not creating housing. What is happening to my Valley Glen neighborhood? Can you find a way to help? City Council just asks for reports that don't materize, and nothing changes.

The picture below of 6253 Longridge in Valley Glen shows a renovation that created no additional housing, yet a tree was removed unnecessarily by the design company. I have reported the illegal removal of the front yard to Building and Safety, but the tree removal was legal. These "by right" practices are not helping. They just applied for a demolition, probably of a garage to build an ADU.



We cannot trust the taste of the public to create environmentally wise landscapes. We need your help to **preserve** what we have in the way trees and foliage. What can you do to save the health of the City with this Housing Element? We can't plant our way out of this, especially if palms are the tree of choice and concrete, gravel and plastic grass replace lawns. Long-time residents are upset. I am in touch with them. Though I comment as an individual, I am the founder and chair of the Neighborhood Council Sustainability Alliance Trees Committee, which has over 80 members throughout the City very worried about what feels like a war against trees by the City. You can help in your next iteration of this Housing Element.

There is a reporter writing a book called *Shade* for Random House, and your team could be very embarrassed when he writes about Los Angeles. So far it is

not looking good for LA in the interviews he has conducted. Let us help you show that improvement is possible here.

Joanne D'Antonio
Community Forest Advisory Committee Alternate Representative, CD 2
Neighborhood Council Sustainability Alliance, Trees Committee Chair
NCSA Representative, Urban Forestry Management Plan Working Group (Dudek Report)
Sustainability Representative, Greater Valley Glen Council
CFAC.CD2alt@aol.com
montaggiojoanne@yahoo.com
https://www.ncsa.la/trees
(818) 387-8631

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Sep 20, 2021 at 1:41 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Sep 20, 2021 at 1:03 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Alexander Booth** <alexanderbooth@everyactioncustom.com>
Date: Mon, Sep 20, 2021 at 1:02 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. But additional bold action and specific implementation measures are needed to make the housing element update successful.

I urge the City to:
- Rezone enough new capacity to result in the creation of 300,000 new homes, enough to close the RHNA gap.
- Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods, and would require wealthy, high-opportunity areas to accommodate the most new housing.
- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Allow "missing middle" multifamily housing citywide.
- Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
- Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Sincerely,
Alexander Booth

Personally sent by Alexander Booth using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Alexander Booth
520 S Mariposa Ave Apt 207 Los Angeles, CA 90020-2714
alexanderbooth@kfalosangeles.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 8:49 AM
To: alexanderbooth@kfalosangeles.com

Hello Alexander,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Sep 20, 2021 at 1:42 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

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E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Sep 20, 2021 at 12:26 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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E-NEWS

---------- Forwarded message ---------
From: **William Wright** <willrobwright@everyactioncustom.com>
Date: Mon, Sep 20, 2021 at 12:25 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Sincerely,

Personally sent by William Wright using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
William Wright
734 E Kensington Rd Los Angeles, CA 90026-4427
willrobwright@gmail.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 9:06 AM
To: willrobwright@gmail.com

Hello William,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Sep 20, 2021 at 1:42 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

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From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Sep 20, 2021 at 1:03 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
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E-NEWS

---------- Forwarded message ---------
From: **Nicholas Burns III** <nkburns3@everyactioncustom.com>
Date: Mon, Sep 20, 2021 at 12:53 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Sincerely,

Personally sent by Nicholas Burns III using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nicholas Burns III
1740 S Westgate Ave Unit H Los Angeles, CA 90025-3792
nkburns3@gmail.com

Housing Element <housingelement@lacity.org> Tue, Sep 21, 2021 at 12:30 PM
To: Nick Burns <nkburns3@gmail.com>

Hi Nick,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Sep 20, 2021 at 1:40 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Sep 20, 2021 at 1:14 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Thomas Irwin** <thomasirwin13@everyactioncustom.com>
Date: Mon, Sep 20, 2021 at 1:13 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. But additional bold action and specific implementation measures are needed to make the housing element update successful.

I urge the City to:
- Rezone enough new capacity to result in the creation of 300,000 new homes, enough to close the RHNA gap.
- Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods, and would require wealthy, high-opportunity areas to accommodate the most new housing.
- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Allow "missing middle" multifamily housing citywide.
- Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
- Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Sincerely,

Personally sent by Thomas Irwin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Thomas Irwin
962 S Woods Ave East Los Angeles, CA 90022-3931
thomasirwin13@gmail.com

Housing Element <housingelement@lacity.org> Tue, Sep 21, 2021 at 4:22 PM
To: thomasirwin13@gmail.com

Hello Thomas,

Hope all is well.

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Re: General Plan Housing and Safety Element Public Hearing | Audiencia Pública para los Elementos de Vivienda y de Seguridad

2 messages

Lori Erlendsson <oceanlor@hotmail.com> Mon, Sep 20, 2021 at 4:28 PM
To: "housingelement@lacity.org" <housingelement@lacity.org>

I can't attend these meetings.

This is what you can tell those working on housing for me:

1. Stop spending $500,000 or more per unit to build low-income or homeless housing. THAT'S RIDICULOUS!
2. Find a way to penalize other states when they buy tickets to send homeless people here - or send them back and send the state/city/whatever a bill! Sue them if they don't pay!
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7. Learn from other cities/states, e.g., Utah, what they have done, what has been successful and what hasn't worked well.

From: Los Angeles City Planning <housingelement@lacity.org>
Sent: Monday, September 20, 2021 12:01 PM
To: oceanlor@hotmail.com <oceanlor@hotmail.com>
Subject: General Plan Housing and Safety Element Public Hearing | Audiencia Pública para los Elementos de Vivienda y de Seguridad



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Public Comment	6:30 - 8 p.m.
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11 a.m. - 1 p.m.

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Presentation	11 a.m. - 11:30 a.m.
Public Comment	11:30 a.m. - 1 p.m.
Meeting ID	819 0769 3424
Password	824297
To call in	+1 213 338 8477 US +1 669 900 9128 US

Instructions for Access (Computer):

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- From the Zoom application, Join > Enter Meeting ID > Enter Password.

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- Dial one of the listed phone numbers.
- When asked for a Meeting ID, enter “820 2304 7796”, followed by “#” (pound sign).
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You can access the official Notice of Public Hearing here.

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Lea la revisión del borrador del Elemento de Vivienda 2021-2029.

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Audiencia Pública (Virtual)

Martes 21 de septiembre de 2021

6 p.m. - 8 p.m.

Use este enlace para unirse a la reunión de Zoom:

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Presentación	6 p.m. - 6:30 p.m.
Comentarios públicos	6:30 - 8 p.m.
ID de reunión	820 2304 7796
Contraseña	499352
Marque por su ubicación	+1 213 338 8477 US +1 669 900 9128 US

Miércoles 22 de septiembre de 2021

11 a.m. - 1 p.m.

Use este enlace para unirse a la reunión de Zoom:

Audiencia Pública

Presentación	11 a.m. - 11:30 a.m.
Comentarios públicos	11:30 a.m. - 1 p.m.
ID de reunión	819 0769 3424
Contraseña	824297
Marque por su ubicación	+1 213 338 8477 US +1 669 900 9128 US

Instrucciones de acceso (a través de computadora):

- Vaya al enlace del seminario web e ingrese la contraseña cuando se le solicite O
- Desde la aplicación Zoom, Unirse> Ingresar ID de reunión> Ingresar contraseña

Instrucciones de acceso (a través de computadora):

- Marque uno de los números de teléfono enumerados.
- Cuando se le solicite un ID de reunión, ingrese el número de ID de reunión, "820 2304 7796", seguido de "#" (signo de número)
- Cuando se le solicite que ingrese una identificación de participante, ingrese "#" (signo de número) para continuar

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Los Angeles City Planning | 200 N. Spring St, Room 525, Los Angeles, CA 90012

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Constant Contact

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Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 9:35 AM
To: Lori Erlendsson <oceanlor@hotmail.com>

Hello Lori,

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From: Los Angeles City Planning <housingelement@lacity.org>
Sent: Monday, September 20, 2021 12:01 PM
To: oceanlor@hotmail.com <oceanlor@hotmail.com>
Subject: General Plan Housing and Safety Element Public Hearing | Audiencia Pública para los Elementos de Vivienda y de Seguridad



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Instrucciones de acceso (a través de computadora):

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Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Sep 20, 2021 at 1:43 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Sep 20, 2021 at 12:26 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Haley Feng** <fxbhaley@everyactioncustom.com>
Date: Mon, Sep 20, 2021 at 12:24 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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- Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update, so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Sincerely,

Personally sent by Haley Feng using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Haley Feng
3155 S Sepulveda Blvd Los Angeles, CA 90034-4220
fxbhaley@gmail.com

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 9:18 AM
To: fxbhaley@gmail.com

Hello Haley,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Sep 20, 2021 at 1:39 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
T: (213) 978-1271 | F: (213) 978-1275
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Sep 20, 2021 at 12:26 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Andy Freeland** <andy@everyactioncustom.com>
Date: Mon, Sep 20, 2021 at 12:23 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. But additional bold action and specific implementation measures are needed to make the housing element update successful.

I urge the City to:
- Rezone enough new capacity to result in the creation of 300,000 new homes, enough to close the RHNA gap.
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- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Allow "missing middle" multifamily housing citywide.
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Sincerely,

Personally sent by Andy Freeland using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andy Freeland
901 S Flower St Unit 300 Los Angeles, CA 90015-2296
andy@andyfreeland.net

Housing Element <housingelement@lacity.org> Tue, Sep 21, 2021 at 4:19 PM
To: Andy Freeland <andy@andyfreeland.net>

Hello Andy,

Hope all is well.

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Sep 20, 2021 at 1:42 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
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E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Sep 20, 2021 at 12:38 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Tami Kagan-Abrams** <tami@everyactioncustom.com>
Date: Mon, Sep 20, 2021 at 12:31 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Sincerely,

Personally sent by Tami Kagan-Abrams using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tami Kagan-Abrams
2430 Hercules Dr Los Angeles, CA 90046-1634
tami@abramsgroup.org

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 8:53 AM
To: tami@abramsgroup.org

Hello Tami,

Hope all is well.

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Sep 20, 2021 at 1:41 PM
To: Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Housing Element <housingelement@lacity.org>
Cc: Arthi Varma <arthi.varma@lacity.org>, Nicholas Maricich <nicholas.maricich@lacity.org>

Hello.

I'm forwarding several of these emails that Vince is receiving.

Thank you.

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Room 425
Los Angeles, CA 90012
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Sep 20, 2021 at 1:08 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
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Planning4LA.org

E-NEWS

---------- Forwarded message ---------
From: **Dana Marterella** <dmarterella@everyactioncustom.com>
Date: Mon, Sep 20, 2021 at 1:07 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Sincerely,

Personally sent by using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Dana Marterella
9751 W Olympic Blvd Beverly Hills, CA 90212-3749
dmarterella@gmail.com

Housing Element <housingelement@lacity.org> Tue, Sep 21, 2021 at 4:29 PM
To: dmarterella@gmail.com

Hello Dana,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302



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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Support for a strong & transformative housing element update

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Sep 20, 2021 at 1:42 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: She, Hers, Her
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Los Angeles City Planning
200 N. Spring St., Room 425
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Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Sep 20, 2021 at 12:51 PM
Subject: Fwd: Support for a strong & transformative housing element update
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Room 425-C
Los Angeles, CA 90012
T: (213) 978-1271
Planning4LA.org
E-NEWS

---------- Forwarded message ---------
From: **Tieira Ryder** <tie.ryder@everyactioncustom.com>
Date: Mon, Sep 20, 2021 at 12:49 PM
Subject: Support for a strong & transformative housing element update
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

Hello,

We have a county-wide, global housing crisis and the matter of housing & affordability must be addressed county-wide in LA! Please listen to & support community housing advocates!

https://htwws.org/santamonicaairport/

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Sincerely,

Tieira Ryder
www.HTWWS.org

Sincerely,
Tieira Ryder
3726 Grand View Blvd # 661385 Los Angeles, CA 90066-3110
tie.ryder@gmail.com

Housing Element <housingelement@lacity.org> Fri, Oct 22, 2021 at 10:53 AM
To: T <tie.ryder@gmail.com>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

09/21/21 City Council Agenda- General Comment & the Housing element

2 messages

T <tie.ryder@gmail.com> Sat, Sep 18, 2021 at 12:37 PM
To: athompson@cityofinglewood.org, aallen@cityofinglewood.org
Cc: Planning CPC <cpc@lacity.org>, executiveoffice@bos.lacounty.gov, housing@planning.lacounty.gov, housing@scag.ca.gov, HousingElement@lacity.org, HousingElements@hcd.ca.gov, hello2urbangirls@protonmail.com, GDotson@cityofinglewood.org, dfaulk@cityofinglewood.org, emorales@cityofinglewood.org, apadilla@cityofinglewood.org, cdaniels@cityofinglewood.org

Please stop giving more money to law enforcement agencies who are currently getting over 8 BILLION dollars in LA County to terrorize residents! We need real investments in our community like mental, behavioral, and rehabilitation health sites! We need investments in safe, clean, and affordable housing, both rent and homeownership! We needed these basic needs over 10-20 years ago, we cannot wait any longer to get the housing justice & equity that we are owed.

We will be looking at suing any elected officials that are aiding in any corruption that is causing residents of Inglewood to fall further into poverty. We need all public land focused on affordable housing, we need more open green space and walkable/bike-friendly communities! As we reimagine safety, we need to talk about preventing crimes from happening in the first place! By ending poverty and investing in behavioral health support & paying workers in that field adequate money for the work, we can create safer communities!

Please DO NOT sell any more public land to be used for stadiums and entertainment! All stadiums in SouthLA need to have annual investments that go directly to the community in the form of cash payments and investments into behavioral health support for residents that have CLEAR, visible mental, behavioral, and rehabilitation health needs!

The time for housing, land, and restorative justice is NOW! We will not be waiting for another generation to ask for the basic needs that we are owed! We are not asking anymore but requesting!

Best,
Tieira
www.HTWWS.org

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 6:03 PM
To: T <tie.ryder@gmail.com>

Hello,

Hope all is well.

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

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Los Angeles City Planning

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

CLTs and the Draft Housing Element.

3 messages

Trevor Davis <Trevor@reachforcommunity.org> Fri, Sep 17, 2021 at 2:14 PM
To: HousingElement@lacity.org

Dear Draft Housing Element team,

I am native Angeleno and longtime community organizer who has worked with Councilmember Mark Ridley-Thomas in leadership with the Empowerment Congress, with the University of Southern California, Arts for LA and countless other community organizations for over a decade.

I want to applaud your efforts to advance inclusive, sustainable community development models like Community Land Trusts in this document — and encourage you to continue incorporating this advocacy into every aspect of your work. To that end, I have included some specific feedback on this document below for your consideration.

Lastly, I encourage you to investigate the resources and models laid out in the work of the Democracy Collaborative's Community Wealth Building project, which provides a vast wealth of successful models on how to empower our communities through CLTs, CDFIs, CDCs and beyond.

We are a model for the nation with our leadership in Los Angeles. Thank you again for your efforts to make my hometown a more just and equitable place to live and for picking up on this paradigm shift in affordable housing.

Sincerely,
Trevor Davis
Executive Director
REACH for Community

======

Feedback on the Draft Housing Element:

I strongly support the goals of #4. We absolutely need a citywide community land trust and have it be included in the rezoning program as soon as possible. It's well past time that Los Angeles leads the way in this area.

I encourage the inclusion of CLTs in the goals of #5, to ensure that they are on a level playing field with other parties in terms of development and acquisition financing of affordable housing.

I applaud the efforts of #15 and encourage the development of policies that prioritize the CLT model of community land ownership in the use of any and all public land.

I ask that CLTs be prominently featured in the work of #16, as we look at new models for affordable housing.

I applaud the inclusion of Community Land Trusts as a crucial model for permanent affordable housing, as advanced in item #30.

I also ask that CLT education be included in the efforts put forth with #62 and #67, as a crucial model for inclusive sustainable development.

I ask that CLTs be considered for the goals of #81, for community-level affordable housing solutions.

I fully support the goals of #90, and encourage educational outreach to be offered to any tenants/communities who are seeking to purchase these properties.

I ask that any effort toward a comprehensive homeless strategy, as outlined in #92, feature CLTs as a crucial level for ethical, inclusive, sustainable community development. If we aim to achieve permanently affordable housing, we need to invest in structures where our communities own and manage the land.

I ask that the work done to advance the anti-displacement goals of #122 prominently feature CLTs as a key lever to support local communities.

=====

--
Trevor Davis
Arts Advocate
c: 323-842-1383
Executive Director, REACH for Community
Co-Chair, Empowerment Congress Arts & Culture Committee

"Culture is one of the most important levers to pull in order to rehabilitate and relaunch an economy; It also provides direction."
~ Aminata Traoré

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 9:43 AM
To: Trevor Davis <Trevor@reachforcommunity.org>

Hello Trevor,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Trevor Davis <Trevor@reachforcommunity.org> Wed, Sep 22, 2021 at 2:37 PM
To: Housing Element <housingelement@lacity.org>

Thank you for your response and for your work on this.

I just joined your listserv and will look forward to seeing how this evolves, and the impact it makes.

Best regards,
Trevor

--
Trevor Davis
Arts Advocate

c: 323-842-1383
Executive Director, REACH for Community
Co-Chair, Empowerment Congress Arts & Culture Committee

"Culture is one of the most important levers to pull in order to rehabilitate and relaunch an economy; It also provides direction."
~ Aminata Traoré

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

GeneralPlanHousingElementPublicComment

2 messages

Ron Bitzer <ronbitzer49@gmail.com> Thu, Sep 16, 2021 at 7:58 AM
To: DCP <housingelement@lacity.org>
Cc: Matt Glesne <matt.glesne@lacity.org>, Aaron Ordower <aaron.ordower@lacity.org>

Please refer to the attached file for my public comment about pending rezoning of land use in the City. Ron Bitzer, North Hollywood

DraftHousingElementComment-RBitzer.pdf
1832K

Housing Element <housingelement@lacity.org> Tue, Sep 21, 2021 at 4:14 PM
To: Ron Bitzer <ronbitzer49@gmail.com>

Hello Ron,

Hope all is well.

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

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[Quoted text hidden]

City Planning's *Current* Authority
Enhances Prospects for the Housing Element Cycle 6 Plan, If Exercised

Information: Ron Bitzer, ronbitzer49@gmail.com

Any rezoning of City of Los Angeles neighborhoods in order to address State-mandated housing priorities will impact other City-wide goals.

Missing from this Housing Element draft, however, is any program goal or component of a program goal for addressing "livable and sustainable communities" in park-starved neighborhoods. The draft executive summary does acknowledge public input favoring housing near public parks, Draft Housing Element, 6th Cycle, Executive Summary p. 32.

Dedication of new parks is already an issue for City Planning; community advocacy around park equity issues will only grow (e.g. The Prevention Institute).

In fact, the current Director of City Planning, Mr. Bartoni, led a coalition of park advocates in 2016 to expand a State-authorized fee program aimed at generating new park land and/or restricted fee dollars paid by developers of added residential units.

This **Quimby Park Fee** program in LA merits more oversight at the 5-year post-reform mark. None of the annual Park Fee reports for 2017-2020 disclose park land dedications by developers to satisfy the Quimby Park Fee, because there have been none. The restricted Park Fee balance effective June 30, 2020, exceeded $160 million.

More park land and open space should go hand-in-hand with more housing ---- especially in view of this minimum goal of 456,643 added dwelling units during 2021-2029 (40% of which are targeted for low income residents).

Chapter 6 of the draft Housing Element 6th Cycle draft describes more than 100 housing and housing-related goals for LA.

Noteworthy among 124 Program Goals are only two that involve explicitly the Department of Recreation and Parks --- the City agency qualified to deal with public financing of new parks such as the County Measure A and the State Proposition 68.

During 2021-2029 Recreation and Parks will be tasked with the following staffing issues:

- Goal #19 ---- Recreation and Parks will join outreach teams working with the homeless individuals.

- Goal #113 ---- Recreation and Parks will provide emergency housing during any major disaster.

Regardless of how Program Goals may or may not be modified, City Planning can join with Recreation and Parks, City Council members and community advocates sooner rather than later in learning of success and failure in the creation of new parks.

Example #1: City Planning routinely rejects Recreation and Parks recommendations for new park land dedication as the Park Fee, when applications from developers of more than 50 added dwelling units come before the City.

> In the matter of 2300 West Venice Blvd., a DCP senior staffer "clarified" a Quimby Park Fee condition prepared by a junior DCP staffer by crossing out "That the Project dedicate land to the City, or provide a combination of land dedication and fee payment, in order to fulfill the Project's requirements under provisions of LAMC 12.33," and then published with emphasis,
>
> > **"That the Park Fee paid to the Department of Recreation and Parks be calculated as a subdivision (Quimby) fee based on the C2-2-CIPO Zone,"** Letter of Clarification, Department of City Planning, Case #AA-2018-7264-PMLA,October 28, 2019, p. 3.

Example #2: Rezoning of parcels to an Open Space zoning occurs in concentrated communities of the City as exemplified by Washington Irving Pocket Park at 4103 West Washington Blvd.. Zoning is OS-1XL. See following ZIMAS map for this community and park photo.

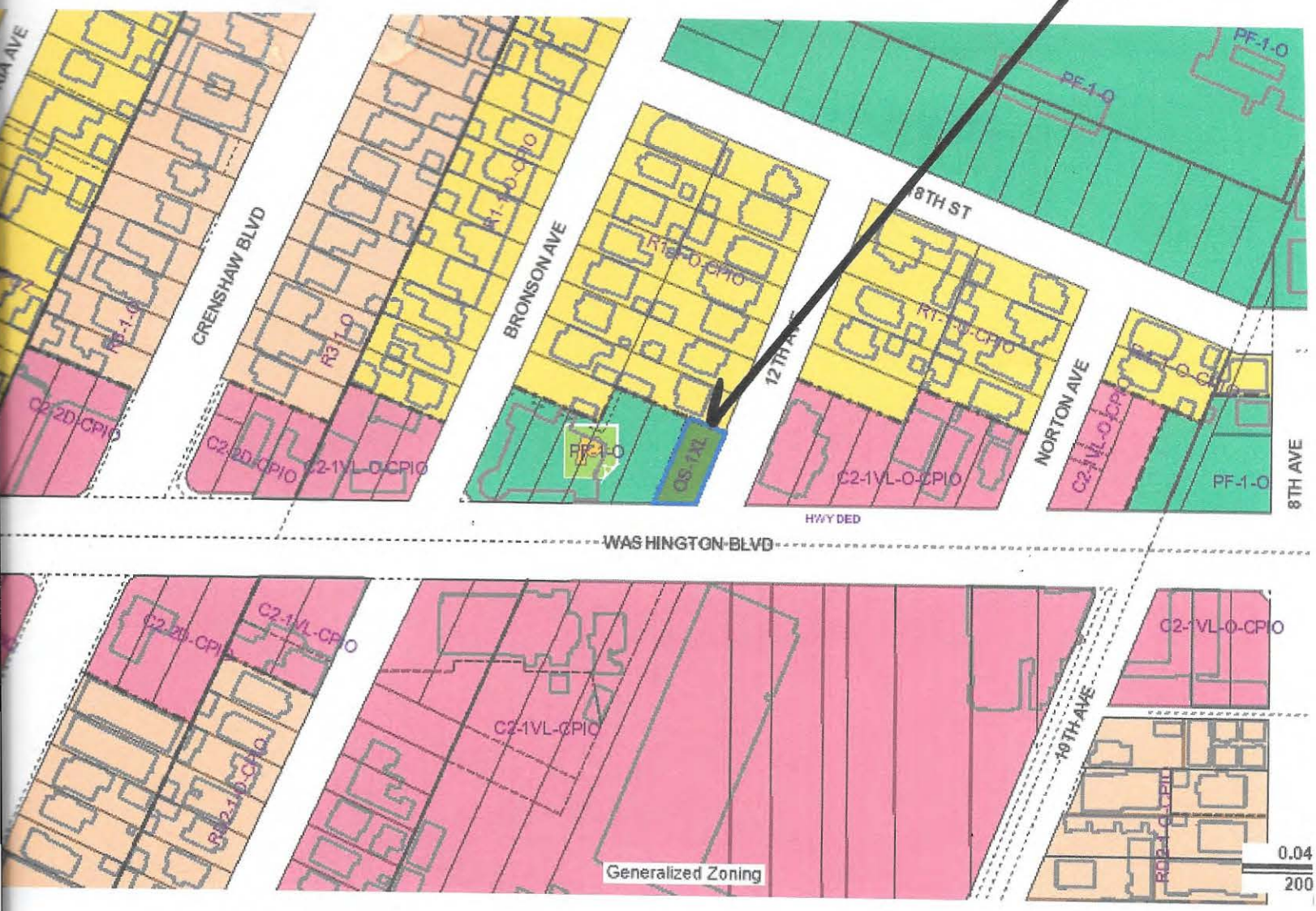
Other City Planning considerations in promoting new parks sooner rather than later are the following:

1. "Targets, Milestones, Initiatives," Green New Deal: Sustainable City pLAn, City of Los Angeles, p. 28.

2. Competitive public financing for new urban parks via the County Measure A perpetual funding and the State Proposition 68.

3. More than 340 vacant lots comparable in size to pocket parks (0.1 to 3.0 acres) are owned by the City of LA or LA Airports in the City.

4103 W. Washington Blvd.



Google Maps W Washington Blvd



Image capture: Feb 2021 © 2021 Google

Los Angeles, California

Google

Street View - Feb 2021



Housing Element <housingelement@lacity.org>

ACT-LA's Housing Element Comment Letter

2 messages

Alfonso Directo Jr. <adirecto@allianceforcommunitytransit.org> Wed, Sep 15, 2021 at 3:00 PM
To: Vince Bertoni <vince.bertoni@lacity.org>, Ann Sewill <ann.sewill@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Housing Element <housingelement@lacity.org>
Cc: Laura Raymond <lraymond@allianceforcommunitytransit.org>

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

I hope this email finds you well. We at the Alliance for Community Transit - LA (ACT-LA) continue to appreciate the opportunity to engage in the Housing Element update.

Attached are ACT-LA's comments and recommendations to LA City's 2021-29 draft Housing Element. Please review this attached letter and let us know if we can meet to discuss it further.

Thank you,
Alfonso
--

Alfonso Directo Jr., PE (he/him)
Advocacy Manager | Alliance for Community Transit - Los Angeles
cell: (949) 400-0818
website: www.allianceforcommunitytransit.org

2 attachments

ACT-LA Comment Letter to LA City draft Housing Element with Attachment A - 2021-0915.pdf
2980K

Attachment B - Oct 2020 ACT-LA-Housing-Element-Letter.pdf
319K

Housing Element <housingelement@lacity.org> Tue, Sep 21, 2021 at 4:05 PM
To: "Alfonso Directo Jr." <adirecto@allianceforcommunitytransit.org>

Hello Alfonso,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

act·LA
Housing Jobs & Transit for All

Se. tember 15, 2021

R. : Comments and Recommendations for LA City's 2021-29 Draft Housing Element

Dear City of Los Angeles Planning Department and Housing and Community Investment Department:

The Alliance for Community Transit - Los Angeles (ACT-LA) coalition respectfully submits this comment letter regarding the Housing Element for 2021-2029 to highlight key priorities and opportunities for more equitable development in our region. ACT-LA is a county-wide coalition of 41 organizations working on the forefront of racial, environmental, and economic justice. Our coalition members include tenants' rights organizations, affordable housing developers, workers' centers, public interest law firms, and public health advocates, among many others. Many of our coalition members serve on the Housing Element Task Force, or are otherwise engaged in community planning and other land use plans or policy-making to advance racial equity, smart growth, and community stability in the creation and implementation of housing policies and programs. Thanks to our coalition's diversity, we view housing policy through an intersectional lens and work to center low-income communities and communities of color in decisions that seek to transform our neighborhoods.

The residents of Los Angeles that we represent have borne the heaviest toll from generations of failed land use policy and environmental injustice, including redlining and exclusionary zoning. Furthermore, the last year has showcased and exacerbated the affordable housing, racial injustice, and public health crises in Los Angeles. It is a critical time to act, and the Housing Element is a tremendous opportunity to ensure that Los Angeles grows in an equitable and sustainable fashion: prioritizing underserved communities, centering their concerns, and providing for them overdue housing justice in Los Angeles.

We therefore call on the City Planning department to advance racial equity, public health, environmental justice, and community stability through the 2021-2029 Housing Element—and to materially benefit our communities with more and better affordable housing opportunities through the Rezoning Program. Specifically, we offer the following comments and recommendations to the Housing Element.

1. **<u>The Draft Sites Inventory demonstrates the magnitude of L.A.'s affordable housing crisis and compels equitable distribution of new deeply affordable housing.</u>**

    a. ***Realistic De. elopment Potential***

We applaud the Department for developing and utilizing a methodology to assess the realistic development potential using a regression analysis based on historical development patterns. The department's two step approach taking both the likelihood of development and the maximum capacity expected to be developed into account provides a unique model that highlights where, how many, and at

what affordability level housing units are likely to be built in the next 8 years. The department's work highlights the housing opportunities and challenges the city is facing and better informs the creation of new programs and policies to maximize affordable housing production, preserve existing affordable housing, and affirmatively further fair housing.

b. RSO Protections

We support the draft Housing Element in ***not*** designating sites with existing RSO housing as low-income sites. All relevant policies and implementation of the Housing Element should be geared to provide maximum protection for RSO units. In the absence of a City-wide no-net-loss requirement, including RSO sites in the inventory but not designating them as Lower Income units adds protections in the form of no-net-loss requirements while protecting them from being targeted for redevelopment under the by-right approval process for recycled sites. That said, the City should enact a city-wide no net loss requirement via the Housing Element implementation process (Council File #21-0035 (Martinez - Cedillo)).

2. The Housing Element must maximize all opportunities to stabilize rents and maximize tenant protections

We reiterate suggestions to protect and enhance the Rent Stabilization Ordinance and to further protect tenants that we put forward in our October 2020 letter. We also recommend the following insertions to the Programs and Policies put forth in Chapter 6 of the draft Housing Element.

- Program 31: Reduce the annual allowable rent increase under the RSO. Reduce the annual allowable rent increase, and close the “master-metered loophole,” in the City’s Rent Stabilization Ordinance to help address indirect displacement in gentrifying neighborhoods and encourage energy conservation.
- Program 85: Expand just-cause eviction protections to cover all tenants in the City of Los Angeles and establish a corresponding enforcement program.
- Program 88: Codify a tenant’s right to counsel in an eviction and administrative proceedings. Codify a tenant’s right to counsel that guarantees access to an attorney to all tenants who face displacement.
- Program 88:Create a permanent tenant education program working with community based organizations to inform tenants of their rights and how to access eviction defense resources.
- Program 87: Explore additional opportunities that strengthen the RSO. Explore amendments to the City’s RSO to restrict allowable grounds for eviction, including restrictions on eviction for failure to pay and policies to alleviate rent-debt. The City needs to further explain in detail in this program how they "will continue to implement amendments to the LA Municipal Code to strengthen enforcement, preserve RSO units, prevent displacement of tenants, ensure relocation assistance to tenants..." as a strategy for protecting tenants vulnerable to Ellis Act displacement.

- Program 84: Increase investigation and prosecution of source-of-income discrimination. Develop proactive enforcement mechanisms, such as testers and hearing officers, to identify and prosecute source-of-income discrimination
- Program 86: The Tenant Anti-Harassment Ordinance was enacted this year but in a weaker form than advocated for. Current policy is still lacking avenues to prosecute repeat offenders. We also advocate to add language to track harassment complaints monthly and by Council District.
- Program 84: The City should add a program, committing to adopting a renter access ordinance, in order to ensure that residents are able to access safe and healthy housing regardless of their credit or prior rental history, including failure to pay rent or utility bills during the COVID-19 pandemic, and regardless of whether they have a prior criminal history. The ordinance should require that housing providers publish a list of objective criteria, reasonably related to tenancy, which will be considered when a tenant applies for rental housing, and provide a written explanation when denying an applicant housing. The ordinance should also allow tenants to dispute rejections and, if successful, require landlords to provide the next available comparable unit.

3. **The Housing Element must further environmental justice, improve climate resilience and promote community health.**

ACT-LA believes equitable housing policies must advance justice and utilize equity-based approaches to housing development by supporting alternative housing models, while also protecting community health. It is our hope that the City of LA Planning Department will address LA's legacy of segregation and discriminatory practices in communities throughout the state by increasing affordable housing in communities that have remained exclusionary and requiring cities to conduct both meaningful environmental review of proposed project sites and racial equity analyses to inform future planning and housing decisions.

In 2016, the California Legislature passed Senate Bill (SB) 1000 to incorporate environmental justice into the local land use planning process.[1] SB 1000 requires local governments to address pollution and other hazards that disproportionately impact vulnerable communities in their jurisdiction. Vulnerable communities, formally defined as "disadvantaged communities" include two identification methods: (1) "an area identified by the California Environmental Protection Agency (CalEPA) pursuant to Section 39711 of the Health and Safety Code"; or (2) a "low-income area that is disproportionately impacted by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation."[2] If a local government adopts or updates two or more elements of its general plan after January 1, 2018, which LA City will do with the anticipated adoption of the Housing Element and upcoming safety element this fall, SB 1000 requires the local government to identify any

[1] SB 1000 is codified at Government Code section 65302, subdivision (h).
[2] Gov. Code, § 65302, subd. (h)(4)(A).

"disadvantaged communities" within its planning area.[3] If a local government identifies one or more disadvantaged communities in its planning area, its general plan must have either an "environmental justice element" or "related goals, policies, and objectives integrated in other elements" (collectively, "EJ policies") that "reduce the unique or compounded health risks in disadvantaged communities" by addressing different topics, such as (1) reducing pollution exposure, (2) promoting public improvements, (3) promoting safe and sanitary homes, and (4) promoting public engagement in the local decision making process.[4]

The City of Los Angeles' General Plan does not have a stand-alone Environmental Justice Element, therefore, SB 1000-related goals, policies, and objectives must be incorporated throughout other elements of LA's General Plan.[5] The 2015 Plan for a Healthy Los Angeles, a health and wellness element of LA's General Plan, lays the groundwork to create healthier communities for all LA County residents. As an Element of the General Plan, it provides goals and policies, to evaluate health and environmental justice as a priority for the City's future growth and development. However, this health and wellness element was adopted before SB 1000 was adopted, and requires significant revisions to meaningfully satisfy SB 1000 requirements. Although updated environmental justice requirements are addressed in the revised "Plan for a Healthy Los Angeles" and the "Health Atlas for the City of Los Angeles," we are not convinced that these two documents satisfy all SB1000 requirements, and we are concerned to find that critical environmental justice topics are not meaningfully addressed in the City's draft 2021-2029 Housing Element Update.[6] The City's lack of compliance with state law requirements under SB 1000 has a significant impact on LA residents, disproportionately impacting vulnerable communities within its boundaries. The City of LA has multiple sources of pollution and interspersed industry, carrying a high pollution burden. Because the City's draft Housing Element Update will serve as a blueprint for future development, City Planning should create programs that adequately address environmental justice issues. Addressing environmental justice issues will also ensure the furthering of fair housing.[7]

The City of LA contains numerous census tracts that the California Environmental Protection Agency (CalEPA) has designated as "disadvantaged communities."[8] CalEPA's screening tool, CalEnviroScreen 4.0, ranks each census tract in the state for pollution and vulnerability. The City of LA's CalEnviroScreen (census tract) scores are among the highest in the state. Latinx residents make up the largest demographic of the City's population with 1,922,889 persons (48.6%), followed by White residents, who make up over

[3] Gov. Code, § 65302, subds. (h)(1)–(2).
[4] Gov. Code, § 65302, subd. (h)(1).
[5] Government Code section 65302(h)(1).
[6] Targeted amendments to the Plan for a Healthy Los Angeles have been proposed by LA City Planning to clarify that the Plan for a Healthy Los Angeles and the Health Atlas for the City of Los Angeles meet the requirements of SB 1000, available at: https://planning.lacity.org/odocument/0cf2d603-e8b2-496f-9c74-17c757041745/Plan_for_a_Healthy_LA.pdf (last visited August 30, 2021).
[7] Camille Brown, *F.om Flint to DC, Pay attention to the intersections between environmental justice and fair housing*, Equal Rights Center, https://equalrightscenter.org/from-flint-to-dc-pay-attention-to-the-intersections-between-environmental-justice-and-fair-housing/.
[8] SB 535; An article from 2017 states "Of the 22 high pollution census tracts, 20 tracts are industrial areas in greater Los Angeles," See https://calepa.ca.gov/wp-content/uploads/sites/6/2017/04/SB-535-Designation-Final.pdf.

a quarter of the population at 28.5%. Asians make up 11.5% of the population, followed by Black or African Americans at 8.5% of the population, and Native Americans, Pacific Islanders, and those who ID as 'other' make up the remaining 2.8%. Disturbing studies and investigations have found that "people of color are more likely than white people to live alongside power plants, oil refineries and landfills" in LA.[9] Busy freeways and toxic industrial sites cloak neighborhoods with high levels of fine particulate matter (PM 2.5), toxic releases, clean-up sites and hazardous waste. In addition to these compounding pollution levels, LA residents are more vulnerable to the City's increasing environmental hazards due to additional vulnerabilities from medical conditions such as asthma and cardiovascular disease.[10] Other vulnerabilities identified through CalEnviroScreen, include linguistic isolation, poverty, and rising rent burdens from escalating housing costs.[11]

Housing Justice and Environmental Justice are inextricably linked. Access to safe and affordable housing has a direct impact on public health. The very communities facing the highest rent burden are often the same frontline communities who bear the brunt of the negative impacts brought on by multiple, intersecting crises related to housing, houselessness, and environmental racism. Staggering health disparities are brought on by land uses based on an extractive economy that contributes to environmental degradation, industrial pollution, the climate crisis, and increased health hazards for the frontline communities. According to the last Health Atlas for the City of LA, 21% (or approximately 59,000 individuals) of Southeast LA CPA residents lived adjacent to noxious land uses in 2013.[12]

LA City's 2021-2029 Housing Element is an opportunity to ensure that housing promotes public health with land use policies that are aligned with practices that create a more productive, equitable, and healthy regenerative use of land. This draft plan must be revised to incorporate the required components of an Environmental Justice Element as the remaining elements of the General Plan do not satisfy state law. The following recommendations account for issues related to environmental justice and public health in development processes, and climate resilient housing to mitigate negative climate impacts and improve community health.

a. Promote environmental justice and public health in development processes.

Under Government Code Section 65040.12(e), environmental justice is the "fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement

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[9] Sammy Roth, *Why communities fighting for fair policing also demand environmental justice*, Los Angeles Times (Jun. 4, 2020), https://www.latimes.com/environment/newsletter/2020-06-04/why-communities-fighting-for-fair-policing-also-demand-environmental-justice-boiling-point; Mark Olalde et al, *The toxic legacy of old oil wells: California's multi-billion dollar problem*, Los Angeles Times (Feb. 6, 2020), https://www.latimes.com/projects/california-oil-well-drilling-idle-cleanup/.

[10] Doyle Rice, *Study finds a race gap in air pollution--whites largely cause it; Blacks and Hispanics breathe it*, https://www.usatoday.com/story/news/nation/2019/03/11/air-pollution-inequality-minorities-breathe-air-polluted-whites/3130783002/ (Mar. 11, 2019).

[11] See CalEnviroScreen 4.0; interactive Health Atlas for the City of LA, https://planning.lacity.org/interative-health-atlas/index/index.html.

[12] Health Atlas for the City of LA, https://wattscommunitystudio.files.wordpress.com/2013/06/healthatlas.pdf (June 2013).

of environmental laws, regulations, and policies." Environmental justice goals, policies, and objectives should reduce health risks to disadvantaged communities, promote civil engagement, and prioritize the needs of disadvantaged communities. California law further establishes that environmental justice[13] includes:

- the availability of a healthy environment for all people;
- the deterrence, reduction, and elimination of pollution burdens for communities disproportionately experiencing the adverse effects of that pollution;
- government entities engaging and providing technical assistance to communities most impacted by pollution to promote their meaningful participation in all phases of the environmental and land use decision-making process; and
- at a minimum, the meaningful consideration of recommendations from communities most impacted by pollution into environmental and land use decisions.

We are concerned that this draft plan does not sufficiently address the cumulative impacts and disproportionate pollution burden placed on environmental justice communities throughout LA. As a result, this draft plan does not establish sufficient goals and policies to promote positive health outcomes to meet housing needs with a focus on low-income households and disadvantaged communities.

First, the draft plan does not consider the tens of thousands of individuals in the City of LA who live in close proximity to an active oil well.[14] Neighborhood drill sites, sometimes a few feet from homes, greatly increase and compound a slew of toxic emissions such as benzene, a known carcinogen.[15] In addition, high levels of cancer-causing diesel particulate matter are emitted into the air from the countless diesel trucks and emergency diesel generators used to service and sustain active oil wells. It is not just active wells that exacerbate environmental and health harms in LA. Wells that are no longer producing oil and gas are often left uninspected and unmaintained, some since the 1990s, leaking oil, gas, and other contaminants into the air and local groundwater.[16] The toxic practices of the oil industry have taken their toll on frontline communities throughout LA. Impacted residents and their children experience high rates of cancer, miscarriages, frequent nosebleeds, headaches, rashes, and respiratory issues, especially asthma.[17] It is important to note that oil drilling sites are not incidentally concentrated in low-income

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[13] Government Code Section 65040.12[e][2].
[14] Kyle Ferrar, *California Setback Analyses Summary*, https://www.fractracker.org/2020/04/california-setback-analysis-summary/ (April 2, 2020).
[15] Stories of Oil Drilling in Wilmington, Communities for a Better Environment Story Map, https://www.arcgis.com/apps/MapSeries/index.html?appid=11f7468097464b6296d441d187f3d4f8 (last visited Sep. 8, 2021).
[16] The Center for Public Integrity, *Deserted oil wells haunt Los Angeles with toxic fumes and enormous cleanup costs*, https://publicintegrity.org/environment/deserted-oil-wells-haunt-los-angeles-with-toxic-fumes-and-enormous-cleanup-costs/ (March 5, 2020).
[17] New scientific research published in June 2021 documents significant decreased lung and pulmonary function from living near active and inactive drill sites in South Los Angeles, Jill E. Johnston et al, Department of Preventive Medicine, Keck School of Medicine, USC, https://www.sciencedirect.com/science/article/abs/pii/S0013935121003820?via%3Dihub (last visited Sep. 8, 2021).

communities and communities of color–this is the result of decades of racist land use decisions such as fast-tracked permit approvals, redlining and racial covenants. The undeniable concentration of oil wells in disadvantaged communities is just one symptom caused by the historical practices of 'redlining,' predatory lending, and other inequitable policies that shape modern land use decisions and planning–while forcing low-income communities and communities of color to live in neighborhoods marked by environmental harms and health hazards.

To protect the health, safety and well-being of all Los Angeles residents, we urge LA City Planning to declare oil drilling/production a non-conforming use immediately (Council File #17-0447 (Bonin, Cedillo, Harris-Dawson, Koretz, Martinez, Wesson - Huizar)), prohibiting new oil drilling/production within the City of LA, phasing out existing oil drilling within five years with a just transition for workers and communities.[18] ACT-LA members hope to continue working with the City Planning Department to advance just and equitable housing development that combats the unjust legacy of redlining which continues to limit equitable access to healthy affordable housing options for communities of color to this day.

For example, ACT-LA members are concerned by LA City's proposal to redevelop Brownfield sites, coupled with broader policies to "provide incentives and promote flexibility for the conversion of non-residential structures to new housing in order to reduce the carbon footprint resulting from demolition and new construction"[19] and proposed programs to increase CEQA streamlining to incentivize energy and resource conservation.[20] We oppose the false solution too often presented to environmental justice communities that health and safety measures (such as environmental review under CEQA) must be sacrificed in order to build affordable housing. In addition, we reject the false narrative that CEQA is a barrier to housing development. The number of lawsuits filed under CEQA has been surprisingly low, "averaging 195 per year throughout California since 2002."[21] We believe that affordable housing that includes energy and resource conservation can be incentivized in other ways such as more inclusive social housing models, community land trusts, cooperative housing, and nonprofit community-run housing that do not diminish the importance of environmental review or expand the use of CEQA exemptions.

Next, while ACT-LA supports increasing availability and equitable access to safe and affordable housing, we strongly oppose building affordable housing on polluted land without proper remediation. As such, we are concerned by the City of LA's plan to maximize the use of unused, public lands by remediating toxic sites for affordable housing development. Although chapter 4 of LA City's draft plan claims that public

[18] Los Angeles City Council Environment Committee Votes Unanimously to Pursue a Phase-Out of Oil Drilling City-Wide to Protect Public Health (STAND-LA Blog, Dec. 1, 2020) http://www.stand.la/stand-la-blog/los-angeles-city-council-environment-committee-votes-unanimously-to-pursue-a-phase-out-of-oil-drilling-city-wide-to-protect-public-health
[19] Policy 3.2.8.
[20] 2021-2029 Housing Element Update, Policy 3.2.4.
[21] CEQA in the 21st Century: Environmental Quality, Economic Prosperity, and Sustainable Development in California, https://rosefdn.org/wp-content/uploads/2016/08/CEQA-in-the-21st-Century.pdf (last visited Aug. 30, 2021).

lands are an option "provided that there are no environmental features that would [negatively] impact the [proposed] development on a site by site basis (4-14)," the draft Housing Element's definition of Environmental Hazards fails to include man-made hazards such as oil drill sites. We are concerned by Policy 3.2.9, which seeks to create "new residential uses, including live/work and mixed-use, in less-productive industrial, office, and commercial areas when the site can accommodate housing in keeping with citywide industrial land, jobs-housing and jobs preservation priorities." This policy does not identify or sufficiently discuss plans for clean-up and remediation of industrial sites. Rather, the policy sets forth a broad goal to build on underutilized industrial land without clarifying how the City plans to ensure that prior-industrial land will be tested and cleaned, or what the required soil standard is before proposing an affordable housing project. Providing these details is important and critical to ensuring community members are aware of their rights and able to hold negligent companies accountable for failing to test or clean the soil to the standard required by local and state law.

Furthermore, the draft housing element does not adequately address the risks of existing and future environmental hazards such as drought, intense heat, wildfires and floods on publicly owned lands due to climate change. Despite resounding scientific consensus that global temperatures are warming and weather patterns are rapidly intensifying, the draft housing element does not include climate change projections or account for how these changes will influence how housing should be developed and where it can be sited. We encourage LA City Planning to study and account for climate change projections when deciding where housing can be sited. SB 1000 also requires the safety element to include protection from flooding, climate adaptation, and resilience strategies. We were unable to locate an active inventory of proposed locations or approved ones that were analyzed with future climate impacts in mind. In addition, we would like to request more clarity around (1) approval criteria for affordable housing developers and (2) whether priority is being given to those working in frontline communities.

b. Develop climate resilient housing to mitigate negative climate impacts and improve community health.

As mentioned, climate change is undeniably affecting all of us, from rising temperatures and seas, shifting precipitation patterns and stronger storms, wildfires increasing in size and occurrence- all of which pose risks to our livelihoods. However, low-income communities and communities of color are often hurt first and worst by the impacts of climate change. In vulnerable communities, climate change can be a new and complicating environmental challenge stacked on top of histories of pollution, disinvestment and discrimination.

The Surging Seas tool, created by Climate Central, states that a "medium" sea-level rise scenario points to a "93% risk of at least one flood over 3 ft taking place between today and 2050 in the Los Angeles Area."[22] According to this tool, approximately 47% of the total population living in LA's medium sea-level rise zones are Black, Indigenous, and people of color (BIPOC). To make matters worse, these

[22] Los Angeles, California, USA, *Surging Seas Risk Finder*, https://riskfinder.climatecentral.org/place/los-angeles.ca.us?comparisonType=city-council&forecastType=NOAA2017_int_p50&level=3&unit=ft&zillowPlaceType=place.

same communities are overwhelmingly concentrated in nature-deprived areas, and disproportionately exposed to high pollution levels and toxic land uses. A detailed report released by the Hispanic Access Foundation and the Center for American Progress found that, "the United States has fewer forests, streams, wetlands, and other natural places near where Black, Latino, and Asian American people live." A report by the Liberty Hill Foundation, focusing on the community consequences of expanded oil development in LA notes that "72% of people living near oil and gas drilling in LA County are people of color." These troubling reports make clear that LA is segregated and so is its pollution. Increasing equitable access to healthy affordable housing throughout LA will require an extensive phaseout of toxic land uses such as oil drilling operations and long-term remediation of the land. Housing justice is inextricably linked to environmental justice. This draft Housing Element should (1) make clear that industrial sites are incompatible with residential areas and (2) lay the groundwork for community-driven development and stewardship.

For example, LA City's Council District 15 (CD15), a predominately Latinx and Black community with an overwhelming amount of petrochemical and industrial pollution is also extremely rent burdened. Areas like CD15 not only need more affordable housing, but also increased access to healthy affordable housing--which hinges on surrounding land-use designations. Due to the numerous petroleum and industrial sites near residential, schools and sensitive receptors, the Housing Element must declare oil drilling/production a non-conforming use immediately, prohibiting new oil drilling/production within the City of LA, phasing out existing oil drilling within five years with a just transition for workers and communities.

LA City Council recently passed the "Tenant Anti-Harassment Ordinance,[23]" an ordinance banning landlords from harassing tenants throughout LA. Passing this ordinance was a critical step by LA City to meaningfully invest in safeguarding vulnerable tenants against abusive landlords. We hope to build on LA City's Tenant Anti-Harassment ordinance by expanding the scope of this program to include the impact of the climate crisis, and how it has limited equitable access to healthy affordable housing. For example, urban heat waves are "rapidly increasing in frequency, duration, and intensity with a greater tendency toward more humid nighttime events" a trend that "[has] a high probability of increasing by 42% in frequency and by 26% in duration during severe drought conditions".[24] This increases health risks to communities with low adaptive capacity, such as those with limited access to air conditioning, air filtration, reliable transportation, access to cooling centers--a large majority of whom are migrant, elderly, or monolingual speakers. An analysis by the American Housing Survey found that 22% of Los Angeles households do not have air conditioning. This percentage increased to 30% for low-income households, making less than $50,000 a year.[25] We encourage LA City Planning to respond to these findings by implementing strong climate resilience strategies in LA's Housing Element Update, including but not limited to: (1) mandating proper air conditioning or ventilation systems in leased properties, (2) requiring landlords to install new air conditioning systems as reasonably requested by tenants (especially elders or

[23] Los Angeles Municipal Code art. 5.3 § 45.30.
[24] Glynn C. Hulley et al., *Rising Trends in Heatwave Metrics Across Southern California,* 8 Earth's Future 7 (2020).
[25]Carlos Granada, *Southern California prepares for heat wave amid Stay Home order, with or without air conditioning,* ABC 7 (Apr. 24, 2020), https://abc7.com/heat-wave-covid-los-angeles-coronavirus/6127436/.

families, without handing off the cost to the tenant), and (3) institutionalizing cooling centers and resilience hubs in environmental justice and vulnerable communities. Finally, prioritizing green infrastructure is an important tool in providing natural services that offset intensifying climate change impacts, such as flooding and the urban heat-island effect. It is important to note that communities of color have historically had limited access to green space and parks which can negatively impact community health and resilience. The 2018 *Safeguarding California Plan* highlights the state's growing need to increase equitable access to nature to ensure community health and climate resilience. We urge LA City Planning to invest in programs to: (1) identify park-poor communities, (2) build affordable housing near green infrastructure investments, supported by strong anti-displacement measures to guard against gentrification/displacement, (3) ensure public parks are within walking distance for all communities, and (4) develop and preserve public parks to meet the unique needs of surrounding communities, creating resources for recreation, community building, and local stewardship of the land.

The Clean Up, Green Up (CUGU) (Ordinance #184246)[10] was approved by the LA City Council in 2016 after years of community organizing. The ordinance "authorizes the establishment of a CUGU Supplemental Use District within Boyle Heights, Pacoima/Sun Valley, and Wilmington to reduce cumulative health impacts resulting from incompatible land uses." CUGU focuses on pollution prevention, pollution reduction, and economic revitalization while supporting small-businesses in complying with regulatory requirements. The CUGU district aims to reduce cumulative health impacts created by incompatible land use/concentrated industrial land use, on-road vehicle travel, and heavily freight-dominated transportation corridors, which are within close proximity to homes, schools, and other sensitive uses. The Housing Element can comply with CUGU goals by declaring oil drilling/production a non-conforming land use, prohibiting new oil drilling/production within the City of LA- starting with the CUGU communities, phasing out existing oil drilling within five years and providing a just transition for workers and communities.

The Safeguarding California Plan: 2018 Updates[14] was a collaboration across-departments, agencies, elected representatives, tribal nations, and non-profit organizations. It provides principles, recommendations to guide adaptation efforts, and case studies for the State of CA in addressing climate impacts. The plan emphasizes equity and community engagement as the common ground on which to build policies, projects, and overall decision-making processes. Some of the indicators of climate change that the Safeguarding CA Plan identified were:

- With increasing temperatures, the energy needed to cool buildings during warm weather—measured by "cooling degree days"—has increased.
- Extreme heat days and especially nights have become more frequent since 1950. Heat waves have been highly variable each year, but nighttime heat waves have shown a marked increase since the mid-1970s.
- The area burned by wildfires across the state is increasing in tandem with rising temperatures. Large wildfires account for much of the acreage burned each year

The Safeguarding CA Plan states that public agencies must make "land use and community development decisions that prioritize long-term safety and resilience".[26] The current Housing Element does not sufficiently incorporate climate change impacts and projections, and community-led solutions or approaches to best support those living in impacted areas from flooding and the urban heat-island effect. Recommendations from the Safeguarding CA Plan that are related to the City's Housing Element include:

- L3: Coordinate state laws, regulations, guidelines and policies to promote climate resilience and hazard avoidance and mitigation through local, regional and state planning;
- L-5.4a: Support local implementation of general plan statute requirements on climate justice;
- P-1: Promote community resilience and health equity by improving underlying economic, environmental, social, and living conditions;
- P-6.4: Consider collaborating with State agencies focused on green buildings and energy efficiency to include climate adaptation and health and equity considerations into State initiatives, planning, and policies, including updates to the California Building Code and California Energy Efficiency Standards.

4. **The draft element must honestly acknowledge the history of unjust land use in a way that actively foregrounds policies and programs to Affirmatively Furthering Fair Housing.**

The Affirmatively Further Fair Housing analysis in Chapter 4 shows the product of a long history of segregated housing development patterns and structural racism inherent in conventional planning efforts. While we appreciate the department's affirmatively further fair housing analysis, this analysis makes clear the inequities that exist in the current zoning code. The department's analysis shows that current zoning places an over-representative share of new unit potential in areas at highest risk of gentrification and displacement. We find it especially troubling that the neighborhoods with a higher share of Black, Asian, and Latino residents have the highest share of identified development potential while the lowest capacity neighborhoods have the fewest people of color. This reflects the past use of zoning to enforce segregation and highlights the moral imperative LA City officials and staff now have to use the required rezone program to affirmatively further fair housing and undo past harms.

The data indeed show how LA City's planning policies and programs polarize the city, both racially and economically, and cumulatively fails to affirmatively further fair housing. If the City expects the policies and programs of Chapter 6 to serve as the city's so-called "action plan" over the next eight years of housing in LA City, then Chapter 4 must not only present the data but also (a) identify the current and past policies and programs, which have led to these unjust conditions, (b) identify the risks of inaction, (c) make a commitment to center community needs and reverse decades of racist land use designations through a robust community engagement process, and (d) conduct an additional analysis of the realistic development potential of rezoned sites that subsequently inform the rezoning program.

[26] *Safeguarding California Plan: 2018 Update*, California's Climate Adaption Strategy, (Jan. 2018), https://www.srta.ca.gov/DocumentCenter/View/4762/Safeguarding-California-Plan-2018-Update.

For instance, as the Site Inventory Analysis by Opportunity Area (Table 4.26) shows that nearly half of all sites (49%) that the city are accounting for in the Site Inventory are situated in low-resource areas, which effectively targets these areas for displacement and gentrification. In addition to presenting this data, the Housing Element should account for the negative social and economic impact this data reveals and cite relevant policies such as redlining, which continue to have lasting effects on LA residents, especially low-income residents and residents in communities of color.[27] As page 4-41 of LA City's draft Housing Element says, current policies such as "land use incentives have a much higher rate of producing affordable housing in High Opportunity Areas, [than housing] produced through financial subsidy alone," and publicly "subsidized affordable developments are overwhelmingly located in lower resource areas." This suggests that the City should prioritize strategies that utilize the affordable housing land use incentive programs over subsidy programs to racially and economically integrate neighborhoods and also protect tenants in lower resource areas from displacement by strengthening tenant protections.

The Site Inventory Analysis by Opportunity Area (Table 4.26) also shows the outsized share of affordable housing potential in low resource areas as compared to the (small) share of affordable housing in high resource areas. Specifically, Table 4.26 shows that the City's high and highest opportunity areas (34% of city census tracts) only have 24% of the cities lower income potential. By comparison, the City's low opportunity and high segregation areas (44% of census tracts) have 54% of the lower income potential. In line with presenting this data, the Housing Element needs to acknowledge the role that policies such as current land use zoning designations continue to play in concentrating poverty, which are exacerbated by repeated use of conventional housing models. In order for the City to counteract these inequities expeditiously and at scale, the Housing Element should rightfully focus onsite affordability in high and highest resource areas and boldly invest resources in a new housing paradigm that includes a wider array of housing models with social housing and community land trusts. Simultaneously, the Housing Element must ensure community-serving investment in historically disinvested areas. This includes investing in place-based strategies that create a net gain of affordable housing, stop displacement, prioritize environmental justice, enhance community health, and strengthen community leadership in land use planning.

In order to meet LA City Planning's commitment to center community needs and reverse decades of racist land use decisions, the Housing Element must include a robust community engagement process before changing zoning and land use designations. We urge LA City Planning to adequately discuss the demographic characteristics of the areas within the planned update that are subject to potential rezoning as well as how rezoning might impact those characteristics. The Safeguarding CA Plan identifies the importance of working with the most vulnerable to the impacts of climate change to ensure that they do not suffer disproportionately as a result of historical injustice and disinvestment. Recommendations in the Safeguarding CA Plan that are related to this Housing Element work are Recommendations EM-4, E-6 (increase climate resiliency in low-income and disadvantaged communities), L-1 (develop innovative

[27] Grace Schumker, *Lasting Effects: Redlining in Los Angeles County,* Tufts University (Dec. 2019), https://sites.tufts.edu/gis/files/2020/07/schumaker_grace_GIS101_Fall2019.pdf.

governance models and equitable public engagement strategies to engage residents), and others including Recommendations L-5, P-1, T-5, B-6, O-5, W-6, and PC-6.

While the site inventory highlights the current inequities in the distribution of housing potential throughout the city, the rezone program has the potential to undo these harms and focus future growth in communities within high and highest opportunity areas while protecting sensitive communities from increased displacement pressures. As was done with the site inventory, a successful rezone program must conduct an analysis of realistic development potential in high and highest opportunity areas. The rezone program must then use this analysis's findings to adequately allocate and designate affordable housing through the rezone program. To ensure that the city not only zones for an additional 219,732 units, including 121,881 lower income units, but also can reasonably expect developers to build these units, the city must conduct an analysis of the realistic development potential of any rezoned sites. If the city does not conduct this analysis and use its findings to inform the rezone program, the City cannot reasonably expect to address the massive disparities presented in the site inventory, risks falling far short of providing affordable housing, especially in high opportunity areas, and will fail to affirmatively further fair housing. Without conducting a realistic development potential analysis specifically in the rezone program in high and highest opportunity areas, the department will also not have an accurate ability to assess its progress towards meeting goals to affirmatively furthering fair housing.

Overall, Tables 4.26-4.29 highlight the shortcomings of the current distributions of unit potential. Table 4.26 highlights the outsized share of affordable housing potential in low resource areas as compared to the (small) share of affordable housing in high resource areas. Table 4.27 highlights how the highest capacity neighborhoods are those with the lowest environmental and educational scores and lowest capacity neighborhoods are those with the highest environmental and educational scores. Lastly, Table 4.29 highlights that only 14% of the City's affordable housing units over a decade ending in 2018 were developed in the 35% of high and highest resource census tracts. Together, this chapter shows a dire crisis in the distribution of past and future affordable housing and highlights the importance of affirmative furthering fair housing through the rezone program.

5. **To address the glaring deficiencies outlined in the AFFH analysis and to correct a long history of segregated housing patterns, the City's RHNA Rezoning Program must require onsite affordability with rezoning programs and focus rezoning in high opportunity areas. The City must also ensure that while focusing rezoning in high opportunity areas, the City separately, simultaneously, and equitably invests in historically disinvested areas to prevent gentrification and displacement.**

Communities that our member organizations organize with and represent have borne a heavy toll from generations of failed land use policy and environmental injustices, including redlining and exclusionary zoning. Housing justice and equity for our communities means that the Planning Department must engage with historically marginalized and excluded communities in a way that centers their ongoing concerns and works with them to develop solutions, including as the Housing Element and the Rezoning Program are

revised, finalized, and implemented. As a baseline, the Rezoning Program must materially benefit our communities by resulting in more and better affordable, healthy and stable housing opportunities.

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

- Design the Housing Element's Rezoning Program to include on-site affordable housing requirements that exceed TOC program requirements on every site that is rezoned, and include displacement avoidance and protection measures such as excluding tenant-occupied sites from rezoning. Rezoning should require progressive tiers of affordability for increasingly higher density development. Rezoning should be limited to high and highest opportunity areas of Los Angeles. The City should simultaneously invest public dollars in community-led planning, affordable housing opportunities and housing stability programs, and other community-serving, health-promoting strategies to protect and uplift residents living in historically disinvested areas and areas that are susceptible to gentrification.

- Update the City's affordable housing incentive programs to require more affordable housing and strengthen tenant protections. This process should increase affordability and tenant protections across the board, while focusing increased density allowances in communities in the California Tax Credit Allocation Committee (TCAC) high and highest opportunity areas, while subtracting census tracts that have a high displacement risk.

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

6. **The City should maximize housing justice in L.A. by prioritizing permanent housing affordability and community stability throughout the draft Housing Element, especially in the Site Inventory (Chapter 4) and Programs and Policies sections (Chapter 6).**

a. Public Land

We support the inclusion of the pipeline of new housing on public land in the Sites Inventory. In addition, the Inventory includes 10,000 units of Lower and Moderate Income units attributed to a "Public Lands program" that would use "300 acres of public land to drive a scaled housing solution that would create ten housing development opportunities with 1,000 units each." The Housing Element should provide more detail on this proposed program. It appears that this strategy is referenced in Policy 16. But to the extent this is a major policy initiative with the potential to create 10,000 new units of affordable housing on public land, the Housing Element should provide more information on the timeline, funding sources, key stakeholders, and any other relevant information. The Public Lands program (Policy 16) must prioritize models of housing that by design are permanently affordable and enable community control of housing, including social housing and community land trusts.

Councilmembers Mike Bonin, Nury Martinez, and Marqueece Harris-Dawson already initiated an effort in early 2020 to direct the City departments to explore social housing for LA City. This motion, which LA City Council's Housing Committee members also rightfully affirmed (CF# 20-0197), directs City departments to explore demonstrating the social housing model on LA City- and other government agency-owned land. By utilizing public land for social housing, LA City would lower the development cost of permanently affordable, public-nonprofit-community developed housing.

b. ***Goals and Objectives of the Policy and Programs Section (Chapter 6)***

We offer the following recommendations to the city-stated Goals and Objectives of the draft Housing Element. For Chapter 6 of the Housing Element to serve as the city's so-called "action plan," then the goals and objectives should be modified to adequately reflect the scale of affordable housing needed by residents today and that the goals and objectives are inclusive of permanent affordable housing models. The following recommended edits in italicized text are recommended edits to the City-stated Goals and Objectives of the Policy and Programs Section (Chapter 6).

Recommended Edits to City-stated Goals of the Policies and Programs Section:
GOAL 2: A City that preserves and enhances the quality of housing and provides greater housing stability for households of all income levels.
OBJECTIVE 2.1 Strengthen renter protections, prevent displacement and increase the stock of affordable housing

2.1.3 Provide resources that enable the creation of Affordable Housing from existing unrestricted housing, including *facilitating community stewardship and control, tenant management, and/or tenant ownership.*

Pg 6-11:
GOAL 4: A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present.

OBJECTIVE 4.3 Affirmatively further fair housing in all housing and land use programs by taking proactive measures to promote diverse, inclusive communities that grant all Angelenos access to housing, particularly in Higher Opportunity Areas, increase place-based strategies to encourage community revitalization and protect existing residents from displacement.
Objective: 4.3.4 Advance place-based strategies that create opportunity and financial strength in areas of disinvestment and with a history of discriminatory and predatory financial practices through asset-building shared equity homeownership that creates stability through community control of resources. Mitigating displacement pressures through shielding housing from market forces allows communities to thrive through inclusivity, stability and self-determination.

The above recommendations are a portion of recommendations from the Community Land Trust Coalition that are included as an appendix to this letter. ACT-LA fully supports the recommendations of the Community Land Trust Coalition in the attached appendix.

c. *Policies and Programs (Chapter 6)*

Overall, we see a majority of the programs continue to prioritize traditional affordable housing and market based solutions. We need to incorporate a wider range of housing solutions that prioritize community control and permanent affordability. While social housing is not explicitly stated in any program (aside from mentions in Programs 14 and 16), we see many opportunities in the programs presently listed in Chapter 6 that should support the creation of social housing and can continue to increase support of community land trusts. We urge LA City planning to consider and incorporate the following changes throughout the following programs.

While the following recommendations offer our feedback on some opportunities in the presently listed programs, the following list is not exhaustive. LA City officials and staff should advance the exploration and implementation of social housing and expansion of community land trusts in as many Housing Element programs and policies as possible.

Opportunities for financing social housing
As LA City staff and officials ordinarily pursue affordable housing funding, LA City officials and staff should additionally consider financing social housing models to generate a large scale of permanently affordable, community-controlled housing for current and future LA City residents. In addition, LA City's expansion of existing voucher programs, such as Section 8 tenant and project based vouchers, would be necessary to help ensure permanent affordability and operational viability of social housing and community land trusts. The following new and existing programs should include provisions to fund the demonstration and potential expansion of social housing in LA CIty.

- Housing Vouchers (Programs 2, 41, 42, 100, 102, 104, and 105) - We support housing vouchers targeting a range of populations and the creation of a permanent voucher system with social housing in mind.

- Tax Increment Finance District (Program 66) - We support revenue allocations for social housing using this tax revenue.
- New Revenue Streams for Social Housing (Programs 17 and 20)- Social housing and community land trusts should absolutely be included in these efforts to seek and allocate funding.

Opportunities for the public to learn about social housing as a model for affordable housing
As part of addressing the history of unjust housing policies, LA City should make considerable effort toward building community capacity to envision permanently affordable housing that rightfully gives tenants greater control over their own living situations, which should include expanding knowledge of social housing for all members of the public, especially through the following listed programs.

- Neighborhood Awareness of Special Needs Housing (Program 119)
- At least two Community Plan programs (Program 49 and 65)
- Supporting capacity building for tenant control
    - Property Management Training (Program 44)
    - Tenant/Community Opportunity to Purchase (aka TOPA/COPA) (Program 90) - this program should explicitly mention land trusts as potential buyer and owner of land.
    - Support community participation on site visits to places to learn about their social housing models (Program 12)

Opportunities for fundamental design (environmental and community programming) of social housing
Every housing model that LA City utilizes or provides for should advance environmental justice by design, in order to provide residents with healthy homes in which to lead their lives. Social housing developments, in particular, should fundamentally incorporate sustainable methods of construction and operations.

- Support sustainable methods of construction and operations (Program 69 to 76)

Opportunities for sites and land use to incorporate social housing and utilize community land trusts
LA City officials and staff should prioritize housing production in high and highest TCAC opportunity areas of the city to start to enable equitable access to decades of institutional investment into resources, including schools, job proximity, healthy food, and health care. Simultaneously, LA City officials and staff should also invest in historically disinvested areas of the city to prevent displacement and gentrification. The social housing and community land trust models should be considered for implementation throughout the region and utilized in every area of the city where historically marginalized communities stand to materially benefit from this public investment. Social housing and community land trusts, which are models for permanent affordability and residential stability, should be incorporated fully into the following programs.

- RHNA Rezoning (Program 121) - *See* Rezoning Program recommendations in Part 4 of this letter. Rezoning Programs should enable for an array of affordable housing options expeditiously and at scale in order to counteract market forces that include real estate speculation, which catalyze

displacement and gentrification. Social housing and community land trust models should be among the array of affordable housing options this rezoning program should establish as early as possible over the next eight years with this Housing Element. At a minimum, for instance, the text of this program should be revised to say: "This program will carefully consider the creation of a diversity of housing types to expand more naturally affordable and deed-restricted affordable options, *including social housing*."

- Provide Adequate Sites for Lower Income Households on Nonvacant and Vacant Sites Previously Identified (Program 60)
- Public Land for Affordable Housing (Program 15)
- Neighborhood Awareness of Special Needs Housing (Program 119)

Opportunities for policy that enables use of social housing and expanded use of community land trusts

One characteristic that distinguishes social housing from the conventional public housing model is the focus on community governance of social housing developments. For example, we envision community governance through social housing as a means to enhance resident stability through community control (e.g. tenant councils) and programming (e.g. social/case workers) that enhance residents' wellbeing. Because single family neighborhoods have dominated Los Angeles's landscape for decades and the social housing model has yet to be utilized in Los Angeles, public policy should be changed to enable use of social housing and expanded use of community land trusts. Social housing and community land trusts should be incorporated fully into the following programs.

- Shared Equity Models (Program 4)
- New Models for Affordable Housing (Program 16)
- Preservation of Restricted Units (Program 27)
- New Models of Acquisition, Rehabilitation and Preservation (Program 30) - Should include social housing and Land Trusts
- Anti-Displacement Strategies (Program 122)
- Affirmatively Furthering Fair Housing (Program 124)
- Homeownership for Voucher Holders (Program 2) - Opportunity for land trusts
- Systematic Code Enforcement Program (Program 21) -include database can be used to focus resources identified for foreclosure intervention and displacement prevention
- Comprehensive Homeless Strategy (Program 92) - Social housing should in integrated into comprehensive homeless policy as a permanent supportive housing strategy and a avenue for preventing homelessness

Concerning programs for advancing equitable development, including but not limited to social housing

In contrast to the above five subsections of recommendations to the Housing Element policies and program, we recommend the following two programs be eliminated or substantially reworked so that the Housing Element rightfully addresses the history of unjust land use planning by prioritizing the concerns of historically marginalized communities.

- CEQA Streamlining Measures (Program 55) - CEQA streamlining measures that seek to override the concerns of community members present a false choice between expediency and equity. Community members, especially those who have endured decades of environmental injustice, need legal accountability tools including CEQA to be able to hold developers and successive government agency officials accountable to requisite mitigation measures, including full remediation of environmental degradation. In fact, CEQA provides community members with a process by which to remedy environmental harms and require developers to build safe and healthy homes/communities. Streamlining CEQA as LA City planning describes in this program weakens an important process community members use for cross-sector environmental review and long-lasting accountability. Because of these untold consequences to community members by weakening CEQA protections and to avoid exacerbating institutional inequities in land use planning, this program should be removed from the Housing Element.
- Community and Neighborhood Council Development Review (Program 77) - Neighborhood council development review priority exacerbates institutional inequity by giving Community and Neighborhood Councils, which principally include land owners, additional and privileged access to review property development. As a part of the city's efforts to start addressing the history of unjust land use in high and highest opportunity areas, LA City officials and staff need to prioritize the perspectives of historically marginalized communities in local development review.

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If done right, the Housing Element update and 6th cycle RHNA can be transformative for Los Angeles, with the potential to vastly improve housing affordability and the quality of life for millions of Angelenos. After decades of underproducing affordable housing, perpetuating exclusionary zoning, and lacking policies to advance environmental justice in the City of LA, we call on our city officials and staff to take bold action. We urge you as public stewards to craft and adopt affirmative policies and programs that will result in vast numbers of deeply affordable units, stabilize communities at risk of displacement, unlock affordable housing in high opportunity areas, while simultaneously and equitably investing in historically disinvested areas to prevent gentrification and displacement. Our coalition remains ready to be a thought partner with the City in the implementation of the policies stated in our comment letters and we look forward to continued collaboration on making Los Angeles a city where everyone can thrive.

Sincerely,

Alliance for Community Transit - Los Angeles (ACT-LA)

Attachments:

A. Los Angeles Community Land Trust Coalition Housing Element Recommendations
B. Oct. 2020 ACT-LA comment letter

Attachment A

. OUSING ELEMENT RECOMMENDATIONS BY LOS ANGELES COMMUNITY LAND TRUST COALITION - 9/2/21

City of LA Housing Element - CHAPTER 6 HERE

Pg 6-7:
GOAL 2: A City that preserves and enhances the quality of housing and provides greater housing stability for households of all income levels.
OBJEC. IVE 2.1 Strengthen renter protections, prevent displacement and increase the stock of affordable housing

- 2.1.3 Provide resources that enable the creation of Affordable Housing from existing unrestricted housing*, incl. ding facilitating community stewardship and control, tenant management, and/or tenant ownership*.

OBJECTIVE 2.2: Promote more affordable ownership opportunities and ownership retention strategies,with an emphasis on stability and wealth building for underserved communities.

- 2.2.1 Expand ownership models that increase the ability for households to attain homeownership, including alternative forms of shared and limited equity ownership.
- 2.2.3 Expand ownership and wealth generation opportunities through accessible education and technical assistance, especially in communities of color.

Pg 6-11:
GOAL 4: A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present.
OBJECTIVE 4.3 Affirmatively further fair housing in all housing and land use programs by taking proactive measures to promote diverse, inclusive communities that grant all Angelenos access to housing, particularly in Higher Opportunity Areas, increase place-based strategies to encourage community revitalization and protect existing residents from displacement.
Objective 4.3.2 Advance place-based strategies that create opportunity and financial strength in areas of disinvestment and with a history of discriminatory and predatory financial practices through asset-building shared equity homeownership that creates stability through community control of resources. Mitigating displacement pressures through shielding housing from market forces allows communities to thrive through inclusivity, stability and self-determination.

Programs - pg 6-14:
2. Homeownership for Voucher Holders Goal #: 2, 4 Lead Agencies: HACLA Funding Source: HUD Objective: Increase homeownership opportunities among voucher holders. Allow Section 8 participants to become homeowners by using their Vouchers to purchase a home.

D. pending on funding levels and lender support, HACLA will continue to explore the feasibility of utilizing the homeownership program within the context of public housing revitalization activity. *E. plore facilitating long-term stability and wealth-building by incorporating a Community Land Trust model that supports homeowners and facilitates resales to future low- and moderate-income families.*

4. . hared Equity Models Goal #: 2, 4 Lead Agencies: LACP Supporting Agencies: HCID Funding Source: General Fund Objective: Study barriers to the greater utilization of shared ownerships models. Use these models as a tool to facilitate affordable homeownership. Explore barriers and consider providing assistance to and incentivizing the development of shared-equity ownership models such as Limited Equity Housing Cooperatives (LEHCs), Community Apartments and housing owned by Community Land Trusts (CLTs) or Tenancy in Common (TICs) in the Zoning Code and housing funding processes. *Prioritize public support for LEHCs on land held by CLTs Partner project-based rental subsidy programs with cooperative ownership models to support deeper affordability levels.* Consider policies to require that on-site affordable for-sale units in mixed-income projects be sold to a qualified nonprofit, with an emphasis on CLTs. Promote the State property tax exemption for property that is owned by a CLT and that is being—or will be—developed or rehabilitated as rental housing, LEHCs, or owner-occupied housing per Section 214.18 of the Revenue and Taxation Code. Explore securing tax-defaulted properties through Chapter 8 Agreement Sales for Community Land Trusts (CLTs) to create long-term affordable housing. Explore conveying public land / tax foreclosed / receivership properties to CLTs and prioritize CLTs in current acquisition and rehabilitation programs.

Pg 6-30

21. Foreclosure Registry Goal #: 2, 3 Lead Agencies: HCID Supporting Agencies: LADBS Funding Source: Foreclosure Registration Fees Objective: Maintain a database of contact information of all residential properties within the City of Los Angeles that are subject to Ordinance No. 183, 281 (Amended 2014). Maintain and enhance a dashboard to show results and identify trends impacting neighborhoods, including statistics on initial foreclosure recordings (Notices of Default - NOD) and on the portion of those defaults which proceed to foreclosure (Real Estate Owned - REO); *ensure database can be used to focus resources identified for foreclosure intervention and displacement prevention;* continue education and awareness of Ordinance and increase outreach to over 95% of responsible parties on all new foreclosures recorded in the calendar year. The Foreclosure Registry Ordinance (183281, Amended in 2014) was established in 2010 as a mechanism to protect residential neighborhoods, including abandoned properties, from blight through the lack of adequate maintenance and security as a result of the foreclosure crisis. Any lender (or beneficiary or trustee who holds or has an interest in a deed of trust) who either issues a notice of default or forecloses upon on a residential property located within the City of Los Angeles must register that property with and provide contact information to the Housing and Community Investment Department (HCID) in case any exterior blight issues arise on the property in relation to foreclosure, along with completing required monthly lender inspections for as long as the property remains in foreclosure.

Attachment B

Housing Jobs & Transit for All

October 20, 2020

Re: Program and Policy Recommendations for the 2021-29 Housing Element

Dear City of Los Angeles Planning Department and Housing and Community Investment Department:

The Alliance for Community Transit (ACT-LA) is a city-wide coalition of 38 organizations working at the forefront of racial, environmental, and economic justice. Our coalition members include tenants' rights organizations, affordable housing developers, workers' centers, public interest law firms, and public health advocates, among many others. Thanks to our coalition's diversity, we view housing policy through an intersectional lens. Our mission is to uplift communities—through affordable housing opportunities, good jobs and access to high quality public transit—as the Southland transforms into a more sustainable region. Given our commitment to equity, we believe that low-income communities and communities of color must be centered in decisions that seek to transform our neighborhoods.

The Housing Element is a tremendous opportunity to ensure that as Los Angeles grows, it does so in an equitable and sustainable fashion. At the same time, the past year has demonstrated that we simply cannot afford to mask, ignore, or deepen, the negative human and environmental impacts of the affordable housing, racial injustice, and public health crises in Los Angeles. With many of ACT-LA's member organizations serving on the Housing Element Task Force, or otherwise engaged in community planning and other land use plans or policy-making, the following recommendations represent our shared vision for Housing Element Goals, Policies and Programs that will advance racial equity, smart growth, and community preservation. We will provide additional input on the suitable sites inventory in forthcoming correspondence.

Background

It is abundantly clear that Los Angeles is in the midst of an affordable housing crisis. According to the "Housing Element 2021-29" presentation developed by the Los Angeles Housing and Community Investment Department (HCIDLA) and the Los Angeles Planning Department, nearly 6 in 10 renters in Los Angeles struggle to pay rent, and more than 30% are severely rent burdened. This results in a sizable part of our city struggling to buy groceries or cover their transportation costs. Displacement pressures are already extremely high for the majority of renting Angelenos, with many families living on the edge of losing their home.

This profound housing instability is why Los Angeles now has the highest number of unsheltered people experiencing homelessness in the country. According to LAHSA's most recent Homelessness Count, homelessness in the City of Los Angeles increased 14% this past year. And, homelessness does not

impact all populations equally. Black Angelenas continue to be 4 times more likely to experience homelessness than their white counterparts. Youth homelessness increased 24% this past year. Since public benefits and wage levels have not kept up with housing costs, family homelessness is expected to increase. More than half of unsheltered adults counted this past year are on their first episode of homelessness, which indicates that even as we create new housing opportunities for the unhoused, the housing crisis is forcing yet more of our neighbors onto the street or into their cars.

These dire conditions demand bold action. HCIDLA's "Displacement Index" clearly shows that rent burdened households are concentrated in Central LA, South LA, East LA, Northeast LA, and significant portions of the San Fernando Valley. These communities must therefore be prioritized for displacement prevention policies. The policies outlined below articulate ACT-LA's shared vision for how the Housing Element can and should address the affordable housing and homelessness crises, and protect vulnerable residents.

Our Regional Housing Needs Assessment (RHNA) goal requires the city produce about 32,000 units per year at various levels of affordability, and yet LA has been averaging about only 1,100 affordable units a year. We have failed as a city to come close to meeting the affordable housing goals set out in the last Housing Element. Meanwhile, market rate units have indeed been built, some of which are still sitting empty. And between 2001 and 2019, over 26,500 units - over 3% of the total rent-controlled housing stock (which makes up roughly 75% of rental housing in Los Angeles) were taken off the rental market using the Ellis Act.

The City must prioritize programs and policies that create and preserve the housing Los Angeles needs the most: units affordable to deeply, extremely and very low-income households.Without a significant commitment to policies and programs that result in deeply affordable units at scale, address vacancy issues in new units, and stabilize communities at risk of displacement, simply building a large number of units will not stem the severe housing crisis we are in.

Summary of Recommendations

ACT-LA has outlined six overarching priorities to guide the City's work in meeting housing needs while also protecting vulnerable residents and the environment. Each priority consists of subsections, which include recommended policies and programs to further these priorities. ACT-LA's six priorities for the Housing Element are: (1) Preserve Affordable and Rent-stabilized Housing; (2) Strengthen Tenant Protections; (3) Facilitate Investment in Social Housing, Community Land Trusts, and Strategic Land Acquisitions; (4) Increase Supply of Deeply Affordable Housing; (5) Further Environmental Justice and Improve Climate Resilience and Community Health; and (6) Ensure Meaningful Community Participation and Capacity Building.

Some of the following recommendations are similar to recommendations we made during the creation and adoption of the City of LA's Assessment of Fair Housing Plan. Given the conclusions researchers have made about the transformative nature of access to high opportunity areas for low-income families, we encourage a particular emphasis on goals, objectives, programs, and policies that desegregate Los Angeles and ensure that high opportunity areas actually create opportunity for people of color and low-income families.

1. PRESERVE AFFORDABLE AND RENT STABILIZED HOUSING

Preserving affordable housing—whether subsidized or naturally-occurring—is necessary to achieve housing policy goals and to ensure an equitable and inclusive city. This requires specific Housing Element goals, policies and programs aimed at eliminating the loss of affordable and rent stabilized units due to demolition or conversion, adequately monitoring our affordable housing inventory, and carefully assessing and mitigating the risk of homelessness before it occurs.

a. Regulate demolition and condo conversions.

Demolitions and condo conversions are city-regulated processes that often precede the direct displacement of tenants, often low-income renters of color. The City should follow the lead of other jurisdictions in California and set an annual allowance for the number of demolitions and condo conversions in a given area, such as a Community Plan Area. In addition, HCIDLA and the Planning Department should work with the LA Department of Building and Safety to ensure that demolitions are properly tracked and labeled. Currently, it is difficult for the data to be tracked from Planning Application to demolition and construction as permits go through various agencies such as DCP, LADBS and HCIDLA. Furthermore, to protect against premature demolition, the City should require that demolition permits be granted only after all building permits have been issued. The Housing Element should include policies and programs to effectively regulate demolitions and condo conversions, including but not limited to the following.

- Residential Conversion Annual Allowance. Establish an annual allowance for the number of condo conversions in a given Community Plan Area.
- Residential Demolition Annual Allowance. Establish an annual allowance for the number of residential units demolished in the Community Plan Area.
- Limit Residential Conversions. Residential Conversion Projects, as defined in LAMC Section 12.95.2, shall be denied if the vacancy rate in the Community Plan Area is five percent or less or if the cumulative effect on the rental housing market is significant.
- Restrict Residential Demolition Permits. No permit for residential demolition in the Community Plan Area shall be issued unless all necessary building permits have been issued for new construction on the site.

b. Ensure "No Net Loss" of affordable housing.

Achieving a net gain of affordable housing requires that the City: (a) preserve existing affordable housing; (b) replace affordable housing lost due to new development and ensure right of return; and (c) incentivize new affordable housing production. The Housing Element should include policies and programs to effectively ensure no-net-loss of affordable housing, including but not limited to the following.

- Area-wide No Net Loss. For each Community Plan Area (CPA), create and monitor an inventory of units subject to a recorded covenant, ordinance or law that restricts rents to levels affordable to lower-income households, including Low-income, Very Low-Income, Extremely Low-Income and Deeply Low-Income; subject to the Rent Stabilization Ordinance or AB 1482; and/or occupied by lower-income households. Publish an annual report of the

affordable housing inventory, including the total number of units, affordability level, as well as the frequency and location of Ellis Act evictions, condominium conversions, and/or residential demolitions within the CPA. If an annual report demonstrates a reduction in the inventory within any affordability category, the City should: (a), create a Recovery Action Plan with specific programs and investments to prevent further loss and to increase affordable housing production in the area; and (b) require applications for discretionary land use approvals in the CPA to include a Displacement Impact Report. These provisions would apply until an annual report demonstrates that that particular loss has been recovered.

- Site-specific No Net Loss. *All* new construction should replace any housing demolished that was affordable to or occupied by lower-income households, or subject to LARSO or AB 1482. Replacement requirements should include housing affordable to or occupied by deeply low-income households at the 15% AMI level (in addition to 30%, 50% and 80% AMI levels). Over 10% of renter households in LA County fall into the 0-15% AMI range and cannot afford rents set to the 30% AMI level.[1]
- Right of Return to Newly-Constructed Affordable and/or Rent-Controlled Units. Households displaced due to demolition or condominium conversion should be offered and have the first right of refusal on leases in the new units whenever possible.
- Enhance HCIDLA's Ellis Act Report Dashboard. HCIDLA recently released an Ellis Act Report Dashboard[2] which tracks the number of units withdrawn under the Ellis Act and the number of units added. This dashboard will be a valuable tool and should be improved to include all replacement unit data, as well as information regarding units withdrawn and added from Conditional Use Permits, the Transit Oriented Communities Program, By Right Developments, SB 330 and other entitlement applications.
- Preserve Expiring Covenants. Coordinate with relevant agencies to ensure the renewal of expiring affordable housing covenants and promote opportunities for tenant purchase or acquisition of units with expiring covenants by affordable housing developers, community-based organizations, or community land trusts to achieve affordability in perpetuity.

c. Assess and mitigate risk of homelessness.

A large part of the City's current homelessness crisis is being driven by unaffordable housing, which is exacerbated by rising rents and results in evictions. The City's plans to meet its RHNA allocation through the community plan updates are primarily focused on increasing the supply of market rate housing which is far out of reach of our poorest residents and residents at highest risk of displacement and homelessness. To prevent these planned investments from exacerbating the homelessness crisis, the Housing Element should include policies and programs to effectively identify and mitigate homelessness risk, including but not limited to the following.

- Homelssness Risk Assessment. As part of each community plan update or major economic development project, the City must do an analysis to identify the number of residents at risk of homelessness utilizing HCIDLA's "Displacement Index," as well as the Homelessness

[1] https://chpc.net/resources/los-angeles-county-annual-affordable-housing-outcomes-dashboard-2020/
[2] https://hcidla2.lacity.org/ellis

Management Informations System (HMIS) used by HUD in developing their Annual Homelessness Assessment (AHAR) Report, and other data sources. Used together, the city should develop a predictive model for analyzing where risk is likely to increase due to proposed public and private investment.

- Adopt Protective Measures to Mitigate Identified Risk of Homelessnes. Based on the findings of the homelessness risk assessment, the City should adopt key protective measures such as increasing proactive enforcement of tenants rights regulations and developing policies to preserve and increase the supply of deeply affordable housing. In addition, these reports should also identify hotels and motels—those currently on the market for sale or those that can be acquired through eminent domain[3]—in at-risk areas that could potentially be acquired and converted to affordable housing, without displacing residents that rely on hotels and motels for housing.
- Preserve Residential Hotels. Prevent the conversion or demolition of residential hotels and enforce the rights of residential hotel tenants through additional resources and proactive enforcement of the Residential Hotel Ordinance and Wiggins Settlement.

2. STRENGTHEN TENANT PROTECTIONS

Displacement is a direct cause of houselessness and a destructive force in low income communities and communities of color. The Housing Element must address displacement risks head-on and include Goals, Policies and Programs that create real tools to minimize displacement and promote community stability.

a. Ensure housing opportunities are accessible to all residents without discrimination on the basis of race, income, ancestry, sex, national origin, religion, sexual orientation, maritial/familial status, age, or disability.

Despite the passage of SB329, housing voucher recipients continue to face discrimination from landlords, particularly in opportunity-rich communities. And, while the City's "211LA" program allows tenants to file reports of illegal rent increases, it does not go far enough in proactively monitoring compliance among the City's existing stock of RSO units. In order to strengthen RSO enforcement as well as the antidiscrmination provisions created by SB329, the City of Los Angeles must direct HCID to: offer outreach and education services to landlords and tenants so they are familiar with the new law's requirements, and establish testers, administrative complaint mechanisms, and hearing officers to identify unlawful practices. Such measures will allow HCID to more adequately report violations; collect, investigate, and remedy complaints; perform regular testing to ensure compliance; and report publicly on the number of complaints and resolutions, testing results, and the overall effectiveness of SB329's implementation. The Housing Element should include policies and programs to strengen enforcement of tenant protection and discrimination laws, including but not limited to the following.

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[3] For an example of this kind of analysis, see Roy, A., Blasi, G., & Coleman, J. (2020). "Hotel California: Housing the Crisis", Los Angeles: UCLA Institute on Inequality and Democracy. Map Example from report, "Hotels and Motels in At-Risk Zip Codes": https://www.arcgis.com/home/webmap/viewer.html?webmap=a40364a4ff464ce9a3aaedaafd0bb304&extent=-118.6056,33.8965,-117.8475,34.2588

- Publicize SB 329 anti-discirimation protections. Establish outreach and education services to landlords and tenants regarding SB329 source-of-income anti-discrimination measures
- Increase investigation and prosecution of source-of-income discrimination. Develop proactive enforcement mechanisms, such as testers and hearing officers, to identify and prosecute source-of-income discrimination.

b. Prevent tenant harassment.

Strong tenant protections can be undermined if unscrupulous landlords push tenants out of their homes through harassment and intimidation. The City should enact a robust tenant anti-harassment ordinance (TAHO) that includes substantial statutory penalties to deter such tactics. To ensure efficacy, the anti-harassment ordinance must have strong enforcement mechanisms that provide both a private right of action for tenants and dedicated HCID staffing. The Housing Element should include policies and programs to prevent tenant harassment, including but not limited to the following.

- Enact a Tenant Anti-Harassment Ordinance. Enact a Tenant Anti-Harassment Ordinance with a comprehensive definition of harassment, strong statutory penalties and an enforcement program that consists of dedicated staffing.
- Improve tracking and reporting tenant harassment complaints.Track harassment complaints monthly and by Council District.
- Prosecute repeat offenders. Initiate legal action against repeat offenders of the TAHO to prevent harm and ensure compliance.

c. Prevent Displacement of Vulnerable Tenants by Strengthening the City's Rent Stabilization Ordinance and Just-Cause Eviction Protections.

State law and the City's Rent Stabilization Ordinance currently leave many Los Angeles tenants without protection from arbitrary or unjust evictions. Whether or not a tenant can be evicted should not depend on the year their housing was built or what kind of entity owns their building. All tenants should have the guarantee that, if they pay their rent on time and abide by their lease, they will not be evicted. And, if they are evicted for no fault of their own, they will receive relocation assistance to help find new housing.

In many circumstances, the annual allowable rent increase under the city's rent stabilization ordinance significantly exceeds the rate of inflation. Allowing rent to increase faster than inflation leaves tenants in gentrifying neighborhoods vulnerable to indirect displacement if new, predominantly market-rate, projects drive up neighborhood rents. The Housing Element should direct the City Council to amend the Rent Stabilization Ordinance to reduce the annual allowable rent increase to a percentage of inflation, similar to the Santa Monica and West Hollywood ordinances.

Furthermore, allowing landlords of master-metered units to impose even larger rent increases creates significant displacement pressure and gives landlords an incentive not to upgrade their gas and electric utilities. Tenants in master-metered units should have the same protections against large rent increases as any other tenant. And, it is well established that households on master-meter utilities use more energy than individually metered households. Removing the incentive to maintain master-metered utilities will

protect tenants from large rent increases and remove the disincentive for landlords to upgrade their gas and electric systems, benefiting both the tenant and the environment.

Lastly, in response to the acute displacement pressures brought on by the COVID19 pandemic, the City appropriated significant funding for tenant outreach and education and legal defense for tenants facing eviction. Yet, the funding currently available will reach only a small percentage of tenants impacted by housing instability. Furthermore, the economic impacts of COVID19 on low-income Angelenos are likely to last many years. In addition, according to a recent report conducted by Stout, the City of Los Angeles saves $3.50 for every $1 invested in eviction representation. Codifying a tenant's right to counsel will therefore not only advance economic justice in the City but also do so in a way that is financially sustainable. Providing a guaranteed right to an attorney will act as a strong deterrent against the thousands of baseless evictions filed and executed each year, dramatically reduce housing instability, and reduce in-flows to homelessness. The Housing Element should include policies and programs to strengthen the City's RSO and Just-Cause eviction protections, including but not limited to the following.

- Expand just-cause eviction protections to cover all tenants. Expand just-cause eviction protections to cover all tenants in the City of Los Angeles and establish a corresponding enforcement program.
- Reduce the annual allowable rent increase under the RSO. Reduce the annual allowable rent increase, and close the "master-metered loophole," in the City's Rent Stabilization Ordinance to help address indirect displacement in gentrifying neighborhoods and encourage energy conservation.
- Codify a tenant's right to counsel in an eviction proceeding. Codify a tenant's right to counsel that guarantees access to an attorney to all tenants who face an eviction.
- Create a permanent tenant education program. Create a permanent tenant education program to inform tenants of their rights and how to access eviction defense resources.
- Explore additional opportunities that strengthen the RSO. Explore amendments to the City's RSO to restrict allowable grounds for eviction, including restrictions on eviction for failure to pay and policies to alleviate rent-debt.

3. INVEST IN SOCIAL HOUSING, COMMUNITY LAND TRUSTS, AND STRATEGIC LAND ACQUISITION

We cannot rely on status quo policies to dig ourselves out of this unprecedented affordable housing crisis. Instead, the Housing Element must be the vehicle to drive LA housing policy into a new future that reimagines social housing and brings land into community control in order to produce the permanent deeply affordable housing that Angelenos so desperately need.

a. Facilitate and invest in a Social Housing program that preserves and creates new permanent affordable housing at all levels of affordability, especially the deepest levels of affordability that reach 30% AMI, 15% AMI, 10% AMI and below.

Currently, most renters in Los Angeles are rent burdened and high rents have become a clear driver of homelessness. The City must dramatically expand its supply of Social Housing to shield low-income

residents from an increasingly unaffordable rental market and provide long-term stability for both households and neighborhoods. The Housing Element should include policies and programs to effectively expand the supply of deeply affordable Social Housing, including but not limited to the following.

- Expand the acquisition and use of publicly- and privately-owned land for the use of Social Housing. Acquire land for Social Housing and designate Social Housing - including but not limited to community ownership models (see below) as the primary intended use for surplus or underutilized public land in the City. Coordinate with City, County, State, Metro and other public agencies to identify sites for disposition for Social Housing development and/or community control through neighborhood-based nonprofit ownership.
- Facilitate innovative models of Social Housing. Facilitate innovative models that seek to lower costs while providing quality housing and supporting family-supporting wages.
- Explore establishing a multijurisdictional joint authority to facilitate Social Housing. Explore opportunities for land assembly across jurisdictions through establishment of a multijurisdictional joint authority that can purchase, assemble, remediate, and entitle land for social housing production and preservation.
- Increase access to financing for Social Housing. Create, and/or partner with other public agencies and private lending institutions to facilitate, low-cost financing opportunities for social housing developers, neighborhood-based nonprofit cdcs, land stewards, homeowners, resident associations, and housing cooperative shareholders.
- Remove limits on the number of public housing units allowed in each council district. Take any legal or electoral steps required to remove any limitations on the number of public housing units allowed per council district.
- Explore new funding and revenue sources for Social Housing. Research all available and/or potential funding sources for social housing and actively seek funding opportunities, including partnering with state and federal agencies or electeds on creating new programs and funding opportunities. Pursue the creation of new revenue sources, including but not limited to new taxes - particularly those that serve to limit residential vacancies and speculative land flipping - as well as the potential use of a newly-created public bank to facilitate financing.

b. Advance community ownership models of affordable housing, such as community land trusts, housing cooperatives and other strategies that create permanent affordability and opportunities for renters and unhoused residents to build equity through ownership.

Rents paid by tenants to corporate landlords benefit a corporation's profit margin rather than Los Angeles neighborhoods and families. In order to keep wealth within our communities, provide permanent affordability and provide equity opportunities to households with low incomes, we must scale up community ownership models of affordable housing. The Housing Element should include policies and programs to effectively expand community ownership models, including but not limited to the following.

- Dedicate publicly owned land to community land-trusts. Dedicate publicly owned land to CLTs who can provide affordable housing in perpetuity by owning land and leasing it to

those who live in units built on that land, and/or offer subsidies for the purchase of land and/or house construction by CLTs[4].

- Remove zoning and land use barriers to CLT development. Consult with existing CLTs to identify ways to remove zoning and land use barriers to future CLT development.
- Convey land to CLTs. Convey city-owned, surplus, and abandoned properties to a CLT including land acquired, remediated, and readied for development by a public agency, land bank or redevelopment authority; surplus land acquired by the city for the construction of roads, schools, bike paths, municipal buildings, public housing, etc.; underutilized surface parking lots; surplus fire stations, school buildings, or other buildings owned by the City; and, abandoned buildings.
- Facilitate transfer of tax foreclosed properties to CLTs. Partner with County of Los Angeles' Treasurer and Tax Collector to facilitate transfer of tax foreclosed residential, mixed-use and vacant properties located within the City to CLTs, subsidize rehabilitation, and support a path to ownership for any current residents.
- Prioritize funding to permanently affordable housing. Redirect existing funding toward affordable housing with permanent affordability via threshold criteria or preferential scoring in the distribution of federal, state, and municipal housing funds for the construction, rehabilitation, or financing of affordably priced homes that are owner-occupied, renter-occupied, or owned and managed as a limited equity cooperative.
- Increase CLT use of current acquisition and rehabilitation programs. Engage CLTs and their lending and development partners in evaluating the City's current funding programs for acquisition and rehabilitation of naturally occurring affordable housing (NOAH) and at-risk deed-restricted multifamily properties, and institute resultant recommendations in order to increase CLT utilization of existing and future NOAH programs.
- Design land use incentives to expand CLTs. Award density bonuses, and/or grant regulatory concessions and design any new inclusionary zoning program in a manner that steers units into CLT portfolios and covers a portion of CLT cost of stewardship.
- Expand funding for CLTs. Research all available and/or potential funding sources for CLTs and actively seek funding opportunities, including partnering with state and federal agencies or electeds on creating new programs and funding opportunities. Pursue the creation of new revenue sources, including but not limited to new taxes - particularly those that serve to limit residential vacancies and speculative land flipping - as well as the potential use of a newly-created public bank to facilitate financing
- Foster new CLTs through technical assistance. Foster the development of new CLTs in the City through allocating City resources for tenant engagement, tenant-ownership training, legal counsel, and CLT technical assistance.
- Transfer properties in receivership to CLTs. Establish a receivership program to facilitate the transfer of ownership of properties in receivership to CLTs.

[4] A recent motion introduced by Councilmembers Buscaino, Krekorian, Martinez, and O'Farrell to explore such a strategy is an important first step. However, in addition to partnering with local CLTs, it is crucial that the City Planning Department support these efforts by identifying and committing land for this purpose in high-opportunity neighborhoods. In addition a motion authored by Councilmember Marqueece Harris Dawson, Cedillo, Wesson also explores donating surplus land to Community Land Trusts for the purpose of affordable housing

c. Limit the speculative use of land and property by extractive investors and corporate entities

During the Great Recession, American households lost trillions in wealth and millions of homes were foreclosed. Black and Latino homeowners were 71 to 76 percent more likely to lose their homes after the crash than white homeowners.[5] After the Great Recession, private equity firms invested upwards of $20 billion to purchase more than 200,000 homes nationwide; they converted owner-occupied homes to rental properties and created new financial instruments to trade rental income streams on Wall Street. This transfer of wealth from LA families to Wall Street further entrenched the racial wealth gap and led to increased neighborhood instability. Especially given the economic crisis caused by Covid-19, the City of LA must be doing everything possible to avoid a similar trend in the coming years. The Housing Element should include policies and programs that accelerate an affordable housing acquisition strategy of single family, multifamily and commercial properties, including but not limited to the following.

- Create Anti-Displacement Overlay Zones. Apply strong displacement protections where federal, state or local incentive programs drive new development. For instance, the federal Opportunity Zones program provides catalytic development incentives in census tracts that are among the most vulnerable neighborhoods in the City. Yet, this federal tax program stimulates provides no guidelines to protect communities. Local regulation can provide necessary protections to keep neighborhoods stable and healthy.
- Enact disclosure requirements for property owners Enact disclosure requirements for LLCs, LLPs, LPs and other corporate or non-individual ownership designations to ensure public transparency and understanding regarding the business practices by corporate owners of housing and land.
- Prosecute predatory landlords and developers. Deepen local institutional capacity to investigate and pursue affirmative cases against landlords with predatory patterns of behavior like frequent/malicious evictions, unlawful evictions, poor habitability records, tenant harassment issues, and violations of RSO, and disclose such records to the public.
- Tax and regulate large real estate portfolios. Adopt regulatory and revenue generating policies to disincentivize the accumulation of large real estate portfolios. These may include policies such as a vacancy tax, a flipping tax, and Out-of-State Property Transaction tax.

d. Facilitate Acquisition of Land and Housing for Community Benefit.

Right of Refusal programs can help preserve the ongoing affordability of dedicated affordable rental housing by giving priority consideration to mission-oriented buyers when the owner of a subsidized rental property decides to stop participating in a subsidy program. They can also be applied to unsubsidized rental properties, helping to preserve the availability of rental units and in some cases facilitate conversion to dedicated affordable rentals. Eligible buyers may include tenant associations, nonprofit and for-profit developers, and/or state or local government agencies. To establish such a program first requires that the City Council pass an ordinance establishing a TOPA/COPA policy.

Once the policy framework is established, tenants trying to exercise the right of first refusal will typically need substantial financial and technical assistance to make a successful offer. HCID should establish a

[5] Bocian, et al., "Foreclosures by Race and Ethnicity: The Demographics of a Crisis" *available at* https://www.responsiblelending.org/mortgage-lending/research-analysis/foreclosures-by-race-and-ethnicity.pdf

technical assistance program that educates tenants on their Cities may also want to identify non-profit organizations that have experience conducting preservation transactions and can act as partners to help tenant associations throughout the process

By creating a right of first offer and a right of first refusal for current tenants and qualified organizations to purchase for-sale rental properties, and supporting the exercise of these rights, the City can help keep property in community hands and remove housing from the speculative market. The Housing Element should include policies and programs to adopt and implement an Opportunity to Purchase policy, including but not limited to the following.

- Adopt an Opportunity to Purchase Ordinance. Direct City Council to adopt an ordinance creating an Opportunity to Purchase policy containing a right of first offer and right of first refusal of for-sale rental property for current tenants and qualified organizations, including Community Land Trusts, neighborhood-based CDCs, tenant organizations, nonprofit organizations, public agencies, and other entities who commit to permanent affordability. Qualified purchasers should have an exclusive window to offer to purchase rental property and secure financing. If these qualified offers are rejected, the same purchasers should have the right to match any third party offers to sell the same property.
- Support Opportunity to Purchase with Technical Assistance. Provide technical assistance to tenants and qualified organizations to exercise their right of first offer and/or right of first refusal.
- Create infrastructure to facilitate notification between buyers and sellers. Develop an infrastructure to facilitate notification between buyers and sellers, in order to maximize participation and effectiveness of the Opportunity to Purchase policy.
- Identify funding to support buyers exercising the opportunity to purchase.Identify dedicated funding to ensure that qualified purchasers under this policy are able to secure financing and make competitive, bona fide offers to purchase when exercising their right of first offer.

e. Develop a strategic land acquisition program to preserve and expand the supply of affordable housing.

In addition to land use policies such as inclusionary zoning, value capture, and no-net-loss, the City should adopt a strategic land acquisition program to help meet the need for preservation and production of affordable housing. Strategic acquisition, or "land banking", is a process to acquire land and property for preservation and/or future development.[6]A land bank established as a public, quasi-public or non-profit entity can serve three critical functions: speed; reducing barriers; and cost savings. When properly structured to fulfill these objectives, a land bank may be able to acquire a property more quickly than an affordable housing developer who must adhere to complex funding requirements from multiple sources. The land bank can reduce barriers to acquisition by helping coordinate inspections, permitting and other entitlement processes. Lastly, a land bank can add efficiency to the system by using its relative size and coordinating capacity to achieve economies of scale which together can reduce the cost for the non-profit

[6] Kildee, D. and Hovey, A. "Land Banking 101: What is a Land Bank" Center for Community Progress, distributed by U.S. Department of Housing and Urban Development, Neighborhood Stabilization Program, accessed June 2020.

developer, CLT, low- or moderate-income homeowner or tenant group who will be the ultimate steward. A land bank operates with a clear mandate and operating directives, which in this case should ensure that disposition of property will achieve goals that include enhancing residential stability of current residents, retention of public investment, long-term affordability, and building capacity and advancing self-determination of impacted, lower income communities. The Housing Element should include policies and programs to implement a land acquisition policy, including but not limited to the following.

- Create a City Land Bank. Research best practices for establishing a public land bank and make recommendations to the City Council for implementation of a public land bank.
- Land Acquisition Strategies. Develop strategies to assist community land trusts and affordable housing developers with property acquisition. Coordinate with non-profit developers and community land trusts to take advantage of off-site acquisition options provided under Measure JJJ.
- Land Sales/Property Transactions: Collect and make information about land sales and property transactions in the Community Plan Areas more publicly accessible to support opportunities for purchase by affordable housing developers, community-based organizations, or community land trusts, and to enhance communities' access to information regarding changes in their own neighborhoods.

4. INCREASE THE SUPPLY OF DEEPLY AFFORDABLE HOUSING

While our city needs to increase the supply of housing, market rents on new construction far exceed what the vast majority of tenants can afford. Extremely low-income households face the worst rent burdens, are more likely to be severely rent burdened, and face the most acute housing shortage for their income range. Creating an adequate supply of deeply affordable housing (DLI and ELI) is a critical strategy to prevent further homelessness and protect the most vulnerable residents of LA.

a. Produce an adequate supply of affordable housing to meet current and projected need.

The Housing Element should include policies and programs to effectively produce affordable housing to meet current and projected needs, including but not limited to:

- Inclusionary Zoning. Adopt city-wide inclusionary zoning requirements on new rental and for-sale development that is structured in such a way as to incentivize construction of deeply affordable units, with the option to satisfy affordable housing requirements through off-site construction significantly restricted.
- Density Bonus. Explore an expansion of density bonus program, with restrictions on buildings occupied by tenants within 10 years.
- Deep affordability. Identify and implement incentives for new development to contribute towards the community's deeply low-, extremely low-, and very low-income housing needs.
- Public Investment in Affordable Housing. Utilize public land and funding for the construction of new housing for deeply low-, extremely low-, very low-, and low-income households.

- Strategic Use of City-Owned Land. Devote City-owned land exclusively to the creation of 100 percent affordable and/or supportive housing projects through below-market or no-cost sale or lease to non-profit developers or community land trusts.
- Surplus Land. Prioritize the creation of affordable housing by facilitating below-market sale or lease of surplus and other underutilized property to affordable housing developers, or for the creation of new park space where there is a demonstrated need for one or the other, consistent with state law.
- Vacancy Penalty. Support the adoption of a vacant homes penalty assessed on sites with vacant residential and commercial units; prioritize the use of revenue for the creation and preservation of deeply affordable housing, including supportive housing and land acquisition by community land trusts.

b. Equitably Distribute Deeply Affordable Housing Around Transit Corridors.

According to the City Planning Department's Inventory of Sites, there are 308,000 potential units on developable land in the City of Los Angeles, and 85% of these sites are within ½ mile of transit. Given that low-income renters are more likely to be transit-dependent, it is crucial that developments on these sites include units dedicated to the deepest affordability levels. The Housing Element should include policies and programs to effectively and equitably distribute deeply affordable housing around transit corridors, including but not limited to the following.

- Value Capture. Require that community plan updates implement value capture zoning such that any upzone is connected to affordability requirements equal to or greater than the Transit Oriented Communities program.
- Affordability in High Opportunity Areas. Require that community plan updates in high opportunity neighborhoods accommodate multi-family residential development with affordability levels equal to or greater than the TOC program.
- Homeowner Assistance. Expand and fund homeowner assistance programs for low- and moderate income households.
- Prioritize housing for displaced residents. Create a program that gives first priority of affordable housing units in TOC buildings to tenants of former buildings on that site, or tenants who have been evicted under the Ellis Act.

c. Reduce barriers for production of all affordable housing that does not result in the removal of existing units and/or displacement of tenants and that does not expose low-income communities of color to environmental harms.

New construction of 100% affordable and/or permanent supportive housing should have a clear and streamlined process from application to certificate of occupancy. The Housing Element should include policies and programs to effectively reduce barriers for production of affordable housing, including but not limited to the following.

- Affordable Housing on Vacant and Underutilized Land. Explore a citywide program that allows the production of affordable housing on vacant land, commercial buildings, or buildings unoccupied in the last 10 years, by right.

- Affordable Housing on Religious Institution property. Establish a program that encourages development by right of 100% affordable housing projects in key areas, including on land owned by religious institutions.
- Remediation. Create a program that requires - and funds - the environmental remediation of all housing sites and mitigation of impacts by neighboring sites.
- Innovation. Explore innovative solutions to increasing production of 100% affordable housing.
- Remove Obstacles to Permanent Supportive Housing. Identify and eliminate barriers to the funding, approval, and development of permanent supportive housing.

d. Provide reparations for Black Angelenos with affordable housing.

Los Angeles should take proactive steps to address the past and continuing harms of redlining, racial covenants, housing discrimination, predatory home loans, and disinvestments in Black neighborhoods by providing reparations for Black Angelenos with access to affordable rental housing and homeownership opportunities. The Housing Element should include policies and programs to provide reparations for Black Angelenos with affordable housing, including but not limited to the following.

- Set aside a percentage of affordable units for Black families. for Require a percentage of affordable housing rental units and for-sale units be set aside for eligible Black families.
- Establish a "Certificate of Preference" Program for Displaced Black Residents. Establish "Certificate of Preference"[7] for displaced Black residents to be entitled to priority in renting or buying units in the neighborhoods from which they were displaced.
- Support Black Homeownership. Fund a homeownership assistance program for Black families and support current homeowners with funds for rehabilitation of their properties.

5. FURTHER ENVIRONMENTAL JUSTICE, IMPROVE CLIMATE RESILIENCE AND PROMOTE COMMUNITY HEALTH

Access to safe and affordable housing has a direct impact on public health. The very communities facing the highest rent burden are often the same frontline communities who bear the brunt of the negative impacts brought on by multiple, intersecting crises related to housing, homelessness, and environmental racism. These health disparities are brought on by land uses based on an extractive economy that contributes to environmental degradation, industrial pollution, the climate crisis, and increased health disparities for the frontline communities. For example, according to the Health Atlas for the City of LA, 21% (or approximately 59,000 individuals) of Southeast LA CPA residents lived adjacent to noxious land uses in 2013. The Housing Element is an opportunity to ensure that housing promotes public health with land use policies that are aligned with practices that create a more productive, equitable, and healthy regenerative use of land. Therefore, the recommendations, below, account for issues related to habitability, overcrowding, access to an adequate supply of safe affordable housing, and the need for climate resilient infrastructure and zoning policies.

[7] For example, this motion introduced by Councilmembers Harris-Dawson, Price, and Wesson in 2018 would create a neighborhood stabilization program for South LA.

a. Promote environmental justice and public health in development processes.

The City's Health Element names the harmful health impacts of displacement on individuals, families, and communities when development and infrastructure investment is pursued without regard for low-income residents already residing in the area; the need for both preservation and production of affordable housing to avoid rising rents, evictions, and increased homelessness; and centering land-use policies on a goal to reduce "health disparities and advancing health, equity, and sustainability in Los Angeles." The Housing Element can achieve consistency with the Health and Wellness Element by including policies and programs to advance environmental justice and community health, including but not limited to the following.

- Health Impact Assessments. Integrate health impact assessments into environmental impact reviews (EIRs), evaluating proximity to industrial land use/brown fields; health impacts of exposure to industrial and other noxious land uses; displacement impacts; and risk of increased evictions, homelessness, and susceptibility to overcrowded and substandard housing.
- REAP. Identify ways to ensure the Rent Escrow Account Program (REAP) is meeting its intended goals.
- Healthy Homes. Ensure all appropriate City departments are trained to identify and address environmental hazards, including, but not limited to mold, asbestos, and lead hazards affecting tenants, and develop strategies to prevent and mitigate the negative health impacts of repair or construction work that may release environmental hazards, including providing meaningful relocation assistance at the expense of the property owners, and enforcing tenants' right to return to their repaired rental units.
- Receivership Program. As a deterrent to slum housing practices and to facilitate community ownership goals, establish a receivership program for properties in REAP that do not achieve compliance so that tenant groups, CLTs and social housing entities can act as receivers and stewards of delinquent properties.
- Health and Habitability Training and Outreach. Require property owners and property managers to undergo training on responsible management of environmental hazards and tenants' right to live in habitable housing, and partner with community-based organizations to assist in outreach to tenants to inform them of their rights to live in habitable housing, regardless of income, race, or immigration status.
- Healthy Development Standards. Identify and adopt development standards that promote healthy air and water quality.
- Use an EJ lens in Planning. Integrate the CalEnviroScreen into land use planning to target critical investments increasing access to affordable housing in underserved and highly impacted areas.
- Industrial sites / brownfield sites. Advance new standards such as requiring EIRs to include health impact assessment for a 2-mile radius; enhanced site remediation and polluter accountability strategies; prevent development in proximity to brownfield sites until full EIR/HIA and remediation is done; provide support to affordable housing developments for environmental review and remediation, including identifying funding opportunities based on polluter-pay principles.

b. Plan for climate resilience.

Low-income communities are more likely to disportionately bear the burden of climate change. For example, low-income communities that are park-poor and have less green infrastructure investment are also more likely to acutely feel the effects of extreme weather events due to climate change. The Housing Element should include policies and programs to enhance climate resiliency as a component of housing development, including but not limited to the following.

- EJ in infrastructure. Work with the City's Climate Emergency Mobilization Department to ensure infrastructure alignment with principles of environmental justice and a just transition framework that puts an end to environmental racism and, thus, the displacement of low-income communities and communities of color, and uplifts public health through affordable housing.
- Education and training. Train City departments, property owners, and property managers on tenants' rights to live in habitable housing, the health effects of environmental hazard exposure, and appropriate management of environmental hazards such as lead and asbestos to prevent tenant exposure.
- Land use compatibility. Prevent instances of incompatible land use by establishing strict health and safety buffers between hazardous and sensitive land uses, including a 2500-foot health and human safety buffer between oil extraction sites and sensitive land uses, and a 500-foot buffer between other noxious land uses, such as auto-related uses, and sensitive land uses
- Green and Renewables Infrastructure. The City should convene stakeholders to develop green and renewable energy standards for housing development.

6. ENSURE MEANINGFUL COMMUNITY PARTICIPATION AND CAPACITY BUILDING

Public resources can go further when they are used to amplify actions being taken independently by community organizations. For this engagement to be transformative, however, it must be aligned—in both content and process—to actionable processes and policies that can improve equity outcomes for people. Ensuring the success of the aforementioned programs requires that the city partner with existing community-based organizations with established networks of trust with residents in their respective neighborhoods. Such partnerships will ensure information is distributed in a linguistically and culturally appropriate manner, and also allow the city to gather data on the effectiveness of new Housing Element policies and programs on directly impacted communities. The Housing Element should include policies and programs to ensure CBOs are integrated into implementation and evaluation of Housing Element programs, including but not limited to the following.

- Budget for seed grants or community contracts to support the participation of community-based organizations (CBOs) in tracking and evaluating housing element policies and programs.
- Develop a list of mission-based nonprofit organizations in each Community Plan Area and distribute RFPs annually to develop contracts with organizations that work directly with

tenants, individuals experiencing homelessness, and other vulnerable populations so as to ensure the success of new housing policies and programs. HCID can achieve this through distribution of funds from housing block grants, and/or the establishment of community contracts with CBOs. These partnerships will ensure the effective implementation of Housing Element policies and programs.

***

The Housing Element update and 6th cycle RHNA can be transformative for Los Angeles, with the potential to vastly improve housing affordability and the quality of life for millions of Angelenos if done right. After decades of underproduction of affordable housing, exclusionary zoning, and a lack of preservation of low-cost housing, our city must commit to take bold action and adopt affirmative policies and programs that will result in deeply affordable units at scale, address vacancy issues in new units, and stabilize communities at risk of displacement, while simultaneously building new housing units. Our coalition is eager to be a thought partner with the City in the implementation of the policies stated in our letter and we look forward to continued collaboration on making Los Angeles a city where everyone can thrive.

Sincerely,

ACT-LA

Housing Element <housingelement@lacity.org>

Housing Element Rezoning Program Van Nuys Station

Max Podemski <max.podemski@lacity.org> Wed, Sep 15, 2021 at 4:16 PM
To: HousingElement@lacity.org
Cc: Arthi Varma <arthi.varma@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Ackley Padilla <ackley.padilla@lacity.org>

Hello,

Please find the attached letter regarding the Housing Element Rezoning Program and Van Nuys Station.

Please let me know if you have any questions.

Thanks,

Max

--

Max Podemski
Planning and Transportation Director
Office of Council President Nury Martinez
Councilwoman, Sixth District
City Hall, Room 470
200 N Spring Street, Los Angeles, CA 90012
P: 213-473-7006 F: 213-473-7779

Housing Element Rezoning Program van Nuys station.pdf
75K

LOS ANGELES CITY COUNCIL PRESIDENT

NURY MARTINEZ

COUNCILWOMAN, 6TH DISTRICT

September 15, 2021

Matthew Glesne
Senior City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA 90012

RE: Housing Element Rezoning Program

Dear Mr. Glesne,

The Van Nuys Amtrak and Metrolink Station is already an important transportation hub for the San Fernando Valley. In the coming decades, the station will receive even more transit connections and will be served by the East San Fernando Valley Light Rail Line, the Sepulveda Pass Metro Line, as well as increased Amtrak and Metrolink service. This will make it one of the most important stations in the entire city.

The area around the Van Nuys Station is currently zoned for manufacturing. However, much of this land is currently occupied by non-industrial uses. In the coming years, the area southwest of the station will be converted into the maintenance yard for the East San Fernando Valley Line. Currently, The Plant shopping center occupies the area northeast of the station.

Some of the land uses in this area are also incompatible with the surrounding residential uses. This includes a stretch of land zoned manufacturing that extends to the north of the station between Van Nuys Boulevard and Cedros. This mix of uses creates an environmental justice issue in a community that is in the 90% on CalEnviroscreen.

We request that Planning consider including some of the area within close proximity of the Van Nuys Station into the rezoning program for the Housing Element while still maintaining manufacturing land that provides an important economic and jobs function for the city. This will help the city meet its Regional Housing Needs Assessment (RHNA) target while also providing housing near transit.

Please feel free to contact me if you have any questions.

Sincerely,

Max Podemski
Planning Director, Council District 6

CITY HALL OFFICE 200 N. Spring Street, Suite 470, Los Angeles, CA 90012 213.473.7006 / Fax: 213.847.0549
VAN NUYS DISTRICT OFFICE 14410 Sylvan Street, Suite 215, Van Nuys, CA 91401 818.778.4999 / Fax: 818.778.4998
SUN VALLEY DISTRICT OFFICE 9300 Laurel Canyon Blvd, 2nd Floor Sun Valley, CA 91331 818.771.0236 / Fax: 818.756.8155

www.nury-martinez.com

Housing Element <housingelement@lacity.org>

CCA Letter re: Housing Element (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

2 messages

Michael Shilstone <mshilstone@ccala.org> Wed, Sep 8, 2021 at 1:18 PM
To: Housing Element <housingelement@lacity.org>
Cc: Jessica Lall <jlall@ccala.org>, Marie Rumsey <mrumsey@ccala.org>, Clara Karger <ckarger@ccala.org>

Housing Element team,

Please find attached a letter from our organization regarding the draft 2021-2029 Housing Element: *The Plan to House LA.* We welcome the opportunity to discuss this further, and appreciate your consideration.

Thank you,

Michael

Michael Shilstone
Director of Economic Development

213.607.2433 | mshilstone@ccala.org | ccala.org

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DTLA Insights | Member Development Projects

2021 09 08 - LA City Planning and HCID - Summer Draft Housing Element - CCA Letter.pdf
196K

Housing Element <housingelement@lacity.org> Fri, Sep 24, 2021 at 2:01 PM
To: Michael Shilstone <mshilstone@ccala.org>

Hello Michael,

Hope all is well.

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

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



Housing Element Staff
Los Angeles City Planning

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

[Quoted text hidden]

CCA
CENTRAL CITY ASSOCIATION OF LOS ANGELES

September 8, 2021

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

Ann Sewill
General Manager
Housing and Community Investment Department
1200 W. 7th Street, #100
Los Angeles, CA 90017

Re: 2021-2029 Housing Element (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

Dear Mr. Bertoni and Ms. Sewill,

Established in 1924, Central City Association (CCA) is committed to advancing policies and projects that enhance Downtown Los Angeles' vibrancy and increase opportunity in the region. We represent over 300 members that have played a leading role in transforming Downtown Los Angeles and our city, including building over 17,000 units of new housing.[1] CCA participated on the Task Force for the 2013-2021 Housing Element, and we are pleased to again serve on the Task Force for the 2021-2029 Housing Element Update. We appreciate that the draft Housing Element is aligned with our March 29, 2021 letter's recommendations to reflect actual housing needs, provide transparency in the site identification process and lay the groundwork for equitable growth citywide through a coordinated and objective approach to allocating housing targets to Community Plans. **We offer this letter to provide additional recommendations for further strengthening the Housing Element as a visionary document for ensuring the robust, equitable and timely creation of new housing.**

Ensure Community Plans and Specific Plans Are Aligned with the Housing Element

While the Housing Element sets ambitious housing targets and sweeping policies, Community Plans and Specific Plans implement the zoning and contain many technical provisions that may limit the potential for feasible housing development in practice. This leads to Community Plans showing a higher capacity for new housing in theory or "on paper" than what would reasonably be feasible under their respective zoning, which can be highly specific. The DTLA 2040 Community Plan currently in the approval process is an example.

The DTLA 2040 Community Plan creates significant housing capacity to enable over 100,000 new units as DTLA is set to accommodate 20% of the city's future growth. However, many technical zoning aspects of DTLA 2040, as currently proposed, would limit housing development potential. For instance, every new housing development in the Arts District or Fashion District would have to include a baseline of office or light industrial space, which is not likely sustainable. Housing in these areas is also largely restricted to live/work units with high minimum unit sizes, including some areas that would allow housing only via

[1] https://www.ccala.org/what-we-do/member-development-projects/

adaptive reuse, which further limits feasibility and density. The plan would also decrease zoning capacity in Chinatown, including reducing development rights below what can be achieved today under the Transit Oriented Communities (TOC) program, while also introducing building height limits and requirements to dictate a minimum share of two-bedroom units or larger in each project. DTLA 2040 would also prohibit mixed-income housing in the Skid Row area which would limit growth and run counter to the Housing Element's goal of the equitable distribution of affordable housing. These types of constraints will likely result in less housing development than the plan's potential theoretical capacity.

We have seen well-intentioned plans with highly specific requirements diminish potential for housing before. The Cornfield Arroyo-Seco Specific Plan (CASP) envisioned the creation of nearly 9,000 new housing units[2] but has failed to produce any new housing due to a complex web of zoning rules that do not facilitate financially feasible housing development since the plan's adoption in 2013.[3] Almost a decade later, the CASP is now in what will be a multiyear process of being updated to better align its zoning regulations with project feasibility. Amid a historic housing shortage, this represents nearly a decade of missed opportunity to deliver new housing units in this area of the city, and we must learn from this in our future planning efforts.

The Housing Element should establish a mechanism to evaluate the feasibility of Community Plans and Specific Plans to ensure that they provide pathways for feasible housing creation prior to their adoption. If Community Plans do not produce enough housing to meet our RHNA goals, it will undermine our long-range planning efforts and trigger SB 35.

Eliminate Anti-Infill and Anti-Urban Provisions of Our Planning Code

Much of the City's planning code is outdated and reflects a more low-density, suburban and auto-centric vision of growth. This is reflected in elements such as P-Zones that limit entire parcels to only vehicular parking uses, minimum parking requirements, Site Plan Review that requires any project over a certain size to undergo discretionary approval and CEQA review, and density limits that set a maximum number of units that may be built on a lot. All these provisions are inherently anti-urban as they incentivize smaller developments that prioritize parking, while disincentivizing dense infill growth. This is misaligned with our current goals of creating a socioeconomically mixed, walkable and transit-oriented city.

Although we are encouraged that the Housing Element mentions amending Site Plan Review, it does so only in the context of 100% affordable housing developments (Program 54). The City has also taken similar steps in Community Plans by increasing Site Plan Review thresholds, but only for projects with affordable housing. This is reflective of the City's broader approach to enabling development: rather than updating and eliminating antiquated code provisions, the City instead designs policies that allow developers to eschew aspects of the outdated code – density limits, low FAR and parking requirements, for example – for the provision of affordable housing. While programs like TOC and Density Bonus are effective, more comprehensive updates to the outdated zoning code would encourage housing across a broad range of income levels. A holistic zoning update would align with the Housing Element's recognition of the city's deep housing shortage and that rents have been most stable where the most housing has been built. The

[2] https://planning.lacity.org/eir/CornfieldArroyo/DEIR/Volume%20I/Ch13_CASP%20DEIR%20Population-Housing-Employment.pdf
[3] https://urbanize.city/la/post/chinatown-cornfield-arroyo-seco-plan-update

Housing Element calls for approximately 500,000 new housing units by 2029, a growth rate that the city has never realized. To meet this urgent need, the City must use the Housing Element to fundamentally change its mindset for growth.

The City hopes to make some progress in eliminating density limitations and minimum parking requirements with the DTLA 2040 Community Plan, but we believe these policies should be expanded to other areas of the city as well.

Ultimately, there have only been narrow attempts at removing anti-density policies to-date, but the Housing Element should instead provide an affirmative vision of a sustainable, equitable and transit-oriented city by making them citywide priorities. This includes:

- **Eliminate Site Plan Review or use a more appropriate threshold metric –** Eliminate Site Plan Review as a discretionary review threshold, and instead only require discretionary review if a project does not conform to zoning. Alternatively, Site Plan Review could be based on metrics that better align with our sustainability goals, such as a project's Vehicle Miles Travelled (VMT) instead of an arbitrary unit limit which discourages density**.**
- **Eliminate density limits and use FAR to govern building size –** Dwelling units per acre is an anti-density rule. The DTLA 2040 plan proposes to eliminate this metric, and it should be eliminated throughout the city. FAR, along with other design controls, should be used to govern building scale and size.
- **Eliminate minimum parking requirements and P-Zones –** Minimum parking requirements and P-Zones are antiquated and prioritize vehicles over new housing. DTLA 2040 seeks to eliminate parking requirements. These auto-oriented policies should be eliminated from the City's code.

Update the City's Affordable Housing Incentives Guidelines and Create a Database of Expiring Covenants

The Housing Element should be used as an opportunity to update the City's Affordable Housing Incentives Guidelines, a policy which has not been updated since 2006.[4] This policy generally requires affordable units to be the same average square footage and number of bedrooms as market rate units in the same building. However, this misses the opportunity for more context-specific affordable housing and could result in more total affordable units. If affordable housing requirements were based on total residential square footage in a project (or a percentage of FAR, which is needed in areas like DTLA with unlimited density), there could be two 500 square foot affordable studios for one 1,000 square foot market rate two-bedroom unit in the same building, or one 2,000 square foot affordable three-bedroom unit for four 500 square foot market rate studios in the same building, as examples. The unit finishes, access points for entry/exit and amenities would be identical for the market rate and affordable units.

The Guidelines should also add an option for satisfying incentive programs' affordable housing requirements through preservation of affordable units. Many rent-restricted affordable units in the city face expiring covenants, which would mean they would imminently convert to market-rate units without intervention. The City currently attempts to leverage scarce available funding to preserve affordability restrictions, but its capacity is limited. Allowing projects that use affordable housing incentive programs to be able to fund, directly or indirectly, the preservation of affordable units, would provide an additional

[4] https://planning.lacity.org/Code_Studies/Housing/DRAFTUPDATEDAffordHousingGuide.pdf

support to this effort while also providing more flexibility for housing developments. Relatedly, the City should create a publicly-accessible database of expiring affordability covenants. This would serve as a resource for communities and housing professionals, creating more opportunities for developers to buy buildings with expiring covenants to preserve those units.

The Housing Element should facilitate an update to the Affordable Housing Incentives Guidelines to enable more creative affordable housing production and preservation solutions, and the City should create a public database of buildings with expiring covenants.

Clarify Dwelling Unit and Hotel Room Definitions

Currently, there is a lack of clarity between dwelling units and hotel rooms that inhibits flexibility for both uses and is out of sync with modern demand. The current code does not allow an extended stay hotel to have kitchens in units. The code views units with kitchens as dwelling units. Units without kitchens are treated as guest rooms. This makes it impossible to have hotels with kitchens in guest rooms, and limits more creative, less conventional housing arrangements that may be more affordable options (like co-living, for example). **Liberalizing and modernizing these definitions through the Housing Element would encourage more types of housing and more extended stay hotels, providing greater flexibility for both.**

Eliminate or Update Fire District 1 and Facilitate Mass Timber Housing

Mass timber is a new innovative and sustainable construction material that is increasingly being used in cities worldwide to enable taller wood buildings than is possible with light timber.[5] It's a less costly material than concrete and steel. It is more sustainable as it can be sourced locally and does not require overseas production and transportation, which are significant sources of carbon emissions. Despite recent changes to the California Building Code that would allow mass timber buildings up to 18 stories, the City's Fire District 1 provision currently does not allow mass timber construction in many of the city's dense urban areas where it would be most appropriate.

Meanwhile, the City Council is considering a proposal to expand Fire District 1, although a joint departmental report highlights that this would be detrimental to housing by increasing already high costs to build housing and likely resulting in less affordable housing development.[6] **The draft Housing Element does not currently mention Fire District 1 or mass timber, but it should recommend eliminating or updating Fire District 1 given its documented impacts on housing costs and production, and to facilitate sustainable mass timber housing construction in the city.**

Clarify Policy for Historic Resources

Historic preservation is an important goal, where appropriate, but too often there is uncertainty whether a project site involves a historic resource, creating confusion for applicants and communities. This delays projects and the delivery of new housing and can unnecessarily entangle projects in legal ambiguity. **The Housing Element should include a statement that clarifies that identification of a potential historic resource in SurveyLA does not presumptively make the site a resource.**

[5] https://www.ccala.org/clientuploads/directory/whitepapers/CCA__Mass_Timber_White_Paper_final.pdf
[6] https://clkrep.lacity.org/onlinedocs/2019/19-0603_rpt_dbs_%205-27-21.pdf

CCA
CENTRAL CITY ASSOCIATION OF LOS ANGELES

Establish Standard Conditions of Approval

We are strong advocates for more by-right approval of projects based on objective review criteria, which provides clarity and certainty for all stakeholders. Today, there is significant discretion over projects, even at the staff level, which can result the imposition of conditions of approval that do not have basis, or nexus with environmental or other project impacts. These unforeseen conditions can add costs, time and risk for projects in an already challenging context. **The Housing Element should establish standard City conditions of approval for projects enacted by ordinance, which would reduce subjectivity and unexpected changes to projects.** The City should look to its recently adopted Restaurant Beverage Program as an example off cutting back discretion to streamline projects with clear, upfront standards, an approach which should be extended to housing projects.

The 2021-2029 Housing Element is a progressive and visionary document and is a meaningful departure from previous Housing Elements in its acknowledgement of the housing crisis and potential solutions. However, it is important that the Housing Element's broad vision and policy goals are not lost in implementing provisions like Community Plans, Specific Plans and other facets of the City's planning and building codes. We believe these recommendations will further strengthen the Housing Element, and their execution would provide more expedient and fairer creation of housing in the city. Thank you for your consideration and commitment to housing our city's current and future residents, and we remain your partners in helping to ensure the Housing Element is adopted this October.

Sincerely,



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

cc: Mayor Eric Garcetti
Council President Nury Martinez
Members of the Los Angeles City Council

626 Wilshire Blvd., Suite 850, Los Angeles, CA 90017
213.624.1213 | ccala.org

Housing Element <housingelement@lacity.org>

CCA Letter re: Housing Element (CPC-2020-1365-GPA; ENV-2020-6762-EIR)

2 messages

Michael Shilstone <mshilstone@ccala.org> Wed, Sep 8, 2021 at 1:18 PM
To: Housing Element <housingelement@lacity.org>
Cc: Jessica Lall <jlall@ccala.org>, Marie Rumsey <mrumsey@ccala.org>, Clara Karger <ckarger@ccala.org>

Housing Element team,

Please find attached a letter from our organization regarding the draft 2021-2029 Housing Element: *The Plan to House LA.* We welcome the opportunity to discuss this further, and appreciate your consideration.

Thank you,

Michael

Michael Shilstone
Director of Economic Development

213.607.2433 | mshilstone@ccala.org | ccala.org

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Housing Element <housingelement@lacity.org> Fri, Sep 24, 2021 at 2:01 PM
To: Michael Shilstone <mshilstone@ccala.org>

Hello Michael,

Hope all is well.

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

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



Housing Element Staff
Los Angeles City Planning

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

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

3 messages

Flora Melendez <flora.melendez@lacity.org> Wed, Sep 8, 2021 at 8:17 AM
To: Housing Element <housingelement@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>, Cally Hardy <cally.hardy@lacity.org>
Cc: Arthi Varma <arthi.varma@lacity.org>, Nicholas Maricich <nicholas.maricich@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

---------- Forwarded message ---------
From: **Elizabeth Reid-Wainscoat** <ereidwainscoat@biologicaldiversity.org>
Date: Tue, Sep 7, 2021 at 4:37 PM
Subject: Comments on City of LA's Housing and Safety Element Update DEIR
To: Vince Bertoni <vince.bertoni@lacity.org>
Cc: mayor.helpdesk@lacity.org <mayor.helpdesk@lacity.org>, councilmember.buscaino@lacity.org <councilmember.buscaino@lacity.org>, councilmember.blumenfield@lacity.org <councilmember.blumenfield@lacity.org>, councilmember.bonin@lacity.org <councilmember.bonin@lacity.org>, gilbert.Cedillo@lacity.org <gilbert.Cedillo@lacity.org>, councilmember.harris-dawson@lacity.org <councilmember.harris-dawson@lacity.org>, councilmember.Krekorian@lacity.org <councilmember.Krekorian@lacity.org>, paul.koretz@lacity.org <paul.koretz@lacity.org>, councilmember.lee@lacity.org <councilmember.lee@lacity.org>, councilmember.martinez@lacity.org <councilmember.martinez@lacity.org>, councilmember.ofarrell@lacity.org <councilmember.ofarrell@lacity.org>, councilmember.price@lacity.org <councilmember.price@lacity.org>, councilmember.rodriguez@lacity.org <councilmember.rodriguez@lacity.org>, councilmember.raman@lacity.org <councilmember.raman@lacity.org>, councilmember.wesson@lacity.org <councilmember.wesson@lacity.org>, Councilmember.kevindeleon@lacity.org <Councilmember.kevindeleon@lacity.org>, lauren.faber@lacity.org <lauren.faber@lacity.org>

Dear Mr. Bertoni,

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

You can access our references via this folder.

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

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

Sincerely,

Elizabeth

Elizabeth Reid-Wainscoat (she/her)

Urban Wildlands Campaigner

CENTER *for* BIOLOGICAL DIVERSITY

660 S. Figueroa Street #1000

Los Angeles, CA 90017

Cell: (831) 428-3312

ereidwainscoat@biologicaldiversity.org

CommentLetter_City of LA Housing Element_2021-09-07.pdf
397K

Housing Element <housingelement@lacity.org> Wed, Sep 8, 2021 at 9:04 AM
To: ereidwainscoat@biologicaldiversity.org

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

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Cally Hardy <cally.hardy@lacity.org> Wed, Sep 8, 2021 at 9:09 AM
To: Flora Melendez <flora.melendez@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>, Arthi Varma <arthi.varma@lacity.org>, Nicholas Maricich <nicholas.maricich@lacity.org>, Housing Element <housingelement@lacity.org>

Received, thank you, Angie.

Best,
Cally

On Wed, Sep 8, 2021 at 8:17 AM Flora Melendez <flora.melendez@lacity.org> wrote:
[Quoted text hidden]

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Cally Hardy (she/her/hers)
City Planning Associate
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September 7, 2021

Sent via email

Mr. Vince Bertoni
Director of Planning
Los Angeles Department of City Planning
200 North Spring Street
Los Angeles, CA 90012
vince.bertoni@lacity.org

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

Dear Mr. Bertoni,

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

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

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

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

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

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

More detailed comments are provided below.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

II. Home-hardening existing communities should be a central component of the Update's Objective 3.3 "Promote disaster and climate resilience in citywide housing efforts"

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

[3] Congress for the New Urbanism (CNU). "Defining the 15-minute city." Accessed September 7, 2021. https://www.cnu.org/publicsquare/2021/02/08/defining-15-minute-city

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

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

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

[4] California Environmental Justice Alliance. "Environmental & Housing Justice Policy Platform." Accessed September 7, 2021. https://calgreenzones.org/platform-for-environmental-housing-justice/

VI. Conclusion

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

Thank you for your consideration of these comments.

Sincerely,



J.P. Rose
Senior Attorney, Urban Wildlands
Center for Biological Diversity

CC:
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Housing Element <housingelement@lacity.org>

(no subject)

2 messages

Jennifer Cox <jennifer.sandness@gmail.com> Tue, Sep 7, 2021 at 10:28 AM
To: housingelement@lacity.org

File Number: ENV-2020-6762-EIR
ATTN: Cally Hardy, CIty Planning Associate, City of Los Angeles Department of CIty Planning

In response to the survey regarding The Plan to House L.A., as a homeowner in the city I have substantial concerns and objections to this plan. Please do not change zoning for the operation of housing and services for the unhoused. My community is already suffering from increased crimes, violence and vandalism.

The unhoused that were brought to my community during the start of the COVID pandemic have been constantly using drugs in the open on our streets and in our parks, attacking residents and businesses, made the sidewalks impassable and have been terrorizing us.

Please provide long term care facilities, rehab and mental health.

Thank you,
Jennifer Cox, resident
jennifer.sandness@gmail.com

Housing Element <housingelement@lacity.org> Tue, Sep 7, 2021 at 4:40 PM
To: Jennifer Cox <jennifer.sandness@gmail.com>

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

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

file number ENV-2020-6762-EIR

2 messages

Monica Dragavon <m_dragavon@hotmail.com> Tue, Sep 7, 2021 at 4:53 PM
To: "housingelement@lacity.org" <housingelement@lacity.org>

TO:
Cally Hardy, City Planning Associate, City of Los Angeles Department of City Planning
file number ENV-2020-6762-EIR

Dear Ms. Hardy,

I am concerned with and oppose the components and explain reasons below:
- Reduce zoning and other regulatory barriers to the placement and operation of housing and services for the unhoused.(Policy 5.1.5)
- Implement a housing-first approach and coordinate service provision(Policy 5.1.4)
- Identify and remove barriers to permitting, preserving, and expanding licensed community care facilities(Policy 5.1.5)
- Adopt amendments to zoning code to remove restrictions for health-based residential facilities(Program 116)
- Adopt amendments to zoning code to facilitate by-right siting of shelter and transitional housing facilities(Program 115)

Housing First DOES NOT REQUIRE ENTERING A TREATMENT PROGRAM. Even though they may OFFER services, addicts don't have to take them. When Mayor Garcetti took over Petit Park Rec Center to house chronic homeless during covid, it left behind “housing resistant” drug users, drug sellers, and unstable mentally ill people who moved to the area and still continue to cause repeated problems. This particular group of tranisents has attracted gangs and drug users/sellers to the area. Housed or unhoused, nobody wants to live near this.

When you help the ROOT CAUSES of substance abuse and severe mental health problems, many homeless can become welcome and productive members of society, and the community will feel supportive of helping. The community voted for Prop HHH because they wanted to help people, but they need the right kind of help! Housing First was NOT written in measure HHH. People did not vote for that. Housing active substance abusers/chronic mentally ill individuals in residential communities without proper long-term rehab/mental health care beforehand, puts the entire community at risk. We do not allow drunk drivers on the road due to poor judgement so why place similar poor judgement individuals, due to illicit drug use/chronic mentally ill, to present poor judgment and harm to the community daily?

Don’t risk our quality of life by building housing for untreated individuals in residential/local business areas! If they choose to continue to use drugs and the State choses to enable them, do so without harming the rest of us. Data has shown that Housing First is more successful with housing individuals-NOT with treatment. I have gone as far as requesting data from the Mayor’s office, but they would not provide as “it was complicated.” What is not complicated, is the data I have found which shows there is no increase in addicts getting clean with Housing First. Don’t rezone; put Housing First for active abusers where it will not be a problem or health or safety risk to others.

Housing is important, but it is irresponsible to house UNTREATED individuals in Tiny Homes, apartments or on the streets in our communities. It threatens the well-being of any community. Long-term in-patient rehabilitation needs to occur away from residents-not at casual sober-living type homes where they allow people to wander away and continue to do drugs. Although some of these facilities are run well, unfortunately there has not been enough oversight at some of these money mills. Plus, when you allow business to purchase residential properties to use as money-making businesses, they can afford to purchase high which brings the comps and cost of housing high and out of reach to regular individuals looking to buy their first home, but now out of reach. Like Air BNB, your use of these half-way homes are part of the problem to affordable real estate.

In addition, some people may need lock-up mental health treatment to keep them and the community safe. Los Angeles is terribly short on mental beds compared to other major cities. Please open up a state run facility! Work of changing mental illness laws for the sake of those who have already refused the offered apartment and ended up dying on the streets. It was NOT a housing problem in Granada Hills, but mental illness that the individual did not realize they had and died on the sidewalk. To be clear: she was offered her own apartment, refused, died. Outreach had been by multiple times and offered her an apartment. Please add more beds to mental facilities so more people can be helped-LA is sorely lacking compared to other major cities.

In addition, zoning laws and regulations were made for good reason. The rules cannot be arbitrarily lifted to permit harm to society because LA politicians believe they cannot solve the massive addiction/mental illness crises. The general population would not have a NIMBY attitude if their safety and well-being were not threatened. Substance abuse, erratic behaviors, petty theft to support bad habits, public nuisance, and vandalism are crimes that add up to a poor quality of life. This does not bode well for a healthy society. The City should not be allowed to put society at risk. After treatment, let's hope they are ready to start over with community support!

To be clear, although I am opposed to any re-zoning, my comments above are not in reference to low income housing, but specifically to Housing First situations with untreated individuals detailed above. For low income housing, I believe this can be done by other means rather than changing rezoning codes and thus, the character of a neighborhood. Why change the essence of a community? We can create low income housing without the rezoning. Los Angeles is following San Francisco with the overpriced, unaffordable housing and it's not right. People of all income levels need to live in a safe and clean community. I have ideas if you care.

Monica Dragavon
m_dragavon@hotmail.com
file number ENV-2020-6762-EIR

Housing Element <housingelement@lacity.org> Tue, Sep 7, 2021 at 5:00 PM
To: Monica Dragavon <m_dragavon@hotmail.com>

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

Regards,
The Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

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

4 messages

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

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

Matt

On Tue, Sep 7, 2021 at 1:03 PM Tony Gittelson <tonygittelson@gmail.com> wrote:

> Sept. 7, 2021
>
> Mr. Matthew Glesne,
> Senior City Planner
> Mr. Matthew Glesne,
> Senior City Planner
> Ms. Blair Smith,
> City Planner
> Citywide Policy Planning Department
>
> Dear Matthew Glesne and Blair Smith,
>
> Pursuant to our conversation with you, we wish to submit, for public comment, the attached proposal, **The Livable Communities Initiative**, that we urge be included as a Program in the **2021-29 Housing Element.**
>
> We are affiliated with a coalition of approximately 2,700 concerned homeowners, renters and Los Angelenos deeply engaged in local, grassroots community organizing. The name of our coalition is **Hang Out, Do Good**. As part of our work, our Housing Committee is extremely focused on the lack of sufficient, equitable affordable housing in our own communities, and throughout Los Angeles (city and county).
>
> To address this urgent crisis, we have engaged in lengthy conversations with our own members, and with our neighbors, and with a vast array of housing experts, academics, city planners and affordable housing developers, to craft **The Livable Communities Initiative (LCI)**.
>
> The Livable Communities Initiative (LCI) is a combination of existing LA City goals and programs, explicitly stated throughout the 2021-2029 Housing Element, but one that holistically addresses equitable and affordable housing, mobility and transit justice, and climate, as one idea, rather than piecemeal. LCI grew out of a collaboration between housing activists and mobility, bike, and transit activists; we found that by linking the issues of housing equity and mobility together, we created a virtuous cycle in which the collective vision had much greater impact than each component part--at the same time, we have crafted a comprehensive approach to equitable affordable housing, based on the **City's Equitable Distribution Plan** (May 21, 2021) that Affirmatively Furthers Fair Housing (AFFH), ensuring that high-opportunity neighborhoods provide a fair share of affordable housing. By adding affordable housing in job-rich, transit-rich and amenity-rich neighborhoods, Los Angeles can reverse the pressures that create displacement and gentrification in under-resourced communities.
>
> The core of the LCI is to address our housing crisis by upzoning under-utilized commercial arterials to 3-5 stories while simultaneously transforming the street: slowing the cars, adding wide sidewalks, a tree canopy, al fresco dining, bike lanes, and fast and frequent transit -- making it a "Complete Street." By

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

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

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

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

Thank you so much,

Lindsay Sturman & Tony Gittelson
The Livable Communities Initiative

Jennifer Levin & Helen Eigenberg
Co-Founders
Hang Out, Do Good

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

Gerhard Mayer
GGLO
Architect and Urbanist

Patricia Bijvoet
Landscape Architect and Urban Planner
UPLA Studio

Terenig Topjian
Founder, Have A Go
haveago.city

--

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

Tony Gittelson <tonygittelson@gmail.com> Tue, Sep 7, 2021 at 4:19 PM
To: Matthew Glesne <matthew.glesne@lacity.org>
Cc: Housing Element <housingelement@lacity.org>, Blair Smith <blair.smith@lacity.org>, Lindsay Sturman <lindsay.sturman@gmail.com>, Jennifer Levin <jentwelve@gmail.com>, helen eigenberg <hm.eigenberg@gmail.com>

Thank you so much, Matt!

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

All best,

Tony

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

[Quoted text hidden]

Matthew Glesne <matthew.glesne@lacity.org> Tue, Sep 7, 2021 at 4:51 PM
To: Housing Element <housingelement@lacity.org>

[Quoted text hidden]

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

Housing Element <housingelement@lacity.org> Tue, Sep 21, 2021 at 7:11 PM
To: Jackie Cornejo <jackie.cornejo@lacity.org>, Nancy Twum-Akwaboah <nancy.twum@lacity.org>, Marisol Romero <marisol.romero@lacity.org>, Maya Abood <maya.abood@lacity.org>



Housing Element Staff
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[Quoted text hidden]

Livable Communities Initiative (LCI) - DRAFT - Sept. 7 2021.pdf
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Housing Element Program Proposal: "Livable Communities Initiative"

129. The Livable Communities Initiative (NEW)

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

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

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

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

TEXT

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

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

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

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

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

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

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

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

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

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

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

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

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

Parking Requirements: 21, 65

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

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

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

Monitoring: Program 47

Education: Program 67, 120

“No Net Loss” Programs: 28, 29, 124

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

Reducing Homelessness*****: Program 92, 99, 107

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

Housing Element <housingelement@lacity.org>

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

2 messages

info@pacpalicc.org <info@pacpalicc.org> Tue, Sep 7, 2021 at 11:33 AM
To: housingelement@lacity.org

Please see message below and attached letter.

Best regards,

Christina Spitz
Secretary
Pacific Palisades Community Council
www.pacpalicc.org

From: <info@pacpalicc.org>
To: <housing.element@lacity.org>, <cally.hardy@lacity.org>, <cpc@lacity.org>
Cc: <davidcard22@gmail.com>, <dkaplan6@gmail.com>, <rgcohen@aol.com>, <johnpadden@kw.com>, Joanna Spak <jlspak@yahoo.com>, <ppfriends3@hotmail.com>
Sent: 9/7/2021 11:28 AM
Subject: Comment Letter: Draft Housing Element 2021-2029 update & Draft EIR

> To: Dept. of City Planning/attn. Cally Hardy
> and City Planning Commission:
>
> Please see attached comment letter from Pacific Palisades Community Council regarding the above matter.
>
> Thank you.
>
> Best regards,
>
> Christina Spitz
> Secretary
> Pacific Palisades Community Council
> www.pacpalicc.org

PPCC Comment Letter Housing Element DEIR.pdf
310K

Housing Element <housingelement@lacity.org> Tue, Sep 7, 2021 at 4:45 PM
To: info@pacpalicc.org

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

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

Planning4LA.org
T: (213) 978-1302



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[Quoted text hidden]

PACIFIC PALISADES COMMUNITY COUNCIL

September 7, 2021

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

and

Los Angeles City Planning Commission
Via email to: cpc@lacity.org

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

DCP and Planning Commission:

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

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

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

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

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

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

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

[1] http://pacpalicc.org/wp-content/uploads/2021/02/PPCCHousing-Element-Comment-Letter.pdf.
[2] https://drive.google.com/drive/folders/1FW1Zq_nSUl1c3MGqUh3AhKJuwoFO3uTr

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

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

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

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

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

Sincerely,

Executive Committee, Pacific Palisades Community Council

David Card, Chair	Christina Spitz, Secretary
David Kaplan, Vice-Chair	John Padden, Organization Representative (P.R.I.D.E.)
Richard G. Cohen, Treasurer	Joanna Spak, Elected Representative (Area 1; Castellammare, Paseo Miramar)

Housing Element <housingelement@lacity.org>

ENV-2020-6762-EIR

2 messages

Winifred Powelllipton <powelllipton@aol.com> Mon, Sep 6, 2021 at 9:02 AM
To: housingelement@lacity.org

Housing first does not demand that a treatment program be entered, offering this service is not enough, addicts will refuse and have refused. Petit park is overrun with drug addicts and mentally unstable people who have made it dangerous to live around this park. Garcetti took over Petit Rec Center to house chronic homeless and left us with drug dealers, addicts and mentally unstable individuals who resist housing. Dealing with the root causes is vital and should putting those who are not in treatment into communities is putting us in danger. Low income housing for law abiding people is welcomed but not drug abusing individuals who will put the community at risk. Long term rehabilitation needs to occur away from family homes, where older families live or young people are living not at casual sober living houses in our communities where they are free to leave and continue to do drugs. The mentally ill need to be where they are treated and not a danger to themselves or the community.
Zoning laws and regulations were made with good reason. To arbitrarily lift them will cause harm to families who live in these areas and only benefits developers. Leave our zoning laws alone. Families have worked hard to afford the American dream and you want to wipe that away with new zoning laws, not to mention the extra power and water needed for apartment buildings when California is having great difficulty supplying those homes and apartments now. Parking and traffic on top of that. More buses is not the answer. Our quality of life is going down hill fast and it seems that our elected officials, at ever level, to not care.

Marie Lipton
818 822 9010
ENV-2020-6762-EIR
Sent from my iPhone

Housing Element <housingelement@lacity.org> Tue, Sep 7, 2021 at 3:20 PM
To: Winifred Powelllipton <powelllipton@aol.com>

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

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

File Number ENV-2020-6762-EIR

2 messages

Anna Berberian <annaberberian@yahoo.com> Sun, Sep 5, 2021 at 3:33 PM
To: housingelement@lacity.org

Good afternoon,

My name is Anna Berberian and I am writing to you as a concerned citizen and taxpayer living in the City of L-A that is tired of being held hostage in her neighborhood by the homeless population that is comprised of criminals and drug addicts. Enough is enough.
What exactly is the reasoning beyond the harebrained idea of Housing First DOES NOT REQUIRE ENTERING A TREATMENT PROGRAM even though they will OFFER the services but addicts don't have to take them? Mayor Garcetti took over Petit Park Rec Center to house chronic homeless during covid which left us with “housing resistant” drug users, drug sellers, and unstable mentally ill people walking in our streets today.

When you help the ROOT CAUSES of substance abuse and severe mental health problems, many homeless can become welcome and productive members of society, and the community will feel supportive of helping. The community voted for Prop HHH because they wanted to help people but they need the right kind of help! Putting these individuals within residential communities without proper mental health care puts the community at risk just like allowing drunk drivers on the road.

Housing the homeless is important, but homeless people have different reasons for being homeless. Putting law-abiding individuals in low-income housing in the area is not a problem. But putting drug abusers and mentally ill who constantly disturb the community while leaving their taxpayer provided Housing First home is a big problem for nearby residents. This city has refused to address the root cause of many homeless.

It is irresponsible to leave UNTREATED individuals in Tiny Homes, apartments or on the streets in our communities. It threatens the well-being of the community. Long-term in-patient rehabilitation needs to occur away from residents-not at casual sober-living type homes where they allow people to wander away and continue to do drugs. Some people may need locked mental health treatment to keep them and the community safe. Los Angeles is terribly short on mental beds compared to other major cities.

In addition, zoning laws and regulations were made for good reason. The rules cannot be arbitrarily lifted to permit harm to society because LA politicians believe they cannot solve the massive addiction/mental illness crises. The general population would not have a NIMBY attitude if their safety and well-being were not threatened. Substance abuse, erratic behaviors, petty theft to support bad habits, public nuisance, and vandalism are crimes that add up to a poor quality of life. This does not bode well for a healthy society.

Thank you

Sent from my iPhone

Housing Element <housingelement@lacity.org> Tue, Sep 7, 2021 at 3:12 PM
To: Anna Berberian <annaberberian@yahoo.com>

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

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

T: (213) 978-1302



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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

ENV-2020-6762-EIR Comments

2 messages

Lisa K.Carothers <ldknurse60@yahoo.com> Sun, Sep 5, 2021 at 7:24 PM
To: "housingelement@lacity.org" <housingelement@lacity.org>

To: Cally Hardy

Regarding: ENV-2020-6762-EIR

From: Lisa Carothers
ldknurse60@yahoo.com

Please see my comments below. I am angry that a survey went and it's too late for me to respond and I barely received notice about the ability to add my comments to the city's plan to resolve the unhoused situation.

- Regarding Policy 5.1.5 - Reduce zoning and other regulatory barriers to the placement and operation of housing and services for the unhoused.

NO! Not unless you make it mandatory for people to receive mental health treatment! We cannot have those who have erratic and often drug-seeking behaviors placed in our community! The citizens have a right to know who their neighbors are and not risk the often poor oversight that goes along with facilities.

- Regarding Policy 5.1.4. - Implement a housing-first approach and coordinate service provision(Policy 5.1.4)

NO! Housing First isn't safe for the homeless who are mentally ill or on drugs nor is it safe for the community! We have too many housing-resistant who roam the streets stealing, throwing bottles at citizens, doing drugs in broad daylight, and dropping drug paraphernalia all over the place. We are tired of the rampant codependency by the LA City Government where these sick people are permitted to traumatize the neighborhoods instead of being placed in treatment facilities where they get immediate help for their drug problem.

Stop and look at the ROOT CAUSE! Stop asking the sick people if they want help and just make them take it! They aren't in their right minds due to drugs yet you expect a sane response from them? I'm angriest at the politicians and the City department heads who are so grossly irresponsible.

You don't allow often dangerous people to roam the streets looking for another fix when they should be inside seeing psychiatrists, social workers, and attending 12-step types of programs in addition to medication to stabilize moods and prevent psychosis.

- Regarding Policy 5.1.4 - Identify and remove barriers to permitting, preserving, and expanding licensed community care facilities

NO! Not unless you make it mandatory for people to receive mental health treatment! We cannot have those who have erratic and often drug-seeking behaviors placed in our

community! The citizens have a right to know who their neighbors are and not risk the often poor oversight that goes along with facilities. They need guarded facilities while detoxing to keep ALL citizens safe.

- Regarding Program 116 - Adopt amendments to zoning code to remove restrictions for health-based residential facilities

NO! Again, not unless you make it mandatory for people to receive mental health treatment! We cannot have those who have erratic and often drug-seeking behaviors placed in our community! The citizens have a right to know who their neighbors are and not risk the often poor oversight that goes along with facilities.

- Regarding Program 115 - Adopt amendments to zoning code to facilitate by-right siting of shelter and transitional housing facilities

NO! Again, not unless you make it mandatory for people to receive mental health treatment! We cannot have those who have erratic and often drug-seeking behaviors placed in our community! The citizens have a right to know who their neighbors are and not risk the often poor oversight that goes along with facilities.

Housing Element <housingelement@lacity.org> Tue, Sep 7, 2021 at 3:16 PM
To: "Lisa K.Carothers" <ldknurse60@yahoo.com>

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

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

ENV-2020-6762-EIR

2 messages

Bill Cotter <bcotter@socal.rr.com> Sun, Sep 5, 2021 at 3:11 PM
To: housingelement@lacity.org

There are so many things wrong with this “plan” it’s hard to know where to start.

Let’s eliminate zoning, fill the city with apartment buildings even though we don’t have water or power for what we have today, then not require the homeless to do anything to address the core of their problems. We have EMPTY BEDS now because people CHOOSE to stay on the street. Get them help for their addictions and illnesses, please – covering the city in apartment houses is NOT going to address these issues. I’m sure it will enrich your developer buddies big time though.

For those considering this “plan” – are you ready to have the house next door torn down and be replaced by a multi-story building full of untreated addicts? That’s what this plan espouses.

Housing Element <housingelement@lacity.org> Tue, Sep 7, 2021 at 3:08 PM
To: Bill Cotter <bcotter@socal.rr.com>

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

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Comment on ENV-2020-6762-EIR

2 messages

Ann Dorsey <aedorsey@hotmail.com> Sun, Sep 5, 2021 at 8:21 PM
To: "housingelement@lacity.org" <housingelement@lacity.org>

To Whom It May Concern:

I am writing to submit a comment on file number ENV-2020-6762-EIR.

Although there may be a need for increased housing at all income levels, Los Angeles has to find a way to meet AFORDABLE housing needs. This must be a priority, or the homelessness situation will only get worse.

Thank you,

Ann Dorsey
Northridge, CA 91325
aedorsey@hotmail.com

Housing Element <housingelement@lacity.org> Tue, Sep 7, 2021 at 3:18 PM
To: Ann Dorsey <aedorsey@hotmail.com>

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

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

ENV 2020-6762- EIR

2 messages

Angiee Suarez <thesuarezs@gmail.com> Sun, Sep 5, 2021 at 5:34 PM
To: housingelement@lacity.org

Cally Hardy,
I am a resident in North Granada Hills and urge to please aid us with the homelessness issue here. Please do not put tiny homes, etc in this community where we have schools, parks, etc. Without addressing the mental Health Of the people experience in homelessness. We have been ravaged in this community by a sudden surge in population since the pandemic started. These individuals that were sent to our community from other areas have severe mental issues and drug issues that have not been resolved and therefore allowing them to be put into homes in our neighborhood close to churches schools etc. has already proven to be very ineffective and harmful to our children and the residents.

Please think of our children and what they have already seen. Naked women and men offering them sex while they walk to school, crack pipes and drug paraphernalia being thrown at them on sidewalks
To name a few.

-Angela M. Suarez

Sent from my iPhone

Housing Element <housingelement@lacity.org> Tue, Sep 7, 2021 at 3:14 PM
To: Angiee Suarez <thesuarezs@gmail.com>

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

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

3 messages

Joann Gioia <gioiajoann@everyactioncustom.com> Thu, Sep 2, 2021 at 1:10 PM
Reply-To: gioiajoann@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

Hi:

I am writing to tell you to please ignore Abundant Housing's suggestions for the Los Angeles City Housing Element. Abundant Housing has no right to tell the City or the residents of Los Angeles how they should run or live in their City. There is no need to allow duplexes to be built on lots zoned single family. The Los Angeles City Council was correct in opposing SB 9 and SB 10. These bills will destroy Los Angeles. The City of Los Angeles needs to have a balance of single and multi family homes. Only the City of LA and residents of LA can decide where it is best to allow density. Please do not listen to the YIMBYS, they are pushing high density everywhere. If a person purchased a home that is zoned R1 that home should remain R1. It is illegal to change zoning after a purchase has been made without the approval of the residents that change will involve. Let's work on the housing element together and keep the YIMBYs (Abundant Housing) out of it.

Sincerely,
Joann Gioia
2535 Robalo Ave San Pedro, CA 90732-4635
gioiajoann@gmail.com

Vince Bertoni <vince.bertoni@lacity.org> Thu, Sep 2, 2021 at 1:12 PM
To: Flora Melendez <flora.melendez@lacity.org>

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org> Tue, Sep 7, 2021 at 2:20 PM
To: Joann Gioia <gioiajoann@gmail.com>

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

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

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Denise Chavez <denise.chavez@lacity.org> Fri, Aug 27, 2021 at 9:41 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Fri, Aug 27, 2021 at 9:39 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Denise Chavez <denise.chavez@lacity.org>



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



---------- Forwarded message ---------
From: **Nicole Beaudoin** <Nicole_m_beaudoin@everyactioncustom.com>
Date: Fri, Aug 27, 2021 at 9:38 AM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Nicole Beaudoin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nicole Beaudoin
1616 S Redondo Blvd Los Angeles, CA 90019-5355
Nicole_m_beaudoin@yahoo.com

--



Denise Chavez
Executive Office
Los Angeles City Planning

200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271



Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:46 PM
To: Nicole Beaudoin <Nicole_m_beaudoin@yahoo.com>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Tue, Aug 24, 2021 at 10:36 AM
To: Housing Element <housingelement@lacity.org>

Please see email.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Tue, Aug 24, 2021 at 10:35 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Christopher James** <chris.james@everyactioncustom.com>
Date: Tue, Aug 24, 2021 at 10:34 AM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Christopher James using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Christopher James
1235 Westchester Pl Los Angeles, CA 90019-3525
chris.james@holmes.us

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:45 PM
To: Alex Parks <Alex@alexparks.tv>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Mon, Aug 23, 2021 at 6:14 AM
To: Housing Element <housingelement@lacity.org>

Please see email.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 23, 2021 at 6:12 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Alex Parks** <Alex@everyactioncustom.com>
Date: Sun, Aug 22, 2021 at 9:00 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Alex Parks using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Alex Parks
3850 La Salle Ave Los Angeles, CA 90062-1159
Alex@alexparks.tv

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:44 PM
To: Alex Parks <Alex@alexparks.tv>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

2021 - 2029 Housing Element Update

4 messages

President of RVNC <rampartvillage@gmail.com> Fri, Aug 20, 2021 at 2:26 PM
To: Vince Bertoni <vince.bertoni@lacity.org>
Cc: housingelement@lacity.org, craig.bullock@lacity.org, Ronald Reece <roneereecervnc@gmail.com>, David Rockello <rockello@gmail.com>

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

Dear Mr. Bertoni:

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

Thank you.

Diversity Is Our Strength!

Philip Armstrong, President
Rampart Village Neighborhood Council
155 N. Occidental Blvd. Suite 236
Los Angeles, CA 90026
(o) 213.568.3086
(c) 213.275.9322
www.RVNC.org
f: realRVNC

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

8.17.2021RVNCComments.pdf
744K

Blair Smith <blair.smith@lacity.org> Fri, Aug 20, 2021 at 3:11 PM
To: Cally Hardy <cally.hardy@lacity.org>, Housing Element <housingelement@lacity.org>, Jackie Cornejo <jackie.cornejo@lacity.org>, Wajiha Ibrahim <wajiha.ibrahim@lacity.org>

FYI.

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Fri, Aug 20, 2021 at 3:05 PM
Subject: Fwd: 2021 - 2029 Housing Element Update
To: Blair Smith <blair.smith@lacity.org>
CC: Matthew Glesne <matthew.glesne@lacity.org>, Arthi Varma <arthi.varma@lacity.org>

Hello

Vince received this email today.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Fri, Aug 20, 2021 at 3:03 PM
Subject: Fwd: 2021 - 2029 Housing Element Update
To: Anna Orellana <anna.orellana@lacity.org>
Cc: Flora Melendez <flora.melendez@lacity.org>

Hi Anna:

I don't need comment letters on policy/projects. Please forward to the appropriate staff.

Thanks,

Vince
[Quoted text hidden]
--

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

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

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Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

8.17.2021RVNCComments.pdf
744K

Housing Element <housingelement@lacity.org> Fri, Aug 20, 2021 at 3:18 PM
To: President of RVNC <rampartvillage@gmail.com>

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

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

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Matthew Glesne <matthew.glesne@lacity.org> Fri, Aug 20, 2021 at 3:49 PM
To: Housing Element <housingelement@lacity.org>, Blair Smith <blair.smith@lacity.org>

---------- Forwarded message ---------
From: **President of RVNC** <rampartvillage@gmail.com>
Date: Fri, Aug 20, 2021 at 2:27 PM
Subject: 2021 - 2029 Housing Element Update
To: Vince Bertoni <vince.bertoni@lacity.org>
CC: <housingelement@lacity.org>, <craig.bullock@lacity.org>, Ronald Reece <roneereecervnc@gmail.com>, David Rockello <rockello@gmail.com>

[Quoted text hidden]
--

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning



200 N. Spring St., Suite 525C
Los Angeles, CA 90012



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Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
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T: (213) 978-1271



--



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



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Comments on 2021 - 2029 Housing Element Update

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

Date: August 17, 2021

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

From: Rampart Village Neighborhood Council

Subject: 2021 - 2029 Housing Element Update

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

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

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

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

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

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

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

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

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

Sincerely,

Rampart Village Neighborhood Council

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

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Fri, Aug 20, 2021 at 10:59 AM
To: Housing Element <housingelement@lacity.org>

Please see email.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Fri, Aug 20, 2021 at 10:58 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Robert Fisher** <fisher557@everyactioncustom.com>
Date: Fri, Aug 20, 2021 at 10:55 AM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Robert Fisher using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Robert Fisher
4230 11th Ave Los Angeles, CA 90008-4505
fisher557@hotmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:43 PM
To: fisher557@hotmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 9:57 AM
To: Housing Element <housingelement@lacity.org>

Please see email.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 9:56 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **William Wright** <willrobwright@everyactioncustom.com>
Date: Thu, Aug 19, 2021 at 9:55 AM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

As a housing advocate, I'm disappointed that City Council voted yesterday to oppose SB 9 & SB 10. We need robust poliy changes to address our severe housing crisis.

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk

greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by William Wright using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
William Wright
734 E Kensington Rd Los Angeles, CA 90026-4427
willrobwright@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:42 PM
To: willrobwright@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Fri, Aug 20, 2021 at 6:25 AM
To: Housing Element <housingelement@lacity.org>

Please see email.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Fri, Aug 20, 2021 at 6:23 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Edward Williams** <eddiecwilliams@everyactioncustom.com>
Date: Thu, Aug 19, 2021 at 6:40 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Edward Williams using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Edward Williams
6125 Cashio St Apt 2 Los Angeles, CA 90035-3747
eddiecwilliams@gmail.com

--



Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271



Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:49 PM
To: eddiecwilliams@gmail.com

Hello,

Hope all is well.

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

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



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 7:50 AM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 7:46 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Lelia Scheu** <leliascheu@everyactioncustom.com>
Date: Thu, Aug 19, 2021 at 7:43 AM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Lelia Scheu using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Lelia Scheu
4551 Russell Ave Los Angeles, CA 90027-4411
leliascheu@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:40 PM
To: leliascheu@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 6:22 AM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 6:18 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Tamara Satterwhite** <Tsatterwhite@everyactioncustom.com>
Date: Thu, Aug 19, 2021 at 1:01 AM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

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Personally sent by Tamara Satterwhite using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tamara Satterwhite
5314 Packard St Los Angeles, CA 90019-2650
Tsatterwhite@childrensinstitute.org

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:40 PM
To: Tsatterwhite@childrensinstitute.org

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 9:37 AM
To: Housing Element <housingelement@lacity.org>

Please see the email.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 9:35 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Chava Danielson** <chava@everyactioncustom.com>
Date: Thu, Aug 19, 2021 at 9:31 AM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

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Personally sent by Chava Danielson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Chava Danielson
3133 Ettrick St Los Angeles, CA 90027-2501
chava@dsharc.com

--



Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271



Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:44 PM
To: chava@dsharc.com

Hello Chava,

Hope all is well.

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

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



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 12:56 PM
To: Housing Element <housingelement@lacity.org>

Please see email.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 12:55 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Katherine Chen** <katherinelaurachen@everyactioncustom.com>
Date: Thu, Aug 19, 2021 at 12:53 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

My name is Katherine Chen, MD.

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

As a UCLA physician and public health researcher, I know from my patients and from my research that the lack of affordable housing in LA has long been a public health threat, now made worse by COVID. Single-family zoning is a major part of the problem because it keeps poverty concentrated and prevents my lower-income and black & brown patients from accessing the same opportunities for health and well-being as wealthy and often White families that have benefited from structural racism.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an

Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Katherine Chen, MD, using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Katherine Chen
3446 Vinton Ave Apt 1 Los Angeles, CA 90034-4761
katherinelaurachen@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:42 PM
To: katherinelaurachen@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750



Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302



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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 9:18 AM
To: Housing Element <housingelement@lacity.org>

Please see the email.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 9:18 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Alexander Booth** <alexanderbooth@everyactioncustom.com>
Date: Thu, Aug 19, 2021 at 9:16 AM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Alexander Booth using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Alexander Booth
520 S Mariposa Ave Apt 207 Los Angeles, CA 90020-2714
alexanderbooth@kfalosangeles.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:41 PM
To: alexanderbooth@kfalosangeles.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 12:55 PM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 12:52 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Carey Bennett** <careyjeanbennett@everyactioncustom.com>
Date: Thu, Aug 19, 2021 at 12:48 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

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Personally sent by Carey Bennett using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Carey Bennett
2929 St George St Los Angeles, CA 90027-3025
careyjeanbennett@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:47 PM
To: careyjeanbennett@gmail.com

Hello Carey,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

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

3 messages

Laura Raymond <lraymond@allianceforcommunitytransit.org> Thu, Aug 19, 2021 at 1:25 PM
To: vince.bertoni@lacity.org, Matthew Glesne <matthew.glesne@lacity.org>, Housing Element <housingelement@lacity.org>, ann.sewill@lacity.org
Cc: "Alfonso Directo Jr." <adirecto@allianceforcommunitytransit.org>

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

Good afternoon, I hope this finds you well.

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

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

Best,

Laura

--

Laura Raymond (she/her)
Director | Alliance for Community Transit - Los Angeles
cell: (646) 344-0381
website: www.allianceforcommunitytransit.org

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

Housing Element <housingelement@lacity.org> Thu, Aug 19, 2021 at 1:59 PM
To: Blair Smith <blair.smith@lacity.org>, Jackie Cornejo <jackie.cornejo@lacity.org>, Maya Abood <maya.abood@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Wajiha Ibrahim <wajiha.ibrahim@lacity.org>, Betty Barberena <betty.barberena@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Nancy Twum-Akwaboah <nancy.twum@lacity.org>, Marisol Romero <marisol.romero@lacity.org>

FYI

Housing Element Staff
Los Angeles City Planning

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

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

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

Housing Element <housingelement@lacity.org> Wed, Aug 25, 2021 at 4:51 PM
To: Laura Raymond <lraymond@allianceforcommunitytransit.org>

Laura,

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

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

Housing Element Staff
Los Angeles City Planning

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

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act·LA
Housing Jobs & Transit for All

August 19, 2021

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

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

Dear Director Bertoni,

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

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

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

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

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

2. Expand the City's affordable housing incentive programs to create mixed-income and 100% affordable housing in communities in the California Tax Credit Allocation Committee (TCAC) high and highest opportunity areas, while subtracting census tracts that have a displacement risk.

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

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

Sincerely,

The ACT-LA Coalition

CC:

Ann Sewill, General Manager, HCIDLA

Housing Element Team Email: HousingElement@lacity.org

Matt Glesne, Senior City Planner, LA City Planinng

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 6:19 AM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 6:16 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Kevin Zelaya** <kevz21189@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 7:11 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

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Personally sent by Kevin Zelaya using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Kevin Zelaya
1139 S Rimpau Blvd Los Angeles, CA 90019-1812
kevz21189@gmail.com

--



Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271



Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:34 PM
To: kevz21189@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 6:21 AM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 6:17 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Tom Vosburgh** <thomas.a.vosburgh@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 8:37 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

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Personally sent by Tom Vosburgh using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tom Vosburgh
11833 Goshen Ave Apt 4 Los Angeles, CA 90049-6346
thomas.a.vosburgh@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:36 PM
To: thomas.a.vosburgh@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 6:18 AM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 6:15 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Elisa Visick** <evisick@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:52 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

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Personally sent by Elisa Visick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Elisa Visick
429 1/2 N Avenue 57 Los Angeles, CA 90042-3405
evisick@rocketmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:34 PM
To: evisick@rocketmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 6:22 AM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 6:17 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Margaret Shekell** <mshekell@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 10:27 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

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Personally sent by Margaret Shekell using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Margaret Shekell
11010 Rose Ave Apt 211 Los Angeles, CA 90034-6041
mshekell@sbcglobal.net

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:38 PM
To: mshekell@sbcglobal.net

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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T: (213) 978-1302

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 6:20 AM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 6:16 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Diamond SHAMJI** <diamondhs@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 8:11 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Diamond SHAMJI using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Diamond SHAMJI
8646 Olin St Los Angeles, CA 90034-2515
diamondhs@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:36 PM
To: diamondhs@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Wed, Aug 18, 2021 at 6:41 PM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Aug 18, 2021 at 6:38 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Jan Delos Santos** <zanyj@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:03 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Jan Delos Santos using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jan Delos Santos
1515 S Orange Grove Ave Los Angeles, CA 90019-4923
zanyj@yahoo.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 11:59 AM
To: zanyj@yahoo.com

Hello,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 6:22 AM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 6:17 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Kyle Nomowsky** <naumoux@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 10:37 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes in non HPOZ area of our County, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone commercial and industrial zones to meet the housing target and leave single-family zoning ALONE.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned not enough has been done to concentrate housing growth along commercial corridors without disrupting existing single-family neighborhoods.

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors sit empty unused and idle, focusing housing growth in these areas will increase housing inventory. And building more homes in areas that already welcome lower-income families does advance fair housing.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone commercial and industrial zones in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Kyle Nomowsky using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Kyle Nomowsky
1635 N Vista St Los Angeles, CA 90046-2817
naumoux@gmail.com

--



Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271



Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:39 PM
To: naumoux@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Wed, Aug 18, 2021 at 6:43 PM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Aug 18, 2021 at 6:39 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Paras Nanavati** <paras@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:28 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Paras Nanavati using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Paras Nanavati
2285 Cove Ave Los Angeles, CA 90039-3664
paras@pncstudios.com

--



Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271



Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:34 PM
To: paras@pncstudios.com

Hello Paras,

Hope all is well.

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

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



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 6:19 AM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 6:16 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Sean McCormick** <sean643@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 7:18 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

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Personally sent by Sean McCormick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Sean McCormick
7817 Truxton Ave Los Angeles, CA 90045-2918
sean643@gmail.com

--



Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271



Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:35 PM
To: sean643@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

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Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Wed, Aug 18, 2021 at 6:42 PM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Aug 18, 2021 at 6:38 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **David Marmor** <dmarmor@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:15 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I want to express my strong support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by David Marmor using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
David Marmor
814 Milwaukee Ave Los Angeles, CA 90042-2614
dmarmor@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:31 PM
To: dmarmor@gmail.com

Hello David,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Wed, Aug 18, 2021 at 6:44 PM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Aug 18, 2021 at 6:40 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Olga Lexell** <olga.lexell@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:38 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Olga Lexell using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Olga Lexell
1115 S Elm Dr Los Angeles, CA 90035-1143
olga.lexell@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:23 PM
To: Olga Lexell <olga.lexell@gmail.com>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Wed, Aug 18, 2021 at 6:40 PM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Aug 18, 2021 at 6:37 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Samantha Leach** <samantha@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:03 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Samantha Leach using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Samantha Leach
5607 Clemson St Los Angeles, CA 90016-4615
samantha@s-hw.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 11:53 AM
To: Samantha Leach <samantha@s-hw.com>

Hello,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Wed, Aug 18, 2021 at 6:41 PM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Aug 18, 2021 at 6:38 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Arjun Kolachalam** <arjunk@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:07 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Arjun Kolachalam using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Arjun Kolachalam
2237 Aaron St Los Angeles, CA 90026-1723
arjunk@hey.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:27 PM
To: arjunk@hey.com

Hello,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Wed, Aug 18, 2021 at 6:42 PM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Aug 18, 2021 at 6:38 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **MAAYAN KAPLAN** <maayan.kaplan1@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:07 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

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Personally sent by MAAYAN KAPLAN using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
MAAYAN KAPLAN
607 S Cloverdale Ave Los Angeles, CA 90036-4163
maayan.kaplan1@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:21 PM
To: maayan.kaplan1@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Wed, Aug 18, 2021 at 6:43 PM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Aug 18, 2021 at 6:39 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Stanley Johnson** <STJOHNSO@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:17 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

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Personally sent by Stanley Johnson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Stanley Johnson
1120 S Grand Ave Apt 1806 Los Angeles, CA 90015-4398
STJOHNSO@AEROTEK.COM

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:22 PM
To: STJOHNSO@aerotek.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 6:19 AM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 6:16 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Eddie Isaacs** <isaacs_e@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 7:27 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

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Personally sent by Eddie Isaacs using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Eddie Isaacs
375 E 2nd St Apt 603 Los Angeles, CA 90012-4157
isaacs_e@yahoo.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:39 PM
To: isaacs_e@yahoo.com

Hello Eddie,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Wed, Aug 18, 2021 at 6:44 PM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Aug 18, 2021 at 6:39 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Nicholas Hooper** <Hoops225@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:28 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

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Personally sent by Nicholas Hooper using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nicholas Hooper
11861 Iowa Ave Los Angeles, CA 90025-3710
Hoops225@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:36 PM
To: Hoops225@gmail.com

Hello,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Wed, Aug 18, 2021 at 6:44 PM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Aug 18, 2021 at 6:40 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Andrew Heinzman** <saheinzman@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:38 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

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Personally sent by Andrew Heinzman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andrew Heinzman
1866 Greenfield Ave Apt 305 Los Angeles, CA 90025-4472
saheinzman@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:32 PM
To: saheinzman@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Wed, Aug 18, 2021 at 6:42 PM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Aug 18, 2021 at 6:38 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Carol Gordon** <thecarolanngordon@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:09 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

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Personally sent by Carol Gordon using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Carol Gordon
2801 Glendower Ave Los Angeles, CA 90027-1118
thecarolanngordon@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:29 PM
To: thecarolanngordon@gmail.com

Hello,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 6:21 AM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 6:17 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Verity Freebern** <verityfreebern@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 10:01 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

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Personally sent by Verity Freebern using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Verity Freebern
4258 Verdugo Rd Los Angeles, CA 90065-4714
verityfreebern@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:37 PM
To: verityfreebern@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 6:22 AM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 6:17 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
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Los Angeles, CA 90012
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T: (213) 978-1271 | F: (213) 978-1275
E: vince.bertoni@lacity.org



---------- Forwarded message ---------
From: **Patrik Ervell** <pervell@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 10:16 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Patrik Ervell using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Patrik Ervell
569 N Rossmore Ave Apt 707 Los Angeles, CA 90004-2447
pervell@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 2:38 PM
To: pervell@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Wed, Aug 18, 2021 at 6:44 PM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Aug 18, 2021 at 6:39 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Gregory Dina** <gregdina@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:31 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

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Personally sent by Gregory Dina using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Gregory Dina
6427 W 86th Pl Los Angeles, CA 90045-3702
gregdina@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:22 PM
To: gregdina@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 6:18 AM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 6:15 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Peter Avildsen** <peter@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:58 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

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Personally sent by Peter Avildsen using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Peter Avildsen
161 N Catalina St Los Angeles, CA 90004-4670
peter@thirdculture.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:38 PM
To: Peter Avildsen <peter@thirdculture.com>

Hello Peter,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Wed, Aug 18, 2021 at 6:43 PM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Wed, Aug 18, 2021 at 6:39 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Irma Araneta** <iaraneta@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 6:18 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

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Personally sent by {AranetaLastName}} using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Irma Araneta
11999 Chalon Rd Los Angeles, CA 90049-1524
iaraneta@csjla.org

--



Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271



Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:32 PM
To: iaraneta@csjla.org

Hello Irma,

Hope all is well.

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

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



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Anna Orellana <anna.orellana@lacity.org> Thu, Aug 19, 2021 at 6:21 AM
To: Housing Element <housingelement@lacity.org>

Please see the email received by Vince.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Thu, Aug 19, 2021 at 6:17 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Tami Kagan-Abrams** <tami@everyactioncustom.com>
Date: Wed, Aug 18, 2021 at 8:25 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

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Personally sent by Tami Kagan-Abrams using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tami Kagan-Abrams
2430 Hercules Dr Los Angeles, CA 90046-1634
tami@abramsgroup.org

--



Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271



Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 5:42 PM
To: tami@abramsgroup.org

Hello Tami,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Denise Chavez <denise.chavez@lacity.org> Tue, Aug 17, 2021 at 4:22 PM
To: housingelement@lacity.org

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Tue, Aug 17, 2021 at 4:22 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Denise Chavez <denise.chavez@lacity.org>



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



---------- Forwarded message ---------
From: **Carey Bennett** <careyjeanbennett@everyactioncustom.com>
Date: Tue, Aug 17, 2021 at 4:10 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

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Personally sent by Carey Bennett using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Carey Bennett
2929 St George St Los Angeles, CA 90027-3025
careyjeanbennett@gmail.com

--

Denise Chavez
Executive Office
Los Angeles City Planning

200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:37 PM
To: careyjeanbennett@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:20 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Tue, Aug 17, 2021 at 7:40 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

Morning

Please see the email that was sent to Vince.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Tue, Aug 17, 2021 at 7:25 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Aaron Horst** <horst.aaronm@everyactioncustom.com>
Date: Tue, Aug 17, 2021 at 7:20 AM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

For starters, encouraging greater and more diverse types of housing in a neighborhood is not a "disruption" -- it is a recipe for keeping more and more of the city vibrant, diverse, and open to residents of all incomes. Beyond that, concentrating housing growth along commercial corridors runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, and focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

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Personally sent by Aaron Horst using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Aaron Horst
2165 W 28th St Los Angeles, CA 90018-3022
horst.aaronm@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 11:33 AM
To: horst.aaronm@gmail.com

Hello,

Hope all is well.

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

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Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:06 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 3:41 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

Please see the email Vince received.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 3:34 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Kevin Zelaya** <kevz21189@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 3:29 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

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Personally sent by Kevin Zelaya using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Kevin Zelaya
1139 S Rimpau Blvd Los Angeles, CA 90019-1812
kevz21189@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:45 PM
To: kevz21189@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:19 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 2:52 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

Please see the email Vince received.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 2:30 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **William Wright** <willrobwright@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 2:27 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter

from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by William Wright using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
William Wright
734 E Kensington Rd Los Angeles, CA 90026-4427
willrobwright@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 3:20 PM

To: willrobwright@gmail.com

Hello,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:19 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 2:49 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

Hi

Please see the email Vince received.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 2:25 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Tom Vosburgh** <thomas.a.vosburgh@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 2:22 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Tom Vosburgh using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tom Vosburgh
11833 Goshen Ave Apt 4 Los Angeles, CA 90049-6346
thomas.a.vosburgh@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:08 PM
To: thomas.a.vosburgh@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:19 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 2:44 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>, Arthi Varma <arthi.varma@lacity.org>, Flora Melendez <flora.melendez@lacity.org>

Hi

Please see the email Vince received today.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 2:16 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **James Schuyler** <jamesdschuyler@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 2:10 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by James Schuyler using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
James Schuyler
2700 Lompoc St Los Angeles, CA 90065-5108
jamesdschuyler@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:09 PM
To: jamesdschuyler@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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Planning4LA.org
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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:16 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 3:11 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

Please see the email Vince received.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 3:09 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Tieira Ryder** <tie.ryder@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 3:08 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

https://htwws.org/santamonicaairport/

Hello,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods. Rezoning must be county-wide.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Best,
Tieira
https://htwws.org/santamonicaairport/

Sincerely,
Tieira Ryder
3726 Grand View Blvd # 661385 Los Angeles, CA 90066-3110
tie.ryder@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886



Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:01 PM
To: T <tie.ryder@gmail.com>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:17 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 2:54 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

Please see the email Vince received.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 2:30 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Cipra Nemeth** <cipran@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 2:28 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter

from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Cipra Nemeth using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Cipra Nemeth
6600 Lindenhurst Ave Los Angeles, CA 90048-4612
cipran@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:04 PM

To: Cipra Nemeth <cipran@gmail.com>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:18 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 2:51 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

Please see the email Vince received.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 2:25 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Henry van Moyland** <henryvanmoyland@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 2:23 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter

from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods. I am particularly heartened that you are one of the signatories.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

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Personally sent by Henry van Moyland using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Henry van Moyland
546 S Curson Ave Los Angeles, CA 90036-3253
henryvanmoyland@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:06 PM
To: henryvanmoyland@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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T: (213) 978-1302



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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

3 messages

Cally Hardy <cally.hardy@lacity.org> Mon, Aug 16, 2021 at 2:38 PM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 2:37 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Cally Hardy <cally.hardy@lacity.org>
Cc: Blair Smith <blair.smith@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Arthi Varma <arthi.varma@lacity.org>

Hi

Please see the email Vince received.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 2:04 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Sean McCormick** <sean643@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 2:02 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Sean McCormick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Sean McCormick
7817 Truxton Ave Los Angeles, CA 90045-2918
sean643@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Cally Hardy (she/her/hers)
City Planning Associate
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA 90012
Planning4LA.org
(213) 978-1643



Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:20 AM
To: Housing Element <housingelement@lacity.org>

[Quoted text hidden]



Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886



Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 11:31 AM
To: sean643@gmail.com

Hello,

Hope all is well.

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

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



Housing Element Staff
Los Angeles City Planning

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



[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:19 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 2:46 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>, Arthi Varma <arthi.varma@lacity.org>, Flora Melendez <flora.melendez@lacity.org>

Hi

Please the email Vince received.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 2:16 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Arjun Kolachalam** <arjunk@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 2:13 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Arjun Kolachalam using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Arjun Kolachalam
2237 Aaron St Los Angeles, CA 90026-1723
arjunk@hey.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 4:58 PM
To: arjunk@hey.com

Hello,

Hope all is well.

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

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



Housing Element Staff
Los Angeles City Planning

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



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

3 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:19 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 2:47 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>, Arthi Varma <arthi.varma@lacity.org>, Flora Melendez <flora.melendez@lacity.org>

Hi

Please see the email Vince received.

Thanks
---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 2:20 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Andrew Knauer** <andrewknauer@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 2:19 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Andrew Knauer using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andrew Knauer
2197 W 29th St Los Angeles, CA 90018-3027
andrewknauer@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Sep 22, 2021 at 4:55 PM
To: andrewknauer@everyactioncustom.com

Hello Andrew,

Hope all is well.

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

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



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Mail Delivery Subsystem <mailer-daemon@googlemail.com> Wed, Sep 22, 2021 at 4:56 PM
To: housingelement@lacity.org



Address not found

Your message wasn't delivered to **andrewknauer@everyactioncustom.com** because the address couldn't be found, or is unable to receive mail.

The response from the remote server was:

```
550 5.1.0 Recipient rejected: <andrewknauer@everyactioncustom.com>
```

Final-Recipient: rfc822; andrewknauer@everyactioncustom.com
Action: failed
Status: 5.1.0
Remote-MTA: dns; mxa.mailgun.org. (52.207.76.111, the server for the domain everyactioncustom.com.)
Diagnostic-Code: smtp; 550 5.1.0 Recipient rejected: <andrewknauer@everyactioncustom.com>
Last-Attempt-Date: Wed, 22 Sep 2021 16:56:24 -0700 (PDT)

---------- Forwarded message ----------
From: Housing Element <housingelement@lacity.org>
To: andrewknauer@everyactioncustom.com
Cc:
Bcc:
Date: Wed, 22 Sep 2021 16:55:46 -0700
Subject: Re: Please rezone single family exclusionary neighborhoods!
----- Message truncated -----

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:17 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 2:55 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

Please see the email Vince received.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 2:41 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Tami Kagan-Abrams** <tami@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 2:40 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter

from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Tami Kagan-Abrams using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tami Kagan-Abrams
2430 Hercules Dr Los Angeles, CA 90046-1634
tami@abramsgroup.org

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:03 PM

To: tami@abramsgroup.org

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:18 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 3:07 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

Please see the email Vince received.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 3:00 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Oren Hadar** <Hellomynameisoren@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 2:58 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I write to express my support for adopting a rezoning target of 300,000 more homes, as recommended by a joint letter from six councilmembers. In addition, I urge the city council to go further and rezone single-family exclusionary

neighborhoods in high-opportunity areas of the city such as the Westside.

I am a homeowner and resident of Council District 10. In the last few years, five of my closest friends, all young people with families, have moved out of Los Angeles to cheaper cities because they could not afford to live here any more. These are all young, middle-class families, priced out. The housing crisis is destroying our city's middle class, and exclusionary zoning is a big reason why.

I am encouraged that the City has incorporated a data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing Planning to produce two fair share reports. However, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

Single-family neighborhoods in high-income and high-opportunity neighborhoods such as the Westside absolutely should be disrupted if the city wants to affirmatively further fair housing. More people should be able to live in the parts of town with the most jobs, the best schools, and the best air quality. These are the neighborhoods that have built the least amount of housing in the past few generations, and they should contribute their fair share. The neighborhoods already zoned for multi-family housing, that aren't mentioned in the letter, are concentrated in lower-income parts of the city.

Also, low-income families are already being displaced in single-family neighborhoods even without rezoning or new construction. According to the Census, my Mid-City neighborhood (Wilshire Vista) was 50% Black in 2000. It is now 25% black. The number of new housing units constructed during that time: zero. Gentrification is happening because of the housing shortage. "Protecting" single-family neighborhoods will only lead to them becoming playgrounds for the rich.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Oren Hadar using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Oren Hadar
1337 Carmona Ave Los Angeles, CA 90019-2533
Hellomynameisoren@yahoo.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith

City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:05 PM
To: Hellomynameisoren@yahoo.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:16 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 3:08 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

Please see the email Vince received.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 3:07 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Andy Freeland** <andy@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 3:01 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter

from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Andy Freeland using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andy Freeland
901 S Flower St Unit 300 Los Angeles, CA 90015-2296
andy@andyfreeland.net

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:02 PM

To: Andy Freeland <andy@andyfreeland.net>

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:07 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 3:26 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

Please see the email Vince received.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 3:25 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Brad Foley** <brfoley76@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 3:24 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter

from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods. This is so important for our city. For the people who rent, for the homeless, for those who commute, and those of us who care about sustainability and livability.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does. Everyone in our city deserves a chance at a place in quiet, clean, family friendly neighborhoods.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Brad Foley using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Brad Foley
2702 S Normandie Ave Los Angeles, CA 90007-2114
brfoley76@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 12:48 PM
To: brfoley76@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:40 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 11:41 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>, Flora Melendez <flora.melendez@lacity.org>, Arthi Varma <arthi.varma@lacity.org>

Hi

Please see email that was sent to Vince today.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 11:24 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>

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

---------- Forwarded message ---------
From: **Haley Feng** <fxbhaley@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 11:22 AM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to reconsider concentrating growth along commercial corridors and instead prioritize rezoning single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Haley Feng using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Haley Feng
3155 S Sepulveda Blvd Los Angeles, CA 90034-4220
fxbhaley@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886



Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:20 PM
To: fxbhaley@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:18 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 2:55 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

Please see the email Vince received.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 2:39 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Jonathan Eby** <joneby22politics@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 2:38 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter

from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

Los Angeles is the third richest city on the planet. To have close to 75% of our land zoned for single family homes doesn't make economic or social justice sense. Too many young people can't afford rent, and too many families can't afford to buy a home because land owners aren't legally allowed to build apartments or town homes on the land they own. This doesn't make sense. We need to loosen the regulatory burden so we can build homes for everyone, in all neighborhoods.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Jonathan Eby using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jonathan Eby
11035 Moorpark St North Hollywood, CA 91602-3442
joneby22politics@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:07 PM
To: joneby22politics@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:41 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 11:40 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>, Flora Melendez <flora.melendez@lacity.org>, Arthi Varma <arthi.varma@lacity.org>

Hi

Please see email that was sent to Vince today.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 9:45 AM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Leonora Camner** <leonora@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 9:33 AM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to reconsider concentrating growth along commercial corridors and instead prioritize rezoning single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Leonora Camner using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Leonora Camner
1013 16th St Santa Monica, CA 90403-4331
leonora@abundanthousingla.org

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Thu, Sep 23, 2021 at 11:52 AM
To: Leonora Camner <leonora@abundanthousingla.org>

Hello Leonora,

Hope all is well.

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

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

Housing Element Staff
Los Angeles City Planning

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

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

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:20 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 2:42 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>, Arthi Varma <arthi.varma@lacity.org>, Flora Melendez <flora.melendez@lacity.org>

Hi

Please see the email Vince received.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 2:04 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Alexander Booth** <alexanderbooth@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 2:03 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

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Personally sent by Alexander Booth using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Alexander Booth
520 S Mariposa Ave Apt 207 Los Angeles, CA 90020-2714
alexanderbooth@kfalosangeles.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:19 PM
To: alexanderbooth@kfalosangeles.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:19 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 2:45 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>, Arthi Varma <arthi.varma@lacity.org>, Flora Melendez <flora.melendez@lacity.org>

Hi

Please see the email Vince received.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 2:16 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Mark Bolin** <mark.bolin7@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 2:11 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I noted that your signature was not among them. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

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Personally sent by Mark Bolin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Mark Bolin
920 N El Centro Ave Apt 8 Los Angeles, CA 90038-3054
mark.bolin7@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886



Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:19 PM
To: mark.bolin7@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please rezone single family exclusionary neighborhoods!

2 messages

Blair Smith <blair.smith@lacity.org> Wed, Aug 18, 2021 at 9:16 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anna Orellana** <anna.orellana@lacity.org>
Date: Mon, Aug 16, 2021 at 3:26 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Blair Smith <blair.smith@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>

Please see the email Vince received.

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 16, 2021 at 3:23 PM
Subject: Fwd: Please rezone single family exclusionary neighborhoods!
To: Anna Orellana <anna.orellana@lacity.org>



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



---------- Forwarded message ---------
From: **Brent Barnes** <Brentbobarnes@everyactioncustom.com>
Date: Mon, Aug 16, 2021 at 3:21 PM
Subject: Please rezone single family exclusionary neighborhoods!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for adopting a rezoning target of 300K more homes, as recommended by a joint letter from six councilmembers. I also urge the city council to go further and rezone single-family exclusionary neighborhoods.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. I am also encouraged by councilmember Martinez and Cedillo's leadership in instructing planning to produce two fair share reports. But as an Angeleno, I am concerned to see the letter co-signed by six councilmembers caving to NIMBYism and choosing to concentrate housing growth along commercial corridors "without disrupting existing single-family neighborhoods."

This doesn't make sense and runs counter to the city's goals of protecting tenants and advancing fair housing. Many areas near commercial corridors are already zoned for multi-family, focusing housing growth in these areas will risk greater renter displacements. And building more homes in areas that already welcome lower-income families does not advance fair housing - opening up exclusionary zoning does.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I strongly urge you to rezone single-family exclusionary neighborhoods in the housing element update so that we can create a fair, prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Brent Barnes using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Brent Barnes
915 N Ogden Dr West Hollywood, CA 90046-7354
Brentbobarnes@gmail.com

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Wed, Oct 20, 2021 at 1:00 PM
To: Brentbobarnes@gmail.com

Hello,

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment was added to our case file and included in the CPC Staff Report. On October 14th, the City Planning Commission recommended approval of the plan, it will next proceed through Council committees.

Thank you,
Housing Element Team



Housing Element Staff
Los Angeles City Planning

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



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

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Draft Housing Element

Cally Hardy <cally.hardy@lacity.org> Mon, Aug 16, 2021 at 9:15 AM
To: Housing Element <housingelement@lacity.org>

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

FYI

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

FYI

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

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

Dear Mr. Bertoni and Ms. Sewill,

Please find the attached letter regarding the Draft Housing Element.

If you have any questions you can contact my staff member, Max Podemski, at max.podemski@lacity.org.

Sincerely,



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

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

--

Cally Hardy (she/her/hers)
City Planning Associate
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA 90012
Planning4LA.org
(213) 978-1643

8.13.21 Housing Element Letter_vF.pdf
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CITY HALL
LOS ANGELES, CALIFORNIA 90012

August 13th, 2021

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

CC: Ann Sewill, General Manager HCIDLA

RE: Draft Housing Element

Dear Mr. Bertoni,

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

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

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

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

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

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

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

Incentive Program

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

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

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

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

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

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

Rezoning Program

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

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

Removing Barriers to Housing Production

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

NURY MARTINEZ
Councilmember, 6th District

MARQUEECE HARRIS-DAWSON
Councilmember, 8th District

GILBERT A. CEDILLO
Councilmember, 1st District

BOB BLUMENFIELD
Councilmember, 3rd District

CURREN D. PRICE
Councilmember, 9th District

KEVIN DE LEON
Councilmember, 14th District

NITHYA RAMAN
Councilmember, 4th District

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

2 messages

Shenette Holman <Ms.shenetteh@everyactioncustom.com> Sun, Aug 8, 2021 at 3:46 PM
Reply-To: Ms.shenetteh@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

Hello, my name is Shenette Holman and I'm urging you to please fix our city's affordable housing shortage. As a mother of four children my family and I had housing in the past. Now that my two oldest children are grown and are out in the world creating their own lives it's just my two youngest children and I.

My two youngest children have really been resilient by dealing with being homeless during this pandemic and school closures. I truly feel as if my children have suffered enough and deserve a home to continue to strive for excellence in.

My children are really good children that deserve more than I could ever give them. During the pandemic their grades did slip but that was due to not having housing, getting sufficient internet and computer access. I can't begin to explain how difficult it was to charge all these various electronics while the world was shutdown. Yet, I do cause I care about my children and their education. Now I'm pleading with you to please do your part and help not just my family but the many families who are in the same boat.

You do believe that all human beings deserve adequate housing right ? Especially our children. Below is the standard message that we are encouraged to send. You can choose to read it or not the choice is yours. With that being said when it comes to affordable housing you can chose to fix the city's lack of affordable housing issue or you could choose to not fix it and continue to let the homeless population grow and be criminalized.

Thank you,

Shenette H.

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. By creating a thorough quantitative model that estimates sites' likelihood of redevelopment, Planning has provided a fair estimate of the City's current realistic capacity for new housing and acknowledged that Los Angeles will only achieve 10% of its RHNA target in a "business as usual" scenario. The draft housing element also proposes creating over 220,000 homes through rezoning and other land use reforms, particularly in high-resource areas that have accommodated little new housing in recent years. All of this represents significant progress.

Now, additional bold action and specific implementation measures are needed to make the housing element update successful. I urge the City to:
-Target the creation of 300,000 new homes through rezoning and land use reforms.
-Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
-Increase affordable housing opportunities in high-opportunity neighborhoods.
-Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
-Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Shenette Holman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Shenette Holman
442 S San Pedro St Los Angeles, CA 90013-2132
Ms.shenetteh@gmail.com

Housing Element <housingelement@lacity.org> Wed, Aug 18, 2021 at 4:16 PM
To: Ms.shenetteh@gmail.com

Hope all is well.

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

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



Housing Element Staff
Los Angeles City Planning

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



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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Updated Housing Elements and Zoning Codes

2 messages

Flora Melendez <flora.melendez@lacity.org> Sun, Aug 8, 2021 at 7:19 PM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Fri, Aug 6, 2021 at 6:47 PM
Subject: Fwd: Updated Housing Elements and Zoning Codes
To: Flora Melendez <flora.melendez@lacity.org>

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

Hello,

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

Respectfully,

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

--

~ Angie

Flora (Angie) Melendez
Pronouns: she/hers/her

Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
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T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

The 200_RHNA_Los Angeles.pdf
978K

Housing Element <housingelement@lacity.org> Wed, Aug 18, 2021 at 5:29 PM
To: info@thetwohundred.org

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

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

Housing Element Staff
Los Angeles City Planning

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

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

[Quoted text hidden]

August 6, 2021

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

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

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

Dear Mayor Garcetti and Mr. Bertoni,

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

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

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

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

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

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

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

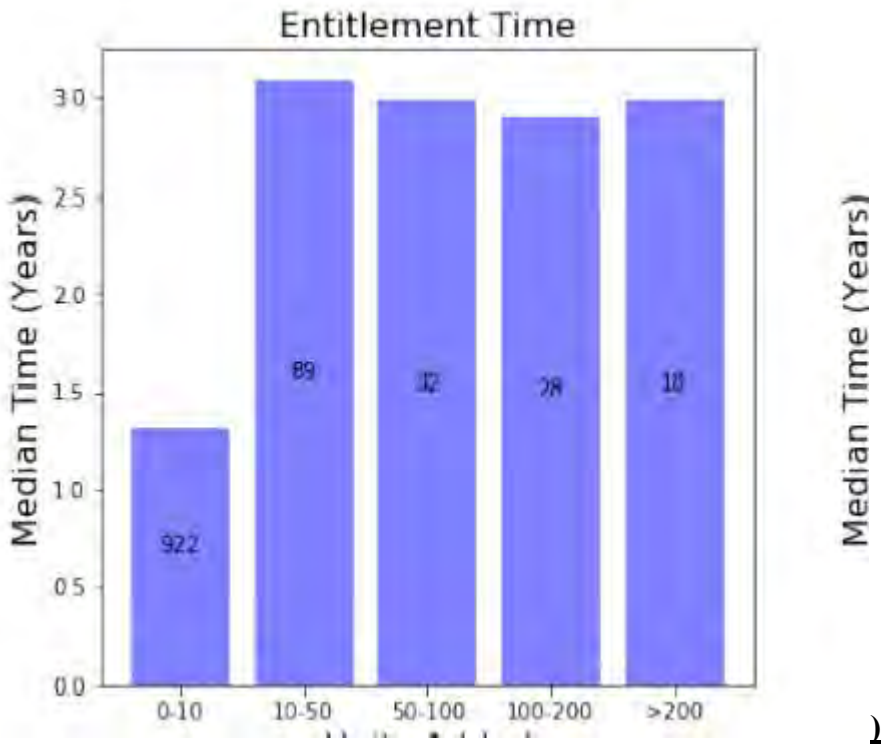
1. **Charging Country Club Initiation Fees for New Housing is Racist and Exclusionary.** Country clubs often charge initiation fees of $50,000 or more, with the express intent to select wealthier members and exclude "those people" who cannot afford steep fees. Many local agencies have imposed fees on new housing that wildly exceed even $50,000, such as San Francisco which has charged fees of $165,000 per apartment! While we appreciate that new homes need to pay for their "hard" infrastructure needs like water and sewage services, too many jurisdictions have allowed well-meaning special interests seeking additional funds for important local priorities like art, affordable housing, and recreational programs to pile these fees onto new housing rather than obtain funding (as or if needed by special assessments or taxes approved by existing residents) equitably, which means paid for equitably by the city's existing (not just future) residents. As documented by UCB, excessive and wildly different housing development fees increase housing costs and decrease housing production and affordability – and these fees are passed along to new residents. Development_Fees_Report_Final_2.pdf (berkeley.edu) Most cities and counties defend high fees on new housing with "nexus" studies, based on made-as-instructed reports prepared by consultants paid by cities. "Nexus" may pass constitutional muster, but violates civil rights housing laws by excluding housing – and "those people" (us) from your community.

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

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

Figure 1: Housing Project Entitlement/CEQA Process Time in San Francisco (by Project Size/Unit Count)

Measuring the Housing Permitting Process in San Francisco - Terner Center (berkeley.edu)



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A. **End Bureaucratic Delays to Housing Approvals**. Also as explained by UCB, "[t]he most significant and pointless factor driving up production costs was the length of time it takes to for a project to get through the city permitting and development process" which in turn caused even higher costs as projects stuck in bureaucratic review proceedings were required to repeatedly modify their projects to deal with the "additional hoops and requirements" that "pop up" at various stages of the permitting and development process. San_Francisco_Construction_Cost_Brief_-_Terner_Center_January_2018.pdf (berkeley.edu), p. 2.

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

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

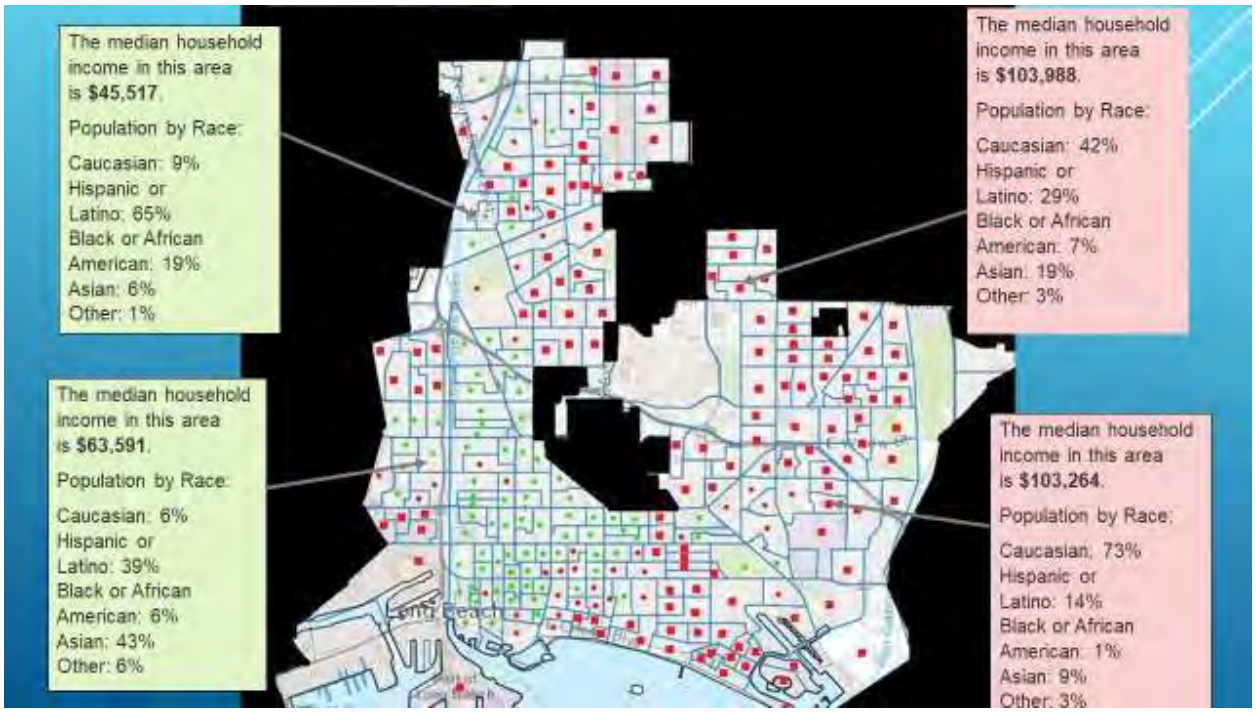
permit" (CUPs) even for code-compliant housing, to allow local agencies to apply a "we know it when we see it" open-ended level of discretion to allow, deny, or condition housing approvals – the same standard the Supreme Court applies to obscenity. In 1984, this CUP process – brought to us all by the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

Civil Rights Compliant Solution to Anti-Housing CEQA Abuse. *Under the Housing Accountability Act, cities and counties no longer have the discretion to disallow housing, require fewer units, or impose fees and exactions that make housing projects infeasible. Local control determines the allowable location and density of housing, but these cannot be "paper housing" that is never actually approved (or approved with feasible conditions). Only housing that causes a demonstrable and specific significant adverse consequence to human health or safety can be downsized, delayed, or conditioned with costly obligations.* Housing Accountability Act Technical Assistance Advisory Housing Element implementation procedures should expressly acknowledge this state law as a prohibition on the local agency's exercise of its discretion on any issue other than a demonstrable and specific adverse health or safety risk caused by the proposed housing project, and eliminate or limit subsequent CEQA review under conforming zoning requirements to prescribed objective health and safety standards specifically caused by the proposed housing project. As determined recently by the California Supreme Court, local government may still preserve exterior architecture and design review processes that do not create discretionary authority to add new conditions addressing CEQA topics. McCorkle Eastside Neighborhood Group v. City of St. Helena :: 2019 :: California Courts of Appeal Decisions :: California Case Law :: California Law :: US Law :: Justia. Local General Plan and zoning codes following this recommendation avoid mandatory CEQA processing and litigation risks, and are a mandate – especially in the whiter, wealthier and healthier communities such as most of Marin County that have elevated their "no growth" environmentalism into open and flagrant racist conduct such as intentionally segregating its public schools by race. First desegregation order in 50 years hits Marin schools - Los Angeles Times (latimes.com)

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

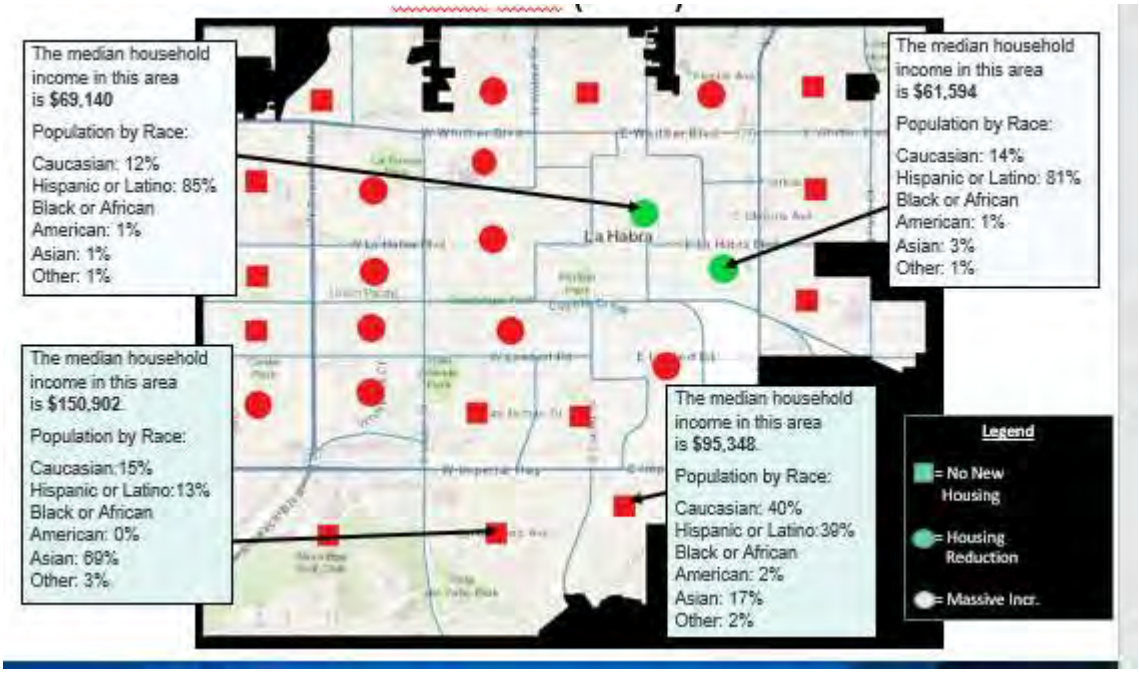
The Southern California Association of Governments (SCAG), which includes 197 cities an 6 counties where collectively the majority of Californians live, was on the verge in 2020 of adopting a VMT-centric regional housing plan that prioritized agency-decreed VMT reductions above all other laws, including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

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



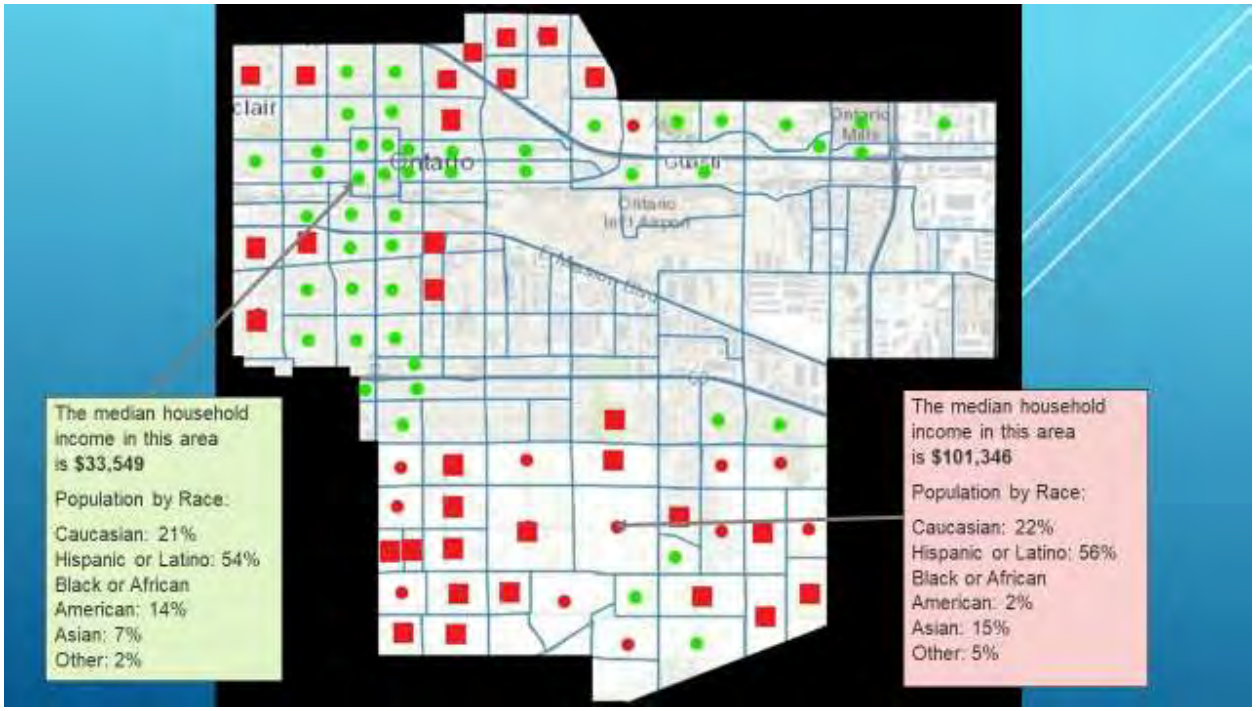
When applied to smaller communities, such as the small town of La Habra in Orange County, SCAG's VMT-reducing housing scheme was even more blatantly racist. As shown in Figure 3, SCAG decreed that housing belonged in the city's two poorest TAZ zone neighborhoods – majority Latino – and excluded from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

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



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

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



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

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

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

Figure 5: Oakland Redlining and VMT Map Comparison



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

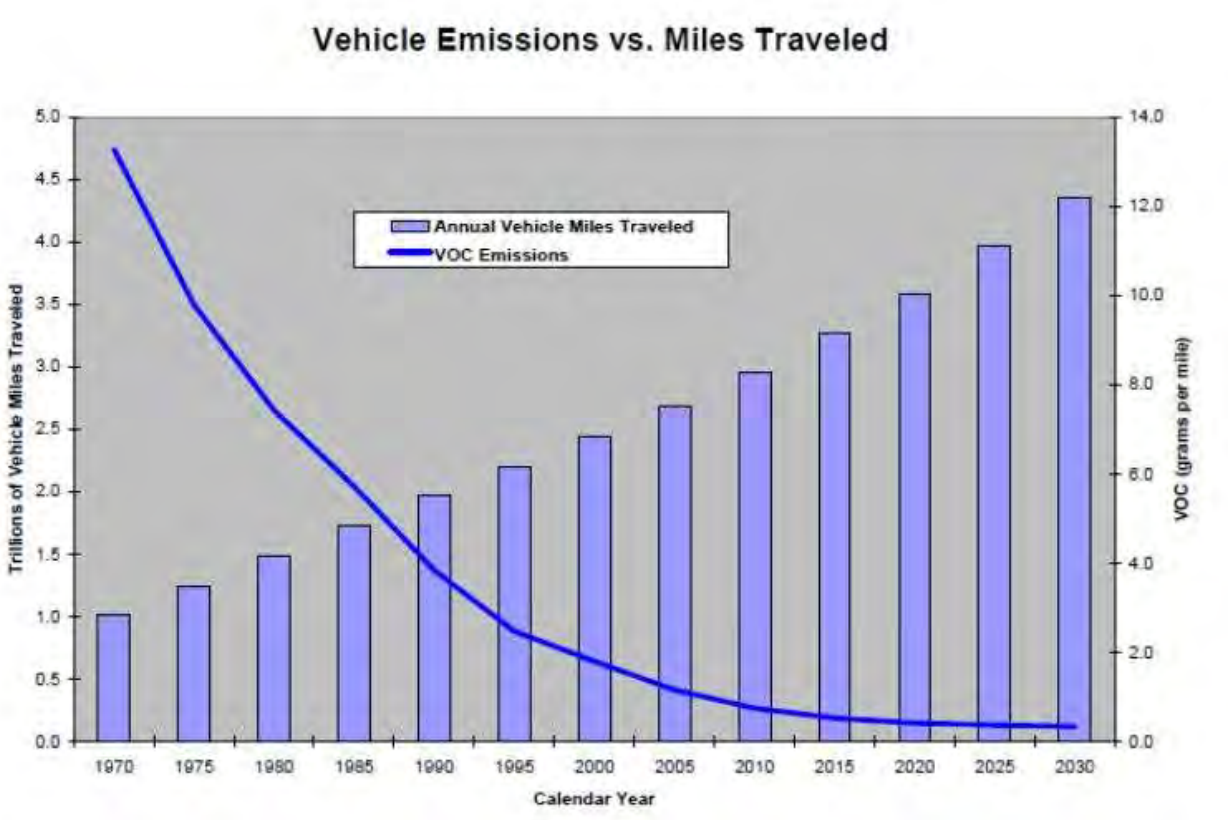
There are two other inconvenient truth about this VMT-based housing policy civil rights violation.

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

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

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

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



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

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

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

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

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

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

When longtime civil rights champion Amos Brown was recently asked whether "the Bay Area is a safe haven for Black people and other people of color" he was unambiguous: "No. . . Since 1970, we have lost Black people who were pushed out of this city. The 70's Black population was between 15-16%. Well now it's down to about 4%. That didn't happen by accident and it wasn't just economics. This happened because of public policy."
https://www.sfchronicle.com/lift-every-voice/article/Amos-Brown-16219697.php

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

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

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

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

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

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

Respectfully,



Robert Apodaca
Vice-Chair and Director of Public Policy
The Two Hundred
www.thetwohundred.org

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Chapter 2 Constraints/Housing Element Suggestions

Ryan.Leaderman@hklaw.com <Ryan.Leaderman@hklaw.com> Wed, Aug 4, 2021 at 6:47 PM
To: housingelement@lacity.org
Cc: matthew.glesne@lacity.org

Hi Housing Element Folks,

Constraints preventing expeditious housing development include the post-approval plan check, condition clearance, and covenant acquisition process. Chapter 2 of the draft Housing Element must better address removal of these constraints that result in months' long delays after a housing development project is approved. Some post-approval delays are a result of items, such as:

- Post-approval second guessing of entitlements/project details after approval. After approval, plan check staff will second guess and re-interpret zoning provisions applicable to projects that the Planning Department already approved; any interpretation of code provisions, compliance with requirements needs to happen during the entitlement process when the City processes the application. Aside from Housing Accountability Act requirements (for those projects subject to it) that prevent the City from identifying late inconsistencies, the late-hit review causes massive uncertainty, drives up costs, and takes a significant amount of time to resolve. This should be addressed.

- Post-approval covenant acquisition. We have run into issues with Recreation and Parks, in particular (but with an assist from the City Attorney's office), not issuing draft covenants for review and execution to effectuate park fee credits. I have one project where we are waiting more than eight months for RAP staff to even provide a draft of a required covenant for review. This is resulting in fees increasing substantially, creation of uncertainty, and massive delay – and we haven't even negotiated the covenant yet. There is no justification why the draft covenant and the terms going into the covenant cannot be prepared concurrent with the project approval instead of after the fact, especially since the open space areas were clearly and unambiguously identified during the entitlement process. This is a significant issue. Similarly, the HCID affordability covenant includes items not found in City codes and also is a late hit. There is no reason why many, if not, most of all the terms cannot be implemented via set ordinance or prepared concurrent with project approval instead of after the fact. These are two examples of real world constraints that impede the development of housing, increase costs, and create massive uncertainty. I imagine that land use professionals working in the City have many similar or other examples showing how the City's current post-approval covenant approval process majorly constrains housing development.

- City not accepting plan check drawings electronically or approving drawings electronically. Aside from bringing the City plan check process into the 21st Century more than twenty years late, this could save considerable time and expense by not having to produce paper, replicate and deliver paper copies.

I look forward to seeing the revised draft Housing Element addressing and helping to remove these constraints with real reform efforts so that the City can produce and lower the cost of housing.

Thank you,

Ryan Leaderman | **Holland & Knight**
Partner
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Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Significant typo in 2021-2029 Draft of the Housing Element - Chap. 6

Tony Gittelson <tonygittelson@gmail.com> Sun, Aug 1, 2021 at 4:29 PM
To: Blair Smith <blair.smith@lacity.org>
Cc: Housing Element <housingelement@lacity.org>

Hi Blair,

I'm actually going through the programs listed in Chap. 6 quite carefully (for my own learning & advocacy purposes) -- there are two **Program 10**'s on pp.6-20-21. Not trying to be pedantic, but it will screw-up the numbering of the rest of the programs--looks like #10 - The Affordable Linkage Fee is the new one. Maybe that goes to the back...?

Anyway, passing it on. The rest of the Housing Element has been extremely informative and well laid-out.

All best,

Tony

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On Wed, Jul 28, 2021 at 11:50 AM Blair Smith <blair.smith@lacity.org> wrote:

> Hi Tony,
>
> Yes in the last Housing Element (2013-2021) policies connect to programs, but are not physically linked. We are looking into document shortcuts for the final draft for those reading online. I'm glad the handouts were useful, we have them on the draft page as you mentioned and also on the resources page.
>
> Appreciate your suggestions,
> Blair
>
> On Wed, Jul 28, 2021 at 12:40 PM Tony Gittelson <tonygittelson@gmail.com> wrote:
>
> > Re my last comment: I see it is on the website, maybe it was always there and I overlooked it. I immediately went to the draft itself. Either way, many thanks for calling my attention to it, just what I was looking for!
> >
> > Tony Gittelson
> > Los Angeles, CA
> > Tel. (323) 938-5535
> > Cell (213) 400-1494
> > TonyGittelson@gmail.com
> >
> > On Wed, Jul 28, 2021 at 9:31 AM Tony Gittelson <tonygittelson@gmail.com> wrote:
> >
> > > Hi Blair,
> > >
> > > Wow, even this information sheet is a vast improvement! Precisely what the Housing Element needed--and what *we* needed, actually--to make it a more usable, searchable document. I'm also really delighted to hear that policies and programs will be linked in the next draft. Had all this been in the works??

Either way, thank you for being so responsive -- this small change is a *very* helpful tool for both housing advocates and for planners. I would definitely add this information sheet to the website, or is it already there?

Many thanks,

Tony

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On Wed, Jul 28, 2021 at 8:36 AM Blair Smith <blair.smith@lacity.org> wrote:

Hi Tony,

Thank you for the suggestion. Programs will be linked to specific policies in the revised draft this September. We also have an information sheet that connects the programs to the broader citywide priorities if you want to take a look.

Thanks,
Blair

On Fri, Jul 23, 2021 at 8:11 PM Tony Gittelson <tonygittelson@gmail.com> wrote:

Sorry, maybe a helpful PS - At a minimum, for online versions of the Housing Element, you could easily *hyperlink*, for example, Goal 3 policies with those programs that are intended to address Goal 3 priorities. That level of categorization already exists, it would just need to be hyperlinked linked. I'm not sure how you could link the sub-policy objectives (3.1, 3.2, etc) to programs--but it would sure be great if you could.

As it is, all the careful planning and organization of the Housing Element, turns into a bit of a muddle, in Chapter 6--just when you really most want to access that information.

Thanks again.

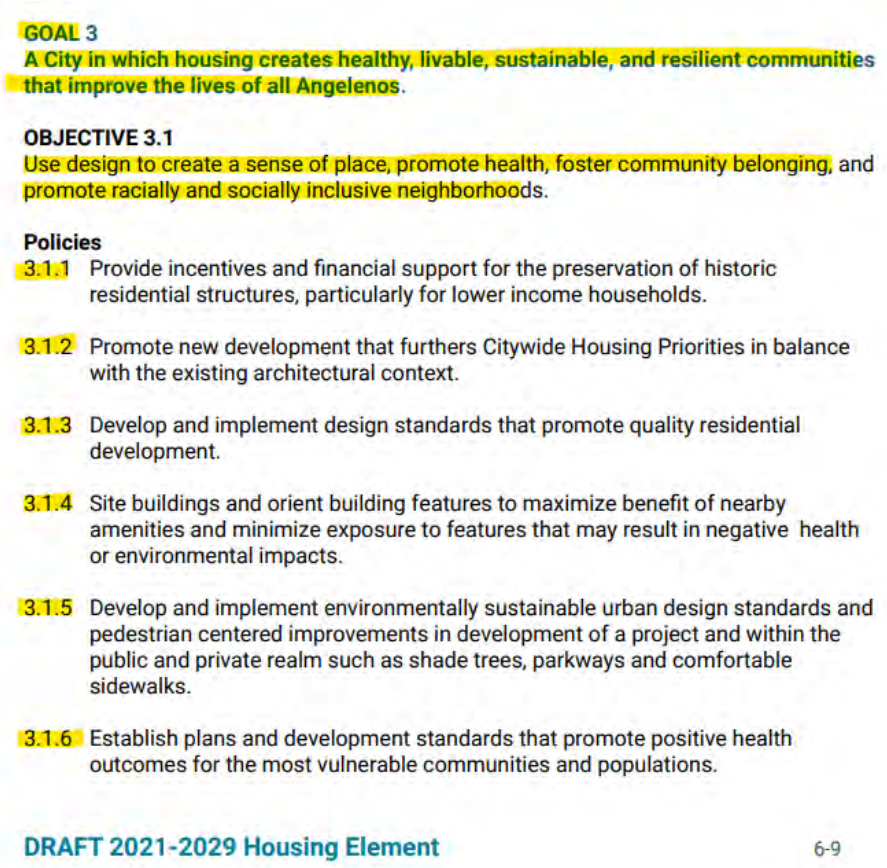
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On Fri, Jul 23, 2021 at 4:56 PM Tony Gittelson <tonygittelson@gmail.com> wrote:

Hi Blair (and/or the Housing Element Staff),

I am reading, and learning a ton from this latest draft of the Housing Element. Props to all involved, as it's highly readable and carpeted with extremely useful information, but a question/helpful criticism:

When I finally got to the **"Programs" section** in **Chap. 6**, to see what programs attach to which specific policy goals (as with some other housing advocates we're thinking of suggesting some language to include in the latest Element), I was dismayed to find the programs are not cross-indexed to specific policy goals. For instance, Goal 3 and the Policy Objectives that go with it, are an area of particular interest to us, eg, livability, health and sustainability:



GOAL 3
A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos.

OBJECTIVE 3.1
Use design to create a sense of place, promote health, foster community belonging, and promote racially and socially inclusive neighborhoods.

Policies

3.1.1 Provide incentives and financial support for the preservation of historic residential structures, particularly for lower income households.

3.1.2 Promote new development that furthers Citywide Housing Priorities in balance with the existing architectural context.

3.1.3 Develop and implement design standards that promote quality residential development.

3.1.4 Site buildings and orient building features to maximize benefit of nearby amenities and minimize exposure to features that may result in negative health or environmental impacts.

3.1.5 Develop and implement environmentally sustainable urban design standards and pedestrian centered improvements in development of a project and within the public and private realm such as shade trees, parkways and comfortable sidewalks.

3.1.6 Establish plans and development standards that promote positive health outcomes for the most vulnerable communities and populations.

DRAFT 2021-2029 Housing Element 6-9

But when you try to look for the programs that specifically address these areas, it's a surprising hodgepodge of programs (in an appendix) that you have to wade through, numbered 1 - 128. (Granted, there are "broad" goals--1,2,3,4,5--listed under the subheading. Still, it's a bit of a fishing expedition.)

Wouldn't it make more sense, that the policy objectives are somehow cross-indexed (or better yet hyperlinked) to the programs designed to carry out these policies? Would that be possible with the 6th cycle of the Housing Element? I think it would be enormously helpful to housing advocates and city planners.

I'd be eager to hear your thoughts.

Thanks so much,

Tony Gittelson
(I'm aligned/allied with a bunch of housing organizations, incl AHLA, CA YIMBY, and some local organizing groups)

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Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886








Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Ann Bickerton <aebickerton@everyactioncustom.com> Fri, Jul 30, 2021 at 2:44 PM
Reply-To: aebickerton@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. By creating a thorough quantitative model that estimates sites' likelihood of redevelopment, Planning has provided a fair estimate of the City's current realistic capacity for new housing and acknowledged that Los Angeles will only achieve 10% of its RHNA target in a "business as usual" scenario. The draft housing element also proposes creating over 220,000 homes through rezoning and other land use reforms, particularly in high-resource areas that have accommodated little new housing in recent years. All of this represents significant progress.

Now, additional bold action and specific implementation measures are needed to make the housing element update successful. I urge the City to:
-Target the creation of 300,000 new homes through rezoning and land use reforms.
-Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
-Increase affordable housing opportunities in high-opportunity neighborhoods.
-Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
-Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Ann Bickerton using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Ann Bickerton
11871 Washington Pl Los Angeles, CA 90066-4640
aebickerton@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Carey Bennett <careyjeanbennett@everyactioncustom.com> Thu, Jul 29, 2021 at 8:40 AM
Reply-To: careyjeanbennett@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Carey Bennett using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Carey Bennett
2929 St George St Los Angeles, CA 90027-3025
careyjeanbennett@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Verity Freebern <verityfreebern@everyactioncustom.com> Sat, Jul 31, 2021 at 9:28 AM
Reply-To: verityfreebern@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my outrage about the most recent city council decision to criminalize poverty. The council's majority vote to reinstate the no-lie law is shameful and inhumane. It must not be allowed to happen.

Additionally, I support a strong, transformative housing element update for LA.

I urge the City to:
-Target the creation of 300,000 new homes through rezoning and land use reforms.
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Personally sent by Verity Freebern using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Verity Freebern
4258 Verdugo Rd Los Angeles, CA 90065-4714
verityfreebern@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Mark Larson <markdlarson@everyactioncustom.com> Fri, Jul 30, 2021 at 9:00 PM
Reply-To: markdlarson@hey.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles.

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Personally sent by Mark Larson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Mark Larson
934 4th St Santa Monica, CA 90403-2617
markdlarson@hey.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Sarah Kate Levy <sklevy@everyactioncustom.com> Thu, Jul 29, 2021 at 1:37 PM
Reply-To: sklevy@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Sarah Kate Levy using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Sarah Kate Levy
3056 Durand Dr Los Angeles, CA 90068-1910
sklevy@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Zennon Ulyate-Crow <zennonuc@everyactioncustom.com> Sat, Jul 31, 2021 at 10:47 AM
Reply-To: zennonuc@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Zennon Ulyate-Crow using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Zennon Ulyate-Crow
PO Box 680 Topanga, CA 90290-0680
zennonuc@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Jeffrey White <white.jeffreyn@everyactioncustom.com> Thu, Jul 29, 2021 at 1:22 PM
Reply-To: white.jeffreyn@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Jeffrey White using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jeffrey White
629 N Harper Ave Los Angeles, CA 90048-2224
white.jeffreyn@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Kevin Zelaya <kevz21189@everyactioncustom.com> Thu, Jul 29, 2021 at 1:11 PM
Reply-To: kevz21189@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Kevin Zelaya using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Kevin Zelaya
1139 S Rimpau Blvd Los Angeles, CA 90019-1812
kevz21189@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

LA City Housing Element - Comment Letter

Anthony Dedousis <anthony@abundanthousingla.org> Wed, Jul 28, 2021 at 9:32 AM
To: Housing Element <housingelement@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, vince.bertoni@lacity.org, Nicholas Maricich <nicholas.maricich@lacity.org>
Cc: Leonora Camner <leonora@abundanthousingla.org>, Jon Wizard <jon@yimbylaw.org>, Jes McBride <jes@yimbylaw.org>, Sonja Trauss <sonja@yimbylaw.org>

Dear Mr. Bertoni and colleagues,

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

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

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

Regards,

Anthony

--

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

July 27, 2021

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

Dear Mr. Bertoni,

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

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

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

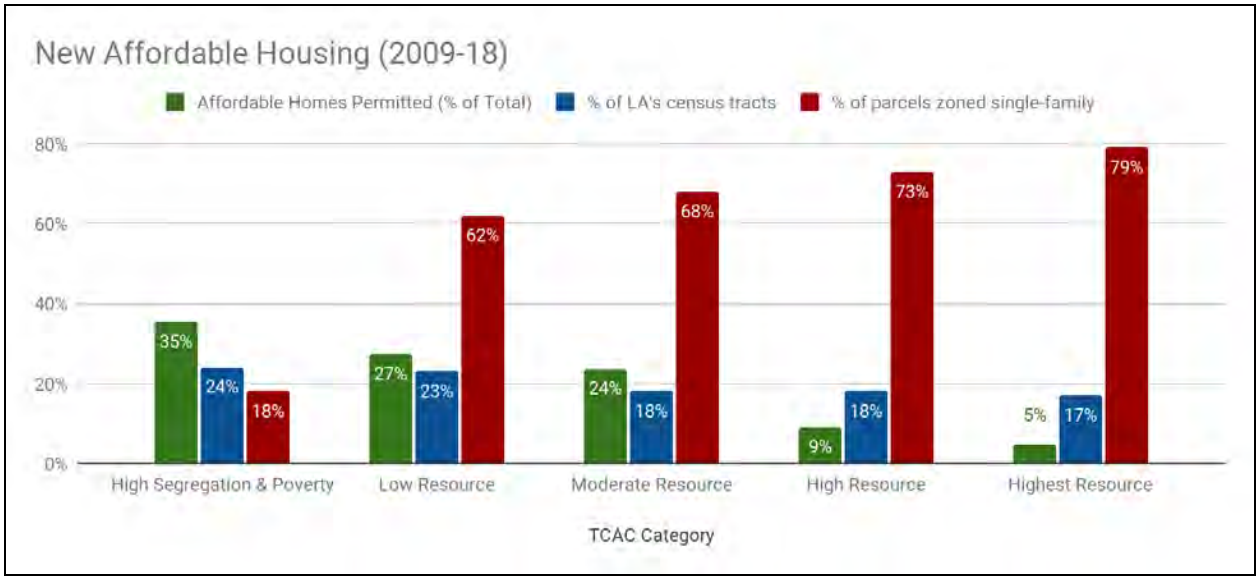
- In January 2021, we wrote to recommend that, as part of the housing element update process and RHNA rezoning, the City set housing growth targets for each CPA, based on objective, quantifiable criteria like housing costs, median income, access to transit, proximity to job centers, access to parks and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

high on AFFH compliance in housing element updates, as required under Assembly Bill 686.
- In June, we wrote to express support for the Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416) and the Report Relative to a City Zoning Code Update (CF 20-1042), and encouraged the City Council to incorporate major reforms into the housing element update.

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

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

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



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

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

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

[1] Report Relative to Citywide Equitable Distribution of Affordable Housing, May 2021, p. 12 and p. 14

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

The following issues are of particular concern to us:

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

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

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

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

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

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

[2] Draft Housing Element, City of Los Angeles, pg. 4-6
[3] HCD APR Dashboard, Units Permitted by Structure per Year, 2017-20
[4] HCD No Net Loss Law Memo, pg. 1
[5] HCD Site Inventory Guidebook, pg. 22

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

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

Draft Housing Element No Net Loss Buffers

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

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

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

Recommended No Net Loss Buffers

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

[6] HCD Site Inventory Guidebook, pg. 22

Moderate Income	75,091	86,355	15%
Above Moderate Income	196,831	196,831	0%
Total	**456,643**	**514,088**	**13%**

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

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

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

Draft Housing Element Pipeline Forecast

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

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

[7] Draft Housing Element, City of Los Angeles, pg. 4-20
[8] Initial Study, City of Los Angeles, pg. 16

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

Recommended Housing Element Pipeline Forecast

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

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

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

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

[9] HCD Site Inventory Guidebook, pg. 31

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

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

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

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

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

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

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

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

[10] Draft Housing Element, City of Los Angeles, pg. 4-23
[11] Draft Housing Element, City of Los Angeles, pg. 4-25

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

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

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

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

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

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

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

[12] Draft Housing Element, City of Los Angeles, pg. 4-25
[13] Draft Housing Element, Appendix 4.6, pg. 14
[14] Draft Housing Element, Appendix 4.6, pg. 29

Recommended updates to ASI methodology

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

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

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

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

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

[15] AFFH Guidance Memo, p. 46
[16] AFFH Guidance Memo, p. 47

with an above-average median income must break down barriers that keep lower income and minority households from accessing housing in the city.[17]

- "Goals, policies, and actions" to further fair housing must be "aggressively set to overcome ... contributing factors [to fair housing problems, and thus] to meet the 'meaningful impact' requirement in statute."[18] The list of actions shall include concrete timeframes for implementation, measurable outcomes, explicit prioritization ("high," "medium," or "low"), and "must be created with the intention to have a significant impact, well beyond a continuation of past actions."[19]
- "The schedule of actions generally must (1) enhance the mobility of low-income and minority communities, (2) encourage the development of new affordable housing in high-opportunity areas, (3) protect existing residents from displacement, and (4) invest in disadvantaged places."[20]

The draft housing element is therefore obligated to promote fair housing opportunities and undo patterns of segregation. The City must follow HCD's recommendation that cities distribute lower-income housing opportunities throughout the city, and recommends that cities first identify development potential for lower-income housing in high-opportunity neighborhoods.[21] **This would mean rezoning more parcels, including residential parcels currently zoned single-family only, to encourage enough housing growth to achieve the RHNA target.**

The City is also obligated to provide meaningful AFFH analysis, including evidence that its proposed distribution of lower-income housing opportunities would reduce the concentration of lower-income households in locations with an existing concentration of low- and moderate-income households. **HCD's recent AFFH guidance makes it abundantly clear that this benchmark will be used to help determine AFFH compliance.[22]**

Additionally, Government Code Section 65583(c) requires housing elements to include programs with concrete action steps to facilitate housing production.[23] Per HCD's Housing Elements Building Blocks, "Programs must include specific action steps the locality will take to implement its policies and achieve its goals and objectives. Programs must also include a specific timeframe for implementation, identify the agencies or officials responsible for implementation, describe the jurisdiction's specific role in implementation, and (whenever possible) identify specific, measurable outcomes." Building Blocks lists definite time frames for implementation, demonstration of a firm commitment to implement the program, description of the local government's specific role in program implementation, description of the specific action

[17] AFFH Guidance Memo, pp. 15, 32-34, 77
[18] AFFH Guidance Memo, p. 52
[19] AFFH Guidance Memo pp. 52, 71
[20] AFFH Guidance Memo, p. 54
[21] HCD Site Inventory Guidebook, pg. 3
[22] AFFH Guidance Memo, p. 47
[23] "The element shall contain all of the following: A program [or programs] that sets forth a schedule of actions during the planning period, each with a timeline for implementation, that may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives…"

steps to implement the program, and proposed measurable outcomes (e.g., the number of units created, completion of a study, development of a homeless shelter, initiation of a rezone program, preservation of at-risk units, etc.) as appropriate examples of concrete action steps.

The draft housing element and Fair Share Reports appropriately identify major governmental constraints that perpetuate housing scarcity, provide convincing evidence that restrictive zoning and land use rules are associated with a lack of affordable housing opportunities in high-resource neighborhoods, and propose a reasonable set of high-level policy solutions. **However, the draft housing element doesn't provide an appropriately specific rezoning, constraint removal, and overall land use reform program, nor is there a firm commitment to implementing specific policy measures to encourage strong housing growth citywide, particularly in high-resource neighborhoods.** The Goals section of the draft housing element frequently uses words like "plan", "explore", "consider", "examine", but contains very few firm commitments to action or implementation.

Without a more detailed plan and a credible path to implementation by October 2024, the City will not achieve its RHNA target. Additionally, the draft housing element's lack of specificity on a land use reform program makes it impossible to assess whether it, or the draft housing element altogether, complies with state AFFH law.

We urge the City to provide a thorough, detailed plan for rezoning, constraint removal, and overall land use reform as part of the final version of the housing element update, including details on implementation.

<u>A credible plan for equitably achieving the RHNA goal would include:</u>

A. Committing to the creation of 306,000 new homes by 2029 through the housing element's rezoning and land use reform programs.

The draft housing element's contention that the RHNA target can be achieved by only rezoning for 220,000 new homes is based on an overly optimistic assessment of the Adequate Sites Inventory. Committing to land use reforms that target the creation of 306,000 more homes by 2029 is necessary in order to meet the RHNA target.

This must include a firm commitment to increase Los Angeles' **realistic capacity** by 306,000 homes (i.e. increasing the city's zoned capacity enough to result in the production of 306,000 homes), not simply increasing the **theoretical zoned capacity** by 306,000 units. A parcel's maximum theoretical capacity is not the same as its realistic capacity. To draw a parallel to college admissions, when UCLA wants 2,000 students in its incoming class, they admit 4,000 students. Similarly, to achieve housing production targets, jurisdictions must increase zoned capacity well above the target number of new homes.

State housing element law requires cities to target realistic capacity growth, not theoretical zoned capacity, in its rezoning program, just as it does for assessment of the site inventory.[24] Similarly, HCD instructs cities to "accommodate 100 percent of the shortfall of sites necessary to accommodate the remaining housing need for housing for very low- and low-income households during the planning period…" and that "Those sites must meet the adequate sites requirements in terms of the suitability and availability outlined above."[25] This also would be in keeping with the draft housing element's excellent model for assessing the City's Expected Unit Potential, which recognizes that parcel-level estimates of likelihood of redevelopment are critical for accurately forecasting future housing production.

B. Implementation of a comprehensive Fair Share approach to the RHNA rezoning program, which would define "opportunity" holistically.

CPA and/or neighborhood-level RHNA targets, including affordable housing growth RHNA targets, should be based on a formula that includes the following objective, numerical criteria:

- Housing costs
- Median income
- Access to transit
- Proximity to job centers
- Access to public resources (e.g. parks, schools)
- Patterns of historical exclusion and segregation
- Environmental quality

This would essentially merge the proposed Equitable RHNA Rezoning Program and Citywide Housing Needs Allocation Process/Targeted Fair Share Zoning Allocations methodologies, ensuring that a consistent set of standards would guide RHNA rezoning, a Framework Element update, expansion of TOC and the city Density Bonus program, and all future community plan updates. This would also ensure that a majority of new lower-income housing opportunities are accommodated in moderate-, high-, and highest-resource census tracts.

C. Increase affordable housing opportunities in high-opportunity neighborhoods.

In order to meet HCD's AFFH standards, the City's housing element must reverse historic patterns of socioeconomic segregation by dismantling the barriers to housing opportunities for low- and moderate-income households in high-income neighborhoods. **Policies that would promote this outcome include:**

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[24] **Gov't Code 65583(c)(1):** "The housing element program "shall … (1) Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning..." It is noteworthy that the same term, "accommodate," is used in the statute to describe both what's learned from the site capacity analysis, and what will be done through the rezoning.

[25] HCD Site Inventory Guidebook, pg. 33

- **Rezoning parcels located near transit, job centers, schools, and parks in order to expand the supply of housing in the City's highest-opportunity areas. This should include R1 zoned parcels where single-family detached homes are currently mandated by law.**
- **Significantly reducing the concentration of lower-income households in neighborhoods with high concentrations of low- and moderate-income households, in neighborhoods with high exposure to pollution, and in R/ECAPs.**
- **Identifying new funding sources and public resources to encourage the production of affordable housing, such a real estate transfer tax or congestion pricing.**
- **Exempting parcels containing rent-restricted and de facto affordable housing units from rezoning, in order to prevent lower-income renter displacement.**
- **Ensuring that "no net loss" provisions apply to parcels in the site inventory and rezoning program with a monitoring and implementation program.**
- **Prioritizing the production of affordable housing on publicly-owned land.**
- **Creating a 100% affordable housing zoning overlay that encompasses high-opportunity neighborhoods, including R1 zoned parcels.**
- **Implementation of stronger tenant protection policies, including expanded affordable unit replacement requirements ("no net loss") for redevelopment of existing rental properties, a "right of return" after redevelopment at the same rent as before, and rental assistance during redevelopment.**

D. Avoid relying on Community Plan updates for implementation of the RHNA rezoning program.

Program 121 in the draft Housing Element states that "The Rezoning Program is anticipated to be implemented through a number of work efforts including updates to up to 16 Community Plans (four West LA plans and six SE/SW Valley plans, two Downtown plans, Boyle Heights, Hollywood, Harbor-Gateway and Wilmington), two Specific Plans (CASP and Slauson TNP) as well as at least one citywide ordinance that will create additional zoning capacity through an expansion of affordable housing incentive programs (Density Bonus Update)."

It is concerning that the City proposes to rely on Community Plan updates to achieve a significant portion of the RHNA rezoning program, since the Community Plan update process has a very poor track record of delivering strong housing growth. Recent Community Plan updates have suffered from years-long delays to develop and implement, often due to nuisance lawsuits from housing opponents (the Hollywood Community Plan update is a particularly salient example). Additionally, these updates often reflect the policy preferences of vocal housing opponents (e.g. the Westside Community Plan), rather than the broader community, which is why they generally do not meaningfully increase new housing opportunities. **Relying on a fundamentally broken process to achieve a rezoning program that must be implemented by October 2024 is a recipe for failure.**

The final Housing Element should report the increase in realistic capacity for housing (see Recommendation A) that would be created via the Downtown and Hollywood Community Plan updates, and should commit to achieving the remainder of the rezoning target through policy reforms that apply citywide (see Recommendations B, C, E, and G for examples).

E. Expand and merge TOC and the city Density Bonus program.

The City's successful TOC program has led to the production or proposal of over 30,000 housing units, of which 21% are affordable to lower-income households. Expanding it to cover more transit-rich locations and locations with access to high-quality resources, jobs, and amenities would create even more affordable housing units in high-income neighborhoods. We are encouraged by the Housing Element and Fair Share Reports' support for expanding TOC and combining it with the City's Density Bonus Program.

Crucially, this expansion must include locations where apartments are currently banned, since TOC incentives currently do not apply to parcels where fewer than five units may be built. This significantly limits the effectiveness of the TOC program, and helps to explain why relatively few TOC units have been produced in the Westside and San Fernando Valley, where R1 zoning is particularly widespread.

F. Update the Framework Element by 2024, in parallel with the RHNA rezoning, or consider abolishing the Framework Element altogether.

The Framework Element, a strategy for long-term growth that influences future community plan and citywide element updates, is decades out of date. By relying on flawed and outdated forecasts of future neighborhood population growth, it effectively sets artificial caps on housing production in many neighborhoods, acting as a significant barrier to an equitable distribution of new housing opportunities citywide.

While the Housing Element and Fair Share Reports recognize the need for an updated Framework Element, they don't commit to a date by which to achieve this effort. Updating the Framework Element by 2024 is a necessary step towards implementation of a high-quality, comprehensive Fair Share approach to the RHNA rezoning program. Alternatively, the City should consider abolishing the Framework Element altogether, since it is optional and not required under state law.

G. Implement a strong constraint removal program that would apply citywide.

While the Housing Element and Fair Share Reports discuss at length the many governmental constraints that restrict housing production and foster housing scarcity and unaffordability, they lack a detailed, credible plan for constraint removal that would apply citywide, as required under California housing element law. **Policies that would promote constraint removal, housing supply growth, and greater housing affordability include:**

- **End exclusionary zoning by legalizing 8 housing units on all residentially-zoned parcels, and by legalizing mid-rise and high-rise housing production on parcels near transit in high-resource areas where apartments are banned today.**
    - Legalizing denser housing on owner-occupied R1 parcels is especially important, given that the draft Housing Element's rezoning program appears over-reliant on multifamily residential and commercial parcels that likely host rent-stabilized units ("More than 50% of lower income rezoning will occur on sites with exclusively residential uses or allowing 100% residential uses.")[26] Senate Bill 10, if passed, would help to facilitate this local reform.
- **Eliminate on-site parking requirements, instead allowing property owners to decide how much on-site parking is necessary.**
- **Reduce restrictions on maximum height, floor-area ratio, unit size, and lot coverage.**
- **Raise the Site Plan Review threshold to 250 homes, and establish a fast by-right review process for all new multifamily and mixed-use buildings which meet the zoning law and the General Plan.**
- **Pre-approve standard ADU, small-scale "missing middle" multifamily and small lot subdivision housing plans, allowing developers to receive a permit quickly if they use a pre-approved design.**

H. Include a full list of parcels where the rezoning program will apply in the final version of the Housing Element update.

The City's final Housing Element should provide a full parcel-level dataset explaining where the proposed rezoning program would and would not apply, as well as summary statistics breaking out the number of homes in each income bucket accommodated in each neighborhood and by TCAC category of census tracts. This level of transparency is necessary to demonstrate that the City's rezoning program appropriately meets the state's AFFH requirements. This would also be in keeping with Los Angeles County's housing element, which provided a complete list of parcels that would be rezoned in order to implement its rezoning program.

***

The City of Los Angeles has a legal obligation to sufficiently plan to meet current and future residents' housing needs, in a way that guarantees access to opportunity for Californians of all racial and ethnic backgrounds. The issues that we've highlighted above suggest that the City has not yet offered a credible plan for fulfilling this legal obligation. We urge you to actively embrace this opportunity to provide a variety of attainable housing options for the residents and workers of Los Angeles.

[26] Draft Housing Element, pg. 6-84 and 6-85

Finally, state law imposes penalties on jurisdictions that fail to adopt a compliant 6th Cycle housing element update by October 15, 2021. On that date, noncompliant jurisdictions will forfeit the right to deny residential projects on the basis of local zoning, so long as projects include at least a 20% set-aside for below market-rate units or are 100% moderate-rate projects.[27] Noncompliant jurisdictions may also lose the ability to issue building permits, including permits for kitchen and bath renovations. Jurisdictions that want to maintain local control over new development should therefore plan to adopt a compliant housing element update on time.

In May, HCD declined to certify San Diego's 6th Cycle housing element, on the grounds that it did not adequately meet the legal requirements to affirmatively further fair housing, and to demonstrate the likelihood of redevelopment of non-vacant sites. If San Diego does not meet these requirements by June 16, 2021, HCD will find the housing element out of compliance. This suggests that HCD will be bold in enforcing housing element law, and that the City risks rejection of its 6th Cycle housing element and decertification if it continues down this path.

We request the opportunity to meet with you and your colleagues to address the concerns raised in this letter. Thank you for your time and consideration.

Sincerely,

Leonora Camner	Sonja Trauss
Executive Director	Executive Director
Abundant Housing LA	YIMBY Law

CC: Jason Elliott, Senior Counselor to Governor Gavin Newsom
Megan Kirkeby, Deputy Director, Housing Policy Development, HCD
Melinda Coy, Land Use and Planning Manager, HCD
Tyrone Buckley, Assistant Deputy Director of Fair Housing, HCD
Paul McDougall, Housing Policy Development Manager, HCD

[27] California Government Code 65589.5(d)(5).

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Tommy Atlee <tommyatlee@everyactioncustom.com> Thu, Jul 29, 2021 at 11:33 AM
Reply-To: tommyatlee@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. By creating a thorough quantitative model that estimates sites' likelihood of redevelopment, Planning has provided a fair estimate of the City's current realistic capacity for new housing and acknowledged that Los Angeles will only achieve 10% of its RHNA target in a "business as usual" scenario. The draft housing element also proposes creating over 220,000 homes through rezoning and other land use reforms, particularly in high-resource areas that have accommodated little new housing in recent years. All of this represents significant progress.

Now, additional bold action and specific implementation measures are needed to make the housing element update successful. I urge the City to:
-Target the creation of 300,000 new homes through rezoning and land use reforms.
-Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
-Increase affordable housing opportunities in high-opportunity neighborhoods.
-Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
-Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Tommy Atlee using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tommy Atlee
147 N Norton Ave Los Angeles, CA 90004-3912
tommyatlee@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Golden Bachelder <bacheldergolden@everyactioncustom.com> Wed, Jul 28, 2021 at 2:29 PM
Reply-To: bacheldergolden@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Golden Bachelder using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Golden Bachelder
1 Lmu Dr Los Angeles, CA 90045-2650
bacheldergolden@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Sarah Back <sarahback1@everyactioncustom.com> Wed, Jul 28, 2021 at 2:16 PM
Reply-To: sarahback1@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Sarah Back using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Sarah Back
1260 N Hayworth Ave West Hollywood, CA 90046-5265
sarahback1@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Chelsea Bangasser <clbangasser@everyactioncustom.com> Wed, Jul 28, 2021 at 3:05 PM
Reply-To: clbangasser@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Chelsea Bangasser using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Chelsea Bangasser
220 San Vicente Blvd Santa Monica, CA 90402-1526
clbangasser@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 11:24 AM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Nicholas Burns III** <nkburns3@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 11:15 AM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Nicholas Burns III using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nicholas Burns III
1740 S Westgate Ave Unit H Los Angeles, CA 90025-3792
nkburns3@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Chelsea Byers <chels.byers@everyactioncustom.com> Wed, Jul 28, 2021 at 3:19 PM
Reply-To: chels.byers@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Chelsea Byers using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Chelsea Byers
9031 Phyllis Ave Apt 3 West Hollywood, CA 90069-4424
chels.byers@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Bob C <bcaloza@everyactioncustom.com> Thu, Jul 29, 2021 at 11:10 AM
Reply-To: bcaloza@me.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Bob C using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Bob C
3401 Scott Rd Burbank, CA 91504-1736
bcaloza@me.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Anthony Castelletto <a.castelletto@everyactioncustom.com> Wed, Jul 28, 2021 at 2:02 PM
Reply-To: a.castelletto@ucla.edu
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Anthony Castelletto using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Anthony Castelletto
3608 Keystone Ave Apt 4 Los Angeles, CA 90034-5622
a.castelletto@ucla.edu

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Mehnaaz Chowdhury <mzchowdhury19@everyactioncustom.com> Wed, Jul 28, 2021 at 6:25 PM
Reply-To: mzchowdhury19@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Mehnaaz Chowdhury using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Mehnaaz Chowdhury
1200 N Mansfield Ave Los Angeles, CA 90038-1100
mzchowdhury19@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Kyle Chrise <kylechrise@everyactioncustom.com> Wed, Jul 28, 2021 at 4:37 PM
Reply-To: kylechrise@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

More housing: Let's get this done!

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Kyle Chrise using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Kyle Chrise
5655 Murietta Ave Van Nuys, CA 91401-4709
kylechrise@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Ben Creed <creedibility@everyactioncustom.com> Wed, Jul 28, 2021 at 8:15 PM
Reply-To: creedibility@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Ben Creed using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Ben Creed
5323 Wilkinson Ave Valley Village, CA 91607-2412
creedibility@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 2:05 PM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Catherine Curtis** <herdingcath@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 2:04 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

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Personally sent by Catherine Curtis using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Catherine Curtis
219 S Barrington Ave Los Angeles, CA 90049-3354
herdingcath@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Chase Engelhardt <cengelh1@everyactioncustom.com> Wed, Jul 28, 2021 at 2:02 PM
Reply-To: cengelh1@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Chase Engelhardt using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Chase Engelhardt
3709 Watseka Ave Los Angeles, CA 90034-4002
cengelh1@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Mary Rose Fissinger <Mrosefiss@everyactioncustom.com> Thu, Jul 29, 2021 at 7:21 AM
Reply-To: Mrosefiss@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Mary Rose Fissinger using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Mary Rose Fissinger
220 1/2 N Avenue 54 Los Angeles, CA 90042-4106
Mrosefiss@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Steven Guerry <steven.guerry@everyactioncustom.com> Thu, Jul 29, 2021 at 8:05 AM
Reply-To: steven.guerry@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I was a resident of Los Angeles from 2004 to 2020. I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Steven Guerry using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Steven Guerry
5346 S Cornell Ave Chicago, IL 60615-5655
steven.guerry@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Michael Hayes <mhayes23@everyactioncustom.com> Wed, Jul 28, 2021 at 6:16 PM
Reply-To: mhayes23@fordham.edu
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Michael Hayes using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Michael Hayes
933 N Benton Way Los Angeles, CA 90026-3825
mhayes23@fordham.edu

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Terence Heuston <terenceheuston@everyactioncustom.com> Thu, Jul 29, 2021 at 5:37 AM
Reply-To: terenceheuston@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Terence Heuston using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Terence Heuston
2632 N Commonwealth Ave Los Angeles, CA 90027-1210
terenceheuston@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Eddie Isaacs <isaacs_e@everyactioncustom.com> Wed, Jul 28, 2021 at 9:19 PM
Reply-To: isaacs_e@sbcglobal.net
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Eddie Isaacs using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Eddie Isaacs
375 E 2nd St Apt 603 Los Angeles, CA 90012-4157
isaacs_e@sbcglobal.net

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Stanley Johnson <STJOHNSO@everyactioncustom.com> Wed, Jul 28, 2021 at 2:20 PM
Reply-To: STJOHNSO@aerotek.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Stanley Johnson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Stanley Johnson
1120 S Grand Ave Apt 1806 Los Angeles, CA 90015-4398
STJOHNSO@AEROTEK.COM

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Brennan Lawson <lawson.brennan@everyactioncustom.com> Wed, Jul 28, 2021 at 2:01 PM
Reply-To: lawson.brennan@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Brennan Lawson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Brennan Lawson
20001 Valley View Dr Topanga, CA 90290-3269
lawson.brennan@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Tanya Lebeck <tlebeck@everyactioncustom.com> Wed, Jul 28, 2021 at 7:19 PM
Reply-To: tlebeck@calstatela.edu
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles.

We need to fix our city's affordable housing shortage. To do this we need to create at least 456,000 new homes by 2029, including at least 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Tanya Lebeck using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tanya Lebeck
135 S Holliston Ave Apt F Pasadena, CA 91106-2625
tlebeck@calstatela.edu

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Jennifer Martinez <jen.yvette.martinez@everyactioncustom.com> Wed, Jul 28, 2021 at 2:06 PM
Reply-To: jen.yvette.martinez@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Jennifer Martinez using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jennifer Martinez
4821 Gaynor Ave Encino, CA 91436-1430
jen.yvette.martinez@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Alec Mitchell <alecpm@everyactioncustom.com> Wed, Jul 28, 2021 at 2:52 PM
Reply-To: alecpm@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Alec Mitchell using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Alec Mitchell
108 W 2nd St Apt 1008 Los Angeles, CA 90012-1592
alecpm@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Babak Mozaffari <bm@everyactioncustom.com> Wed, Jul 28, 2021 at 4:19 PM
Reply-To: bm@contactbm.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Babak Mozaffari using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Babak Mozaffari
525 Santa Monica Blvd Apt 404 Santa Monica, CA 90401-3613
bm@contactbm.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Mark S. and Marsha Novak <marlynov@everyactioncustom.com> Wed, Jul 28, 2021 at 2:08 PM
Reply-To: marlynov@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Mark S. and Marsha Novak using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Mark S. and Marsha Novak
6039 Promontory Ln Ventura, CA 93003-6584
marlynov@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Colleen OBrien <Colleenkelleyobrien@everyactioncustom.com> Wed, Jul 28, 2021 at 2:06 PM
Reply-To: Colleenkelleyobrien@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Colleen OBrien using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Colleen OBrien
1326 Sunset Ave Santa Monica, CA 90405-5843
Colleenkelleyobrien@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Marcus Owens <marcussowenss@everyactioncustom.com> Wed, Jul 28, 2021 at 4:03 PM
Reply-To: marcussowenss@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Marcus Owens using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Marcus Owens
1425 6th St Apt 503 Santa Monica, CA 90401-2580
marcussowenss@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Daniel Poineau <dpoineau@everyactioncustom.com> Thu, Jul 29, 2021 at 1:06 PM
Reply-To: dpoineau@gmail.com
To: vince.bertoni@lacity.org

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I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Daniel Poineau using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Daniel Poineau
939 S Hill St Apt 635 Los Angeles, CA 90015-3283
dpoineau@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Jessamyn Prince <jessamynmidoriprince@everyactioncustom.com> Thu, Jul 29, 2021 at 8:43 AM
Reply-To: jessamynmidoriprince@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Jessamyn Prince using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jessamyn Prince
573 S Lake Ave Apt B Pasadena, CA 91101-5000
jessamynmidoriprince@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Ryan Rubin <rubinryand@everyactioncustom.com> Wed, Jul 28, 2021 at 2:30 PM
Reply-To: rubinryand@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Ryan Rubin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Ryan Rubin
11962 Culver Dr Culver City, CA 90230-6002
rubinryand@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Rafael Sands <rafaelsands@everyactioncustom.com> Wed, Jul 28, 2021 at 2:48 PM
Reply-To: rafaelsands@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Rafael Sands using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Rafael Sands
12721 Hanover St Los Angeles, CA 90049-3739
rafaelsands@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Andrew Silver <asilverins@everyactioncustom.com> Wed, Jul 28, 2021 at 2:40 PM
Reply-To: asilverins@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Today the City Council approved revisions to LAMC 41.18. The city must now to the hard work of creating affordable housing.

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Personally sent by Andrew Silver using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andrew Silver
4328 Bellingham Ave Studio City, CA 91604-1605
asilverins@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Marek Slipski <marek.slipski@everyactioncustom.com> Thu, Jul 29, 2021 at 11:14 AM
Reply-To: marek.slipski@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Marek Slipski using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Marek Slipski
2392 Marengo Ave Altadena, CA 91001-2953
marek.slipski@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Elizabeth Sroka <lrsroka@everyactioncustom.com> Wed, Jul 28, 2021 at 2:44 PM
Reply-To: lrsroka@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Elizabeth Sroka using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Elizabeth Sroka
11109 Emelita St North Hollywood, CA 91601-1308
lrsroka@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Chad Stinson <chad.r.stinson@everyactioncustom.com> Wed, Jul 28, 2021 at 2:11 PM
Reply-To: chad.r.stinson@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Chad Stinson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Chad Stinson
3609 Beethoven St Los Angeles, CA 90066-3040
chad.r.stinson@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Aleli Valencia <avalencia@everyactioncustom.com> Thu, Jul 29, 2021 at 11:05 AM
Reply-To: avalencia@isd.lacounty.gov
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Aleli Valencia using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Aleli Valencia
100 N Barranca St West Covina, CA 91791-1637
avalencia@isd.lacounty.gov

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Bruce Van Voorhis <bruce.vanvoorhis@everyactioncustom.com> Wed, Jul 28, 2021 at 5:36 PM
Reply-To: bruce.vanvoorhis@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Bruce Van Voorhis using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Bruce Van Voorhis
3330 E Foothill Blvd Unit 409 Pasadena, CA 91107-3897
bruce.vanvoorhis@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Elisa Visick <evisick@everyactioncustom.com> Thu, Jul 29, 2021 at 11:52 AM
Reply-To: evisick@rocketmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Elisa Visick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Elisa Visick
429 1/2 N Avenue 57 Los Angeles, CA 90042-3405
evisick@rocketmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Tom Vosburgh <thomas.a.vosburgh@everyactioncustom.com> Wed, Jul 28, 2021 at 5:55 PM
Reply-To: thomas.a.vosburgh@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Tom Vosburgh using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tom Vosburgh
11833 Goshen Ave Apt 4 Los Angeles, CA 90049-6346
thomas.a.vosburgh@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Question re 2021-2029 Draft of the Housing Element - Chap. 6

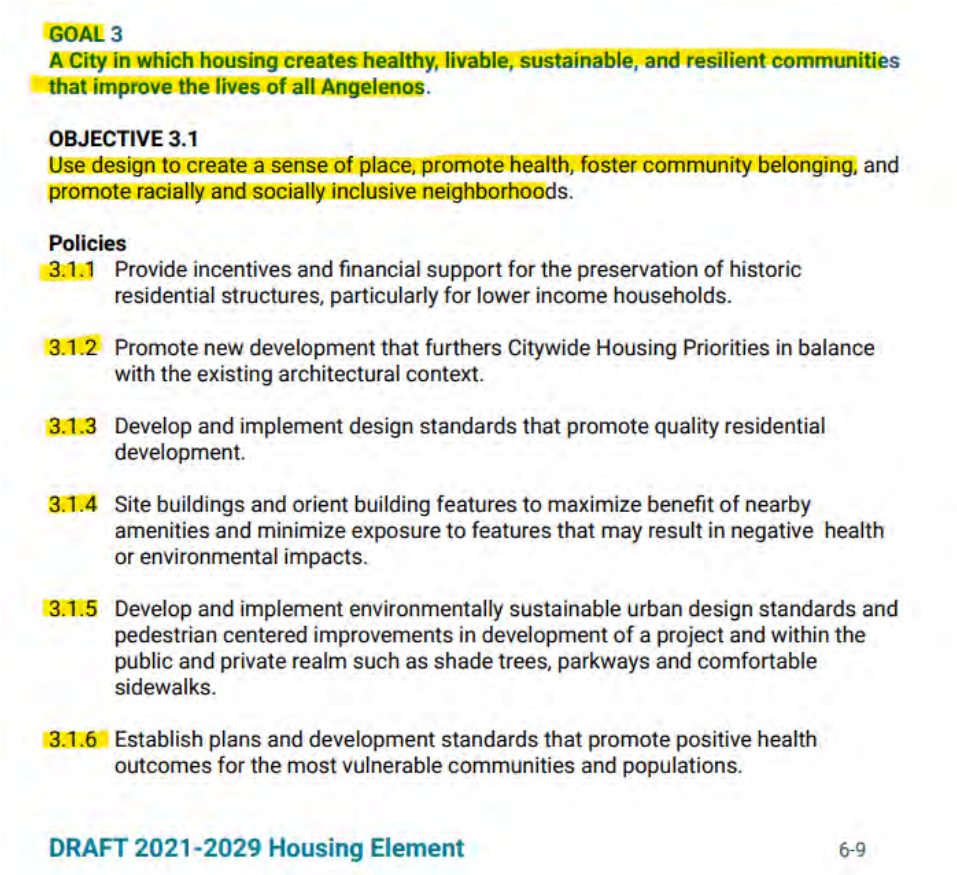
6 messages

Tony Gittelson <tonygittelson@gmail.com> Fri, Jul 23, 2021 at 4:56 PM
To: blair.smith@lacity.org
Cc: Housing Element <housingelement@lacity.org>

Hi Blair (and/or the Housing Element Staff),

I am reading, and learning a ton from this latest draft of the Housing Element. Props to all involved, as it's highly readable and carpeted with extremely useful information, but a question/helpful criticism:

When I finally got to the **"Programs" section** in **Chap. 6**, to see what programs attach to which specific policy goals (as with some other housing advocates we're thinking of suggesting some language to include in the latest Element), I was dismayed to find the programs are not cross-indexed to specific policy goals. For instance, Goal 3 and the Policy Objectives that go with it, are an area of particular interest to us, eg, livability, health and sustainability:



GOAL 3
A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos.

OBJECTIVE 3.1
Use design to create a sense of place, promote health, foster community belonging, and promote racially and socially inclusive neighborhoods.

Policies

3.1.1 Provide incentives and financial support for the preservation of historic residential structures, particularly for lower income households.

3.1.2 Promote new development that furthers Citywide Housing Priorities in balance with the existing architectural context.

3.1.3 Develop and implement design standards that promote quality residential development.

3.1.4 Site buildings and orient building features to maximize benefit of nearby amenities and minimize exposure to features that may result in negative health or environmental impacts.

3.1.5 Develop and implement environmentally sustainable urban design standards and pedestrian centered improvements in development of a project and within the public and private realm such as shade trees, parkways and comfortable sidewalks.

3.1.6 Establish plans and development standards that promote positive health outcomes for the most vulnerable communities and populations.

DRAFT 2021-2029 Housing Element 6-9

But when you try to look for the programs that specifically address these areas, it's a surprising hodgepodge of programs (in an appendix) that you have to wade through, numbered 1 - 128. (Granted, there are "broad" goals--1,2,3,4,5--listed under the subheading. Still, it's a bit of a fishing expedition.)

Wouldn't it make more sense, that the policy objectives are somehow cross-indexed (or better yet hyperlinked) to the programs designed to carry out these policies? Would that be possible with the 6th cycle of the Housing Element? I think it would be enormously helpful to housing advocates and city planners.

I'd be eager to hear your thoughts.

Thanks so much,

Tony Gittelson
(I'm aligned/allied with a bunch of housing organizations, incl AHLA, CA YIMBY, and some local organizing groups)

Tony Gittelson
Los Angeles, CA
Tel. (323) 938-5535
Cell (213) 400-1494
TonyGittelson@gmail.com

Tony Gittelson <tonygittelson@gmail.com> Fri, Jul 23, 2021 at 5:10 PM
To: blair.smith@lacity.org
Cc: Housing Element <housingelement@lacity.org>

Sorry, maybe a helpful PS - At a minimum, for online versions of the Housing Element, you could easily *hyperlink*, for example, Goal 3 policies with those programs that are intended to address Goal 3 priorities. That level of categorization already exists, it would just need to be hyperlinked linked. I'm not sure how you could link the sub-policy objectives (3.1, 3.2, etc) to programs--but it would sure be great if you could.

As it is, all the careful planning and organization of the Housing Element, turns into a bit of a muddle, in Chapter 6--just when you really most want to access that information.

Thanks again.

Tony Gittelson
Los Angeles, CA
Tel. (323) 938-5535
Cell (213) 400-1494
TonyGittelson@gmail.com

[Quoted text hidden]

Blair Smith <blair.smith@lacity.org> Wed, Jul 28, 2021 at 8:35 AM
To: Tony Gittelson <tonygittelson@gmail.com>
Cc: Housing Element <housingelement@lacity.org>

Hi Tony,

Thank you for the suggestion. Programs will be linked to specific policies in the revised draft this September. We also have an information sheet that connects the programs to the broader citywide priorities if you want to take a look.

Thanks,
Blair
[Quoted text hidden]
--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886



Tony Gittelson <tonygittelson@gmail.com> Wed, Jul 28, 2021 at 9:31 AM
To: Blair Smith <blair.smith@lacity.org>
Cc: Housing Element <housingelement@lacity.org>

Hi Blair,

Wow, even this information sheet is a vast improvement! Precisely what the Housing Element needed--and what *we* needed, actually--to make it a more usable, searchable document. I'm also really delighted to hear that policies and programs will be linked in the next draft. Had all this been in the works??

Either way, thank you for being so responsive -- this small change is a *very* helpful tool for both housing advocates and for planners. I would definitely add this information sheet to the website, or is it already there?

Many thanks,

Tony

Tony Gittelson
Los Angeles, CA
Tel. (323) 938-5535
Cell (213) 400-1494
TonyGittelson@gmail.com

[Quoted text hidden]

Tony Gittelson <tonygittelson@gmail.com> Wed, Jul 28, 2021 at 9:40 AM
To: Blair Smith <blair.smith@lacity.org>
Cc: Housing Element <housingelement@lacity.org>

Re my last comment: I see it is on the website, maybe it was always there and I overlooked it. I immediately went to the draft itself. Either way, many thanks for calling my attention to it, just what I was looking for!

Tony Gittelson
Los Angeles, CA
Tel. (323) 938-5535
Cell (213) 400-1494
TonyGittelson@gmail.com

[Quoted text hidden]

Blair Smith <blair.smith@lacity.org> Wed, Jul 28, 2021 at 11:49 AM
To: Tony Gittelson <tonygittelson@gmail.com>
Cc: Housing Element <housingelement@lacity.org>

Hi Tony,

Yes in the last Housing Element (2013-2021) policies connect to programs, but are not physically linked. We are looking into document shortcuts for the final draft for those reading online. I'm glad the handouts were useful, we have them on the draft page as you mentioned and also on the resources page.

Appreciate your suggestions,
Blair
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Hi from pb.....7/23 What happened to FEMA involvement..... Notice of A vailability of Draft EIR for Updates to Housing Element and Safety Ele ment / Aviso de Disponibilidad del borrador del Informe de Impacto Amb iental para las actualizaciones del Elemento de Vivienda y del Element o de Seguridad

2 messages

pbparlor@juno.com <pbparlor@juno.com> Fri, Jul 23, 2021 at 12:08 PM
To: housingelement@lacity.org

in protecting LA river from FLOODING ? we were told "mandatory" flood insurance would be required for new home owners & tat FEMA was now in the insurance business....90039 my hood was one of the areas....big meetings, plans Brace & Boldt programs now nothing ???? typical of how LA drops the ball on PLANS!....and again WHAT ABOUT BOW TIE PARK the dump site that should be better planned, this has been going on for 20 years since I lived here .

---------- Original Message ----------
From: Los Angeles City Planning <housingelement@lacity.org>
To: pbparlor@juno.com
Subject: Notice of Availability of Draft EIR for Updates to Housing Element and Safety Element / Aviso de Disponibilidad del borrador del Informe de Impacto Ambiental para las actualizaciones del Elemento de Vivienda y del Elemento de Seguridad
Date: Thu, 22 Jul 2021 11:50:24 -0400 (EDT)



Para español siga hacia abajo.

Interested Parties,

This email is to inform you of the Notice of Availability (NOA) for the Draft Environmental Impact Report (EIR) prepared for the Updates to the Housing Element and the Safety Element. These documents are being prepared by Los Angeles City Planning as part of the Plan to House LA and Safety Element Update.

The NOA and Draft EIR materials are now available on Los Angeles City Planning's website.

Beginning today, City Planning is accepting comments on the Draft EIR. **The Draft EIR comment period will close at 5:00 p.m. on Tuesday, September 7, 2021**.

If you wish to submit comments on the Draft EIR, please submit your written comments (including a name, contact information, and the following file number ENV-2020-6762-EIR) during the comment period, via mail or e-mail to the following addresses:

Cally Hardy | City Planning Associate
City of Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

E-mail
HousingElement@lacity.org

Beyond the DEIR comment period, general public comments on the plan drafts are also welcome until the Plan is adopted by City Council.

Partes Interesadas,

Este correo electrónico es para informarle del Aviso de Disponibilidad (NOA por sus siglas en inglés) para el Borrador del Informe de Impacto Ambiental (EIR por sus siglas en inglés) preparado para las Actualizaciones del Elemento de Vivienda y del Elemento de Seguridad. Estos documentos están siendo preparados por el Departamento de Planeación de la Ciudad de Los Ángeles como parte del Plan de Vivienda y Elemento de Seguridad.

Los materiales del NOA y el Borrador del EIR ya están disponibles en el sitio web del Departamento de Planeación de la Ciudad de Los Ángeles (en inglés). El Aviso de Disponibilidad (el NOA) está disponible en español.

Empezando hoy, el Departamento de Planeación está aceptando comentarios sobre el Borrador del EIR. **El período de comentarios del Borrador del EIR se cerrará a las 5:00 p.m. del martes 7 de septiembre de 2021**.

Si desea enviar comentarios sobre el Borrador del EIR, por favor envíe sus comentarios por escrito (incluyendo su nombre, información de contacto, y el siguiente número de archivo ENV-2020-6762-EIR) durante el período de comentarios, por correo o vía correo electrónico a las siguientes direcciones:

Cally Hardy | City Planning Associate
City of Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Correo Electrónico
HousingElement@lacity.org

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Housing Element <housingelement@lacity.org> Wed, Aug 18, 2021 at 6:08 PM
To: "pbparlor@juno.com" <pbparlor@juno.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012



Planning4LA.org
T: (213) 978-1302



For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Plan to house LA

2 messages

George Papanikolas <georgepapanikolas@gmail.com> Thu, Jul 22, 2021 at 9:30 AM
To: housingelement@lacity.org

I would like to see the city build a lot more housing, taller housing, there is no reason why everything should be limited to five stories. If we allow it more developments that are sky high skyscrapers then we can have more open space and parks. Please illuminate height restrictions so that we can build a lot more units on each property rather than being limited to 5-8 stories.

George Papanikolas
2379 Venus Dr
Los Angeles, CA 90046
Mobile: 1-323-547-2347
www.GeorgePapanikolas.com
Instagram/Facebook: @georgepapanikolas

Housing Element <housingelement@lacity.org> Wed, Jul 28, 2021 at 8:42 AM
To: George Papanikolas <georgepapanikolas@gmail.com>

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.

Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302

For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Comment on Housing Element Update

janis@begarden.com <janis@begarden.com> Thu, Jul 22, 2021 at 1:54 PM
To: HousingElement@lacity.org

To whom it concerns:

First, I want to say I applaud the City of LA for tackling this multi-faceted way of seeking to fulfill housing needs of Angelenos going forward, to create a more equitable and sustainable solution to housing.

Recently, I've read that in some communities there are development organizations buying up large numbers of properties sold at auction, by $1 "bidding up", thereby gaining ability to lot-split while also adversely influencing and depressing real estate values of neighboring properties. If this is taking place in Los Angeles, especially where seniors and/or persons of color have invested their lives and limited wealth, I am very concerned for how we are to preserve and protect such communities and homeowner/residents going forward.

The document titled "DRAFT 2021-2029 Housing Element" [accessed under link: "What does the plan do?"] includes under subsection "Key Objective and Policy Changes" of section "Preventing Displacement and Ensuring Housing Stability" the following statement:

" Protect communities, especially communities of color, from predatory lending, land acquisition, speculative real estate transactions (Policy 2.2.5)".

How might above-captioned Policy 2.2.5 be implemented/"enforced" to ensure this objective is met? Thank you.

Respectfully submitted,

Janis

Janis Hatlestad
Resident/stakeholder,
Woodland Hills, CA
janis@begarden.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Wisdom From: Katrina Jenkins

Katrina Jenkins <kjwisdom4life@gmail.com> Thu, Jul 22, 2021 at 9:13 PM
To: housingelement@lacity.org, mayor.garcetti@lacity.org

I wanted to comment of the LA City Planning Forum. Housing is one of the largest issues in LA County. I'm glad that I participated in the forum because it drew a light on the issues I wanted to address. Let me just say, you all are doing an awesome job with the limited area you are trying to establish.

My input would be to maximize the area that's being developed. The only way to do that is to build going up. Example: parking structure underneath, business structures at street level, housing units and then green deal projects on top (community gardens/ roof top playgrounds). Projects on the roof tops should have conservation built in, Example: recycled parts in the construction and recycled water ways.

As for our homeless with mental health issues, they will need housing units with built in supports. They're should be a live-in Social Worker on these sites. They will need someone certified to juggle their individual needs. Community and Activity Rooms / Outdoor Exercise equipment and sitting areas, as they promote mental health wellbeing. Perhaps you can offer FREE housing to the Social Workers to draw them into these type of housing structures. Most importantly the zoning laws for assisting them will need to be re-written to allow the support first.

Truely we are our brothers keeper.❤😉

It can be done! Stay encouraged... This is a huge undertaking.

Katrina Jenkins 🙏

Housing Element <housingelement@lacity.org>

Re: Notice of Availability of Draft EIR for Updates to Housing Element and Safety Element / Aviso de Disponibilidad del borrador del Informe de Impacto Ambiental para las actualizaciones del Elemento de Vivienda y del Elemento de Seguridad

3 messages

esp3800@aol.com <esp3800@aol.com> Thu, Jul 22, 2021 at 11:14 AM
Reply-To: esp3800@aol.com
To: "housingelement@lacity.org" <housingelement@lacity.org>

> What's at stake? How can an ordinary Angeleno make sense of this?
>
> LIke for instance, can we raise our public voice to be clear that residents should not be
>
> able to purchase a $35 placard from LADOT that serves as an exclusive license to use the public road way.
>
> This planning element, that owners can purchase adjacent roadway for below market prices, thereby pushing Angelenos into a ticketing trap... is not equity oriented. It's appalling. For shame!
>
> I suggest that Seleta Reynolds hold a public hearing with Vince Bertoni on this subject, before EIR deadline in September. Thank you.
>
> Eric Preven

-----Original Message-----
From: Los Angeles City Planning <housingelement@lacity.org>
To: esp3800@aol.com
Sent: Thu, Jul 22, 2021 8:50 am
Subject: Notice of Availability of Draft EIR for Updates to Housing Element and Safety Element / Aviso de Disponibilidad del borrador del Informe de Impacto Ambiental para las actualizaciones del Elemento de Vivienda y del Elemento de Seguridad



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Cally Hardy | City Planning Associate
City of Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

E-mail
HousingElement@lacity.org

Beyond the DEIR comment period, general public comments on the plan drafts are also welcome until the Plan is adopted by City Council.

Partes Interesadas,

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Planeación de la Ciudad de Los Ángeles como parte del Plan de Vivienda y Elemento de Seguridad.

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Empezando hoy, el Departamento de Planeación está aceptando comentarios sobre el Borrador del EIR. **El período de comentarios del Borrador del EIR se cerrará a las 5:00 p.m. del martes 7 de septiembre de 2021**.

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Cally Hardy | City Planning Associate
City of Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Correo Electrónico
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Housing Element <housingelement@lacity.org> Wed, Jul 28, 2021 at 8:47 AM
To: esp3800@aol.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012
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[Quoted text hidden]

---

esp3800@aol.com <esp3800@aol.com> Wed, Jul 28, 2021 at 9:04 AM
Reply-To: esp3800@aol.com
To: "housingelement@lacity.org" <housingelement@lacity.org>

OK, great. When will Reynolds and Bertoni address the strategy of selling the public right of way to home owners at the cost of workers and visitors?

Please add this as well:
Bonin starts every meeting with Seleta Reynolds, the General Manager of the Los Angeles Department of Transportation (LADOT), by presenting a verbal report relative to the Department's on-going activities.

And he goes out of his way to offer recognition for Department employees for outstanding service ticketing the public.

The use of parking permit districts by municipalities have been upheld through the Supreme Court since 1977: Arlington County Board v. Richards.

Ripe for a challenge or settled law is always a tough call. One thing was very clear, Mike Bonin was a believer.

Despite no coherent strategy -- because if you push every car out of one neighborhood, it will obviously land in an adjacent one -- Bonin will be remembered as Field Marshal committed to bringing the relief.

Like a modern-day General Lucius Dubignon Clay, The Great **Uncompromiser --** a decedent of Henry Clay, the U.S. senator from Kentucky -- Bonin was beyond dedicated.

Clay orchestrated the Berlin Airlift (1948–1949) when the USSR blockaded West Berlin. Aircrews from the American, British, French, Canadian, Australian, New Zealand, and South African air forces flew over 200,000 sorties in one year, providing necessities such as fuel and an astonishingly high carbohydrate-loaded menu of relief food:

646 tons of flour and wheat, 3 tons of fresh yeast for baking, 180 tons of dehydrated potatoes,125 tons of cereal, with limited protein representing 109 tons of meat and fish, 64 tons of fat,10 tons of cheese.

A mere 11 tons of coffee, but airlifts can be really exhausting. It was a miraculous and filling accomplishment.

Bonin was bringing a different kind of relief.

He was bringing the diligent wiring up of every neighborhood in the city to prevent even the possibility of outsiders, no matter how need, from parking on the public roadway.

At City Council, Mike Bonin was advocating #DoNoHarm. But up in Transportation and Public Safety, they were banging out 50 to 55 smart boots a day and on one day applied 81 smart boots.

With the vigor of Dr. Fauci promoting vaccination, Mike Bonin pushed through 247 roadway closures often consisting of hundreds of spaces during 2017, 2018, and six months of 2019. . .that's 247 in 30 months = 8 per month or 2 per week.

As an example, the Preferential Parking District (PPD) No. 276 in the Studio City Area in Council District Two is comprised of about 30 blocks. A block is defined as a street segment between two intersecting streets. Between 300 and 600 spaces.

So if we take an average of 500 spaces x 247 restrictions* = 123,500 spaces!

The Bonin Carlift was a breathtaking nose to the grindstone campaign to rescue NIMBY residents from Angelenos desperate to park.

And why? "The increase goes from $78 to $250 for the first violation, $500 for a second violation within 12 months, and $1,000 for the third violation within 12 months, and increased late penalties."

Bonin was committed to bringing parking restrictions citywide, of every conceivable variety. . .along with Avak he would agendize dozens and dozens and dozens. . .relative to prohibiting the parking of vehicle, prohibit the stopping, standing, or parking vehicles that are in excess of 22 feet in length or over 7 feet in height, parking of vehicles advertising the private sale of those vehicles.

The people had never seen anything like it because they were mostly squirrelled away in committee.

During all of his relief work, Bonin still found time to falsely tag a civil rights advocate as a racist. . . offering ear plugs for public comments.

Check embarrassing video of Lady Gaga's "A Million Reasons" playing over the life in pictures that he tagged a racist, while his BFF from the StreetsBlogLA was reduced to tears.

The Mayor said and you can be sure that Mike Bonin concurs, "I didn’t declare wars that brought people back with PTSD; I haven’t been putting people into prisons for years; I didn’t declare the drug war; I haven’t been in charge of the foster care system.”

No, but you both made it harder for the folks who have it hardest.

Not everyone agrees, if one person is hurting. . .we are all hurting. Standing in solidarity, when one person is grieving, we're all grieving.

Bonin is "closing and fencing" but he's still way better than Buscaino!

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Noah Schechter <noah.a.schechter@everyactioncustom.com> Wed, Jul 21, 2021 at 1:33 PM
Reply-To: noah.a.schechter@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. By creating a thorough quantitative model that estimates sites' likelihood of redevelopment, Planning has provided a fair estimate of the City's current realistic capacity for new housing and acknowledged that Los Angeles will only achieve 10% of its RHNA target in a "business as usual" scenario. The draft housing element also proposes creating over 220,000 homes through rezoning and other land use reforms, particularly in high-resource areas that have accommodated little new housing in recent years. All of this represents significant progress.

Now, additional bold action and specific implementation measures are needed to make the housing element update successful. I urge the City to:
-Target the creation of 300,000 new homes through rezoning and land use reforms.
-Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
-Increase affordable housing opportunities in high-opportunity neighborhoods.
-Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
-Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Noah Schechter using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Noah Schechter
6635 De Longpre Ave Apt 1 Los Angeles, CA 90028-7851
noah.a.schechter@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Michael Dworsky <dmisha@everyactioncustom.com> Tue, Jul 20, 2021 at 11:58 AM
Reply-To: dmisha@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Michael Dworsky using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Michael Dworsky
1752 Federal Ave Apt 4 Los Angeles, CA 90025-4133
dmisha@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element

5 messages

Ryan.Leaderman@hklaw.com <Ryan.Leaderman@hklaw.com> Tue, Jul 20, 2021 at 6:25 PM
To: HousingElement@lacity.org
Cc: matt.glesne@lacity.org

Hi There --

I'm going through the draft Housing Element, and in particular Chapter 4. It's a very impressive document and it is obvious that a lot of thoughtfulness went into this document.

I do have some preliminary questions/concerns:

Can you give me more information how density was modeled for the Greater Downtown Housing Incentive Area, where the LAMC has no density limit for parcels within this boundaries? To this end, how were estimates made for the "base" density for these parcels? This analysis is obviously important to determine the City's chosen approach to density bonus calculations.

With respect to including Project Homekey in the RHNA inventory, my understanding is that even though folks are to be living in these former hotel/motel rooms, these rooms are still classified by the LAMC as "guest rooms" since there are no "kitchens" in them. If these units are included in RHNA, what regulatory hurdles are there to stop other hotel rooms from being considered in RHNA? Since there are likely no apparent regulatory hurdles, what are the tools/Code regulations that needed to be added to the LAMC so that Homekey/Roomkey rooms are distinguishable from hotel rooms. Since these Homekey units would appear in RHNA, what are the regulatory action items to re-define dwelling units/guest rooms in the LAMC?

One or two of the policies discuss innovative housing types, but the zoning reforms/policies for co-living and group housing types are fairly weak. At the same time, these type of housing types are innovative and low-cost, not that different from Homekey/Roomkey rooms. Is there more that the Housing Element can do to bolster these innovative housing types so that there do not seem to be such regulatory hurdles in getting them entitled?

The Housing Element has a heavy reliance on ADUs to help with the RHNA-driven need for housing. Recent Housing Law changes allow ADUs in multi-family buildings, up to 25% increase over existing units. However, on City application forms to add ADUs, I've seen a prohibition on the City's application form that prevents ground floor ADUs in mixed-use buildings. Can the HE add a provision to make it clear that ADUs in ground floor of mixed-use buildings, including in vacant commercial space, is permissible?

Getting housing approved in the City is often challenging. One under-addressed area is the cuts by a thousand deaths and the huge amount of time it takes to go through the clearance process/covenant process when much of that work can be done concurrent/ahead of approval instead of dragging out the plan check process. I would recommend that this be added to the Housing Element with some concrete steps to improve so that the City's post-approval ad hoc processes do not continue to thwart housing and increase its cost.

The flip side of the post-approval process is that the City has many pre-approval processes that prevent applicants from filing their applications and getting a deemed complete status. In particular the PZAs have been a nightmare -- very costly too. Can you add some language re streamlining the processes so as to reduce these particular regulatory hurdles?

Also, it looks like Table B/Appendix 4.7 is missing. Can you let me know when it will be available for public review?

I look forward to responses, and am available to discuss at your convenience.

Thanks!

Ryan Leaderman | **Holland & Knight**
Partner
Holland & Knight LLP
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Phone 213.896.2405 | Fax 213.896.2450
ryan.leaderman@hklaw.com | www.hklaw.com

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Housing Element <housingelement@lacity.org> Thu, Jul 22, 2021 at 9:38 AM
To: Ryan.Leaderman@hklaw.com, Matthew Glesne <matthew.glesne@lacity.org>

Hi Ryan,

Lots of great questions here, we will do our best to respond below.

Unlimited Density. Density for parcels with unlimited density was calculated based on their lot size, as well as assumptions based on potential FAR and unit sizes.

Homekey and RHNA. The Homekey sites counted towards the Inventory include those that are being operated as permanent housing by HACLA, and those that may come from the next round of State funding. Because they units are being income restricted we can count towards lower income categories. We understand that guest rooms can be counted towards the RHNA provided they are used and operated as permanent housing.

Co-Living. Program 62 speaks about innovation in housing including shared housing and co-living. The program talks about identifying barriers and adopting code amendments to fix. If you have suggestions on the proposed program please let us know.

ADUs. We have discussed the issue of retail/commercial conversion to ADUs in mixed use buildings with LADBS and feel this would require a code amendment, or greater clarity from the state that this is meant to be permitted. There is/was a proposed state law to allow this - Sb 778 (thought it appears to have recently been gutted and amended). The Housing Element includes program 63 to reduce barriers for ADU development, including in multifamily buildings. But we can

consider being more explicit about calling out this particular idea. Also the Adaptive Reuse program is another way this issue could be tackled through the code (my understanding is that the new adaptive reuse code being applied downtown would allow for this.

Processing Barriers. Appendix 2.1 we describe constraints that exist to the production of housing including, process, fees, and regulatory barriers, as well as programs to alleviate said constraints. The Sb 330 PZA process is discussed in the Appendix 2.1 pg 53. The plan check correction process is not analyzed and we can look at that. Wondering if you have more specific thoughts on how these things can be done before plan check as it seems some conditions may need to come later - but happy to chat about this. The plan also includes policies and programs about streamlining and improving the development process. That said, your comments are noted and we will continue to explore how best to improve the process through the update.

Appendix 4.7 will be released with the revised draft in early fall.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.

Thank you
The Housing Element Team
[Quoted text hidden]
--

Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302

Ryan.Leaderman@hklaw.com <Ryan.Leaderman@hklaw.com> Thu, Jul 22, 2021 at 9:51 AM
To: housingelement@lacity.org, matthew.glesne@lacity.org

Thanks, Blair. Helpful. Maybe we should schedule a call to discuss some ideas?

Also, for the unlimited density, can you give me more detail re the assump. ons that were used based on lot size, poten al FAR and unit sizes? The response seems quite vague (especially compared to the other responses!) and I just would like to generally understand the calcula on. What were the metrics for (1) lot size, (2) FAR (which seems to be a func on of lot size), and (3) unit size when dealing with an unlimited density property?

Perhaps touching base tomorrow for a call?

Ryan Leaderman | **Holland & Knight**
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Phone 213.896.2405 | Fax 213.896.2450
ryan.leaderman@hklaw.com | www.hklaw.com

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From: blair.smith@lacity.org <blair.smith@lacity.org> **On Behalf Of** Housing Element
Sent: Thursday, July 22, 2021 9:38 AM
To: Leaderman, Ryan M (LAX - X52405) <Ryan.Leaderman@hklaw.com>; Ma hew Glesne <matthew.glesne@lacity.org>
Subject: Re: Housing Element

[External email]

[Quoted text hidden]

Matthew Glesne <matthew.glesne@lacity.org> Tue, Jul 27, 2021 at 11:36 PM
To: Ryan.Leaderman@hklaw.com
Cc: Housing Element <housingelement@lacity.org>

Ryan, we'd be happy to talk. Are you free next Wed after 2?

Matt
[Quoted text hidden]
--

Matthew Glesne
Preferred Pronouns: He, Him, His
Senior City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-2666

Ryan.Leaderman@hklaw.com <Ryan.Leaderman@hklaw.com> Wed, Jul 28, 2021 at 11:03 AM
To: matthew.glesne@lacity.org
Cc: housingelement@lacity.org

Hi Ma ,

Next Wednesday a. er 2 works. Can you send an invite?

Thanks!

Ryan Leaderman | **Holland & Knight**
Partner
Holland & Knight LLP
400 South Hope Street, 8th Floor | Los Angeles, California 90071

Phone 213.896.2405 | Fax 213.896.2450
ryan.leaderman@hklaw.com | www.hklaw.com

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 12:51 PM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
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E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Anthony Dedousis** <anthonypdedousis@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 12:48 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Now, additional bold action and specific implementation measures are needed to make the housing element update successful. I urge the City to:
-Target the creation of 300,000 new homes through rezoning and land use reforms.
-Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
-Increase affordable housing opportunities in high-opportunity neighborhoods.
-Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
-Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Anthony Dedousis using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Anthony Dedousis
1942 Rodney Dr Los Angeles, CA 90027-3158
anthonypdedousis@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 7:34 PM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Nicole Beaudoin** <Nicole_m_beaudoin@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 7:07 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Nicole Beaudoin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nicole Beaudoin
1616 S Redondo Blvd Los Angeles, CA 90019-5355
Nicole_m_beaudoin@yahoo.com
--

~ Angie

Flora (Angie) Melendez
Pronouns: she/hers/her



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E: flora.melendez@lacity.org



Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 4:52 PM
To: Housing Element <housingelement@lacity.org>

~ Angie



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---------- Forwarded message ---------
From: **Carey Bennett** <careyjeanbennett@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 4:51 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Carey Bennett using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Carey Bennett
2929 St George St Los Angeles, CA 90027-3025
careyjeanbennett@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 11:12 AM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
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Los Angeles City Planning
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E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Alexander Booth** <alexanderbooth@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 10:52 AM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Alexander Booth using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Alexander Booth
225 S Olive St Apt 1511 Los Angeles, CA 90012-4906
alexanderbooth@kfalosangeles.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 12:23 PM
To: Housing Element <housingelement@lacity.org>

~ Angie

Flora (Angie) Melendez
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Los Angeles City Planning
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E: flora.melendez@lacity.org

---------- Forwarded message ---------
From: **Lauren Borchard** <laurenborchard@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 12:21 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Lauren Borchard using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Lauren Borchard
535 1/2 N Orange Dr Los Angeles, CA 90036-2066
laurenborchard@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 11:24 AM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
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T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Nicholas Burns III** <nkburns3@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 11:15 AM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Nicholas Burns III using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nicholas Burns III
1740 S Westgate Ave Unit H Los Angeles, CA 90025-3792
nkburns3@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 9:02 AM
To: Housing Element <housingelement@lacity.org>
Cc: Arthi Varma <arthi.varma@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Jul 19, 2021 at 8:53 AM
Subject: Fwd: Please commit to reform housing now!
To: Flora Melendez <flora.melendez@lacity.org>



Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
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Los Angeles, CA 90012
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T: (213) 978-1271 | F: (213) 978-1275
E: vince.bertoni@lacity.org



---------- Forwarded message ---------
From: **Leonora Camner** <leonorasc@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 8:52 AM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Leonora Camner using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Leonora Camner
1013 16th St Santa Monica, CA 90403-4331
leonorasc@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 2:05 PM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
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E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Catherine Curtis** <herdingcath@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 2:04 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Catherine Curtis using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Catherine Curtis
219 S Barrington Ave Los Angeles, CA 90049-3354
herdingcath@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Meagan English <meagan.english@everyactioncustom.com> Tue, Jul 20, 2021 at 2:32 PM
Reply-To: meagan.english@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Meagan English using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Meagan English
5228 Vincent Ave Los Angeles, CA 90041-1401
meagan.english@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 2:23 PM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Brad Foley** <brfoley76@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 2:10 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Brad Foley using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Brad Foley
2702 S Normandie Ave Los Angeles, CA 90007-2114
brfoley76@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 11:12 AM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Andy Freeland** <andy@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 10:51 AM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

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Personally sent by Andy Freeland using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andy Freeland
901 S Flower St Unit 300 Los Angeles, CA 90015-2296
andy@andyfreeland.net

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 11:45 AM
To: Housing Element <housingelement@lacity.org>

~ Angie

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

---------- Forwarded message ---------
From: **Joe Goldman** <jgoldmanca@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 11:34 AM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

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Personally sent by Joe Goldman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Joe Goldman
11733 Montana Ave Los Angeles, CA 90049-4792
jgoldmanca@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Tue, Jul 20, 2021 at 5:52 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Pedro Gonzalez** <gonzalez.j.pedro@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 10:30 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Pedro Gonzalez using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Pedro Gonzalez
413 1/2 N Boylston St Los Angeles, CA 90012-1503
gonzalez.j.pedro@gmail.com
--

~ Angie

Flora (Angie) Melendez
Pronouns: she/hers/her



Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Tue, Jul 20, 2021 at 5:51 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Carol Gordon** <thecarolanngordon@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 10:04 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Carol Gordon using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Carol Gordon
2801 Glendower Ave Los Angeles, CA 90027-1118
thecarolanngordon@gmail.com
--

~ Angie

Flora (Angie) Melendez
Pronouns: she/hers/her



Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 11:13 AM
To: Housing Element <housingelement@lacity.org>

~ Angie



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Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
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Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Taylor Hallam** <taylorj.hallam@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 10:59 AM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

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Personally sent by Taylor Hallam using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Taylor Hallam
4234 Los Feliz Blvd Los Angeles, CA 90027-2243
taylorj.hallam@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Tue, Jul 20, 2021 at 8:37 AM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Tami Kagan-Abrams** <tami@everyactioncustom.com>
Date: Tue, Jul 20, 2021 at 8:36 AM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

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Personally sent by Tami Kagan-Abrams using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tami Kagan-Abrams
2430 Hercules Dr Los Angeles, CA 90046-1634
tami@abramsgroup.org

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 11:45 AM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Luke Klipp** <lukehklipp@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 11:40 AM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

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Personally sent by Luke Klipp using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Luke Klipp
1320 N Hoover St Los Angeles, CA 90027-6008
lukehklipp@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 11:12 AM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Andrew Knauer** <andrewknauer@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 10:53 AM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

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Personally sent by Andrew Knauer using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andrew Knauer
2197 W 29th St Los Angeles, CA 90018-3027
andrewknauer@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 11:24 AM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Tyler Koke** <tyjkoke@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 11:19 AM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Tyler Koke using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tyler Koke
3631 Midvale Ave Apt 5 Los Angeles, CA 90034-6648
tyjkoke@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 11:13 AM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Arjun Kolachalam** <arjunk@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 11:12 AM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Arjun Kolachalam using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Arjun Kolachalam
2237 Aaron St Los Angeles, CA 90026-1723
arjunk@hey.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 5:42 PM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Allison Lee** <allee@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 5:31 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Allison Lee using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Allison Lee
3231 Cheviot Vista Pl Apt 304 Los Angeles, CA 90034-3567
allee@stanfordalumni.org
--

~ Angie

Flora (Angie) Melendez
Pronouns: she/hers/her



Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 12:54 PM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Olga Lexell** <olga.lexell@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 12:53 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Olga Lexell using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Olga Lexell
1115 S Elm Dr Los Angeles, CA 90035-1143
olga.lexell@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Andy May <andymay@everyactioncustom.com> Tue, Jul 20, 2021 at 9:14 AM
Reply-To: andymay@yahoo.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Andy May using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andy May
1901 N New Hampshire Ave Los Angeles, CA 90027-1818
andymay@yahoo.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 12:42 PM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Alex Parks** <Alex@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 12:42 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

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Personally sent by Alex Parks using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Alex Parks
3850 La Salle Ave Los Angeles, CA 90062-1159
Alex@alexparks.tv

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 11:24 AM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Noah Schechter** <noah.a.schechter@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 11:18 AM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Noah Schechter using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Noah Schechter
6635 De Longpre Ave Apt 1 Los Angeles, CA 90028-7851
noah.a.schechter@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 12:05 PM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Zachary Steinert-Threlkeld** <zsteinert@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 12:03 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Zachary Steinert-Threlkeld using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Zachary Steinert-Threlkeld
4005 Monroe St Los Angeles, CA 90029-2995
zsteinert@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Thomas Szelazek <tszelazek@everyactioncustom.com> Wed, Jul 28, 2021 at 2:01 PM
Reply-To: tszelazek@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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Personally sent by Thomas Szelazek using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Thomas Szelazek
2121 E 7th Pl Apt M203 Los Angeles, CA 90021-1770
tszelazek@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 2:47 PM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **Henry van Moyland** <henryvanmoyland@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 2:45 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Henry van Moyland using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Henry van Moyland
546 S Curson Ave Los Angeles, CA 90036-3253
henryvanmoyland@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 9:50 PM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Geneva Vogelheim** <gvogelheim@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 9:23 PM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

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-Target the creation of 300,000 new homes through rezoning and land use reforms.
-Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would set specific housing growth targets for all neighborhoods.
-Increase affordable housing opportunities in high-opportunity neighborhoods.
-Expand and merge TOC and the city Density Bonus program, including parcels where apartments are currently banned.
-Exclude parcels that contain RSO housing units from the site inventory and rezoning plan, in order to prevent lower-income renter displacement.

The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Geneva Vogelheim using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Geneva Vogelheim
3770 Keystone Ave Los Angeles, CA 90034-6360
gvogelheim@gmail.com
--

~ Angie

Flora (Angie) Melendez
Pronouns: she/hers/her



Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Please commit to reform housing now!

Flora Melendez <flora.melendez@lacity.org> Mon, Jul 19, 2021 at 11:24 AM
To: Housing Element <housingelement@lacity.org>

~ Angie



Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org



---------- Forwarded message ---------
From: **William Wright** <willrobwright@everyactioncustom.com>
Date: Mon, Jul 19, 2021 at 11:24 AM
Subject: Please commit to reform housing now!
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

It's encouraging that the City has incorporated a sophisticated, data-driven site inventory analysis in its draft housing element, as well as a detailed and objective assessment of fair housing issues in Los Angeles. By creating a thorough quantitative model that estimates sites' likelihood of redevelopment, Planning has provided a fair estimate of the City's current realistic capacity for new housing and acknowledged that Los Angeles will only achieve 10% of its RHNA target in a "business as usual" scenario. The draft housing element also proposes creating over 220,000 homes through rezoning and other land use reforms, particularly in high-resource areas that have accommodated little new housing in recent years. All of this represents significant progress.

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Personally sent by William Wright using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
William Wright
734 E Kensington Rd Los Angeles, CA 90026-4427
willrobwright@gmail.com

Housing Element <housingelement@lacity.org>

Please commit to reform housing now!

Kevin Zelaya <kevz21189@everyactioncustom.com> Thu, Jul 29, 2021 at 1:11 PM
Reply-To: kevz21189@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm writing to express my support for a strong, transformative housing element update in Los Angeles. To fix our city's affordable housing shortage, we need a high-quality plan to create 456,000 new homes by 2029, including 184,000 that are affordable to lower-income households. We can't miss this opportunity to promote greater affordability, equity, and sustainability, as well as a strong economic recovery from the COVID-19 pandemic.

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The housing element update is our opportunity to build a Los Angeles with lower housing costs, a growing regional economy, greater access to opportunity, and greater socioeconomic diversity. I encourage you to incorporate the above policies into the housing element update so that we can create a prosperous, affordable Los Angeles where everyone is welcome.

Personally sent by Kevin Zelaya using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Kevin Zelaya
1139 S Rimpau Blvd Los Angeles, CA 90019-1812
kevz21189@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Feedback on Housing Element and Safety Element Update

Cosette Case <ccase@calif-ilc.org> Wed, Jul 14, 2021 at 2:03 PM
To: "housingelement@lacity.org" <housingelement@lacity.org>

To Whom It May Concern:

Thank you so much for this great opportunity to be a part of the City Planning for Los Angeles. I felt like the plan was more comprehensive than in the past which frankly was a relief. Until now, I felt that feedback wasn't really taken seriously. I still have a few concerns that seem under addressed:

1. Units or set a sides for persons living with disabilities somehow don't get rented to people with disabilities or stay rented to PWD.

2. The pool of ACCESSIBLE units doesn't seem to increase which I attribute to the requirement that modified units are not required to be preserved. So if a tenant who puts in a ramp moves the ramp is just torn out rather than being available for a tenant using a mobility device. This is tremendous form of discrimination as it literally has left persons with mobility disabilities no place to live.

Please keep up the good work and know that ADRC is always willing to support good faith efforts to alleviate the devastating housing shortfall we all are living through.

Thank you,

Cosette D. Case,

ADRC Coordinator

634 s. Spring St. 2nd Floor,

Los Angeles, CA. 90014

213-627-0477

Ccase@calif-ilc.org

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element and Safety Element Update

4 messages

Jesi Harris <jharris7@usc.edu> Wed, Jul 14, 2021 at 2:31 PM
To: housingelement@lacity.org
Cc: Brian Silveira <silveira.brian@gmail.com>

Hi,
Thanks for hosting yesterday's webinar; it was highly informative.
You mentioned that some of the efforts included streamlining affordable housing development in identified "high resource areas".
I want to be sure that this streamlining includes mixed-income developments and not only 100% affordable projects. What are some of the ways that the process will be streamlined?

Thanks,
Jesi
--
Jesi Harris, MUP '21

Planning and Land Use Consultant
Associate Planner, Brian Silveira & Associates
HarrisLandUse@gmail.com
704.277.7332

Jesi Harris <jharris7@usc.edu> Wed, Jul 14, 2021 at 3:09 PM
To: housingelement@lacity.org
Cc: Brian Silveira <silveira.brian@gmail.com>

Could you also send a copy of yesterday's presentation?

Thanks again,
Jesi
--
Jesi Harris, MUP '21

Planning and Land Use Consultant
Associate Planner, Brian Silveira & Associates
HarrisLandUse@gmail.com
704.277.7332

[Quoted text hidden]

Housing Element <housingelement@lacity.org> Wed, Jul 21, 2021 at 4:57 PM
To: Jesi Harris <jharris7@usc.edu>
Cc: Brian Silveira <silveira.brian@gmail.com>

Hello Jesi,

Thanks for your email and apologies for our delayed response. You can find a recording of the webinar and the slide deck here.

In regards to your question about streamlining mixed-income and affordable housing in high resource areas, a number of strategies are being explored including updates to the density bonus ordinance, community plan updates and targeted code amendments. There are also policies that speak to maximizing affordable housing in different market area, allowing a mix of incomes, and ensuring a net gain of affordable housing (Policies 1.2.1, 1.2.6)

Let us know if this answers your question.

Best,
The Housing Element Team
[Quoted text hidden]

Jesi Harris <jharris7@usc.edu> Fri, Jul 23, 2021 at 12:36 PM
To: Housing Element <housingelement@lacity.org>
Cc: Brian Silveira <silveira.brian@gmail.com>

This is very helpful. Thanks for your response.

Best,
Jesi
--
Jesi Harris, MUP '21

Planning and Land Use Consultant
Associate Planner, Brian Silveira & Associates
HarrisLandUse@gmail.com
704.277.7332

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Re: Thank you for attending Housing Element and Safety Element Update

2 messages

kip kennedy <cfiphotoplate@yahoo.com> Sat, Jul 10, 2021 at 8:37 AM
To: "housingelement@lacity.org" <housingelement@lacity.org>

Nobody addressed the water shortage problem. We are already over-built. Stop this building madness!

On Friday, July 9, 2021, 07:31:24 PM PDT, LA City Planning <customercare@gotowebinar.com> wrote:

We hope you enjoyed our webinar.

Please send your questions, comments and feedback to: housingelement@lacity.org.

You are receiving this email because you registered for this webinar. Your email address and personal information will be used by the Webinar organizer to communicate with you about this event and their other services. To review the organizer's privacy policy or stop receiving their communications, please contact the organizer directly.

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Housing Element <housingelement@lacity.org> Tue, Jul 20, 2021 at 10:55 AM
To: kip kennedy <cfiphotoplate@yahoo.com>

Hi Kip,

Thanks for your email. We are considering your comment on addressing water shortage and over-building in our work.

Best,
Wajiha Ibrahim
Citywide Planning
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Webinar - July 8, 2021

3 messages

Maureen Levinson <mlevinson@llpla.com> Sat, Jul 10, 2021 at 7:56 AM
To: "housingelement@lacity.org" <housingelement@lacity.org>

To whom it may concern:

Thank you for the informative Housing element and Safety Element Update webinars. I have a keen interest in creating more affordable housing in Los Angeles but I am concerned that legislation currently proposed has no mention of affordable housing. These new legislation proposals can be difficult to understand as they are currently written.

1. Unfortunately, due to work, I was only able to join the session for approximately the last 20 minutes (question & answer time). **May I please get a link to a recording of the entire session?**

2. Also, may I please **get the name of the analyst(s) in DCP who review proposed State Legislation** and how it will impact our city (example SB 9 & SB 10). I believe I heard Matt say that SB 10 offers "options" or something of that nature. I would like to know where he got that information.

3. Also, in the recent Governor's budget, there is some new funding — and the Governor actually made a statement that he was creating a new **"Housing Accountability Unit" that is "going to hold cities accountable."** They will use that Housing Accountability Unit to monitor City Council meetings and Planning Commission meetings. City Councils works hard to balance a city's need for affordability with quality of life. This is offensive that the State will fund this Housing Accountability Unit without giving cities the funding for affordable housing that would make the State's mandates possible — in other words, the State does not give cities the tools to be able to be successful in following the State's mandates. The whole think is to set local municipalities up for failure and to give authority from local municipalities to for-profit developers. Many see this as a Governor (who campaign was funded by developer and real estate companies).

So what we're looking at here is a $4 million a year watchdog team who will attend County Supervisor meetings, Planning Commission meetings and City Council and tell people what the State thinks what it should be doing. This is unprecedented for the State to come into local jurisdictions and be a watchdog or — police task force — telling cities what the State's interpretation is on what they're about to vote on. It is very easy for the Governor to do this without a formal hearing of a bill — he can just do it.

JDSupra "Proposed California Budget Would Create Housing Accountability Unit and Add New Targeted CEQA Exemptions Focused on Housing"
https://www.jdsupra.com/legalnews/proposed-california-budget-would-create-9623999/

4. I furthermore want to show you what was distributed to CD5 warning of the pitfalls of these proposed Bills — how will these bills help with **affordable housing** when there is no mention of affordable housing in them? **How are we to take what Matt stated and what the Councilmember stated?** Is Matt wrong? Is the Councilmember wrong? I'd like some clarity.

URGENT MESSAGE FROM COUNCILMEMBER PAUL KORTEZ—CONTACT YOUR ASSEMBLYMEMBER!

Dear Friends and Neighbors,

IT'S NOW OR NEVER!

Are we going to stand idly by and let the Big Developers convince the state legislature to destroy our single-family neighborhoods, create parking nightmares and make it even harder to solve the homelessness crisis than it already is?!

For the third year in a row the state legislature is considering bills that let developers destroy thriving single-family and low-density neighborhoods to build luxury apartments without yards or garages. Most importantly, these bills do so without actually addressing the real need Los Angeles and the rest of the state have for genuine affordable housing.

UNLESS WE MAKE A STAND NOW AND CONVINCE OUR ASSEMBLYMEMBERS TO OPPOSE THEM, THESE BILLS ARE GOING TO PASS IN THE COMING WEEK OR TWO!

SB 9, SB 10 and SB 478 promote the failed theory that dense, pricey housing will eventually help the poor. But it never does. Trickle-down affordability has failed everywhere it's been used as an excuse to build new luxury housing. Prices, displacement and homelessness just increase and cities that already are among the most expensive in the world become even more expensive. With all that evidence, only people trying to pull the wool over our eyes claim that building new, over-priced housing is going to magically create affordable housing.

IT'S TIME TO TELL THEM WE'RE NOT BUYING THE LIE!

Here are the bills, all of which could be voted on by the full Assembly as early as this Monday:

SB 9: This divisive bill, the worst of the three, has died in two previous iterations in past years. It destroys single-family zoning in California, presenting a threat to seven million homeowners and 21 million residents in those homes. SB 9 allows four market-rate homes where one now stands, and six units when developer/investors use a trick that is hidden in SB 9. No public hearings are allowed. No affordable units are required. No open space is required. Required parking for the market-rate and luxury units it incentivizes is woefully inadequate. This will victimize any neighborhood where a developer can afford to buy property without doing one thing to legitimately solve our housing crisis.

SB 10: This bill, this year's version of similar past bills which barely failed, was approved by the state Senate in May, but not before Senate Majority Leader Bob Hertzberg's withering criticism of it as a "gun" and not a "tool." SB 10 allows city councils to override zoning and CEQA, to allow 10-unit projects with four "granny flats," again with no commitment to affordability. These 14-unit projects are allowed in almost all neighborhoods with no hearings. It undoes voters' 110-year-old right to self-determine land use policies, letting any city council undo voter-approved land protection — like height limits on commercial towers on our major boulevards. It allows cities to upzone Very High Fire Severity Zones for 14-unit projects if, for example, they're anywhere near a bus line.

SB 478: This bill allows a developer to build 14 luxury housing units — 10 units plus four granny flats — on any multi-family street, or in any mixed-use district. Cities would be banned from imposing any local standard, such as a yard, that precludes a building size based on a 1.25 floor-area ratio and, yet again, it requires no affordable housing. It will discourage the retention of trees and open space, thus contributing to destructive climate change. It replicates a "missing middle" density policy which has failed in other cities such Seattle, Toronto and Vancouver, where all housing has simply become less affordable. And it applies to all "urbanized areas" and "urban clusters," which encompasses even modestly-sized cities such as San Fernando and Culver City, and prohibits unique towns, villages and cities from doing their own planning.

WE ALL HAVE TO TELL OUR ASSEMBLYMEMBERS "HANDS OFF OUR LOCAL CONTROL!"

We're ready to be partners in solving the state's housing crisis, but let us figure out what works best in our own neighborhoods and communities and then provide legitimate tools and incentives to help us do it.

Community organizations and individual residents of Los Angeles who are as concerned about what kind of communities these bills will produce as I am MUST contact your Assemblymembers as soon as possible, preferably on Monday before the bills are voted on by the full Assembly. Encourage your friends and neighbors to do the same. There are enough legislators representing parts of L.A. to defeat these bills, but they won't do it unless they hear from all of us NOW and OFTEN.

JUST SAY "NO!" to 9, 10 and 478. Do it for your quality of life, and for everyone's!

Sincerely,



Councilmember Paul Koretz, Fifth District

Housing Element <housingelement@lacity.org> Wed, Jul 21, 2021 at 5:05 PM
To: Maureen Levinson <mlevinson@llpla.com>, Matthew Glesne <matthew.glesne@lacity.org>

Hi Maureen,

Thank you for your email and apologies for our delayed response. Here is a link to a recording of the webinar and presentation slides.

State bills are generally analyzed by the Mayor's Office, but Matthew Glesne <matthew.glesne@lacity.org> spoke about the potential impacts of the state bills at the meeting, and potential for local solutions. I've added Matt to this thread, in case he has additional clarifications he'd can add.

Funding solutions are integral for meeting the City's housing needs, and the City continues to ensure compliance with state laws to be eligible for funding.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.

Thank you,
The Housing Element Team
[Quoted text hidden]
--

Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302

Matthew Glesne <matthew.glesne@lacity.org> Thu, Jul 22, 2021 at 9:59 AM
To: Housing Element <housingelement@lacity.org>
Cc: Maureen Levinson <mlevinson@llpla.com>

Hi Maureen, happy to try to clarify my statement that SB 10 offered an "option" for cities to use. What this means is that if SB 10 passes it does not force the City to do anything or change anything in the City. It does provide an option for cities to utilize the provisions in the law to apply to a local ordinance that then would require a majority vote by LA City Council. So it would be up to City Council to utilize these provisions.

Matt
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element 2021-2029 Webinar

2 messages

Robert Hogbin <hogdog396@yahoo.com> Sat, Jul 10, 2021 at 10:16 PM
To: "HousingElement@lacity.org" <HousingElement@lacity.org>

Comment:

I understand the need for additional housing in LA and throughout Southern California. I also understand the current water shortages and drought projections that are said to be the worst ever in California.

When I hear our county and city representatives proposing and approving new residential construction (even with new environmental restrictions) makes me wonder about the validity of the water shortage crisis. More people, more toilets flushing, more washing, not to mention the water used during construction.

It seems to me that responsible elected officials would consider the shortage of water throughout the area a significant priority and would look at placing a moratorium on new construction, for at least this year, instead of building.

Doesn't make sense to me ! All I can surmise is that the water shortage takes a back seat to bringing in more people and receiving more money revenue to the respective cities....I can only assume the water shortage is not as bad as we are led to believe...Mixed signals from our representatives !

Bob Hogbin

Housing Element <housingelement@lacity.org> Wed, Jul 21, 2021 at 9:36 AM
To: Robert Hogbin <hogdog396@yahoo.com>

Hi Bob,

Our apologies for the delayed response.

Thank you for sharing your insightful thoughts and concerns on the draft plan. Your comments will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.

Best,
Wajiha Ibrahim

On Sat, Jul 10, 2021 at 10:18 PM Robert Hogbin <hogdog396@yahoo.com> wrote:

> Comment:

I understand the need for additional housing in LA and throughout Southern California. I also understand the current water shortages and drought projections that are said to be the worst ever in California.

When I hear our county and city representatives proposing and approving new residential construction (even with new environmental restrictions) makes me wonder about the validity of the water shortage crisis. More people, more toilets flushing, more washing, not to mention the water used during construction.

It seems to me that responsible elected officials would consider the shortage of water throughout the area a significant priority and would look at placing a moratorium on new construction, for at least this year, instead of building.

Doesn't make sense to me ! All I can surmise is that the water shortage takes a back seat to bringing in more people and receiving more money revenue to the respective cities....I can only assume the water shortage is not as bad as we are led to believe...Mixed signals from our representatives !

Bob Hogbin

--

Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Santa Monica & Beverly Hills, please capture public land for non-compliant housing elements, give land to LA City.

1 message

T <tie.ryder@gmail.com> Sat, Jul 10, 2021 at 12:08 PM
To: HousingElements@hcd.ca.gov
Cc: City of Santa Monica <planning@smgov.net>, planningcomment@smgov.net, housingelement@beverlyhills.org, HousingElement@lacity.org, council@smgov.net, redistricting.lacity@lacity.org, executiveoffice@bos.lacounty.gov, HollyJMitchell@bos.lacounty.gov, kathryn@bos.lacounty.gov, firstdistrict@bos.lacounty.gov, housing@scag.ca.gov, Jes McBride <jes@yesinmybackyard.org>

Hello,

Santa Monica City in LA County has NOT done enough when it comes to affordable housing on the westside of Los Angeles! The same is true for the city of Beverly Hills who recently approved a housing project that offers 7 parking spots PER UNIT and 0 affordable housing... I mean really??? In this climate crisis?????

We need more affordable housing in ALL neighborhoods across LA County, we need to quickly end single-family zoning! Why should these residents living in single-family zoned neighborhoods get the benefits that our cities offer???? It is rumored that Santa Monica's housing department has been ONLY housing White Eastern European Immigrants in the Downtown Santa Monica affordable housing! **Illegal housing discrimination & segregation continues through today in many of the local cities!**

I'm asking that HCD please capture public land from Santa Monica City and Beverly Hills so that LA City can rezone correctly and build the necessary affordable housing. I believe that we need more public housing or let's call it, community-city-owned affordable & market-rate housing! The working class needs a hand in the housing game, right now the private market is dominating and only competes against itself & that shouldn't be. It should have to compete against permanent affordable & market-rate housing that is community-controlled! The working class IS DYING in SoCal, the same can be said for seniors living on the streets and students sleeping in their cars! We can and should want to do much better than we are currently doing!

To HCD, please capture and close the incorrectly zoned Santa Monica airport so that a walkable community that is mostly affordable housing can be developed! Please capture any/all public land from mentioned cities, the delay has gone on long enough! We've been requesting more affordable housing for more than 10 years now, we shouldn't be waiting on local cities to NOT do the right thing! Let's get this right!

Thank You for your time regarding the matter!

Best,
Tieira
323.603.6776
https://htwws.org/santamonicaairport/

---

2 attachments

SANTAMONICAAIRPORT(created by Tieira Ryder).pdf
1576K

OceanVFarmsPenMarGolf.TieiraRyder.HousingProposal.pdf
2955K

Gmail label:plan-public-comment

Questions unanswered in the chat

External Inbox × Add to Mailing L



Philip Armstrong <philip.armstrongrvnc@gmail.com>
to me

Hi Planning Staff,

I'd appreciate getting responses to the two questions I submitted in the chat that you didn't respond to du

Thank you,
Philip Armstrong
Cell: 213-275-9322

Housing Element <housingelement@lacity.org> (sent by blair.smith@lacity.org)
to Jackie, Philip

Hi Philip,

Please see responses below.

Question 1: For the prior cycle, what was the number for at risk affordable housing and what percent of t
Analysis of at Risk Units is included in appendix 2.2. I've added Jackie Cornejo from HCID to this

Question 2 : In Chapter 5, it says: The City has therefore already met its overall RHNA target of 82,002 u
point that the RHNA for the affordable categories were missed by a large margin. Why does Chapter 5 p
Meeting the affordable housing RHNA is a significant challenge as outlined in the Executive Sum
challenge and appreciate your comment.

Thank you,
The Housing Element Team
(Blair Smith)

--



Housing Element Staff
Los Angeles City Planning

Housing Element <housingelement@lacity.org>

LA Housing Element Draft Update, General Comment; TINY Home Owners & Community-City owned housing.

2 messages

T <tie.ryder@gmail.com> Thu, Jul 8, 2021 at 8:31 PM
To: HousingElement@lacity.org
Cc: HousingElements@hcd.ca.gov

Hello,

I have one last general comment from the draft update that just happened. There are many residents that already own tiny homes or they want to own them, ADUS that are built by owners are great but please let us also consider listing vacant land plots that can be rented or purchased so that tiny homeowners can place pre-built tiny homes or so that the city can rent pre-built community-city owned tiny home. We mentioned shared /split lots on the call and pre-built tiny homes would be great for that and it could be affordable. I know many, many residents that have or want tiny homes, there is a support group of residents looking for places to put them.

The call mentioned mixed-use buildings that offer a set number of affordable units that expire after lets say 55 years, are those units being counted in the total number of affordable units or can you clarify how many of those are expected to expire within the 55-year time frame or was that the $9,000 number that was mentioned? I believe that we need more community-city-owned market-rate & affordable housing, the working class needs a hand in the housing game. The private market has us too desperate for housing from them and that should not be.

--
Best,
Tieira
www.HTWWS.org

3 attachments



Tinyhome2.jpg
78K

tinyhome3.jpg
99K





1Tinyhome.jpg
139K

Housing Element <housingelement@lacity.org> Wed, Jul 21, 2021 at 9:20 AM
To: T <tie.ryder@gmail.com>

Hope all is well.

Thank you for sharing your thoughts on the draft plan. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]

--

Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302

Housing Element <housingelement@lacity.org>

Re: Housing Element and Safety Element Update starts in 1 Day

1 message

T <tie.ryder@gmail.com> Thu, Jul 8, 2021 at 7:25 PM
To: housingelement@lacity.org

Thank You for the great call today! We have a county-wide housing crisis, I hope that the city will attempt to capture land from local cities in LA County like Santa Monica in relation to the incorrectly zoned Santa Monica airport.

70% of the city zoned as single-family zoned homes is also a critical change that must happen. Plexes, small bungalows, ADUS, are all wonderful.

Again thank you for the effort to house LA, I hope the city will work with SCAG-HCD to capture land from local cities in LA County that have been upholding illegal segregation as it relates to race & class!

Best,
Tieira
www.HTWWS.org

5 attachments



1SampleHousing.jpg
381K



Housingsample2.jpg
622K

1Bungalow.jpg
73K



OceanVFarmsPenMarGolf.TieiraRyder.HousingProposal.pdf
2955K

SANTAMONICAAIRPORT(created by Tieira Ryder).pdf
1576K

Housing Element <housingelement@lacity.org>

Problems with links on Housing Element Update site

7 messages

sluch20@aol.com <sluch20@aol.com> Wed, Jul 7, 2021 at 3:16 PM
Reply-To: "sluch20@aol.com" <sluch20@aol.com>
To: "HousingElement@lacity.org" <HousingElement@lacity.org>

I've highlighted and noted issues I've encountered in trying to access the plan with these sections. All others opened to English language documents without problems.

https://planning.lacity.org/es/plans-policies/housing-element-update#plan-(borrador)

EXECUTIVE SUMMARY

Executive Summary

The Executive Summary describes the role and requirements for updating the Housing Element. The chapter also describes the six goals of the Element, outlines the organizational format, describes the Relationship of the Element to the City's Master Plan, as well as plans developed by other City agencies and regional jurisdictions, and includes a glossary of terms. This chapter also includes a summary of the public participation that took place during the development of the Housing Element.

To request a translated version of a chapter or appendix, please contact the City Planning Department at HousingElement@lacity.org.

- Appendix 0.1 Summary of Public Participation (Start Phase, Concepts Phase) (NOTE: This opens as Spanish language only)

CHAPTER 1. HOUSING NEEDS ASSESSMENT

Chapter 1. Housing Needs Assessment (NOTE: This does not show a link to open an English language version on the English language section of the site)

Chapter 1 provides a comprehensive summary of the characteristics of the City's population, home, and housing stock, and an analysis of these factors to identify the housing needs of the City's population, including residents with special needs. The analysis shows low levels of housing affordability, and the creation and loss of existing low-cost housing. Demographic changes, such as the increase in the elderly population and the decline in young families and children, are also evaluated.

To request a translated version of a chapter or appendix, please contact the City Planning Department at HousingElement@lacity.org.

CHAPTER 3 OPPORTUNITIES FOR CONSERVATION IN RESIDENTIAL DEVELOPMENT

Chapter 3. Opportunities for Conservation in Residential Development (NOTE: This does not show a link to open an English language version on the English language section of the site)

The state's Housing Element law requires cities to identify opportunities to conserve energy as part of housing development. The City has expanded this analysis to include energy conservation, water conservation, alternative energy sources, and sustainable development that supports conservation and reduces the demand for energy and water. The City's green building code and other regulations such as the Low Impact Development Ordinance have strengthened the City's efforts toward sustainability. City-specific programs include discounts for energy-efficient appliances, changing energy use timing, alternative energy use (e.g., solar energy), installing green roofs, requiring sustainable gardens and site design, and adopting General Plan land use and zoning designations that facilitate higher-density, compact development that is located near transit.

To request a translated version of a chapter or appendix, please contact the City Planning Department at HousingElement@lacity.org.

Housing Element <housingelement@lacity.org> Wed, Jul 7, 2021 at 3:40 PM
To: "sluch20@aol.com" <sluch20@aol.com>

I'm sorry for the inconvenience, we had an issue with our server today and the english version of the site was superseded by the Spanish version. We are working on it right now and hope to resolve the issue soon. Is there any particular chapter I can provide?

Here is the full version of all chapters:https://planning.lacity.org/odocument/043fec77-de15-4838-99db-b5daf92651ee/Full.HE.Doc.HighRez.pdf

Thank you for your patience.

[Quoted text hidden]

sluch20@aol.com <sluch20@aol.com> Wed, Jul 7, 2021 at 4:03 PM
Reply-To: "sluch20@aol.com" <sluch20@aol.com>
To: "housingelement@lacity.org" <housingelement@lacity.org>

Thanks. My son is working on disability housing issues as a volunteer with Daniel Skolnick, District 5's Senior Deputy Planner in anticipation of the Update. We've been trying to access the documents to make comment.
[Quoted text hidden]

Housing Element <housingelement@lacity.org> Wed, Jul 7, 2021 at 4:23 PM
To: "sluch20@aol.com" <sluch20@aol.com>

Ah yes we met a few weeks ago! Here is the full version of the document: https://planning.lacity.org/odocument/043fec77-de15-4838-99db-b5daf92651ee/Full.HE.Doc.HighRez.pdf

Appendices are not linked in this document but are referenced on pages 6 and 7. While the website is down, please let me know if you'd like any of those appendices. You may be particularly interested in the analysis in Chapter 1 pages I-21 - I-29 and Chapter 6.

Please let me know if you have any questions,
Blair
[Quoted text hidden]

---

sluch20@aol.com <sluch20@aol.com> Wed, Jul 7, 2021 at 4:54 PM
Reply-To: "sluch20@aol.com" <sluch20@aol.com>
To: "housingelement@lacity.org" <housingelement@lacity.org>

Hi Blair,

Yes, I'm Ben Verheiden's mom, Sonja. You helped us in a google meet in late April with Matt. Ben will be making some suggestions soon and I've got some comments about language as well. "Disability" needs to be more specific, especially for the Intellectually/Developmentally Disabled (I/DD) population as references only to disability as a "mental" issue. Developmental and Intellectual Disabilities are organic brain disorders that occur at birth and are not considered mental health illness, which is where illnesses such as bi-polar, psychotic (schizophrenia, etc), PTSD, OCD would be placed: I/DD individuals can also develop mental health issues along with their organic brain disorder, but that's in addition to, not in place of. Mental Health: Types of Mental Illness (webmd.com)

The Housing Element needs to not only differentiate these populations, but ensure the inclusive language is present or the I/DD population will again be an afterthought in planning. Physical handicaps, mental illness and elder needs covered well with federal funds for housing support. No so with I/DD individuals. It's a flaw in the Lanterman Act (that created the Regional Centers) as there is no funding model at state or federal level for such housing and no instruction on how to keep record of clients who wish to have housing other than living with their parents (which is where a majority of these adults are due to lack of affordable options)/ These people were warehoused in special facilities for many years until the Self-Determination movement started pushing for developmentally disabled individuals to have choices about where they want to live.

It's funny, the appendices all download in English so we were good with that.

Thanks for all you do and take care,

Sonja Luchini
Ben's mom
[Quoted text hidden]

Housing Element <housingelement@lacity.org> Mon, Jul 12, 2021 at 1:49 PM
To: "sluch20@aol.com" <sluch20@aol.com>, Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>

Hi Sonja,

Thank for the suggestion and comment we will look into this further.

Please let us know if you have any additional comments.

Blair
[Quoted text hidden]

Housing Element <housingelement@lacity.org> Wed, Aug 25, 2021 at 5:42 PM
To: Maya Abood <maya.abood@lacity.org>

Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302

For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: FW: LA's Draft HE

Blair Smith <blair.smith@lacity.org> Mon, Aug 2, 2021 at 10:58 AM
To: Housing Element <housingelement@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>

---------- Forwarded message ---------
From: **Mehmood, Sohab@HCD** <Sohab.Mehmood@hcd.ca.gov>
Date: Mon, Aug 2, 2021 at 9:49 AM
Subject: FW: LA's Draft HE
To: Blair Smith <blair.smith@lacity.org>

Hi Blair,

See below for the public comment received.

Thanks,

Sohab

From: McDougall, Paul@HCD <Paul.McDougall@hcd.ca.gov>
Sent: Monday, August 2, 2021 9:43 AM
To: Mehmood, Sohab@HCD <Sohab.Mehmood@hcd.ca.gov>
Subject: FW: LA's Draft HE

For our records please

From: Jon Wizard <jon@yesinmybackyard.org>
Sent: Friday, July 2, 2021 12:33 PM
To: McDougall, Paul@HCD <Paul.McDougall@hcd.ca.gov>; Coy, Melinda@HCD <Melinda.Coy@hcd.ca.gov>
Subject: LA's Draft HE

Hi friends,

Thanks again for that button, Melinda, and I hope you're enjoying your vacation, Paul!

Just a quick note to say LA's current draft is truly exemplary, and this is the standard by which elements should be designed and judged. Whether this survives the sure-to-be-perilous political process is another story, but a true accounting of the likelihood of development should be both the expectation and the reality. Check out this page that collected all of Chris' down and dirty tweets on their plan. If you two knew all along what LA had up their sleeve, thanks

for your patience as we incessantly belabored the potential disaster of what a bad housing element from them would be. This draft element demonstrates true leadership in the housing space and, I'd hope, a sufficient platform from which to tell San Diego to try again.

https://threadreaderapp.com/thread/1411037893297012739.html [threadreaderapp.com]

Cheers,

Jon

--



Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886



Housing Element <housingelement@lacity.org>

Fwd: Letter to PLUM Committee - Fair Share reports and the housing element

2 messages

Cally Hardy <cally.hardy@lacity.org> Mon, Jun 28, 2021 at 11:34 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Anthony Dedousis** <anthony@abundanthousingla.org>
Date: Mon, Jun 28, 2021 at 11:25 AM
Subject: Letter to PLUM Committee - Fair Share reports and the housing element
To: <councilmember.blumenfield@lacity.org>, <councilmember.harris-dawson@lacity.org>, Gilbert Cedillo <gilbert.cedillo@lacity.org>, <councilmember.Lee@lacity.org>, <councilmember.ridley-thomas@lacity.org>
Cc: Dhakshike Wickrema <dhakshike.wickrema@lacity.org>, Max Podemski <Max.Podemski@lacity.org>, Gerald Gubatan <Gerald.Gubatan@lacity.org>, Leonora Camner <leonora@abundanthousingla.org>, Haley Feng <haley@abundanthousingla.org>, Nicholas Maricich <nicholas.maricich@lacity.org>, Melissa Alofaituli <melissa.alofaituli@lacity.org>, <vince.bertoni@lacity.org>, Laura Krawczyk <laura.krawczyk@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Cally Hardy <cally.hardy@lacity.org>

Dear Councilmembers,

My name is Anthony Dedousis, and I'm director of policy and research at Abundant Housing LA, a local pro-housing advocacy organization. **I'm writing to share a coalition letter regarding 13 community organizations' support for a housing element update that distributes the citywide 456,000-home RHNA goal to each of Los Angeles' community plan areas in a fair, equitable way.**

We are encouraged by two recent reports from the Department of City Planning (DCP) and the Housing and Community Investment Department (HCID) regarding how the City should promote citywide, equitable housing growth in the future. Both the Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416) and the Report Relative to a City Zoning Code Update (CF 20-1042) make a convincing, data-driven case that the City's affordable housing shortage, particularly in high-opportunity neighborhoods, is closely tied to restrictive zoning and other barriers to housing production.

The City Council must quickly act on Planning and HCID's recommendations, and incorporate these policies into the housing element update. We urge you to:

- Implement a comprehensive Fair Share approach to the RHNA rezoning program, which would define "opportunity" holistically.
- Increase affordable housing opportunities in high-opportunity neighborhoods.
- Expand and merge TOC and the city Density Bonus program.
- Update the Framework Element by 2024, in parallel with the RHNA rezoning.
- Exclude parcels that contain RSO housing units from rezoning, in order to prevent lower-income renter displacement.
- Implement stronger tenant protection policies.

Thank you for your consideration.

Regards,

Anthony

--
Anthony Dedousis
Director, Policy and Research
Abundant Housing LA
515 S Flower Street, 18th Floor

Los Angeles, CA 90071
516-660-7402

--



Cally Hardy (she/her/hers)
City Planning Associate
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA 90012
Planning4LA.org
(213) 978-1643



210628 Letter to City Council - Fair Share Reports - SHARED.pdf
1600K

Anna Orellana <anna.orellana@lacity.org> Tue, Jun 29, 2021 at 1:05 PM
To: housingelement@lacity.org

Hi

Please see attached.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Jun 28, 2021 at 11:28 AM
Subject: Fwd: Letter to PLUM Committee - Fair Share reports and the housing element
To: Anna Orellana <anna.orellana@lacity.org>



Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: vince.bertoni@lacity.org



[Quoted text hidden]

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271
[Quoted text hidden]

210628 Letter to City Council - Fair Share Reports - SHARED.pdf
1600K


ABUNDANT
HOUSING LA


CLIMATE ACTION
CAMPAIGN


CALIFORNIA
YIMBY


Westside
for
Everyone


VICA
VALLEY INDUSTRY & COMMERCE ASSOCIATION
SINCE 1949


PATH
MAKING IT HOME


PATH
VENTURES


CSH


FOTPL
Friends of the Purple Line


CENTER for
BIOLOGICAL
DIVERSITY


S.P.Y
safe place for youth


Albert Group


United
PARENTS&
STUDENTS

June 28, 2021

Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012

Dear Councilmembers,

Thank you for the opportunity to comment on the process of updating the housing element of Los Angeles' general plan. We are writing on behalf of a coalition of 13 organizations representing the policy, academic, environmental, business, social justice, and affordable housing communities. We support efforts to expand the availability of housing at all levels of income, and ensure that cities meet their obligations to affirmatively further fair housing.

California's Regional Housing Needs Assessment (RHNA) requires Los Angeles to plan for 456,000 new homes by 2029 through its housing element update, **including 184,000 that are affordable to lower-income households**. This affords us an opportunity to promote greater affordability, equity, and sustainability through housing abundance, as well as a strong economic recovery from the COVID-19 pandemic. This would also finally put us on a path to preventing and ultimately ending homelessness in Los Angeles.

To do this, Los Angeles must reform zoning and land use regulations in a way that increases housing choice and availability, improves access to job centers and transit, and affirmatively furthers fair housing. **This requires high-opportunity neighborhoods to accommodate more housing opportunities,** including those that have historically blocked new housing through exclusionary zoning. Additionally, as Los Angeles plans for housing growth, there must be no conversion of wildlife habitat to housing.

That's why our organizations have called for a housing element update that distributes the citywide 456,000-home RHNA goal to each of Los Angeles' community plan areas in a fair, equitable way.

In January, we wrote to recommend that, as part of the housing element update process and RHNA rezoning, the City set housing growth targets for each CPA, based on objective, quantifiable criteria like housing costs, median income, access to transit, proximity to job centers, access to parks and schools, patterns of historical exclusion and segregation, and environmental quality. In February, we wrote to express our concern that early drafts of the housing element update did not incorporate an equitable distribution approach to promoting housing growth. In April, the California Department of Housing and Community Development (HCD) issued detailed guidelines that clearly require cities to promote lower-income housing opportunities in high-opportunity neighborhoods, and defines quantitative benchmarks for assessing cities' AFFH compliance. This indicates that HCD intends to set the bar high on AFFH compliance in housing element updates, as required under Assembly Bill 686.

With all this in mind, we are encouraged by two recent reports from the Department of City Planning (DCP) and the Housing and Community Investment Department (HCID) regarding how the City should promote citywide, equitable housing growth in the future. Both the Report Relative to Citywide Equitable Distribution of Affordable Housing (CF 19-0416) and the Report Relative to a City Zoning Code Update (CF 20-1042) make a convincing, data-driven case that the City's affordable housing shortage, particularly in high-opportunity neighborhoods, is closely tied to restrictive zoning and other barriers to housing production. Both reports also chart a bold course for major reforms to housing policy, including:

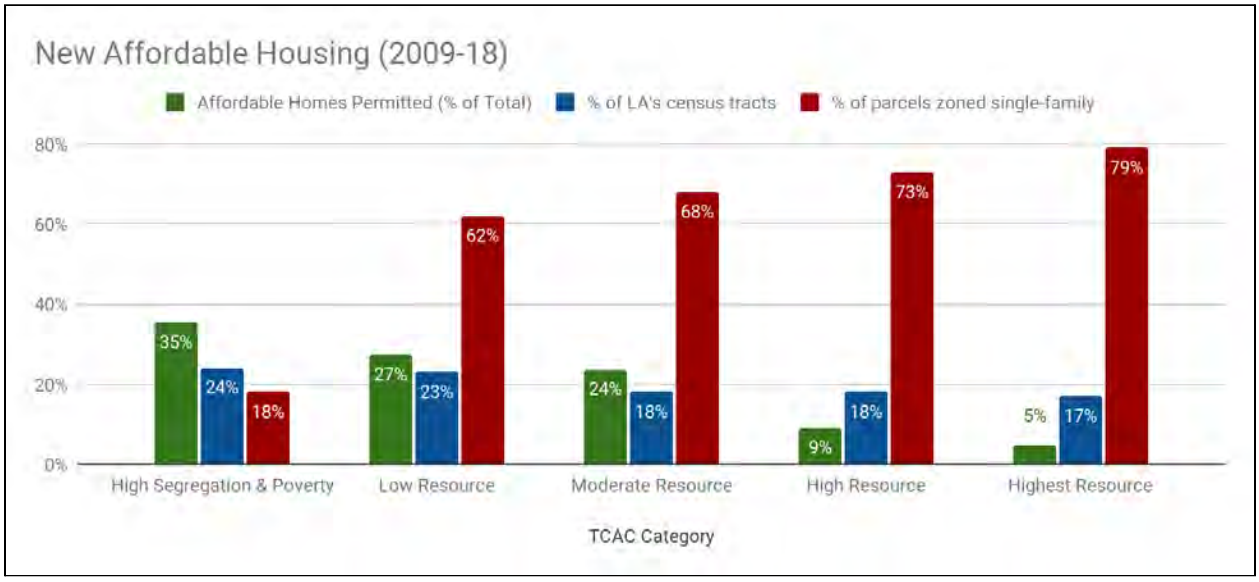
- An equitable distribution approach to the housing element's rezoning program, where the bulk of new housing opportunities, including affordable housing opportunities, would be promoted in high- and moderate-resource areas.
- An expansion and possible merger of the City's Transit-Oriented Communities (TOC) and Density Bonus programs.
- A Citywide Housing Needs Allocation Process/Targeted Fair Share Zoning Allocation formula that would guide a future Framework Element update and community plan updates.

We thank Councilmember Gil Cedillo and Council President Nury Martinez for shining a light on this critical issue, and we thank the hardworking staff at Planning and HCID for designing long-awaited solutions to Los Angeles' housing shortage.

With the final housing element update due to HCD in October, the City Council must quickly act on Planning and HCID's recommendations, and incorporate these policies into the housing element update. **We urge you to enact the following measures:**

- **Implementation of a comprehensive Fair Share approach to the RHNA rezoning program, which would define "opportunity" holistically.** CPA and/or neighborhood-level RHNA targets, including affordable housing growth RHNA targets, should be based on a formula that includes the following objective, numerical criteria:
    - Housing costs
    - Median income
    - Access to transit
    - Proximity to job centers
    - Access to public resources (e.g. parks, schools)
    - Patterns of historical exclusion and segregation
    - Environmental quality
- This would essentially merge the proposed Equitable RHNA Rezoning Program and Citywide Housing Needs Allocation Process/Targeted Fair Share Zoning Allocations methodologies, ensuring that a consistent set of standards would guide RHNA rezoning, a Framework Element update, expansion of TOC and the city Density Bonus program, and all future community plan updates. This would also ensure that a majority of new lower-income housing opportunities are accommodated in moderate-, high-, and highest-resource census tracts.

- **Increase affordable housing opportunities in high-opportunity neighborhoods.** In order to meet HCD's AFFH standards, the City's housing element must reverse historic patterns of socioeconomic segregation by dismantling the barriers to housing opportunities for low- and moderate-income households in high-income neighborhoods.
    - **Between 2009 and 2018, just 14% of new affordable homes were permitted in high- and highest-resource census tracts**, even though these areas make up 35% of the City's total census tracts. This is because apartments are banned on 76% of the residential parcels in these well-resourced areas, a function of exclusionary zoning. **By contrast, 35% of new affordable homes that were permitted during that time were located in census tracts with high segregation and poverty.** These areas allow apartments on 82% of their residential parcels.



- **Expand and merge TOC and the city Density Bonus program.** TOC has led to the production or proposal of over 30,000 housing units, of which 21% are affordable to lower-income households. Expanding it to cover transit-rich locations and locations with access to high-quality resources, jobs, and amenities, including locations where apartments are currently banned, would create even more affordable housing units in high-income neighborhoods.
- **Update the Framework Element by 2024, in parallel with the RHNA rezoning.** The Framework Element is decades out of date, and acts as a significant barrier to an equitable distribution of new housing opportunities citywide. Updating the Framework Element by 2024 is a necessary step towards implementation of a high-quality, comprehensive Fair Share approach to the RHNA rezoning program.
- **Exclude parcels that contain RSO housing units from rezoning, in order to prevent lower-income renter displacement.** Reliance on parcels that contain RSO housing units for new housing growth could accelerate the displacement of lower-income households from many neighborhoods.

- **Implement stronger tenant protection policies**, such as expanded affordable unit replacement requirements ("no net loss") for redevelopment of existing rental properties, a "right of return" after redevelopment at the same rent as before, and rental assistance during redevelopment.

Finally, it's worth pointing out that pro-housing reforms are popular. Last year, Planning polled a representative sample of Los Angeles residents, and found that:

- 79% agreed that "the City's housing strategy should ensure all areas of the City plan for and build their fair share of affordable housing, including my neighborhood."
- 61% agreed that "Property owners should be able to add up to four additional housing units on their own property."
- 52% agreed that "Property owners should be able to tear down a single-family home and replace it with a small apartment building."
- 58% believe that "Reducing regulations to help housing get built faster and at a lower cost" should be a high priority.
- 53% believe that "Allowing small-scale duplexes, triplexes and fourplexes in areas currently set-aside for single-family homes" should be a high priority.

A clear majority of Angelenos reject NIMBYism and support more housing opportunities, including in locations where apartments are currently banned. **We urge you to listen to them.**

The housing element update is our opportunity to build a Los Angeles with:

- Lower housing costs
- Less tenant displacement
- Less income and racial segregation
- A growing regional economy
- Greater access to jobs, transit, and economic opportunity
- Lower climate emissions and better environmental quality (passenger vehicle emissions are the largest source of California emissions)

Let's not miss this chance to create a Los Angeles where everyone is welcome. We respectfully urge you to instruct the Department of City Planning to incorporate the above policies into the housing element update. Thank you for your consideration.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Anthony Dedousis
Director of Policy and Research
Abundant Housing LA

Louis Abramson, PHD
Homelessness Committee Chair
Central Hollywood Neighborhood Council
(Signing in a personal capacity)

Stuart Waldman
President
Valley Industry and Commerce Association (VICA)

David Howden
Director
Corporation for Supportive Housing (CSH)

Larry Fondation
Executive Director
United Parents and Students

Joel John Roberts
Chief Executive Officer
PATH

Konstantin Hatcher
Organizing Director
California YIMBY

J.P. Rose
Senior Attorney
Center for Biological Diversity

Stephen M. Albert, A.I.A.
Housing Element Task Force Member
The Albert Group

Shane Phillips
Housing Initiative Project Manager
UCLA Lewis Center for Regional Policy Studies
(Signing in a personal capacity)

Sahar Khundmiri
Advocacy Manager
Safe Place for Youth

Jose Trinidad Castaneda
Policy Manager
Climate Action Campaign

Geneva Vogelheim
Leader
Westside for Everyone

Lauren Borchard
Co-Chair
Friends of the Purple Line

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Re: Save the Date: Housing Element + Safety Element Workshops + What We've Heard I Talleres sobre Elemento de Vivienda y Elemento de Seguridad y lo que hemos escuchado

1 message

MM MM <90291girl@gmail.com> Thu, Jun 24, 2021 at 5:53 PM
To: housingelement@lacity.org

MAYBE THERE IS A HOUSI G SHORTAGE BECAUSE YOU ARE CORRUPT AND DONT ISSUE BUILDING PERMITS.

On Thu, Jun 24, 2021, 4:02 PM Los Angeles City Planning <housingelement@lacity.org> wrote:



Para español siga hacia abajo.

Save the Date

Over the next few weeks the City will release a draft of the 2021-2029 Housing Element and Safety Element 2021 Update. Save the date to attend one of two webinars to learn more about the drafts and participate in a question and answer session.

Register for the Webinar:

Thursday, July 8th
6 p.m. - 7:30 p.m.

Register

Tuesday, July 13th
12 p.m. - 1:30 p.m.

Register

Over 40,000 Engaged in Housing Element Concept Outreach
In late 2020 the City launched the "Concepts" phase for the 2021-2029 Housing Element. This plan phase focused on six concepts guiding the Housing Element Update that were drafted based on state law and the feedback City Planning collected during the "Vision" phase of its outreach. The Concepts focus on how the Housing Element will address housing-related issues in the City. All six concepts respond to urgent needs: addressing the housing shortage, advancing racial equity and access to opportunity, and promoting sustainability and resilience.

During this phase the department of City Planning engaged with an unprecedented number of people through several targeted outreach efforts, including three webinars, a statistically valid poll, and a public survey. Each of these is discussed in more detail in the attached PDF. In addition to these efforts the city held a meeting of the full Task Force, attended six Neighborhood Council alliance meetings, and held several smaller stakeholder meetings with community organizations.

Learn More: https://planning.lacity.org/plans-policies/community-plan-update/housing-element-news/wrapping-concepts-phase

About the Housing Element
The Housing Element of the General Plan, also called "the Plan to House LA," identifies Los Angeles's housing needs and establishes clear goals and objectives to inform future policy considerations. When the update is completed, the Housing Element will guide the creation and implementation of the City's housing policy from 2021 to 2029

About the Safety Element
The Safety Element of the General Plan details Los Angeles' strategy to prevent, respond to, and recover from disaster events. Recent state legislation requires the city to review and update, as necessary, the Safety Element alongside the Housing Element. As part of the Safety Element 2021 Update the City will integrate targeted amendments into the existing document to better illustrate the City's approach to disaster management and resilience. More information is included in the Background, Summary of Amendments, and FAQ's document.

Guarda la fecha

Durante las próximas semanas, la Ciudad de Los Ángeles publicará un borrador del Elemento de Vivienda 2021-2029 y la Actualización 2021 del Elemento de Seguridad. Guarda la fecha para asistir a uno de los dos seminarios web para obtener más información sobre los borradores y participar en una sesión de preguntas y respuestas.

Register for the Webinar:

Jueves 8 de julio
6 p.m. - 7:30 p.m.

Registrate

Martes 13 de julio
12 p.m. - 1:30 p.m.

Registrate

Más de 40.000 participaron en la divulgación sobre los conceptos del Elementos de Vivienda
A fines de 2020, la Ciudad lanzó la fase de "Conceptos" para el Elemento de Vivienda 2021-2029. Esta fase del plan se centró en seis conceptos que guían la Actualización del Elemento de Vivienda que se redactaron en base a la ley estatal y la retroalimentación que el Departamento de Planeación recopiló durante la fase de "Visión" de su alcance. Los Conceptos se enfocan en cómo el Elemento de Vivienda abordará los problemas relacionados con la vivienda en la Ciudad. Los seis conceptos responden a necesidades urgentes: abordar la escasez de viviendas, promover la equidad racial y el acceso a las oportunidades, y promover la sostenibilidad y la resiliencia.

Durante esta fase, el Departamento de Planeación se involucró con un número sin precedentes de personas a través de varios esfuerzos de divulgación específicos, incluidos tres seminarios web, una encuesta estadísticamente válida y una encuesta pública. Cada uno de estos se analiza con más detalle en el PDF adjunto. Además de estos esfuerzos, la ciudad organizó una reunión del Grupo de Trabajo completo, asistió a seis reuniones de Alianzas de Consejos Vecinales y organizó varias reuniones pequeñas de partes interesadas con organizaciones comunitarias.

Aprende más: https://planning.lacity.org/plans-policies/community-plan-update/housing-element-news/wrapping-concepts-phase

Acerca del Elemento de Vivienda
El Elemento de Vivienda del Plan General, también llamado "el Plan de Vivienda de Los Ángeles", identifica las necesidades de vivienda de Los Ángeles y establece metas y objetivos claros para informar las consideraciones de políticas futuras. Cuando se complete la actualización, el Elemento de Vivienda guiará la creación e implementación de la política de vivienda de la Ciudad de 2021 a 2029.

Acerca del Elemento de Seguridad
El Elemento de Seguridad del Plan General detalla la estrategia de Los Ángeles para prevenir, responder y recuperarse de desastres. La legislación estatal reciente requiere que la ciudad revise y actualice, según sea necesario, el Elemento de Seguridad junto con el Elemento de Vivienda. Como parte de la Actualización 2021 del Elemento de Seguridad, la Ciudad integrará enmiendas específicas al documento existente para ilustrar mejor el enfoque de la Ciudad para la gestión de desastres y la resiliencia. Se incluye más información en el documento Antecedentes, resumen de enmiendas y preguntas frecuentes.

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Fwd: Correspondence from Californians for Homeownership

1 message

Matthew Glesne <matthew.glesne@lacity.org> Mon, May 3, 2021 at 6:08 PM
To: Blair Smith <blair.smith@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Housing Element <housingelement@lacity.org>

FYI - relevant to our last discussion.
Matt

---------- Forwarded message ---------
From: <matt@caforhomes.org>
Date: Mon, May 3, 2021 at 6:02 PM
Subject: Correspondence from Californians for Homeownership
To: <vince.bertoni@lacity.org>
CC: <wajiha.ibrahim@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, <jackie.cornejo@lacity.org>, <claudia.monterrosa@lacity.org>

Dear Mr. Bertoni,

Please see the attached correspondence regarding the City's Housing Element update.

Sincerely,

Matthew Gelfand

--

Matthew Gelfand

Counsel, Californians for Homeownership

525 S. Virgil Avenue

Los Angeles, CA 90020

matt@caforhomes.org

Tel: (213) 739-8206

Californians for Homeownership is a 501(c)(3) non-profit organization that works to address California's housing crisis through impact litigation and other legal tools.

--

Matthew Glesne
Preferred Pronouns: He, Him, His
Senior City Planner
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2021-5-3 - Californians Letter to V. Bertoni.pdf
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CALIFORNIANS FOR HOMEOWNERSHIP

MATTHEW GELFAND, COUNSEL
MATT@CAFORHOMES.ORG
TEL: (213) 739-8206

May 3, 2021

VIA EMAIL

Vincent P. Bertoni
Director of Planning
Department of City Planning
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012
Email: vince.bertoni@lacity.org

RE: Obligation to affirmatively further fair housing in connection with the City of Los Angeles's Sixth Cycle Housing Element Update

Dear Mr. Bertoni:

Californians for Homeownership is a 501(c)(3) non-profit organization devoted to using legal tools to address California's housing crisis. I am writing as part of our work monitoring local compliance with California's laws regarding Housing Elements and the requirement that local governments adopt policies that affirmatively further fair housing (AFFH).

We have reviewed the February 4 letter sent to you by a coalition of civic organizations led by Abundant Housing Los Angeles, which provided feedback on the City's Housing Element update process, as well as Abundant Housing's February 16 letter to you providing additional detailed analysis. The letters are attached here for reference. Based on Abundant Housing's analysis, we are seriously concerned that the City may be moving toward a Housing Element update that does not comply with the City's AFFH requirements. This letter provides an overview of our concerns.

The requirement to affirmatively further fair housing in Housing Element sites inventories

In 2018, the Legislature passed AB 686, which codified the requirement for cities and counties to affirmatively further fair housing as part of the periodic Housing Element update process. Among other things, AB 686 requires the City to consider its obligations to affirmatively further fair housing in preparing its inventory of sites available for development. Gov. Code § 65583(c)(10)(A); *see* Legislative Counsel Digest to Stats. 2018, c. 958 (AB 686) ("This bill would require the inventory to be used to identify sites throughout the community, consistent with the provisions requiring the above-described program, within the housing element to affirmatively further fair housing.").

525 S. Virgil Avenue
Los Angeles, CA 90020

The state Department of Housing and Community Development (HCD)[1] has issued the following guidance regarding the obligation to affirmatively further fair housing in local Housing Element sites inventories:

> In the context of AFFH, the site identification requirement involves not only an analysis of site capacity to accommodate the RHNA, but also whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity. At the most basic level, this requirement suggests two courses of action relating to the identification of sites:
>
> i. Ensure that sites zoned to accommodate housing for lower-income households are not concentrated in lower resource areas and segregated concentrated areas of poverty, but rather dispersed throughout the community, including in areas with access to greater resources, amenities, and opportunity.
>
> ii. Where sites zoned to accommodate housing for lower-income households are located in lower resource areas and segregated concentrated areas of poverty, incorporating policies and programs in the housing element that are designed to remediate those conditions, including place-based strategies that create opportunity in areas of disinvestment (such as investments in enhanced infrastructure, services, schools, jobs, and other community needs).[2]

The City's Housing Element Initial Study

To date, the most complete discussion of the City of Los Angeles's plans for its sixth cycle Housing Element update has been provided in the Initial Study prepared by the City as part of its obligations under the California Environmental Quality Act (CEQA). To be clear, this letter is not a comment on the Initial Study or on the City's environmental review process for its Housing Element update. Instead, like the other civic organizations that have commented on the City's update process, we are relying on details disclosed in the Initial Study because they provide a window into the City's plans for its Housing Element update process.

In its background discussion of state Housing Element law, the Initial Study provides a detailed description of the City's obligations under AB 686. The discussion acknowledges the

---

[1] HCD is the state agency charged with administering the Regional Housing Needs Allocation (RHNA) process and reviewing local Housing Elements.

[2] HCD Memorandum to Planning Directors re: AB 686 ("HCD Memo"), *available at* https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/ab686_summaryhousingelementfinal_04222020.pdf, at 6.

City's obligation to consider its AFFH obligations in its sites inventory:

> Additionally, the Inventory of Sites suitable for housing development must be identified throughout the City in a manner that affirmatively furthers fair housing opportunities.
>
> For purposes of the housing element site inventory, this means that sites identified to accommodate the lower-income portion of the RHNA are not concentrated in low-resourced areas (lack of access to high performing schools, proximity to jobs, location disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty. Sites identified to accommodate the lower income RHNA must be distributed throughout the community in a manner that affirmatively furthers fair housing

Initial Study at 4; *see also* Initial Study at 13.

Unfortunately, when it comes to *implementing* this requirement, the proposed sites inventory approach described in the Initial Study is deficient. Most critically, it appears that the City is only intending to consider AFFH issues in connection with the small portion of its housing development capacity it intends to create through rezoning. Instead, the City must consider its obligations to affirmatively further fair housing in connection with its *entire* sites inventory.

More specifically, according to the Initial Study, the City expects to identify a capacity of over 408,000 units (over 80% of the City's RHNA obligation) through a combination of zoned capacity and pipeline housing development projects. Initial Study at 15. There is no mention of any consideration of AFFH issues in connection with that portion of the City's sites inventory analysis. However, the Initial Study does indicate an intention to consider the City's AFFH obligations in its plans to accommodate an additional 93,230 units through rezoning.

This approach is inadequate. As you know, and as Abundant Housing's detailed analysis demonstrates, the City's existing zoning does not reflect fair and equitable zoning practices. Instead, it reflects longstanding restrictive practices that push housing for lower-income families out of high-opportunity and high-quality of life areas. *See* February 16, 2021 letter from Abundant Housing Los Angeles.

The City must consider these factors not only in determining where and how to rezone for the 20% of its RHNA allocation that it believes it cannot meet through existing zoning—but also in determining whether existing sites can accommodate the other 80% in a manner consistent with the City's AFFH obligations. This is the only way for the City to meet AB 686's requirement to "[e]nsure that sites zoned to accommodate housing for lower-income households are not concentrated in lower resource areas and segregated concentrated areas of poverty, but rather dispersed throughout the community, including in areas with access to greater resources, amenities, and opportunity."[3]

---

[3] HCD Memo at 6.

When the City engages in this analysis, as it must, the results will likely demonstrate that the City needs to engage in a broader rezoning program than currently anticipated.

* * *

We know that the analysis in the City's Initial Study is an early look at the City's plans for its Housing Element update. As the City moves forward with its update, we urge you to account for the City's obligation to affirmatively further fair housing in connection with the entire sites inventory.

Sincerely,



Matthew Gelfand

cc: Department of City Planning
Wajiha Ibrahim (by email to wajiha.ibrahim@lacity.org)
Matthew Glesne (by email to matthew.glesne@lacity.org)

Housing and Community Investment Department
Jackie Cornejo (by email to jackie.cornejo@lacity.org)
Claudia Monterrosa (by email to claudia.monterrosa@lacity.org)

ATTACHMENT


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LAW

February 4, 2021

Mr. Vince Bertoni
Director of Planning
Los Angeles Department of City Planning
200 North Spring Street
Los Angeles, CA 90012

Dear Mr. Bertoni,

Thank you for the opportunity to comment on the process of updating the housing element of Los Angeles' general plan. We are writing on behalf of a coalition of organizations representing the policy, academic, environmental, business, social justice, and affordable housing communities. We support efforts to expand the availability of housing at all levels of income, and ensure that cities meet their obligations to affirmatively further fair housing. **We are concerned that the current community planning and housing element update processes are not on track to achieve this goal.**

Exclusionary zoning and land use practices have led to an undersupply of affordable medium- and high-density housing near jobs and transit, and have perpetuated segregated living patterns and the exclusion of historically disadvantaged communities. The housing and homelessness crisis, together with this year's COVID-19 pandemic, severe wildfires, and civil unrest, illustrate the need for a totally new approach to solving our city and region's housing crisis.

For these reasons, we support a housing element update in Los Angeles that is equitable and balanced, promotes socioeconomic integration, and takes a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

Additionally, it is critical that housing element updates affirmatively further fair housing (AFFH), which is required by state law under AB 686 (2018). According to the State Department of Housing and Community Development (HCD), a housing element must "ensure that sites zoned to accommodate housing for lower-income households are not concentrated in lower resource areas and segregated concentrated areas of poverty, but rather dispersed throughout the community, including in areas with access to greater resources, amenities, and opportunity."[1] Cities should accommodate at least a pro-rata portion of the lower-income RHNA target in high-opportunity census tracts (e.g. if 30% of a jurisdiction's land area is located in high-opportunity tracts, then at least 30% of the lower-income RHNA should be allocated to

[1] HCD, AB 686 Summary of Requirements in Housing Element Law, April 2020, pg. 6

such tracts.) This includes high-opportunity neighborhoods that have frequently used exclusionary land use rules to shut out lower-income households and affordable housing.

We have called for Planning to develop a distribution of the Regional Housing Needs Assessment (RHNA) target of 455,000 homes to each of Los Angeles' community plan areas (CPA) for purposes of the sites inventory. Each CPA's target should be based on a formula that includes objective, quantifiable criteria like housing costs, median income, access to transit, proximity to job centers, access to public resources (e.g. parks, schools), patterns of historical exclusion and segregation, and environmental quality.

Planning's methodology should also include CPA-level housing growth targets by income level. Los Angeles' target of 184,000 homes that are affordable to lower-income households must be distributed fairly across CPAs; all neighborhoods, particularly high-opportunity neighborhoods that have historically blocked new housing through exclusionary zoning, must accommodate more affordable housing.

This equitable distribution of housing growth would reduce traffic and carbon emissions, increase access to jobs and transit, open up exclusionary neighborhoods to Angelenos of all backgrounds, and foster economic recovery from the COVID-19 pandemic, while also ensuring that the City's housing element update complies with AB 686's requirement to affirmatively further fair housing. This would also align with Council President Martinez's recent motion calling for "an equitable distribution of new housing around the city based on high quality jobs, transit, and historic housing production."

It is therefore disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update, despite receiving significant feedback from many members of the Housing Element Task Force in support of this approach. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

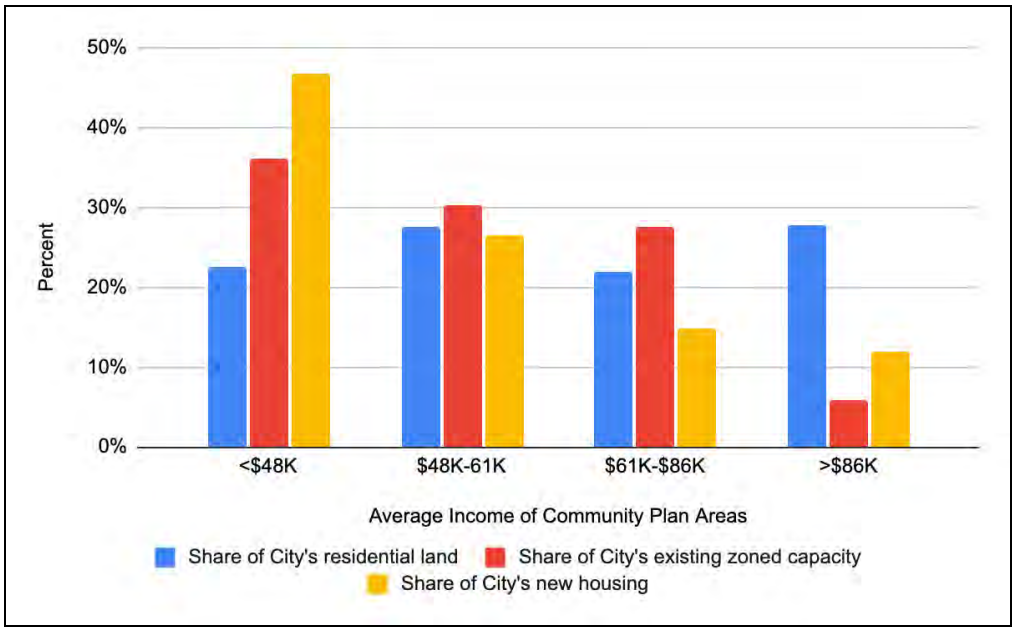
We believe that the facts do not support these conclusions. Additionally, this approach to the housing element update would perpetuate an unsatisfactory status quo, doing little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, excessive water use, displacement of lower-income renters, and segregated neighborhoods. **We must not continue down this path.**

We wish to draw your attention to the following shortcomings of Planning's "status quo" proposal and analysis:

- **Planning's "status quo" proposal fails to affirmatively further fair housing.** By planning for most housing growth on parcels where multifamily development is already

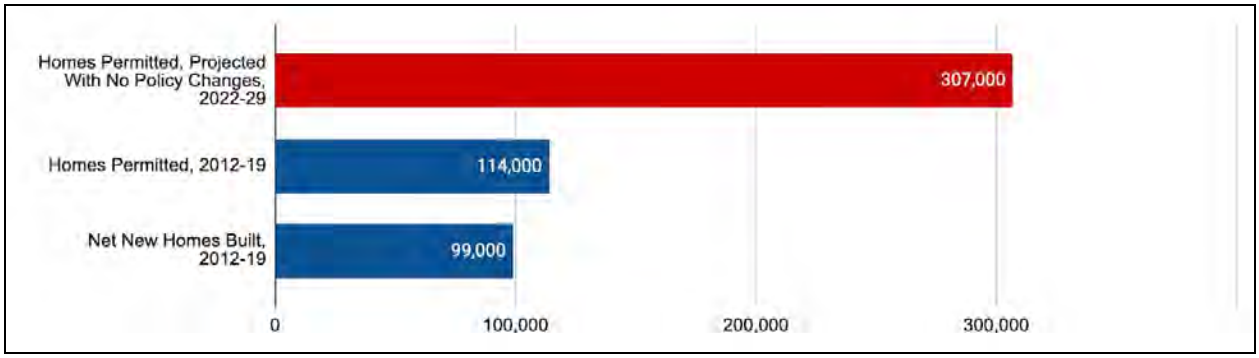
allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

- About one-quarter of the City's residentially-zoned land is in CPAs where the median annual household income is below $48,000. But 36% of the City's zoned capacity is located in these low-income CPAs, helping to explain why 47% of new housing built in Los Angeles between 2013 and 2019 was built in low-income CPAs. Just 12% of new housing was built in high-income CPAs (those with a median annual household income above $86,000), despite these areas making up 28% of the City's residentially-zoned land.[2]



- Planning anticipates that under current zoning (including the nearly-completed Downtown, Hollywood, and Boyle Heights community plan updates), Los Angeles has a realistic development capacity to build 307,000 more homes by the end of the eight-year 6th cycle in 2029.[3] However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019,[4] leading to a net increase of 99,000 homes during that time.[5] Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes. Additionally, their scoping document fails to document how Planning staff arrived at their 307,000-home estimate, nor does it provide an estimate of likelihood of development, a critical factor in assessing realistic development capacity.

[2] Analysis of Dario Alvarez, Pacific Urbanism, and Professor Paavo Monkkonen, UCLA Luskin
[3] Initial Study, pg. 15
[4] Initial Study, pg. 15
[5] California Department of Finance, Report E-5, 2020



- Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, appears to contain a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement. **Planning should decline to include parcels containing RSO housing units in the site inventory, instead identifying additional areas for housing production via rezoning.**
- Since Planning has made overly optimistic assumptions regarding how much of the RHNA target can be achieved without zoning changes, Planning expects that only 93,000 homes need to be accommodated through rezoning and changes to the City's Density Bonus program. Planning anticipates accommodating much of this 93,000-home gap through a series of community plan updates that are already in progress.[6] However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.
- The "status quo" approach does not reflect the input given by the Housing Element Task Force, a diverse group of community leaders, special needs service providers, affordable and market-rate housing developers, and other housing and community development professionals who represent a wide range of expertise. The Housing Element Task Force requested that the City:
    - "update the citywide growth strategy to ensure equity is a core part of future land use decisions,"
    - "develop citywide housing goals by Community Plan areas to ensure more equitable distribution of affordable housing,"
    - "strategically increase housing opportunities in lower density areas,"

[6] Initial Study, pg. 19-20

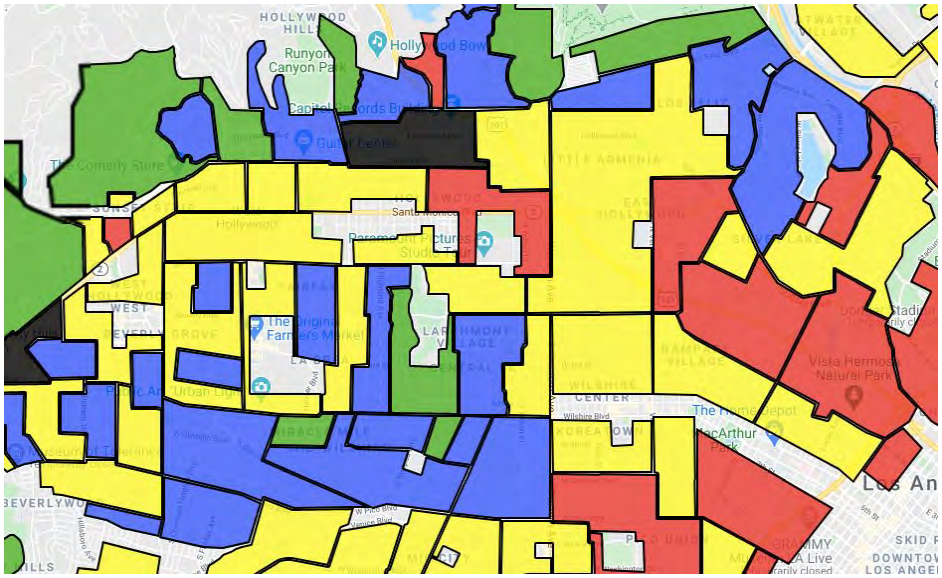
    - “provide land use incentives/preferences in high resource areas for affordable housing developments,”
    - “increase access to opportunities and proactively desegregate the City by planning for more affordable and mixed-income housing in high resource areas,”
    - “facilitate missing middle housing options through the new zoning code.”
- The “status quo” plan is directly opposite to the goals developed on the Task Force because it perpetuates patterns of segregation and fails to meaningfully increase housing production in lower-density and higher-opportunity areas.

Finally, it is worth noting that the racist practice of redlining, which divided our city’s neighborhoods by race and income, strongly influenced zoning laws that remain on the books today, defining where affordable housing may and may not be built. On the maps below, you can see that single-family zoning today is frequently concentrated in areas that were labeled “desirable” (green and blue) in the 1930s, and that new apartment production is generally allowed only in areas that were labeled as “declining” or “hazardous” (yellow and red) when redlining was legal. Consequently, Planning’s proposed site inventory map appears to promote most housing growth in areas that were once labeled as “declining” or “hazardous”.

Clearly, a “status quo” approach to the housing element that fails to undertake meaningful zoning reform would simply reinforce the barriers that redlining created in our communities decades ago.

Home Owners' Loan Corporation map of Los Angeles, 1930s

*"Desirable" areas in **green** and **blue**, "declining" or "hazardous" areas in **yellow** and **red***

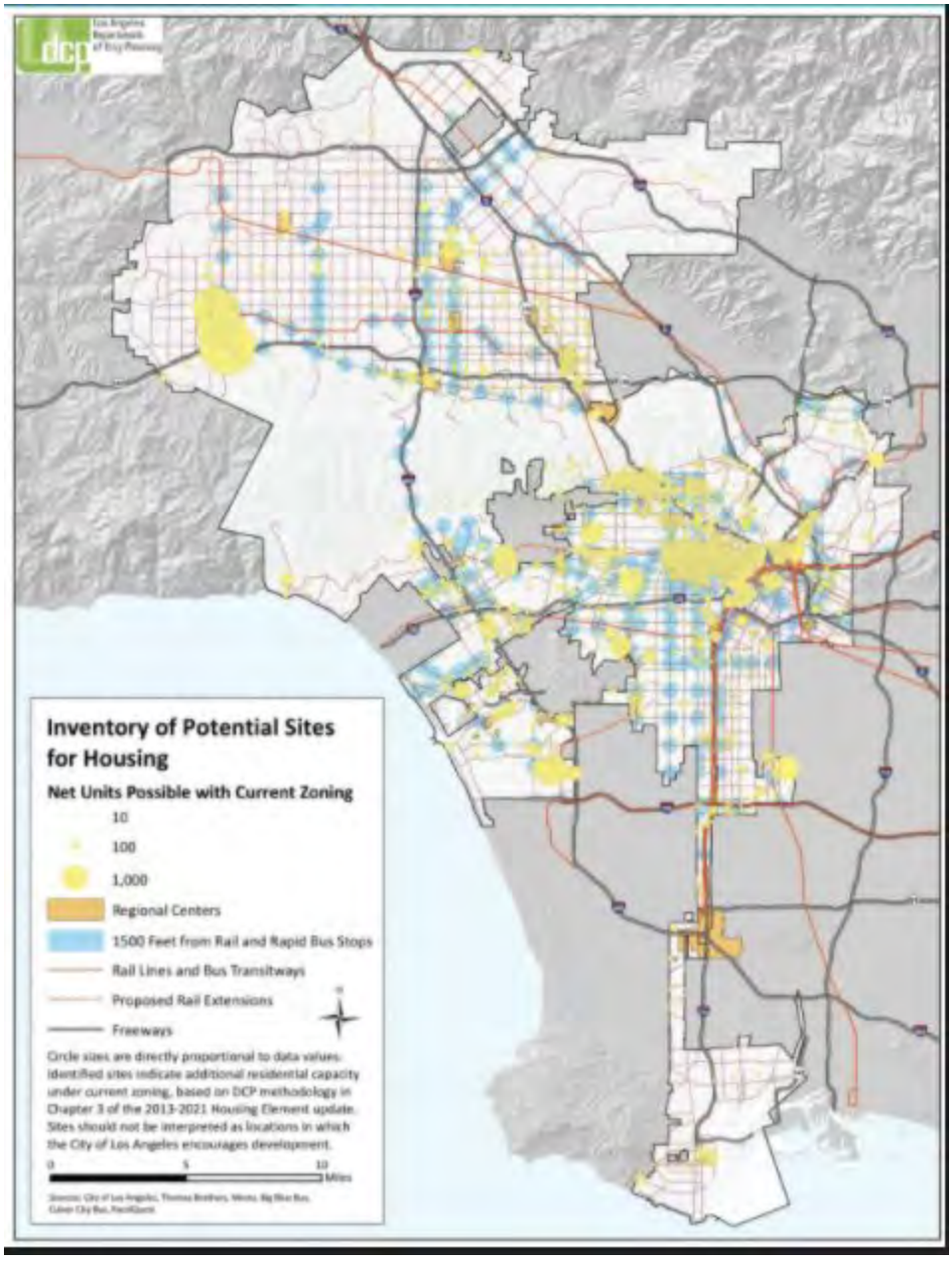


Zoning map of Los Angeles, 2019

*Areas where apartments banned in **pink**; areas where apartments allowed in **blue.***



Inventory of Potential Sites for Housing
Los Angeles Department of City Planning, 2020



For all these reasons, we strongly oppose Planning's "status quo" approach to the housing element update. Fortunately, there is still time to change course and create an equitable, transformative housing element.

While housing element updates are due to HCD by October 15, 2021, the City could request that HCD approve a housing element conditionally. This would give Planning additional time to make necessary revisions. Recently, HCD approved San Diego's housing element update on a conditional basis, giving San Diego an additional six months to "amend the element and

address requirements related to affirmatively furthering fair housing and making findings to demonstrate the likelihood of redevelopment on nonvacant sites." There's no reason why Los Angeles shouldn't take advantage of the opportunity to get the housing element right, especially given that HCD is likely to scrutinize the same issues that we've identified above.

We request the opportunity to meet with you to discuss this matter, and we urge you to instruct the Department of City Planning to revise its approach to the housing element update. Thank you for your consideration.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Anthony Dedousis
Director of Policy and Research
Abundant Housing LA

Marilu Guevara
Executive Director
League of Women Voters of Los Angeles

Chris Carson
Advocacy Chair
League of Women Voters, City of Los Angeles

Shane Phillips
Project Manager, Housing Initiative
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Brian Hanlon
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Stephen M. Albert, A.I.A.
Housing Element Task Force Member
The Albert Group

Paavo Monkkonen
Associate Professor of Urban Planning and Public Policy
UCLA Luskin School of Public Affairs

Joel John Roberts
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PATH Ventures

Sahar Khundmiri
Advocacy Manager
Safe Place for Youth

Sonja Trauss
President
YIMBY Law

Dario Alvarez
President
Pacific Urbanism

A. Lenise Kouture
CEO and President
International Black Restaurant and Hospitality Association

Lauren Borchard and Mehmet Berker
Founders
Friends of the Purple Line

Bryn Lindblad
Deputy Director
Climate Resolve

David Howden
Director, Los Angeles
Corporation for Supportive Housing

Louis Abramson, PhD
Chair, Homelessness Committee
Central Hollywood Neighborhood Council

J.P. Rose
Staff Attorney
Center for Biological Diversity

Lois Starr
Acting Executive Director
PATH Ventures

Jason Riffe
Director, Housing Initiatives
United Way Greater Los Angeles

February 16, 2021

Mr. Vince Bertoni
Director of Planning
Los Angeles Department of City Planning
200 North Spring Street
Los Angeles, CA 90012

Dear Mr. Bertoni,

Thank you for the opportunity to comment on the process of updating the housing element of Los Angeles' general plan. We are writing on behalf of **Abundant Housing LA** regarding Los Angeles' upcoming 6th Cycle housing element update. Abundant Housing LA is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis. We support more housing at all levels of affordability and reforms to land use and zoning codes, which are needed in order to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity.

California has a statewide housing shortage of nearly 3.5 million homes, and has the highest poverty rate in the nation after accounting for housing costs. Households at all levels of income face a historically high rent burden. Exclusionary zoning and longstanding constraints on denser housing have led to an undersupply of medium and high density housing near jobs and transit. This contributes to high rents and displacement of households.

Over the past few years, new state laws (e.g. AB 686 (2018), SB 166 (2017), AB 1397 (2017), SB 828 (2018), SB 35 (2017), etc.) have strengthened the Regional Housing Needs Assessment (RHNA), which sets a housing growth target for individual jurisdictions and requires jurisdictions to update their housing elements in order to achieve these targets.

These changes to state law have led to historically high jurisdiction-level housing growth targets in the upcoming 6th Cycle Housing Element Planning Cycle, and have empowered the state Department of Housing and Community Development (HCD) to enforce appropriately high standards for housing element updates. We are encouraged that Los Angeles was given a target of **456,000 new homes, of which 184,000 must be affordable to lower-income households.**

As jurisdictions start the housing element update process, AHLA seeks to provide input on how jurisdictions should fulfill both the letter and the spirit of housing element law. **Earlier this month, we shared a letter with you, co-signed by 14 civic organizations, expressing serious concerns about Planning's approach for distributing new housing opportunities across the City's neighborhoods, and urging the City to develop and implement an equitable distribution approach to the housing element update.**

Over the course of the housing element update process, AHLA will scrutinize jurisdictions' housing elements, submit comments to HCD as needed, and collaborate closely with nonprofits that bring legal action against jurisdictions that fail to comply with state housing laws.

To that end, we have published a memo, **Requirements and Best Practices for Housing Element Updates: The Site Inventory**, explaining the key legal requirements, as well as HCD and AHLA's recommended best practices, for housing element updates. Additionally, **this checklist provides a summary of our core policy recommendations**. We respectfully encourage you to incorporate the concepts detailed in these documents into Los Angeles' housing element update.

We would draw particular attention to four critical components of the site inventory analysis:

1. Prioritizing high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing opportunities, in order to **affirmatively further fair housing**
2. Including the HCD-recommended buffer of at least 15-30% extra capacity in the site inventory, in order to **avoid violating the No Net Loss requirement**
3. Incorporating an estimate of the **likelihood of development** and the **net new units if developed** of inventory sites
4. Using an HCD-recommended "safe harbor" methodology for **forecasting future ADU production**

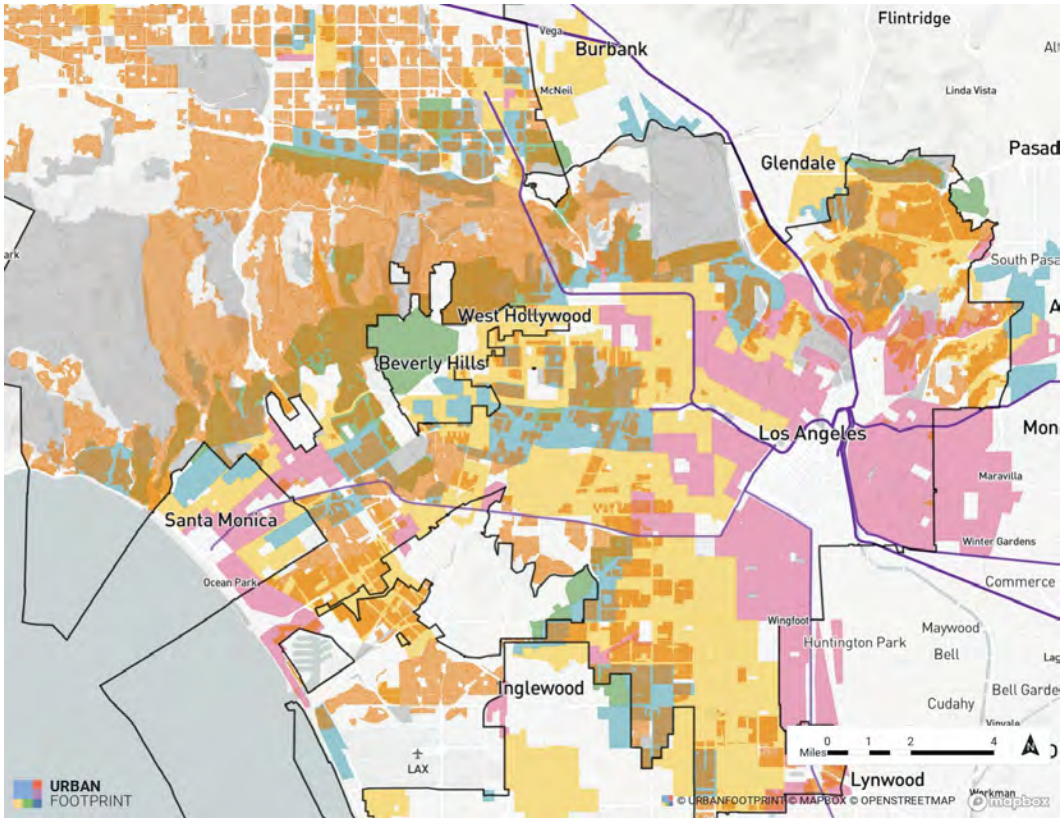
Component #1: Housing elements must prioritize high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing opportunities, in order to affirmatively further fair housing.

AB 686 (2018) requires housing element updates to "affirmatively further fair housing", which is defined as "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."

In our region, housing policy and land use regulations were once used to exclude members of minority groups. Redlining and restrictive covenants, which restricted where Black, Latino, and Asian Americans could live, were once commonplace throughout Los Angeles County. Discrimination in housing takes other forms today: even after *de jure* segregation was banned, opponents of neighborhood change in prosperous areas weaponized zoning policy to make apartment construction illegal in much of Los Angeles, especially in high-income areas. Today, 75% of the City's residentially-zoned land is restricted to single-family housing only, and the areas where apartments are banned tend to be ones that were defined as "desirable" during the age of redlining, and were thus off-limits to many Black, Latino, and Asian Angelenos.

Home Owners' Loan Corporation map of Los Angeles, 1930s

*"Desirable" areas in **green** and **blue**, "declining" or "hazardous" areas in **yellow** and **red***
*Parcels where apartments are banned in **orange***



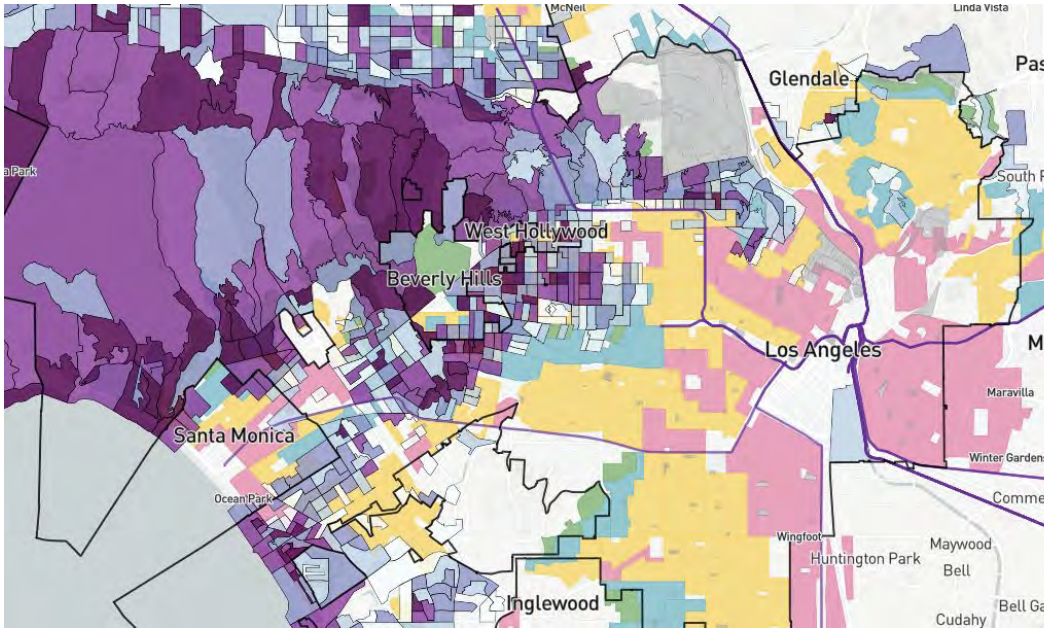
Restrictive zoning has perpetuated historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods. Restrictive zoning has also raised housing costs and denied historically disadvantaged groups housing opportunities near job centers, quality schools, and other public resources, a situation that persists today. Today, the median home sale price in Los Angeles is above $800,000[1], and 57% of the city's renters are "rent-burdened" (i.e. they spend more than 30% of their income on rent)[2]. High housing costs place a disproportionate burden on lower-income communities of color, and have the effect of excluding them from high-opportunity neighborhoods and from the city altogether.

Again, comparing redlining maps from the 1930s to the current distribution of Angelenos by race is instructive. Areas that were defined as "desirable" during the age of redlining, where R1 zoning often predominates, tend to have white majorities today. Areas that were defined as "declining" or "hazardous", where zoning tends to accommodate multifamily housing, tend to be majority Black, Latino, and Asian.

[1] Zillow Home Value Index, Los Angeles
[2] American Community Survey, 2014-18

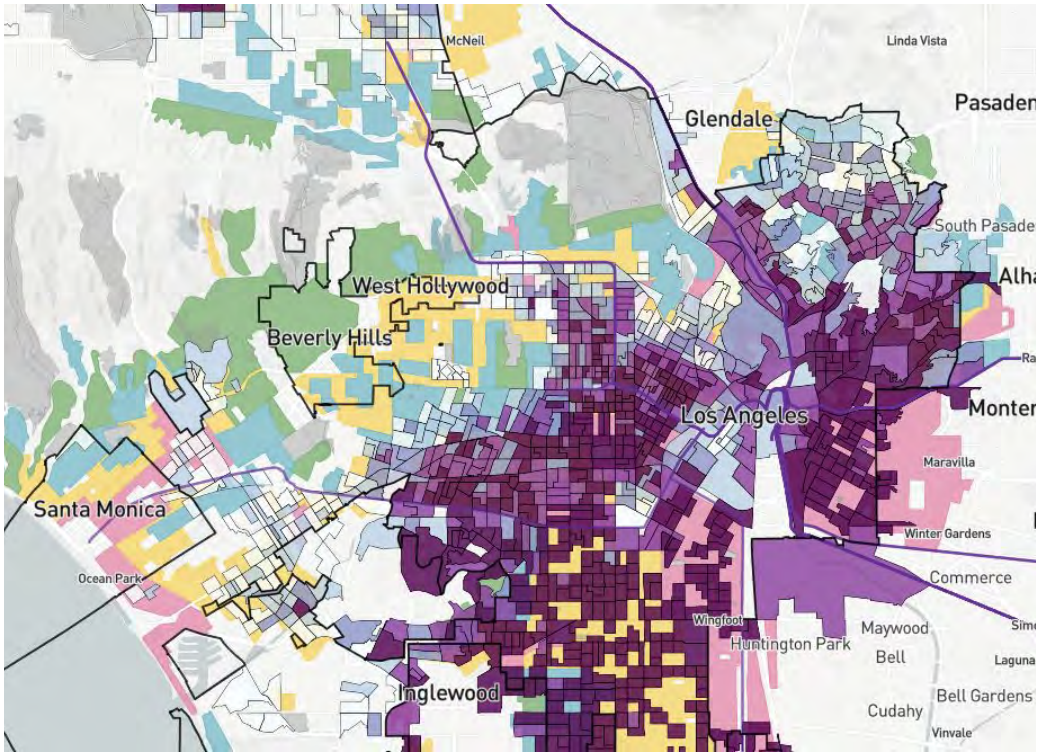
White Population of Los Angeles by Census Tract

*"Desirable" areas in **green** and **blue**, "declining" or "hazardous" areas in **yellow** and **red***
*Majority-white census tracts in shades of **purple***



Nonwhite Population of Los Angeles by Census Tract

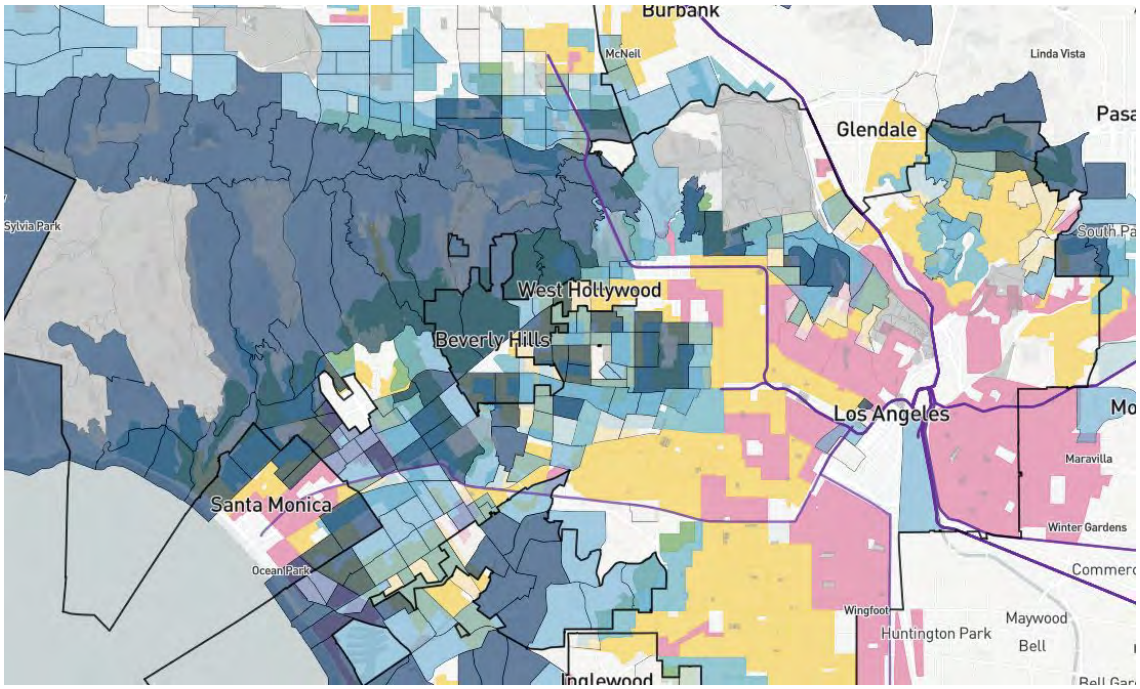
*"Desirable" areas in **green** and **blue**, "declining" or "hazardous" areas in **yellow** and **red***
*Majority-nonwhite census tracts in shades of **purple***



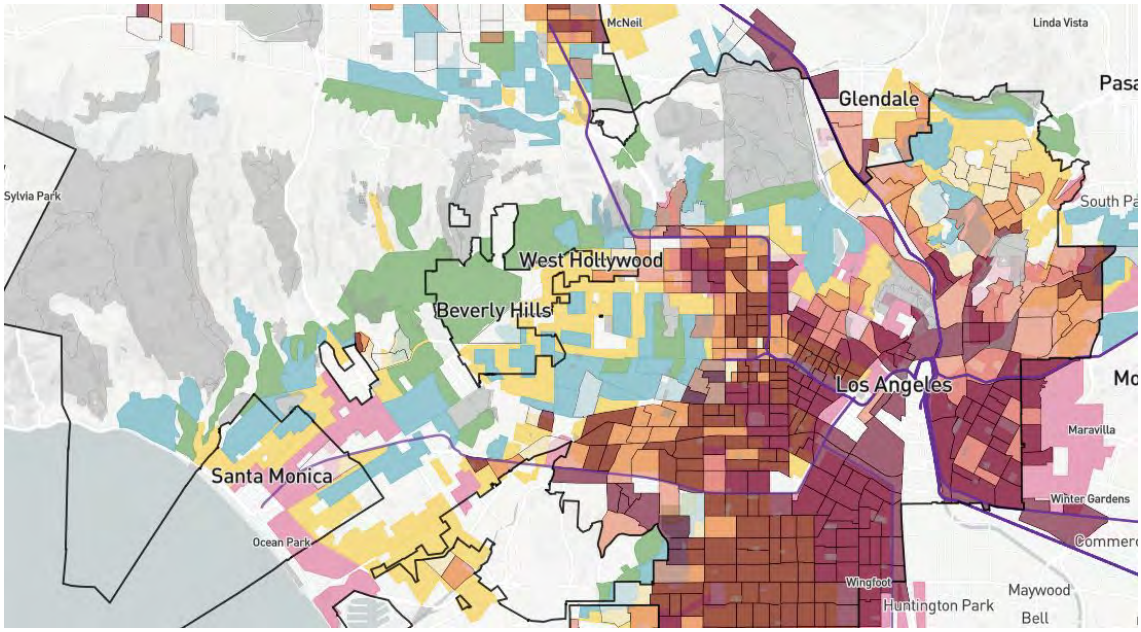
Neighborhoods that were defined as “desirable” during the age of redlining also tend to offer a higher quality of life today. The California Healthy Places Index is a social welfare index that measures overall quality of life in a census tract, based on factors like health, education, housing, economic opportunity, and transportation. Census tracts with higher HPI scores frequently overlap with the green and blue “desirable” areas on the HOLC map. Census tracts with lower HPI scores tend to overlap with yellow “declining” and red “hazardous” areas.

Healthy Places Index Score by Census Tract

*“Desirable” areas in **green** and **blue**, “declining” or “hazardous” areas in **yellow** and **red***
*Census tracts with high HPI scores in shades of **dark blue***



Healthy Places Index Score by Census Tract
*"Desirable" areas in **green** and **blue**, "declining" or "hazardous" areas in **yellow** and **red***
*Census tracts with low HPI scores in shades of **brown***



The City must address these issues by accommodating the lower-income RHNA targets in a way that conforms with AFFH requirements. HCD's Site Inventory Guidebook offers recommendations for **how** jurisdictions should accomplish this. HCD is **likely to require jurisdictions to distribute lower-income housing opportunities throughout the jurisdiction**, and recommends that jurisdictions first identify development potential for lower-income housing in high-opportunity neighborhoods[3].

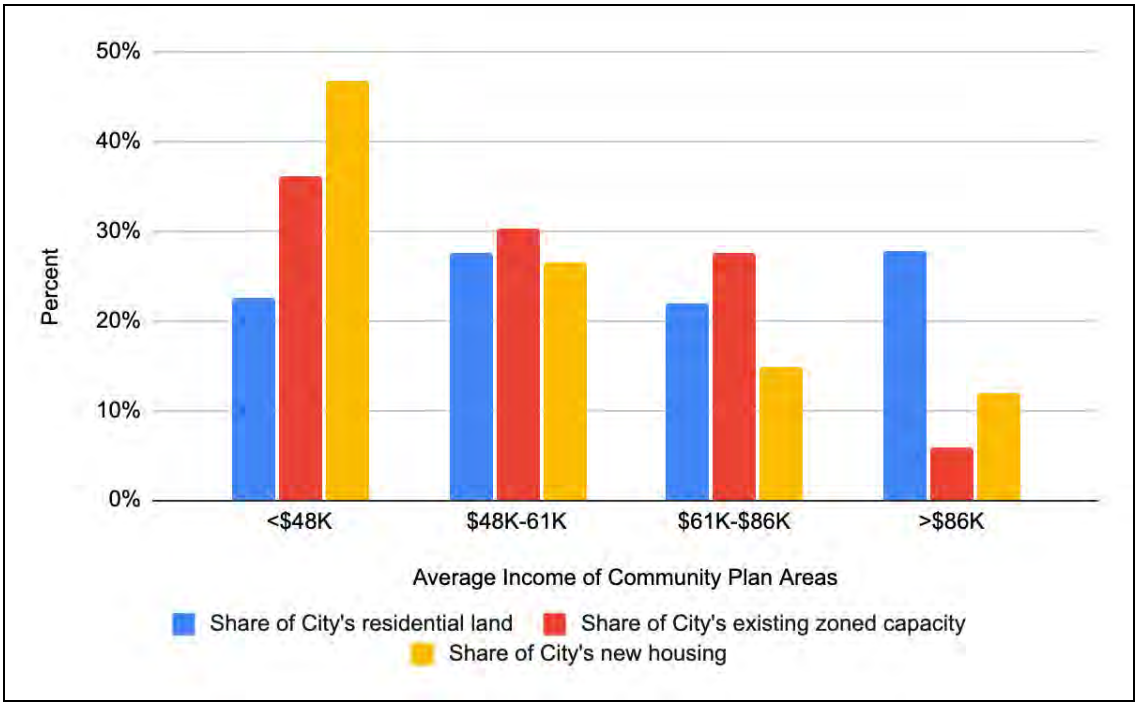
Given that single-family, exclusionary zoning predominates in Los Angeles' highest-opportunity census tracts (as defined in the TCAC/HCD Opportunity Map), significant rezoning will be required in order to accommodate the RHNA targets for lower-income households in a way that affirmatively furthers fair housing. **We urge you to prioritize rezoning in transit-rich, job-rich, and well-resourced neighborhoods, including single-family zoned areas, which will expand affordable housing opportunities while minimizing the impact on existing renters in multifamily-zoned areas.**

Additionally, **Planning should decline to include parcels containing RSO housing units in the housing element's site inventory**, instead identifying additional areas for housing production via rezoning. Stronger tenant protection policies, such as expanded affordable unit replacement requirements ("no net loss") for redevelopment of existing rental properties, a "right of return" after redevelopment at the same rent as before, rental assistance during

[3] HCD Site Inventory Guidebook, pg. 3

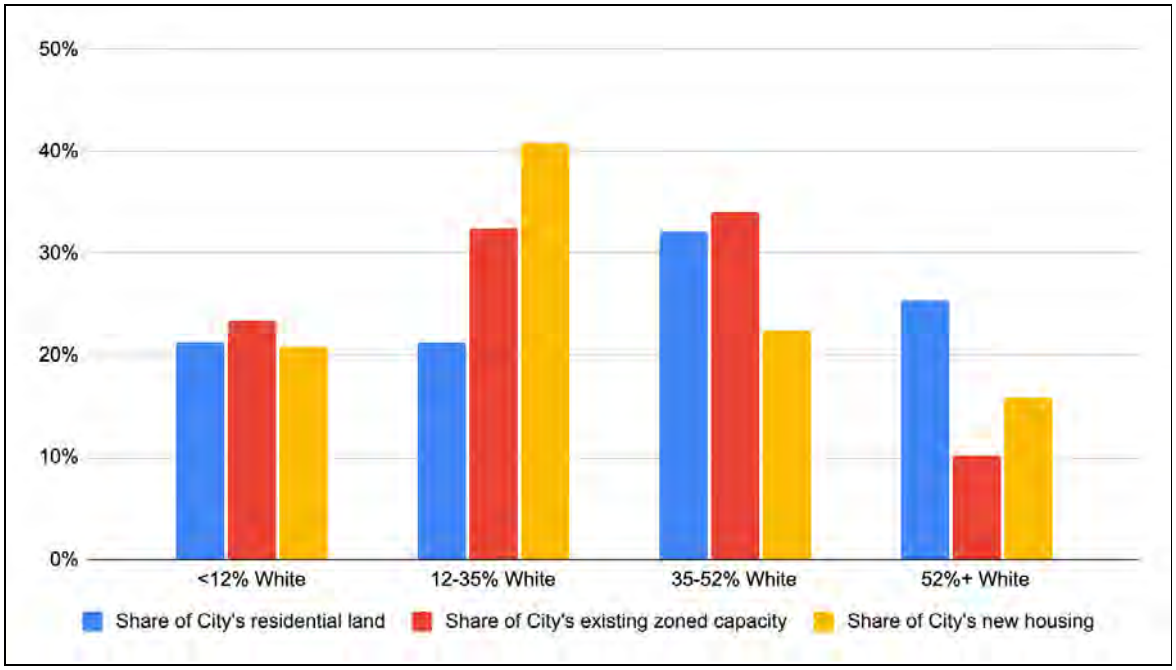
redevelopment, and a voluntary, negotiated tenant buyout system, will help ensure that lower-income renter households can remain in their communities at an affordable rent, as new housing opportunities are created.

A strategy for accommodating the City's RHNA target without significant rezoning will not succeed in achieving the RHNA target, nor will it foster housing growth in an equitable manner that accords with the AFFH requirement. We can see this by looking at where housing growth in Los Angeles has occurred in recent years. About one-quarter of the City's residentially-zoned land is in CPAs where the median annual household income is below $48,000. But 36% of the City's zoned capacity is located in these low-income CPAs, helping to explain why 47% of new housing built in Los Angeles between 2013 and 2019 was built in low-income CPAs. Just 12% of new housing was built in high-income CPAs (those with a median annual household income above $86,000), despite these areas making up 28% of the City's residentially-zoned land. This is because only 6% of the City's zoned capacity is located in these high-income areas, due to restrictive zoning.[4]



Similarly, CPAs where the population is more than 52% white contain one-quarter of the City's residentially-zoned land, but only 10% of the City's zoned capacity and 16% of new housing. 60% of the City's new housing was built in CPAs where the population is less than 35% white, despite having only 43% of the City's residentially-zoned land.

[4] Analysis of Dario Alvarez, Pacific Urbanism, and Professor Paavo Monkkonen, UCLA Luskin



In order to fairly distribute housing opportunities citywide, and move away from this pattern of *de facto* segregation based on race and income, Los Angeles should develop a quantitative methodology for scoring neighborhoods, based on factors like housing costs, median income, access to transit, access to jobs, access to schools, and environmental quality. Neighborhoods that score higher on these dimensions should be allocated higher housing growth targets, and rezoning should be based on these neighborhood-level housing growth targets.

To that end, AHLA and a coalition of 19 organizations representing the policy, academic, environmental, business, social justice, and affordable housing communities have joined together in support of an equitable distribution approach to achieving the citywide RHNA target, in which the Department of City Planning would develop housing growth targets for each of Los Angeles' CPAs, and seek to achieve these targets through the housing element update. **We respectfully urge you to reconsider this option.**

Finally, Los Angeles should identify funding sources, public resources, and density bonus programs to maximize the likelihood that housing projects with below market-rate units are actually built. Local measures like a real estate transfer tax and congestion pricing could help generate new funding to support affordable housing production and preservation.

Component #2: Housing elements should include the HCD-recommended buffer of at least 15-30% extra capacity in the site inventory, in order to avoid violating the No Net Loss requirement.

SB 166 (2017) requires adequate sites to be maintained **at all times** throughout the planning period to accommodate the remaining RHNA target by each income category.[5] This means that if a jurisdiction approves a development on a parcel listed in the site inventory that will have fewer units (either in total or at a given income level) than the number of units (either in total or at a given income level) anticipated in the site inventory, then the jurisdiction must identify and make available enough sites to accommodate the remaining unmet RHNA target for each income category.[6]

If additional sites with adequate zoned capacity don't exist, then the jurisdiction must rezone enough sites to accommodate the remaining unmet RHNA target within 180 days. If the jurisdiction fails to accomplish this rezoning in the required period, then the consequences will include decertification of the housing element and potential state legal action.

To ensure that adequate housing capacity at all income levels exists in the housing element through the 6th Cycle, HCD recommends that "the jurisdiction create a buffer in the housing element inventory of at least 15-30% more capacity than required, especially for capacity to accommodate the lower income RHNA."[7]

Planning has committed to incorporating a 25% No Net Loss buffer for the very low-income and low-income RHNA targets, which we applaud and support. **We would recommend that these buffers be increased to 30%, and also that a 30% No Net Loss buffer for the moderate-income target also be incorporated into the housing element.** This will help to ensure that the City's RHNA target is achieved at all income levels.

Component #3: Housing elements should estimate and report both the **likelihood of development** and the **net new units if developed** of inventory sites.

Just because jurisdictions zone for more housing doesn't mean that the housing will actually be built. The economic cycle, uncertainty of market conditions, the current usage of nonvacant sites, and land use regulations all influence the extent to which rezoned parcels are built to their maximum theoretical capacity.

A parcel's maximum theoretical capacity is not the same as its realistic capacity. To draw a parallel to college admissions, when UCLA wants 2,000 students in its incoming class, they admit 4,000 students. Similarly, to achieve housing production targets, jurisdictions must increase zoned capacity well above the target number of new homes.

[5] HCD No Net Loss Law Memo, pg. 1
[6] HCD Site Inventory Guidebook, pg. 22
[7] HCD Site Inventory Guidebook, pg. 22

An accurate assessment of site capacity is necessary in order for the housing element to achieve sufficient housing production. The site capacity estimate should account for the following **two factors**:

- What is the likelihood that the site will be developed during the planning period?
- If the site were to be developed during the planning period, how many net new units of housing are likely to be built on it?

These are the **likelihood of development**[8] and **net new units if developed**[9] factors, as required by HCD guidelines. The portion of the jurisdiction's RHNA target that a site will realistically accommodate during the planning period is:

(likelihood of development) x (net new units if developed) = realistic capacity.

In past planning cycles, the likelihood of development factor was not expressly considered; housing elements frequently assumed that most or all site inventory locations would be redeveloped to their maximum theoretical capacity. Since this generally did not happen, jurisdictions consistently fell short of their RHNA targets as a result. This is the case for Los Angeles, which is not on a path to achieving its 5th cycle RHNA targets for very low, low, and moderate income housing. Through 2019, it has permitted 8,610 homes that are affordable at these income levels, out of a total RHNA target of 46,590 homes.

5th Cycle RHNA Targets vs. Actual Housing Production (2014-19)

Income Bucket	RHNA Target	Homes Permitted
VLI	20,427	5,129
LI	12,435	2,979
MI	13,728	502
AMI	35,412	92,389
Total	**82,002**	**100,999**

HCD has instructed jurisdictions to estimate the realistic capacity of site inventory parcels, incorporating adjustments that "reflect the realistic potential for residential development capacity on the sites in the inventory"[10], including the "realistic development capacity for the site."[11]

One approach could be to develop a citywide likelihood of development factor, based on past trends in housing production relative to citywide zoned capacity. According to Los Angeles' 5th

[8] HCD Site Inventory Guidebook, pg. 20
[9] HCD Site Inventory Guidebook, pg. 21
[10] HCD Site Inventory Guidebook, pg. 20
[11] HCD Site Inventory Guidebook, pg. 19

cycle housing element, the city had theoretical capacity for 308,000 more housing units.[12] Through 2019, Los Angeles permitted 101,000 housing units[13], which equates to 135,000 housing units permitted by the end of the 5th cycle (assuming that the same annual permitting pace continues through 2021). This implies that in Los Angeles, excess zoned capacity has a **44% likelihood of being developed** (135,000 actual units divided by 308,000 theoretical units).

Granted, the subsequent implementation of the Transit-Oriented Communities program in 2017 effectively increased the City's zoned capacity, suggesting that the denominator in the citywide likelihood of development factor should be larger and that 44% is probably an overestimate of the true likelihood of development for unbuilt capacity in Los Angeles.

Nevertheless, assuming that zoned capacity has a 44% likelihood of being developed in the next 8 years, **the housing element must allow for 1,036,000 units of zoned capacity in order to achieve 456,000 actual housing units.** If Planning believes that a higher likelihood of development (and thus a smaller zoned capacity increase) is justified for certain parcels in the site inventory, persuasive data to support this assumption must be provided.[14]

Another approach would be to build an econometric model that estimates individual parcels' likelihood of development, based on factors like a parcel's zoning, location, land cost per square foot, current use, and potential capacity for housing production relative to current use. **We applaud your department for undertaking this analysis alongside data scientists at UC Berkeley's Terner Center**, and we are confident that this collaboration will lead to a high-quality estimate of the likelihood of development for individual parcels in the site inventory.

We urge you to set high standards for transparency as you estimate the realistic capacity of the site inventory. **We remain concerned about the lack of transparency surrounding Planning's recent estimate that the City currently has "a realistic development capacity of approximately 306,750 units for the 6th cycle Housing Element."[15]** Given that Los Angeles added only 99,000 homes between 2012 and 2019,[16] we find this claim improbable, and without additional information about Planning's methodology, or even Planning's definition of "realistic development capacity", it is impossible for us to verify this claim.

We respectfully ask that you commit to sharing the Planning-Terner Center methodology and econometric model with Housing Element Task Force members, and publish online the draft site inventory and parcels' likelihood of development and net new units if developed. San Diego's public GIS map of its site inventory offers an example worth emulating.

[12] Los Angeles 5th Cycle Housing Element, pg. 3-4
[13] HCD Annual Progress Report dataset, 2020
[14] HCD Site Inventory Guidebook, pg. 20-21
[15] Los Angeles Citywide Housing Element, Initial Study, pg. 15
[16] California Department of Finance, Report E-5, 2020

Component #4: Housing element updates should use an HCD-recommended "safe harbor" methodology for forecasting future ADU production.

Local jurisdictions frequently use overly optimistic estimates of future ADU production to avoid necessary housing reform and rezoning. ADU development estimates must reflect actual on-the-ground conditions to ensure that they are realistic. Overly aggressive ADU production estimates set jurisdictions up for failure in providing the required housing for residents.

To that end, HCD has established two safe harbors for forecasting ADU production during the 6th Cycle[17]. One option ("Option #1") is to project forward the local trend in ADU construction since January 2018. The other, **for use when no other data is available** ("Option #2"), assumes ADU production at five times the local rate of production prior to 2018. Jurisdictions are also permitted to include programs that aggressively promote and incentivize ADU construction. Jurisdictions should clearly and explicitly state their methodology and data sources for future ADU development forecasts.

According to HCD, Los Angeles issued permits for 2,342 ADUs in 2017, 4,079 ADUs in 2018, and 6,747 ADUs in 2019. Under HCD's "Option #1", Los Angeles could take the average of the 2018 and 2019 ADU production trends, and forecast that 5,413 ADUs will be permitted per year during the 6th cycle. This would allow for a **total 6th cycle forecast of 43,304 ADUs.**

Under HCD's "Option #2", Los Angeles could multiply the 2017 ADU production trend by five, and forecast that 11,710 ADUs will be permitted per year during the 6th cycle. This would allow for a **total 6th cycle forecast of 93,680 ADUs.**

Since high-quality data is available on the local trend in ADU construction since January 2018, **Los Angeles should use HCD's Option 1 safe harbor when projecting annual ADU production.** If it believes that higher ADU production forecasts are warranted, it must provide well-grounded estimates, based on the pace of ADU production in neighboring jurisdictions, and must explain programs or policy efforts that could lead to higher ADU production.

Finally, per HCD, the housing element "should also include a monitoring program that a) tracks ADU and JADU creation and affordability levels, and b) commits to a review at the planning cycle midpoint to evaluate if production estimates are being achieved."[18] Los Angeles' housing element should commit to mid-cycle rezoning if ADU production is lower than forecasted, and its midpoint review should be linked with immediate and automatic programs to increase housing production in the second half of the RHNA cycle. AHLA's recommended approach is to incorporate by-right density bonuses on inventory sites, which would automatically take effect mid-cycle if the ADU target is not met. The density bonus should be large enough, and apply to enough parcels, to fully make up for any ADU production shortfall.

[17] HCD Site Inventory Guidebook, pg. 31
[18] HCD Site Inventory Guidebook, pg. 31

The City of Los Angeles has an obligation to sufficiently plan to meet current and future residents' housing needs. The housing element update affords Los Angeles, and the broader Southern California region, the chance to take bold action on lowering housing costs, reducing car dependency, strengthening the local economy, and guaranteeing access to opportunity for Californians of all racial and ethnic backgrounds. We urge you and your colleagues to fully embrace this opportunity to transform Los Angeles for the better.

Finally, it is worth noting that state law imposes penalties on jurisdictions that fail to adopt a compliant 6th cycle housing element update by October 15, 2021. On that date, noncompliant jurisdictions will forfeit the right to deny residential projects on the basis of local zoning, so long as projects include at least a 20% set-aside for below market-rate units[19]. Jurisdictions that want to maintain local control over new development should therefore plan to adopt a compliant housing element update on time.

We would be glad to engage with your office and with the Planning Department throughout the housing element update process. We look forward to a productive and collaborative working relationship with the City of Los Angeles on this critical effort. Thank you for your consideration.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Anthony Dedousis
Director of Policy and Research
Abundant Housing LA

[19] California Government Code 65589.5(d)(5)

Housing Element <housingelement@lacity.org>

Re: WRAC-LUPC today

1 message

Matthew Glesne <matthew.glesne@lacity.org> Mon, May 3, 2021 at 12:31 AM
To: Elizabeth A Pollock <eliz.pollock@gmail.com>, Housing Element <housingelement@lacity.org>

Thanks Elizabeth, I am CCing the Housing Element email to put your comments in the project record.

Matt

On Sun, May 2, 2021 at 6:02 PM Elizabeth A Pollock <eliz.pollock@gmail.com> wrote:

> Good afternoon.
>
> Thank you very much for your presentation this morning.
>
> After working on housing and planning in Del Rey for more than a decade, I have drawn some conclusions:
>
> 1. The City of Los Angeles (the "City") needs to enforce its current zoning, not allow increased densification. The existing zoning allows for construction of many more units than are required by the RHNA numbers.
>
> 2. The rent control laws have given developers an incentive to flatten older buildings and replace them with newer buildings that are much more expensive. The City needs to impose a moratorium on the destruction of older housing stock and realize that if landlords could raise their rents freely, they could pay for the repairs that are needed in older buildings. (I own a rental property in Culver City, and if there were no rent control, I would not raise the rent on my tenants because they are good tenants. Because I cannot risk losing the chance to raise the rent, all of my tenants will get increases at the maximum allowable rate each year.)
>
> 3. The City needs to support enforcement of the rules by both the Department of City Planning and the Department of Building and Safety. In three different instances, it has been our experience that it takes about 10 years to shut down an illegal land use in a residential area. We have seen multiple instances where developers claimed to be building a certain number of units but then increased the number of bedrooms and/or occupants while keeping the number of units permitted. The permits should indicate how many bedrooms and occupants are anticipated. (This has happened with co-living projects, community care facilities, elder care facilities.)
>
> 4. The City needs to give up on the idea that higher density will lead to more affordable housing. The additional density will just place more pressure on our already aging infrastructure and add to public safety concerns when there are fires or other disasters, and residents cannot evacuate. (We have seen this in Del Rey, which is criss-crossed by THREE creeks and has many cul-de-sacs.)
>
> 5. Whenever a density bonus is granted, the City must monitor the implementation of the bonus very carefully. Today you said that if a resident comes in as low income but then no longer qualifies, the landlord must offer a different unit as affordable. I have never seen anyone from the City enforcing affordability covenants unless a building was built as "all affordable." Ideally, the City would go through every building permit issued since 2005, identify all of the density bonuses granted and make sure that each of those units is being rented to a renter who meets the income qualifications.
>
> 6. The City should give up on the idea that people have a right to "affordable" housing. We need housing for people who are too old, sick or disabled to work, and the City should make it clear that unless someone is building that kind of housing, no permits will be granted. The City cannot afford to provide everyone with a cheap place to live, and people who are just poor will still have social skills that will enable them to find a place to live.
>
> 7. As long as housing is evaluated for its profitability and not for its value as a place for a family to live, the idea of buying and holding a home or apartment building as a way to build equity and generate income in retirement will be unattainable for most people.
>
> 8. The City needs to stand up to the State of California and make it clear that we insist on keeping local control of land use in our communities.

Best regards,

Elizabeth A. Pollock
Past President of the Del Rey Residents Association

--



Matthew Glesne
Preferred Pronouns: He, Him, His
Senior City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-2666



Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

1 message

Terry Luedecke <terryluedecke@everyactioncustom.com> Mon, Apr 5, 2021 at 3:54 PM
Reply-To: terryluedecke@yahoo.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Terry Luedecke using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Terry Luedecke
5427 Hermitage Ave Valley Village, CA 91607-2015
terryluedecke@yahoo.com

Housing Element <housingelement@lacity.org>

Fwd: Some random thoughts to consider - Final Days to Take the Plan to House LA Survey -

1 message

Tom Lillig <tomdorigab@gmail.com> Thu, Apr 1, 2021 at 5:33 PM
To: housingelement@lacity.org

To whom it may concern,

Unfortunately, I didn't finish the survey below, but still wanted to convey my thoughts regarding the homelessness issue.

I'm sure you're all more familiar with the dollar numbers related to housing the homeless than I, but I'd venture to guess that in the past, voters and governmental agencies have allocated over a billion dollars to resolve the homeless crisis. I've heard that in some cases the costs for facilities that were built, or renovated to provide housing for the homeless, ranged somewhere between $600,000 to $700,000 per unit. While that must be nice and accommodating, to me it sets an unrealistic financial cost when trying to provide individual housing, because of the tens of thousands in the city and county who are still homeless. Even though the voted on amounts total over a billion, in my opinion it's still an amount that won't resolve the issue because of the magnitude of the homeless population. It could also have the adverse effect of fostering a sense of entitlement for those lucky enough to be accepted into such facilities. It may even have the unintended effect of encouraging others from around the country and around the world to move here to participate in such a program, thereby possibly creating an unrealistic and unsustainable never ending cycle of providing housing and services for the homeless. I've noted such incidences in articles I've read related to homelessness.

In resolution articles I've read or heard about, I would readily agree with Andy Bales, the director of the downtown Union Rescue Mission, who has advocated for using large tents that could comfortably house 120 individuals and which could be built on vacant or shared lots around the Los Angeles area. I couldn't agree more. I believe he stated that the tents cost around $1,000,000 a piece, which works out to a far, far smaller cost per each person taken off the streets, than the ~$600,000 per unit facilities being built. That cost doesn't even include the costs of other services that our homeless population are provided with while being sheltered in the locations. I also would think such tent communities would be a more appropriate solution for housing the homeless and attending to their needs, rather than allowing individual homeless encampments to be created in public areas such as parks or on streets.

Nearby residents and business folks who are in the vicinity of these encampments surely followed proper housing or business application processes to live or conduct a business at their locations, and did so with the expectation that their standard of living or business related functions wouldn't be adversely impacted by encampments that quite possibly create health and safety hazards or negatively impact a businesses' ability to conduct a sustainable business. I have to believe that there are unused city and county properties, or even donor identified properties, that can be used to support tent encampments for the homeless as envisioned by Andy Bales. Such facilities would also allow for even more security, food accommodations, health services and other types of community support than the homeless currently experience when living in randomly selected homeless encampment sites.

As I see it, there are different categories of why people are homeless: those who are down on their luck; those who lost their jobs; those with physical and/or mental illnesses; those with substance abuse problems; those who are criminals in hiding from the authorities and other categories. Each category of homelessness needs to be addressed differently. But, regardless of the category, in my opinion, homelessness needs to be viewed as a temporary state of affairs for the most part. With good job programs, substance abuse support, medical/dental support and psychiatric attention, a substantial portion of our homeless population can rise above and overcome, to lead more productive lives. In addition to the aforementioned tent facilities that could be built at existing unused county/city facilities that could serve as temporary shelters, I would suggest that even unused naval ships or cruise ships that have been retired from active use could be converted for such housing purposes.

I would also advocate for creating a program for housing the homeless that would model how the foster parenting program works. In such a program homeless folks would be interviewed for the possibility of living with a host family. Those interviewed would be vetted so as not to create any potential undesirable matches to insure that those participating in the host family and those participating from the ranks of the homeless, would not be a danger for each other. Proper vetting of participants would be a necessity to avoid any matchups of participants with mental instabilities or violent tendencies. I'm sure a good number of those currently homeless could be housed under the auspices of such a program. Surely the costs of such a program would be dramatically lower by paying a host family a monthly stipend compared to having to spend in the hundreds of thousands of dollars to house one person. As I said, the state of those homeless should be viewed in temporary terms for the majority of the homeless population with the vision that eventually a good number of our homeless friends will re-enter society in a contributing way.

Communal living should also be explored. Attached is an article from a past National Geographic publication that highlights a Denmark Communal living project. Remember the days when Ted Hayes advocated for the homeless? Remember the geodomes? My feeling is that the focus of resolving homelessness should be thought of in smaller solutions rather than larger solutions! I feel that thinking of large solutions can be overwhelming and extremely costly, and greatly slows the process of resolving the crisis of homelessness, while thinking in small solution terms can be more effective, more productive, more responsive and less costly.

It seems the bigger the city . . . the bigger the issue! With the pandemic subsiding, unemployment should make a rebound. You would think that some of those available jobs that would become available could be filled by those now living on the streets. I would even suggest a program to partner with cities and states around the country who are experiencing high unemployment rates and matching folks from the ranks of the homeless here, who might meet the skills that businesses in those other cities and states would require. Many of our homeless friends have very usable skills. Yes, that sounds like shipping the problem elsewhere, but in some cases it could have a benefit to both the organization/company in need and homeless folks.

As with our own Union Rescue Mission, I'm sure there's dozens if not hundreds, of other such organizations in the greater LA area who have a mission and goal to try to address the many issues of homelessness. While watching a Netflix series, I came across a similar organization in New York, known as *The Doe Fund* (https://www.doe.org/about/history). It's quite a disheartening story of how a woman died from pneumonia after being evicted on to the cold streets of New York. She was only known as "mama" to area residents . . . and therefore became a Jane "Doe". The "Doe Fund" was subsequently created to help others suffering her plight. That could be done here to assist our homeless friends.

I also read a story about a gentleman by the name of Candido Arcángel who owns a bodega – a small corner shop – in Brooklyn. All day long customers would come and go, buying coffee and homemade egg sandwiches, stocking up on canned soup, picking up toilet paper or a candy bar or a newspaper. They may have noticed the little knot of men who gathered outside to share a beer or a smoke or mumbling to themselves as they paced the aisles, but it's likely most passersby only registered them as "homeless," an unsurprising sight there. No one knew that at night, when Arcángel closed up the shop, he let the men sleep in the basement under the stairs. What a blessed example of one person's "small" temporary solution. Over 14 years, The New York Times reported, countless men have found rest in Arcángel's unofficial shelter. When asked why he goes out to the streets to bring back those who are sleeping on bus benches and behind dumpsters, he shrugs. "Because I have," he says, "and they don't." The aptly-named Arcángel doesn't charge, and he's never been robbed. His shelter has few amenities – he wants the men to move on to better lives. But it has one thing the men prize most of all: kindness. "Hello, blessings, how are you?" he greets his guests. His attitude sure aptly reflects the biblical verse "do not neglect to show hospitality to strangers." (Hebrews 13:2). I'm sure that there's good folks in the LA area who have a kind heart and also find sleeping facilities for those that are homeless.

In my opinion, too much of the funds allocated to reduce/eliminate homelessness are put towards construction of large buildings to provide individual units for living purposes. Yet the majority of those funds need to be redirected towards large tent and communal living programs, until folks can get back on their feet, and towards resources to retrain folks for jobs and towards addressing mental or physical problems and towards breaking folks of their drug dependencies. Currently at the rate the state, the city and the county are moving, I would think that only a small portion of those who are homeless will ever see a more enriched life.

Greed, and the continually widening gap between the poor and the rich, will continue to acerbate the homelessness issue . . . but that's another topic for much discussion! The pervasive existence of homelessness in our society is not just a local issue, but a GLOBAL issue, and to be truly resolved, it needs to be addressed by world governments in an ambiance of compassion. And that too is another topic for much discussion!

I know you're all busy, so I hope I haven't imposed on time that you could have better spent on other homelessness matters, I just feel impassioned to offer suggestions when I continue to see the plight of those who are homeless.

As I said, just some random thoughts to consider.

Tom

Tom Lillig

15649 Regaldo Street

Hacienda Heights, CA 91745

tomdorigab@gmail.com

(C) 626-483-8301

It's not what happens to you, but how you react to it that matters.

- *Epictetus*

Classification: Public

From: Los Angeles City Planning <housingelement@lacity.org>
Sent: Wednesday, March 10, 2021 11:46 AM
To: Lillig, Tom <Tom.Lillig@bankofthewest.com>
Subject: Final Days to Take the Plan to House LA Survey + Additional Updates | Últimos Días Para tomar la Encuesta del Plan de Vivienda e Información Adicional

Caution: This email originated from an external sender. Do not click on links or open attachments unless you were expecting this message from this sender.

Image removed by sender.

Image removed by sender.

Para ver en español, desliza hacia abajo

Dear interested parties,

Thank you to everyone who has already taken the Plan to Housing LA Survey!

We have collected input from over 1,100 Angelenos, and with your help we hope to reach many more before the survey closes on March 15th.

The survey aims to gather input on the key concepts that will guide the 2021-2029 Housing Element Update. This is your opportunity to share your experiences with housing in Los Angeles and provide feedback on the draft concepts and strategies you'd like to see the City pursue in order to meet the City's housing needs.

Please take the survey using the link below if you haven't already done so, and share this email with friends and neighbors.

Housing Element Survey

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Additional Updates

Website Update

The Housing Element Update webpage has been updated to include many more resources, including recordings from outreach events, new news items, and additional housing resources.

Statistically Valid Poll

In addition to the Concepts Survey described above, City Planning conducted a poll of nearly 805 city residents in November, 2020, both in English and Spanish. In order to capture a statistically representative cross-section of Angelenos, the poll respondents are consistent with the citywide racial, income, household size, renter vs owner, and age demographics of Los Angeles. The poll results are now available online here.

CEQA Scoping

We recently closed the scoping window for an Environmental Impact Report (EIR) that will cover the Housing Element Update and related technical amendments to the Safety Element of the General Plan. There will still be many more opportunities to comment on the environmental analysis when the Draft EIR (DEIR) is released.

Completing the Concepts Phase

The close of the Concepts Survey will signify the end of the Concepts phase of the plan update. We will be posting a summary of community input gathered during the concepts phase through the concepts survey, concepts webinars, task force, and housing poll, in the News section of our website. This spring we will enter the Draft phase of the plan update, circulating draft sections of the plan in late spring.

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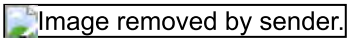
Estimadas partes interesadas:

¡Gracias a todos los que ya han tomado la encuesta del Plan de Vivienda de la Ciudad de Los Ángeles! Hemos recibido la opinión de más de 1,000 Angelinos, y con su ayuda esperamos que más gente tome la encuesta antes de que se cierre el 15 de marzo.

El objetivo de la encuesta es recopilar información del público sobre los conceptos clave que guiarán la Actualización del Elemento de Vivienda 2021-2029. Esta es su oportunidad para compartir sus experiencias con el tema de la vivienda en Los Ángeles y para proporcionar sus opiniones sobre el borrador de conceptos y estrategias que le gustaría ver a la Ciudad seguir para cumplir con las necesidades de vivienda de la Ciudad.

Por favor, tome la encuesta utilizando el enlace que sigue si aún no lo ha hecho, y comparta este correo electrónico con amigos y vecinos.

Encuesta del Plan de Vivienda



Información Adicional

La Actualización del Sitio Web

La página web de la Actualización del Elemento de Vivienda se ha puesto al corriente para incluir muchos más recursos, incluyendo grabaciones de eventos para el público, nuevos artículos de noticias y recursos de vivienda adicionales.

La Encuesta Estadísticamente Válida

Además de la Encuesta del Plan de Vivienda descrita anteriormente, el Departamento de Planeación llevó a cabo una encuesta de casi 805 residentes de la ciudad en noviembre de 2020, tanto en inglés como en español. Con el fin de capturar una sección estadísticamente representativa de Angelinos, los encuestados son consistentes con la demografía de la ciudad de Los Ángeles con respecto a raza, ingresos, tamaño del hogar, si es inquilino o propietario, y edad. Los resultados de la encuesta ya están disponibles en línea aquí.

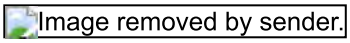
El Alcance de la CEQA

Recientemente cerramos la ventana de alcance para un Informe de Impacto Ambiental

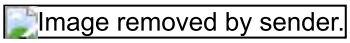
(EIR por sus siglas en inglés) que cubrirá la Actualización del Elemento de Vivienda y las enmiendas técnicas relacionadas con el Elemento de Seguridad del Plan General. Habrá muchas más oportunidades para comentar sobre el análisis ambiental cuando se publique la Versión Preliminar del Informe de Impacto Ambiental (DEIR por sus siglas en inglés).

La Finalización de la Fase de Conceptos

Al cerrar la Encuesta del Plan de Vivienda se significa el final de la fase de Conceptos de la Actualización del Plan. En la sección Noticias de nuestro sitio web, publicaremos un resumen de los comentarios de la comunidad que recibimos durante la fase de Conceptos via los seminarios web, las encuestas, y el grupo de trabajo. Esta primavera entraremos en la fase de la versión preliminar de la Actualización del Plan, y vamos a distribuir las secciones del plan a finales de la primavera.

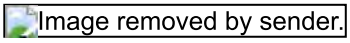


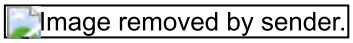
Sign up to receive citywide planning updates by email.

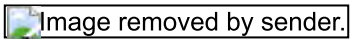


In partnership with Housing + Community Investment Department

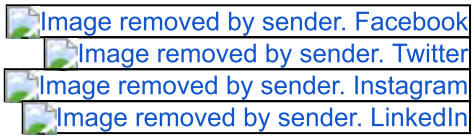
En asociación con el Departamento de Acción Social + Vivienda







Los Angeles City Planning | Planning4LA.org



Los Angeles City Planning | 200 N. Spring St, Room 525, Los Angeles, CA 90012

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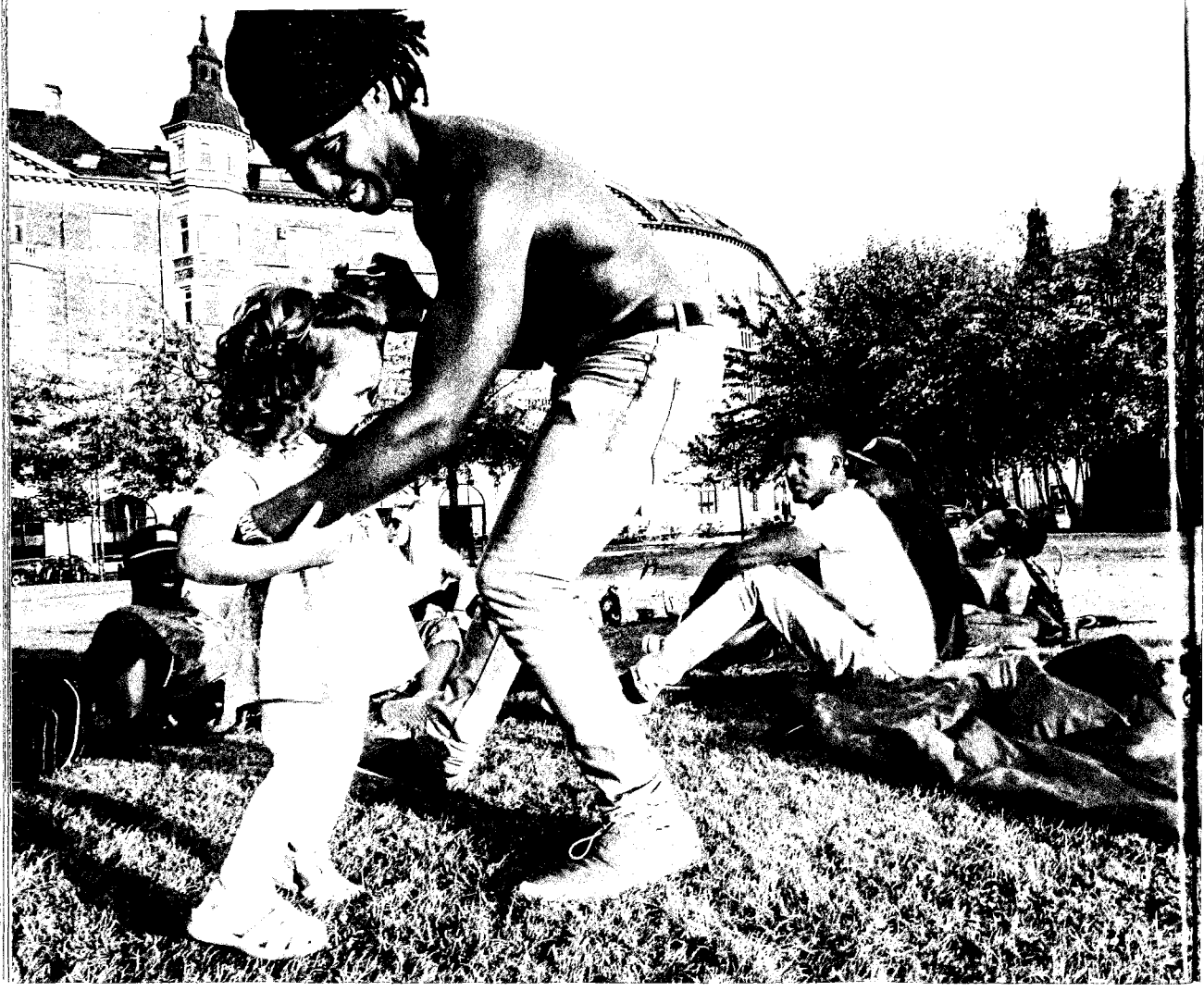
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National Geographic - Denmark Communal living.pdf
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In similar ways Denmark supports the well-being of people like Sidse Clemmensen. I met her on my third trip to Denmark to explore that nation's unique brand of happiness—one that seems to enable people to live a purposeful life better than anywhere else. Sitting in her kitchen sipping tea, the 35-year-old working mother with short brown hair wore a sleeveless blouse, Moroccan slippers, and a diamond stud in her nose.

"The state provides me with everything I need," Clemmensen said. "My children are happy. I have a great husband. And I love my job. I know that nothing too bad can happen to me."

Clemmensen and her family are one of 22 households in a shared housing community called a *bofællesskab* in the city of Aalborg. Each family owns a small Lego-like house, but together they share a huge garden, laundry room, workshop, storage area, parking facility, and dining hall, where they can opt in to communal meals. (Each family



A Cuban immigrant, embracing the Danish passion for socializing, dances with his daughter, who is half Danish, on a lawn near a swimming area in Copenhagen that is a popular gathering place. The Danish people have typically welcomed immigrants, although the recent refugee crisis has somewhat dampened that enthusiasm.

CORY RICHARDS

cooks one or two meals a month for the whole community and then eats the rest of its meals free.) Perched on a low hill overlooking rolling pastures, the complex is within biking distance of the neighborhood elementary school and the university.

In Scandinavian fashion the cohousing complex offers an elegant mix of private and public, an apt metaphor for Danish society as a whole, with its emphasis on trust and community. Denmark's societal evolution may be traced to the Second Schleswig War, in 1864, said Peter Gundelach, a sociologist at the University of Copenhagen, when Denmark lost a quarter of its territory to Prussia. "With that defeat we lost our ambition to be a world superpower," he said. "It humbled us. Our government began to strengthen our national identity and build inwardly instead."

Danes grow up believing they have the right to health care, education, and a financial safety net. University students draw a government stipend in addition to free tuition. New parents can take a yearlong government-paid parental leave at nearly full salary; this includes gay and lesbian parents. People work hard in Denmark, but on average less than 40 hours a week, with at least four weeks of vacation a year. The price for such lavish benefits is one of the world's highest income tax rates, which starts at 41 percent and tops out at 56 percent—a field leveler that makes it possible for a garbageman to earn more than a doctor.



"Danish happiness is closely tied to their notion of *tryghed,* the snuggled, tucked-in feeling that begins with a mother's love and extends to the relationship Danes have with their government," said Jonathan Schwartz, an American anthropologist based in Copenhagen. "The system doesn't so much ensure happiness as it keeps people from doing what will make them unhappy."

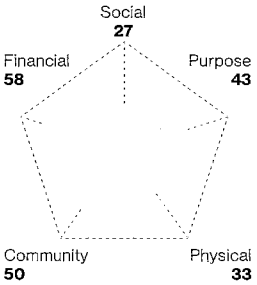
Setting aside time for self-fulfillment is another key ingredient of Danish happiness. More than 90 percent of Danes belong to a club or an association—from cold-water swimmers to rabbit breeders—and more than 40 percent volunteer for civic groups. Danish society, it seems, encourages the kind of balance between engaging work and rewarding play that results in a sense of time described as flow. "The Danes seem more aware of the total needs of a person than most other places," said Mihaly Csikszentmihalyi, a psychologist at Claremont Graduate University in California. "People need to be challenged. It's in our genes. We develop self-confidence through adversity. They're the building blocks to happiness."

HAPPINESS FACTOR

DENMARK

At least half of Danes are thriving in the categories of financial well-being and community engagement. They also score high marks when it comes to finding purpose and meaning in daily activities.

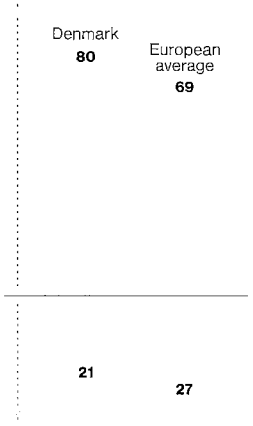
PERCENTAGE OF POPULATION THRIVING IN EACH CATEGORY



EUROPEAN EMOTION

Denmark is the European leader in daily positive experiences; Belarus ranks lowest.

POSITIVE EMOTION SCORE



NEGATIVE EMOTION SCORE

GALLUP WORLD POLL, 2015-16

Housing Element <housingelement@lacity.org>

CCA Letter re: Housing Element

2 messages

Michael Shilstone <mshilstone@ccala.org> Mon, Mar 29, 2021 at 10:54 AM
To: Housing Element <housingelement@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Ari Briski <ari.briski@lacity.org>, Wajiha Ibrahim <wajiha.ibrahim@lacity.org>, Jackie Cornejo <jackie.cornejo@lacity.org>, Claudia Monterrosa <claudia.monterrosa@lacity.org>, Maya Abood <maya.abood@lacity.org>
Cc: Clara Karger <ckarger@ccala.org>

Hi Housing Element team,

I wanted to share the attached letter with our comments on the Housing Element Update that our President and CEO Jessica Lall submitted to Director Vince Bertoni and General Manager Ann Sewill. We appreciate all your work to get the Housing Element adopted by October and we're happy to discuss further.

Best,

Michael

Michael Shilstone
Director of Economic Development

213.607.2433 | mshilstone@ccala.org | ccala.org

626 Wilshire Blvd., Suite 850, Los Angeles, CA 90017

DTLA Insights | Member Development Projects

2021 03 29 - LA City Planning - Housing Element - CCA Letter.pdf
203K

Cally Hardy <cally.hardy@lacity.org> Tue, Mar 30, 2021 at 5:53 PM
To: Michael Shilstone <mshilstone@ccala.org>
Cc: Housing Element <housingelement@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>, Ari Briski <ari.briski@lacity.org>, Wajiha Ibrahim <wajiha.ibrahim@lacity.org>, Jackie Cornejo <jackie.cornejo@lacity.org>, Claudia Monterrosa <claudia.monterrosa@lacity.org>, Maya Abood <maya.abood@lacity.org>, Clara Karger <ckarger@ccala.org>

Michael,

Thank you. Just a note to let you know that the letter has been received by the team.

Regards,
Cally
[Quoted text hidden]
--

Cally Hardy (she/her/hers)
City Planning Associate
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA 90012
Planning4LA.org
(213) 978-1643

CCA
CENTRAL CITY ASSOCIATION OF LOS ANGELES

March 29, 2021

Vince Bertoni
General Manager
Department of City Planning
200 N Spring Street
Los Angeles, CA 90012

Ann Sewill
General Manager
Housing and Community Investment Department
1200 W 7th St #100
Los Angeles, CA 90017

Re: 2021-2029 Housing Element

Dear Mr. Bertoni and Ms. Sewill,

Established in 1924, Central City Association (CCA) is committed to advancing policies and projects that enhance Downtown Los Angeles' vibrancy and increase opportunity in the region. We represent over 300 members that have played a leading role in transforming Downtown Los Angeles and our city, including building over 17,000 units of new housing.[1] CCA participated on the Task Force for the 2013-2021 Housing Element, and we are honored to again serve on the Task Force for the 2021-2029 Housing Element Update. **We offer this letter to highlight what we believe should be fundamental to the City's approach to this Housing Element Update process: 1) Ensuring that the Housing Element reflects realistic housing needs, 2) Being transparent in the site identification process and inventory, and 3) Using the Housing Element as the platform for a citywide compact for equitable growth.**

This Housing Element cycle is more important than ever as several state laws have recently been adopted to provide greater enforcement of housing obligations and updated federal regulations call for addressing a history of housing discrimination across the US. The magnitude of the task that this Housing Element must meet cannot be understated – the City must plan for more than 450,000 units of housing to be built over the course of the next eight years. By way of comparison, about 420,000 units were built during peak housing production in the city between 1960 and 1980, which is fewer units in more than double the amount of time.[2]

The dearth of housing, acknowledged by the current Housing Element's production goal, is at the root of what we believe are three distinct but interconnected housing crises: homelessness, poverty and unaffordability. Our city has the largest unsheltered homeless population in the nation[3], which requires investments in new permanent supportive housing, temporary shelters and mental and social services at scale. At the same time, we also have the highest rates of overcrowded housing[4] with families living in

[1] https://www.ccala.org/what-we-do/member-development-projects/
[2] https://www.ccala.org/news/2019/12/09/cca-reflects/3-fundamentals-on-the-state-of-housing/
[3] https://www.usatoday.com/story/money/2019/11/09/states-with-most-unsheltered-homeless-people-california/40561811/
[4] https://www.nytimes.com/2021/01/23/us/los-angeles-crowded-covid.html

poverty conditions, which will take an expansion of affordable housing production and workforce and economic development efforts to provide economic security. Finally, we face the biggest gap between wages and housing costs[5] presenting barriers for people to access housing or to save enough money to purchase a home. The Housing Element must acknowledge and confront each of these issues.

We appreciate City staff's robust public engagement amid this time-sensitive and challenging effort that must be adopted by October this year – an incredibly tight timeline for a sweeping and important document. We continue to offer the City detailed policy suggestions to meet its housing needs – from fostering micro-unit development to enabling mass timber construction to enhancing the DTLA 2040 Community Plan, among many other ideas – and we have raised various proposals to inform the Housing Element during the outreach period. With this letter, however, we offer specific comments on what we believe is important at the most basic level for the Housing Element process to be successful and truly meet the demands of our current moment.

1. Ensure that the Housing Element reflects realistic housing needs.

The Housing Element must be an honest document that truly reflects the depth of the housing shortage. We were part of a coalition that successfully advocated for the Southern California Association of Governments (SCAG) to recognize both existing housing shortfalls and future needs in its RHNA allocations, which increased LA's regional housing goals from 400,000 to 1.3 million units. With those same partners, we also successfully worked to ensure that the responsibility for accommodating growth was appropriately delegated to cities where we can grow most sustainably and equitably, based on factors like market demand, access to transit, jobs and socioeconomic opportunity. That resulted in the City of Los Angeles' allocation of 456,000 units.

This allocation represents the substantial need for housing in our city. That is why we were concerned when we read the Initial Study for the Housing Element which roughly estimates that the City only needs to plan for an additional 90,000 units, after accounting for projects currently in the entitlement pipeline and carrying over sites that were identified in the prior Housing Element but never developed.[6] The Initial Study states "Based on a preliminary review of remaining available sites from the 5th cycle Housing Element Inventory of Sites, there is existing identified capacity ranging from 285,411 to 461,222 units; however, due to the new requirements to demonstrate realistic development potential that is likely to occur during the eight-year planning period, it is anticipated that the realistic capacity demonstrated on these sites will be diminished." Given this statement, **we fully expect the capacity estimates in the Initial Study to be effectively placeholder figures, and that further analysis will show a need to rezone to create far more capacity than 90,000 units.** Moreover, if a site had been identified in the prior Housing Element as "developable" but was then not developed over the course of the past eight-year cycle, it suggests that the site may have been misidentified and is not realistically developable under current zoning.

2. Be transparent in the site identification process and inventory.

[5] https://la.curbed.com/2017/6/20/15840642/ucla-forecast-affordable-housing-report-home-prices
[6] https://planning.lacity.org/odocument/1a4e2cf4-7365-4fef-a45e-7f4631f2c132/Initial_Study.pdf



To ensure that the Housing Element's capacity estimates are indeed realistic, every specific parcel that is identified in the housing development site inventory should be accessible and communicated to the public prior to adoption of the Housing Element, along with the criteria that was used to determine the sites' realistic development potential.

These criteria should include:

- Lot size;
- Any existing improvements and current uses on the site;
- Existing zoning designation with any applicable "Q" conditions;
- Maximum allowable Floor Area Ratio (FAR);
- Residential density and building height; and
- Market area (such as those used in Linkage Fee determinations)

Publishing the complete housing development site inventory for public feedback will allow development experts to aide in the consideration of sites' realistic housing development potential, thereby helping to achieve a more accurate estimate of existing capacity and the capacity needed to be created through rezoning.

3. Use the Housing Element as a platform for a citywide compact for equitable growth.

The Housing Element is a unique opportunity to set citywide housing policies and goals. As such, **the Housing Element should set general housing growth targets for the City's 35 Community Plan Areas based on objective and measurable criteria to affirmatively further fair housing.** These criteria should be the tool with which the City can guide equitable growth, and should include factors such as:

- Housing costs
- Median income
- Access to transit
- Proximity to job centers
- Access to public resources like parks and schools
- Patterns of historical exclusion and segregation
- Environmental quality.

Despite having citywide housing growth targets set by RHNA, the City currently does not have a publicly available comprehensive strategy for meeting its RHNA needs through rezoning and Community Plan Updates. This has resulted in a process whereby each Community Plan is updated in isolation, seemingly without connection to or coordination with the rest of the City's Community Plans. This approach perpetuates patterns of enabling more organized and affluent areas to oppose new housing while directing most new growth to lower-income areas. The Housing Element could temper this trend by setting overarching responsibilities for growth for each Community Plan, similar to how SCAG allocates RHNA targets to each city in the region, which would provide a guidepost for each Community Plan to work toward playing its role to meet broader citywide goals in a fair and transparent manner.

We believe these three process components are essential to creating an impactful and forward-looking Housing Element that will guide the City over the coming eight-year cycle in reaching its most ambitious

housing growth targets ever. In so doing, we are hopeful that we can collectively address our city's multifaceted, persistent homelessness, poverty and housing affordability and supply crises and systemic social inequities. Thank you for your consideration and commitment to a better Los Angeles, and we hope to be partners in helping the Housing Element be expeditiously adopted this October.

Sincerely,



Jessica Lall
President & CEO,
Central City Association of Los Angeles

cc: Mayor Eric Garcetti
Los Angeles City Council

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

1 message

Margaret Peters <maggie.peters@everyactioncustom.com> Sat, Mar 13, 2021 at 7:22 PM
Reply-To: maggie.peters@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

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I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Margaret Peters using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Margaret Peters
3822 Albright Ave Los Angeles, CA 90066-4002
maggie.peters@gmail.com

Housing Element <housingelement@lacity.org>

Question about the Plan to House LA Online Tool

GURNELL WASHINGTON <g7w10@aol.com> Sat, Mar 13, 2021 at 7:50 AM
To: HousingElement@lacity.org

I have a question...
Why aren't mobility units on social serve site actually mobility units? Many have standard bath tubs with no roll-in or large walk-in shower. I really feel the affordable housing development business is a racket, like gang intervention and CES (coordinated entry system). They all do the minimum to fulfill contract obligations.

Sent from my iPhone

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

1 message

Logan Cimino <lcimino300@everyactioncustom.com> Fri, Mar 12, 2021 at 10:56 AM
Reply-To: lcimino300@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Logan Cimino using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Logan Cimino
6530 Seville Rd Goleta, CA 93117-7119
lcimino300@gmail.com

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

1 message

Kevin Fulton <kevin.fulton.04@everyactioncustom.com> Tue, Mar 2, 2021 at 8:35 PM
Reply-To: kevin.fulton.04@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Kevin Fulton using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Kevin Fulton
880 N Alameda St Apt 117W Los Angeles, CA 90012-4280
kevin.fulton.04@gmail.com

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Incorrect zoning of assembly district 30, council district 11 (Mar Vista); Requesting Santa Monica airport space

2 messages

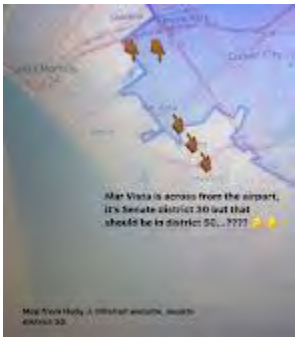
T <tie.ryder@gmail.com> Wed, Mar 3, 2021 at 3:58 PM
To: HousingElement@lacity.org

Hello,
We need to address the zoning issues on the westside, council district 11, assembly district 30 is not zoned correctly. I'm in the area just before Venice off Venice blvd., we are a coastal sub city that is going unseen. I've attached a proposal for possible expansion of the area at the Santa Monica airport, as the open space is not fairly zoned.
--
Best,
Tieira Ryder
323.603.6776
https://htwws.org/santamonicaairport/

3 attachments



District11edit.jpg
86K



Distircts.jpg
67K

Mar Vista, District 11 proposal (created by Tieira Ryder).pdf
736K

Housing Element <housingelement@lacity.org> Wed, Jul 21, 2021 at 9:37 AM
To: T <tie.ryder@gmail.com>

Hope all is well.

Thank you for sharing your thoughts. Your comment will be added to our case file and taken into consideration as we update the Housing Element. Please note that the draft Housing Element is continuing to be refined based on the community feedback we've received to date. We will be sharing the revised draft this fall.

For more information on the Plan to HouseLA visit our website, and/or join our listserv (if you have not already), in order to stay abreast of any Plan updates.

[Quoted text hidden]

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Housing Element Staff
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1302

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

1 message

Joseph Courtney <courtnj@everyactioncustom.com> Tue, Feb 23, 2021 at 11:46 AM
Reply-To: courtnj@campbellhall.org
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Joseph Courtney using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Joseph Courtney
1817 Garfield Pl Apt 8 Los Angeles, CA 90028-6699
courtnj@campbellhall.org

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

1 message

Elaine Loring <eloring162@everyactioncustom.com> Mon, Feb 22, 2021 at 11:28 AM
Reply-To: eloring162@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology. We need affordable housing through the city. Commercial and single family zoning needs to be examined to allow construction of more multi family affordable housing

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Personally sent by Elaine Loring using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Elaine Loring
12075 Valleyheart Dr Studio City, CA 91604-2059
eloring162@gmail.com

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

1 message

Ben Creed <creedibility@everyactioncustom.com> Fri, Feb 19, 2021 at 9:23 AM
Reply-To: creedibility@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Ben Creed using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Ben Creed
5323 Wilkinson Ave Valley Village, CA 91607-2412
creedibility@gmail.com

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

1 message

Pablo Valentin <pabloevalentin@everyactioncustom.com> Fri, Feb 19, 2021 at 4:40 PM
Reply-To: pabloevalentin@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Pablo Valentin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Pablo Valentin
617 E Elk Ave Glendale, CA 91205-1776
pabloevalentin@gmail.com

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

1 message

Claire O'Hanlon <yellom+abundanthousingla@everyactioncustom.com> Wed, Feb 17, 2021 at 9:29 AM
Reply-To: yellom+abundanthousingla@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Claire O'Hanlon using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Claire O'Hanlon
1700 S Bundy Dr Apt 8 Los Angeles, CA 90025-7401
yellom+abundanthousingla@gmail.com

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Paul Moorman <pmoorman35@everyactioncustom.com> Tue, Feb 16, 2021 at 8:49 AM
Reply-To: pmoorman35@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Paul Moorman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Paul Moorman
1210 N Flores St West Hollywood, CA 90069-2913
pmoorman35@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 11:07 AM
To: pmoorman35@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Gabrielle Seiwert <gabrielle.seiwert@everyactioncustom.com> Tue, Feb 16, 2021 at 10:38 AM
Reply-To: gabrielle.seiwert@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Gabrielle Seiwert using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Gabrielle Seiwert
3436 Madera Ave Apt 1 Los Angeles, CA 90039-1957
gabrielle.seiwert@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 11:08 AM
To: gabrielle.seiwert@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Letter to DCP - site inventory process

2 messages

Anthony Dedousis <anthony@abundanthousingla.org> Tue, Feb 16, 2021 at 8:00 AM
To: Housing Element <housingelement@lacity.org>, Cally Hardy <cally.hardy@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>, vince.bertoni@lacity.org, Leonora Camner <leonora@abundanthousingla.org>

Dear Cally and team,

Hope you had a relaxing long weekend. I'm writing to share a letter offering Abundant Housing LA's recommendations for the housing element update.

We've highlighted four critical components of the site inventory analysis portion of the housing element which we believe merit special attention. As you know, we have concerns about Planning's approach to the housing element update so far, and felt that sharing this letter with additional context and legal grounding would be helpful.

Please confirm receipt of this letter when you have an opportunity. Thanks very much for your help.

Regards,

Anthony

--

Anthony Dedousis
Director, Policy and Research
Abundant Housing LA
515 S Flower Street, 18th Floor
Los Angeles, CA 90071
516-660-7402

Cally Hardy <cally.hardy@lacity.org> Fri, Feb 19, 2021 at 9:03 AM
To: Anthony Dedousis <anthony@abundanthousingla.org>
Cc: Housing Element <housingelement@lacity.org>, Leonora Camner <leonora@abundanthousingla.org>

Anthony,

Thank you, the letter has been received.

Best,
Cally
[Quoted text hidden]
--



Cally Hardy (she/her/hers)
City Planning Associate
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA 90012
Planning4LA.org
(213) 978-1643



February 16, 2021

Mr. Vince Bertoni
Director of Planning
Los Angeles Department of City Planning
200 North Spring Street
Los Angeles, CA 90012

Dear Mr. Bertoni,

Thank you for the opportunity to comment on the process of updating the housing element of Los Angeles' general plan. We are writing on behalf of **Abundant Housing LA** regarding Los Angeles' upcoming 6th Cycle housing element update. Abundant Housing LA is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis. We support more housing at all levels of affordability and reforms to land use and zoning codes, which are needed in order to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity.

California has a statewide housing shortage of nearly 3.5 million homes, and has the highest poverty rate in the nation after accounting for housing costs. Households at all levels of income face a historically high rent burden. Exclusionary zoning and longstanding constraints on denser housing have led to an undersupply of medium and high density housing near jobs and transit. This contributes to high rents and displacement of households.

Over the past few years, new state laws (e.g. AB 686 (2018), SB 166 (2017), AB 1397 (2017), SB 828 (2018), SB 35 (2017), etc.) have strengthened the Regional Housing Needs Assessment (RHNA), which sets a housing growth target for individual jurisdictions and requires jurisdictions to update their housing elements in order to achieve these targets.

These changes to state law have led to historically high jurisdiction-level housing growth targets in the upcoming 6th Cycle Housing Element Planning Cycle, and have empowered the state Department of Housing and Community Development (HCD) to enforce appropriately high standards for housing element updates. We are encouraged that Los Angeles was given a target of **456,000 new homes, of which 184,000 must be affordable to lower-income households.**

As jurisdictions start the housing element update process, AHLA seeks to provide input on how jurisdictions should fulfill both the letter and the spirit of housing element law. **Earlier this month, we shared a letter with you, co-signed by 14 civic organizations, expressing serious concerns about Planning's approach for distributing new housing opportunities across the City's neighborhoods, and urging the City to develop and implement an equitable distribution approach to the housing element update.**

Over the course of the housing element update process, AHLA will scrutinize jurisdictions' housing elements, submit comments to HCD as needed, and collaborate closely with nonprofits that bring legal action against jurisdictions that fail to comply with state housing laws.

To that end, we have published a memo, **Requirements and Best Practices for Housing Element Updates: The Site Inventory**, explaining the key legal requirements, as well as HCD and AHLA's recommended best practices, for housing element updates. Additionally, **this checklist provides a summary of our core policy recommendations**. We respectfully encourage you to incorporate the concepts detailed in these documents into Los Angeles' housing element update.

We would draw particular attention to four critical components of the site inventory analysis:

1. Prioritizing high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing opportunities, in order to **affirmatively further fair housing**
2. Including the HCD-recommended buffer of at least 15-30% extra capacity in the site inventory, in order to **avoid violating the No Net Loss requirement**
3. Incorporating an estimate of the **likelihood of development** and the **net new units if developed** of inventory sites
4. Using an HCD-recommended "safe harbor" methodology for **forecasting future ADU production**

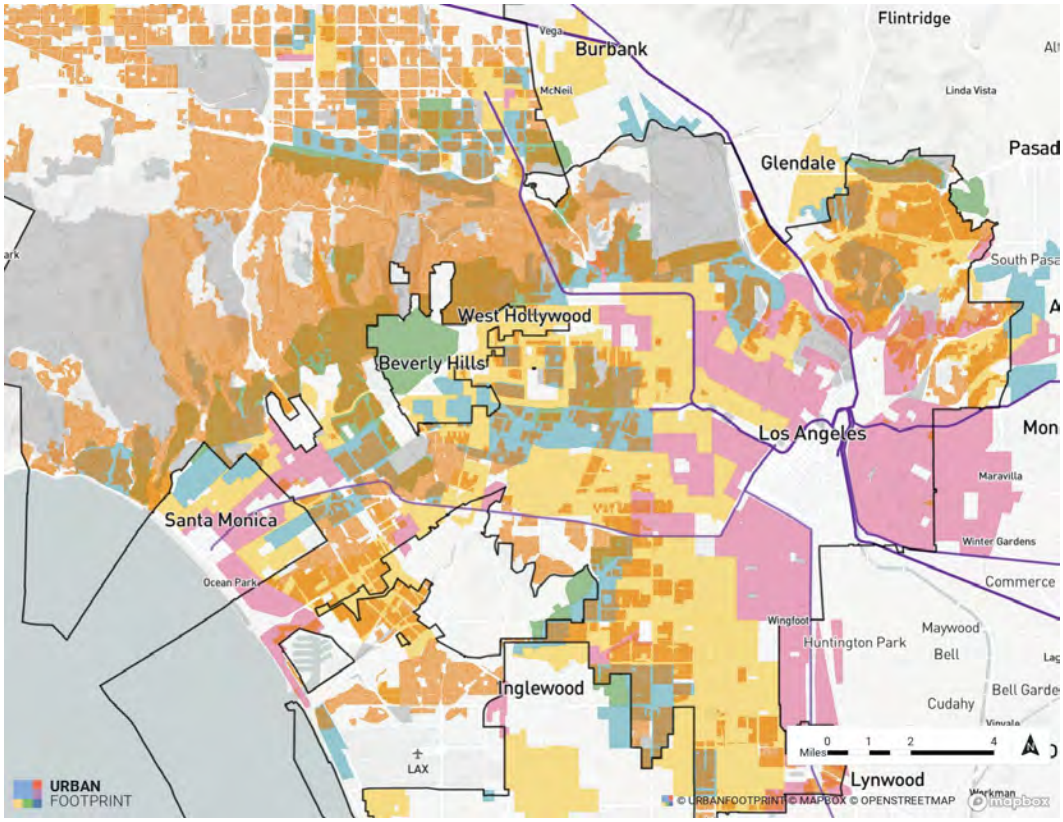
Component #1: Housing elements must prioritize high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing opportunities, in order to affirmatively further fair housing.

AB 686 (2018) requires housing element updates to "affirmatively further fair housing", which is defined as "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."

In our region, housing policy and land use regulations were once used to exclude members of minority groups. Redlining and restrictive covenants, which restricted where Black, Latino, and Asian Americans could live, were once commonplace throughout Los Angeles County. Discrimination in housing takes other forms today: even after *de jure* segregation was banned, opponents of neighborhood change in prosperous areas weaponized zoning policy to make apartment construction illegal in much of Los Angeles, especially in high-income areas. Today, 75% of the City's residentially-zoned land is restricted to single-family housing only, and the areas where apartments are banned tend to be ones that were defined as "desirable" during the age of redlining, and were thus off-limits to many Black, Latino, and Asian Angelenos.

Home Owners' Loan Corporation map of Los Angeles, 1930s

*"Desirable" areas in **green** and **blue**, "declining" or "hazardous" areas in **yellow** and **red***
*Parcels where apartments are banned in **orange***



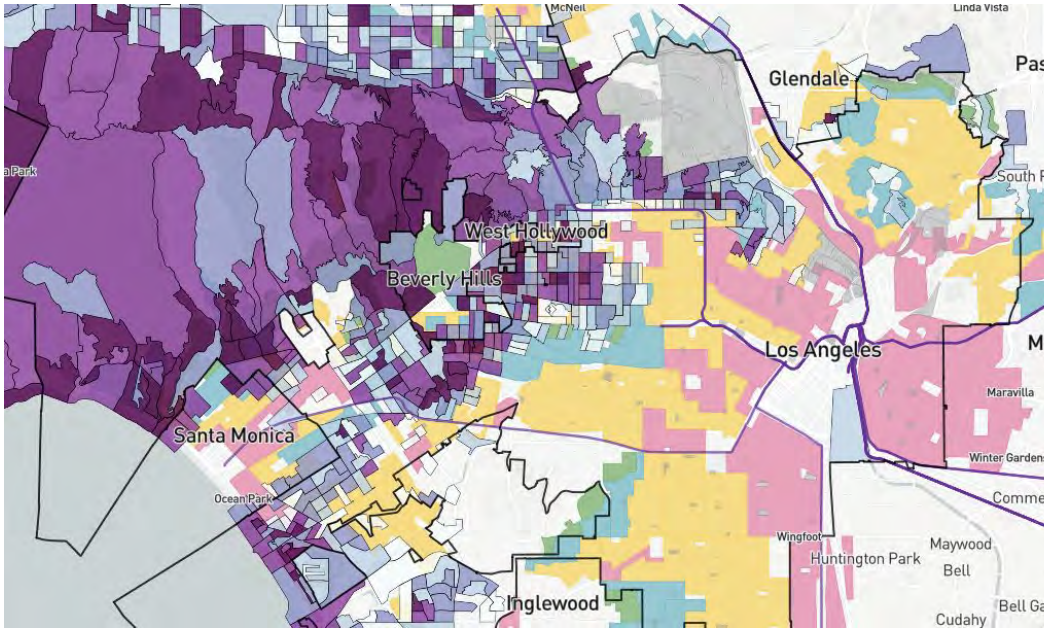
Restrictive zoning has perpetuated historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods. Restrictive zoning has also raised housing costs and denied historically disadvantaged groups housing opportunities near job centers, quality schools, and other public resources, a situation that persists today. Today, the median home sale price in Los Angeles is above $800,000[1], and 57% of the city's renters are "rent-burdened" (i.e. they spend more than 30% of their income on rent)[2]. High housing costs place a disproportionate burden on lower-income communities of color, and have the effect of excluding them from high-opportunity neighborhoods and from the city altogether.

Again, comparing redlining maps from the 1930s to the current distribution of Angelenos by race is instructive. Areas that were defined as "desirable" during the age of redlining, where R1 zoning often predominates, tend to have white majorities today. Areas that were defined as "declining" or "hazardous", where zoning tends to accommodate multifamily housing, tend to be majority Black, Latino, and Asian.

[1] Zillow Home Value Index, Los Angeles
[2] American Community Survey, 2014-18

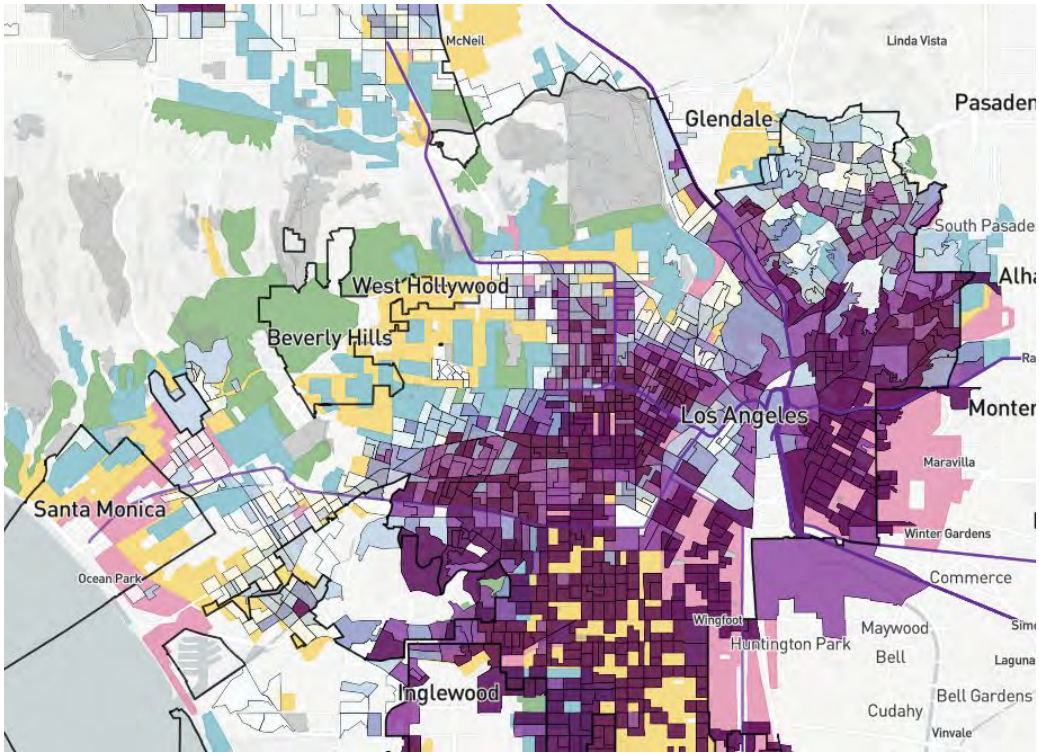
White Population of Los Angeles by Census Tract

*"Desirable" areas in **green** and **blue**, "declining" or "hazardous" areas in **yellow** and **red***
*Majority-white census tracts in shades of **purple***



Nonwhite Population of Los Angeles by Census Tract

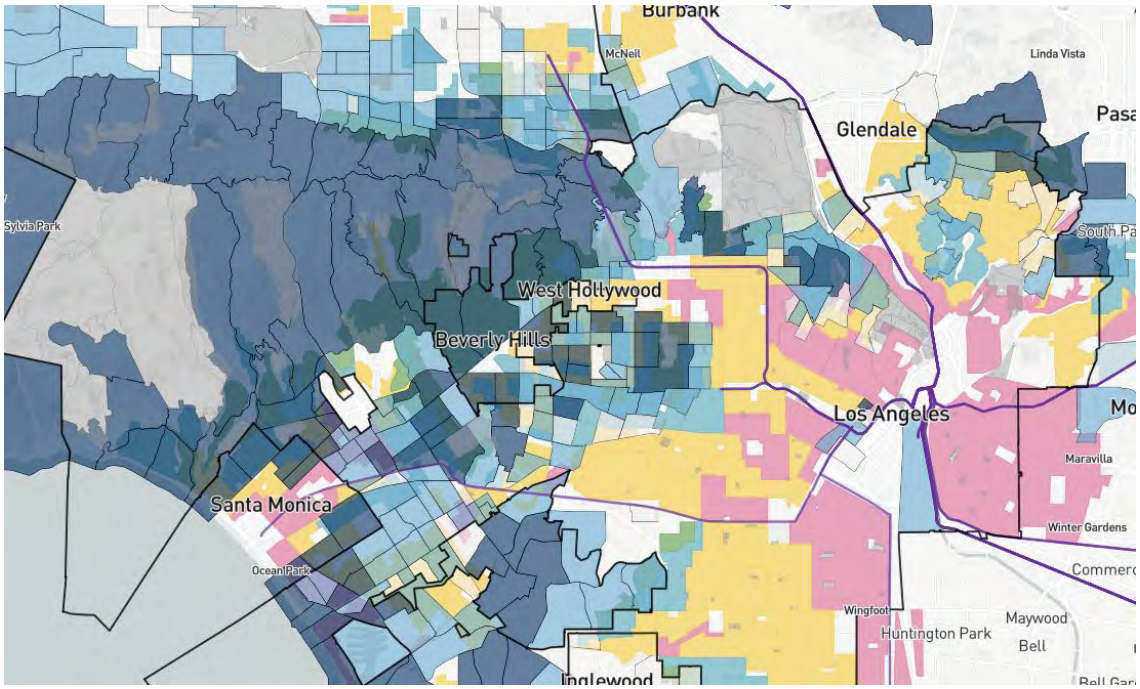
*"Desirable" areas in **green** and **blue**, "declining" or "hazardous" areas in **yellow** and **red***
*Majority-nonwhite census tracts in shades of **purple***



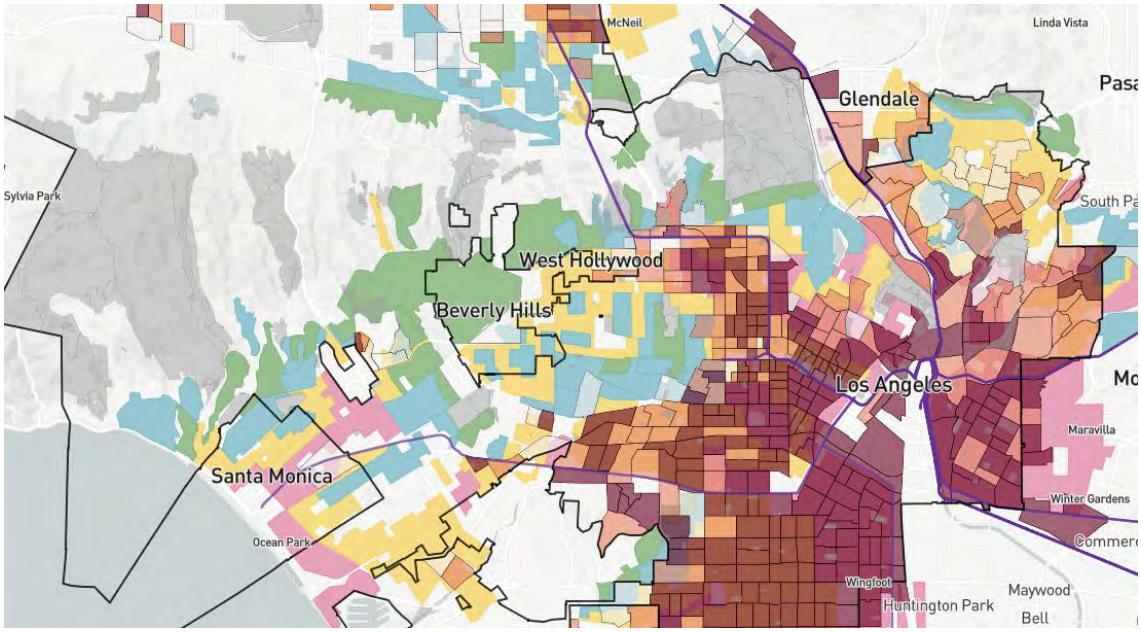
Neighborhoods that were defined as “desirable” during the age of redlining also tend to offer a higher quality of life today. The California Healthy Places Index is a social welfare index that measures overall quality of life in a census tract, based on factors like health, education, housing, economic opportunity, and transportation. Census tracts with higher HPI scores frequently overlap with the green and blue “desirable” areas on the HOLC map. Census tracts with lower HPI scores tend to overlap with yellow “declining” and red “hazardous” areas.

Healthy Places Index Score by Census Tract

*“Desirable” areas in **green** and **blue**, “declining” or “hazardous” areas in **yellow** and **red***
*Census tracts with high HPI scores in shades of **dark blue***



Healthy Places Index Score by Census Tract
*"Desirable" areas in **green** and **blue**, "declining" or "hazardous" areas in **yellow** and **red***
*Census tracts with low HPI scores in shades of **brown***



The City must address these issues by accommodating the lower-income RHNA targets in a way that conforms with AFFH requirements. HCD's Site Inventory Guidebook offers recommendations for **how** jurisdictions should accomplish this. HCD is **likely to require jurisdictions to distribute lower-income housing opportunities throughout the jurisdiction**, and recommends that jurisdictions first identify development potential for lower-income housing in high-opportunity neighborhoods[3].

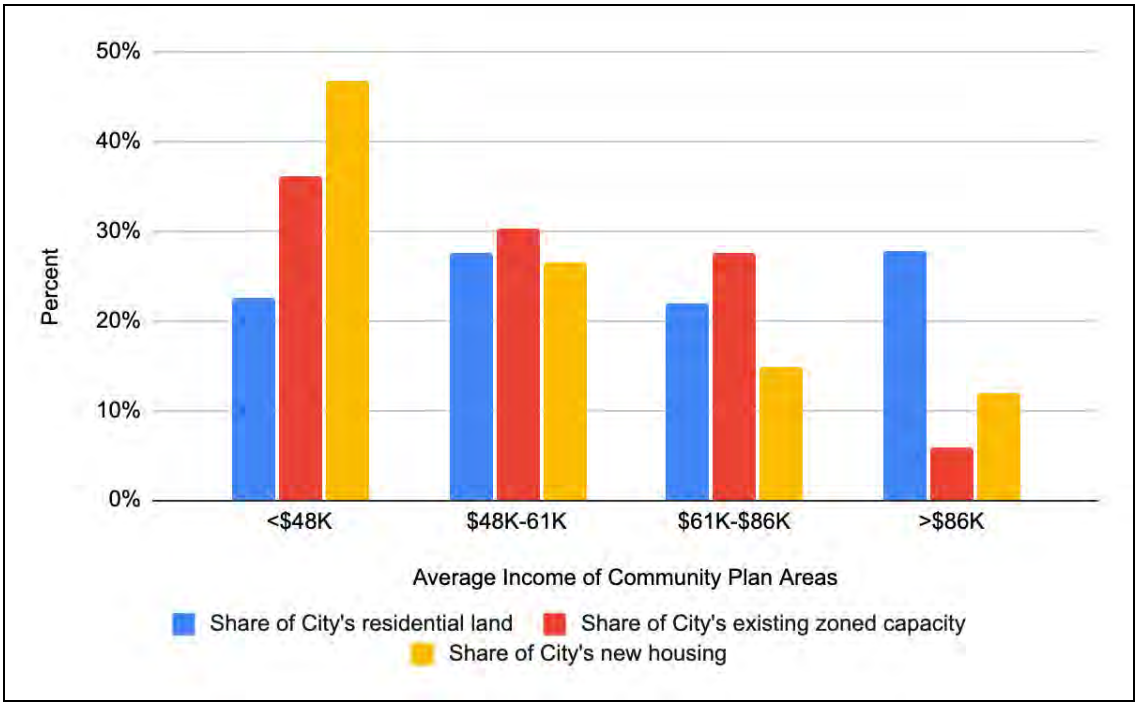
Given that single-family, exclusionary zoning predominates in Los Angeles' highest-opportunity census tracts (as defined in the TCAC/HCD Opportunity Map), significant rezoning will be required in order to accommodate the RHNA targets for lower-income households in a way that affirmatively furthers fair housing. **We urge you to prioritize rezoning in transit-rich, job-rich, and well-resourced neighborhoods, including single-family zoned areas, which will expand affordable housing opportunities while minimizing the impact on existing renters in multifamily-zoned areas.**

Additionally, **Planning should decline to include parcels containing RSO housing units in the housing element's site inventory**, instead identifying additional areas for housing production via rezoning. Stronger tenant protection policies, such as expanded affordable unit replacement requirements ("no net loss") for redevelopment of existing rental properties, a "right of return" after redevelopment at the same rent as before, rental assistance during

[3] HCD Site Inventory Guidebook, pg. 3

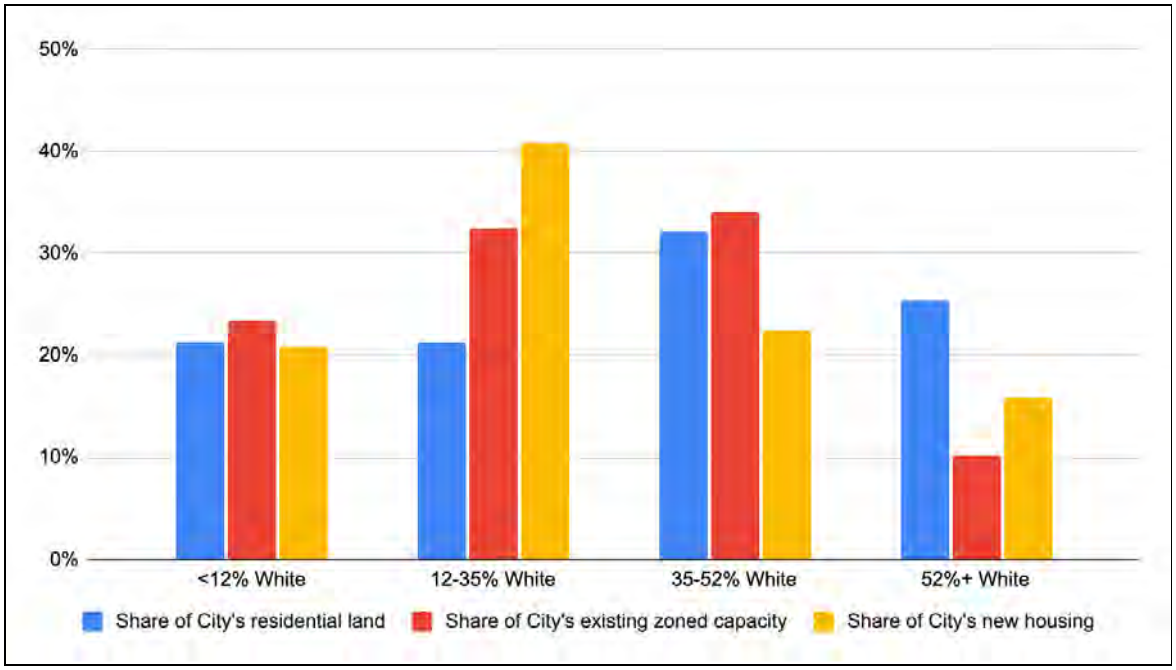
redevelopment, and a voluntary, negotiated tenant buyout system, will help ensure that lower-income renter households can remain in their communities at an affordable rent, as new housing opportunities are created.

A strategy for accommodating the City's RHNA target without significant rezoning will not succeed in achieving the RHNA target, nor will it foster housing growth in an equitable manner that accords with the AFFH requirement. We can see this by looking at where housing growth in Los Angeles has occurred in recent years. About one-quarter of the City's residentially-zoned land is in CPAs where the median annual household income is below $48,000. But 36% of the City's zoned capacity is located in these low-income CPAs, helping to explain why 47% of new housing built in Los Angeles between 2013 and 2019 was built in low-income CPAs. Just 12% of new housing was built in high-income CPAs (those with a median annual household income above $86,000), despite these areas making up 28% of the City's residentially-zoned land. This is because only 6% of the City's zoned capacity is located in these high-income areas, due to restrictive zoning.[4]



Similarly, CPAs where the population is more than 52% white contain one-quarter of the City's residentially-zoned land, but only 10% of the City's zoned capacity and 16% of new housing. 60% of the City's new housing was built in CPAs where the population is less than 35% white, despite having only 43% of the City's residentially-zoned land.

[4] Analysis of Dario Alvarez, Pacific Urbanism, and Professor Paavo Monkkonen, UCLA Luskin



In order to fairly distribute housing opportunities citywide, and move away from this pattern of *de facto* segregation based on race and income, Los Angeles should develop a quantitative methodology for scoring neighborhoods, based on factors like housing costs, median income, access to transit, access to jobs, access to schools, and environmental quality. Neighborhoods that score higher on these dimensions should be allocated higher housing growth targets, and rezoning should be based on these neighborhood-level housing growth targets.

To that end, AHLA and a coalition of 19 organizations representing the policy, academic, environmental, business, social justice, and affordable housing communities have joined together in support of an equitable distribution approach to achieving the citywide RHNA target, in which the Department of City Planning would develop housing growth targets for each of Los Angeles' CPAs, and seek to achieve these targets through the housing element update. **We respectfully urge you to reconsider this option.**

Finally, Los Angeles should identify funding sources, public resources, and density bonus programs to maximize the likelihood that housing projects with below market-rate units are actually built. Local measures like a real estate transfer tax and congestion pricing could help generate new funding to support affordable housing production and preservation.

Component #2: Housing elements should include the HCD-recommended buffer of at least 15-30% extra capacity in the site inventory, in order to avoid violating the No Net Loss requirement.

SB 166 (2017) requires adequate sites to be maintained **at all times** throughout the planning period to accommodate the remaining RHNA target by each income category.[5] This means that if a jurisdiction approves a development on a parcel listed in the site inventory that will have fewer units (either in total or at a given income level) than the number of units (either in total or at a given income level) anticipated in the site inventory, then the jurisdiction must identify and make available enough sites to accommodate the remaining unmet RHNA target for each income category.[6]

If additional sites with adequate zoned capacity don't exist, then the jurisdiction must rezone enough sites to accommodate the remaining unmet RHNA target within 180 days. If the jurisdiction fails to accomplish this rezoning in the required period, then the consequences will include decertification of the housing element and potential state legal action.

To ensure that adequate housing capacity at all income levels exists in the housing element through the 6th Cycle, HCD recommends that "the jurisdiction create a buffer in the housing element inventory of at least 15-30% more capacity than required, especially for capacity to accommodate the lower income RHNA."[7]

Planning has committed to incorporating a 25% No Net Loss buffer for the very low-income and low-income RHNA targets, which we applaud and support. **We would recommend that these buffers be increased to 30%, and also that a 30% No Net Loss buffer for the moderate-income target also be incorporated into the housing element.** This will help to ensure that the City's RHNA target is achieved at all income levels.

Component #3: Housing elements should estimate and report both the **likelihood of development** and the **net new units if developed** of inventory sites.

Just because jurisdictions zone for more housing doesn't mean that the housing will actually be built. The economic cycle, uncertainty of market conditions, the current usage of nonvacant sites, and land use regulations all influence the extent to which rezoned parcels are built to their maximum theoretical capacity.

A parcel's maximum theoretical capacity is not the same as its realistic capacity. To draw a parallel to college admissions, when UCLA wants 2,000 students in its incoming class, they admit 4,000 students. Similarly, to achieve housing production targets, jurisdictions must increase zoned capacity well above the target number of new homes.

[5] HCD No Net Loss Law Memo, pg. 1
[6] HCD Site Inventory Guidebook, pg. 22
[7] HCD Site Inventory Guidebook, pg. 22

An accurate assessment of site capacity is necessary in order for the housing element to achieve sufficient housing production. The site capacity estimate should account for the following **two factors**:

- What is the likelihood that the site will be developed during the planning period?
- If the site were to be developed during the planning period, how many net new units of housing are likely to be built on it?

These are the **likelihood of development**[8] and **net new units if developed**[9] factors, as required by HCD guidelines. The portion of the jurisdiction's RHNA target that a site will realistically accommodate during the planning period is:

(likelihood of development) x (net new units if developed) = realistic capacity.

In past planning cycles, the likelihood of development factor was not expressly considered; housing elements frequently assumed that most or all site inventory locations would be redeveloped to their maximum theoretical capacity. Since this generally did not happen, jurisdictions consistently fell short of their RHNA targets as a result. This is the case for Los Angeles, which is not on a path to achieving its 5th cycle RHNA targets for very low, low, and moderate income housing. Through 2019, it has permitted 8,610 homes that are affordable at these income levels, out of a total RHNA target of 46,590 homes.

5th Cycle RHNA Targets vs. Actual Housing Production (2014-19)

Income Bucket	RHNA Target	Homes Permitted
VLI	20,427	5,129
LI	12,435	2,979
MI	13,728	502
AMI	35,412	92,389
Total	**82,002**	**100,999**

HCD has instructed jurisdictions to estimate the realistic capacity of site inventory parcels, incorporating adjustments that "reflect the realistic potential for residential development capacity on the sites in the inventory"[10], including the "realistic development capacity for the site."[11]

One approach could be to develop a citywide likelihood of development factor, based on past trends in housing production relative to citywide zoned capacity. According to Los Angeles' 5th

[8] HCD Site Inventory Guidebook, pg. 20
[9] HCD Site Inventory Guidebook, pg. 21
[10] HCD Site Inventory Guidebook, pg. 20
[11] HCD Site Inventory Guidebook, pg. 19

cycle housing element, the city had theoretical capacity for 308,000 more housing units.[12] Through 2019, Los Angeles permitted 101,000 housing units[13], which equates to 135,000 housing units permitted by the end of the 5th cycle (assuming that the same annual permitting pace continues through 2021). This implies that in Los Angeles, excess zoned capacity has a **44% likelihood of being developed** (135,000 actual units divided by 308,000 theoretical units).

Granted, the subsequent implementation of the Transit-Oriented Communities program in 2017 effectively increased the City's zoned capacity, suggesting that the denominator in the citywide likelihood of development factor should be larger and that 44% is probably an overestimate of the true likelihood of development for unbuilt capacity in Los Angeles.

Nevertheless, assuming that zoned capacity has a 44% likelihood of being developed in the next 8 years, **the housing element must allow for 1,036,000 units of zoned capacity in order to achieve 456,000 actual housing units.** If Planning believes that a higher likelihood of development (and thus a smaller zoned capacity increase) is justified for certain parcels in the site inventory, persuasive data to support this assumption must be provided.[14]

Another approach would be to build an econometric model that estimates individual parcels' likelihood of development, based on factors like a parcel's zoning, location, land cost per square foot, current use, and potential capacity for housing production relative to current use. **We applaud your department for undertaking this analysis alongside data scientists at UC Berkeley's Terner Center**, and we are confident that this collaboration will lead to a high-quality estimate of the likelihood of development for individual parcels in the site inventory.

We urge you to set high standards for transparency as you estimate the realistic capacity of the site inventory. **We remain concerned about the lack of transparency surrounding Planning's recent estimate that the City currently has "a realistic development capacity of approximately 306,750 units for the 6th cycle Housing Element."[15]** Given that Los Angeles added only 99,000 homes between 2012 and 2019,[16] we find this claim improbable, and without additional information about Planning's methodology, or even Planning's definition of "realistic development capacity", it is impossible for us to verify this claim.

We respectfully ask that you commit to sharing the Planning-Terner Center methodology and econometric model with Housing Element Task Force members, and publish online the draft site inventory and parcels' likelihood of development and net new units if developed. San Diego's public GIS map of its site inventory offers an example worth emulating.

[12] Los Angeles 5th Cycle Housing Element, pg. 3-4
[13] HCD Annual Progress Report dataset, 2020
[14] HCD Site Inventory Guidebook, pg. 20-21
[15] Los Angeles Citywide Housing Element, Initial Study, pg. 15
[16] California Department of Finance, Report E-5, 2020

Component #4: Housing element updates should use an HCD-recommended "safe harbor" methodology for forecasting future ADU production.

Local jurisdictions frequently use overly optimistic estimates of future ADU production to avoid necessary housing reform and rezoning. ADU development estimates must reflect actual on-the-ground conditions to ensure that they are realistic. Overly aggressive ADU production estimates set jurisdictions up for failure in providing the required housing for residents.

To that end, HCD has established two safe harbors for forecasting ADU production during the 6th Cycle[17]. One option ("Option #1") is to project forward the local trend in ADU construction since January 2018. The other, **for use when no other data is available** ("Option #2"), assumes ADU production at five times the local rate of production prior to 2018. Jurisdictions are also permitted to include programs that aggressively promote and incentivize ADU construction. Jurisdictions should clearly and explicitly state their methodology and data sources for future ADU development forecasts.

According to HCD, Los Angeles issued permits for 2,342 ADUs in 2017, 4,079 ADUs in 2018, and 6,747 ADUs in 2019. Under HCD's "Option #1", Los Angeles could take the average of the 2018 and 2019 ADU production trends, and forecast that 5,413 ADUs will be permitted per year during the 6th cycle. This would allow for a **total 6th cycle forecast of 43,304 ADUs.**

Under HCD's "Option #2", Los Angeles could multiply the 2017 ADU production trend by five, and forecast that 11,710 ADUs will be permitted per year during the 6th cycle. This would allow for a **total 6th cycle forecast of 93,680 ADUs.**

Since high-quality data is available on the local trend in ADU construction since January 2018, **Los Angeles should use HCD's Option 1 safe harbor when projecting annual ADU production.** If it believes that higher ADU production forecasts are warranted, it must provide well-grounded estimates, based on the pace of ADU production in neighboring jurisdictions, and must explain programs or policy efforts that could lead to higher ADU production.

Finally, per HCD, the housing element "should also include a monitoring program that a) tracks ADU and JADU creation and affordability levels, and b) commits to a review at the planning cycle midpoint to evaluate if production estimates are being achieved."[18] Los Angeles' housing element should commit to mid-cycle rezoning if ADU production is lower than forecasted, and its midpoint review should be linked with immediate and automatic programs to increase housing production in the second half of the RHNA cycle. AHLA's recommended approach is to incorporate by-right density bonuses on inventory sites, which would automatically take effect mid-cycle if the ADU target is not met. The density bonus should be large enough, and apply to enough parcels, to fully make up for any ADU production shortfall.

[17] HCD Site Inventory Guidebook, pg. 31
[18] HCD Site Inventory Guidebook, pg. 31

The City of Los Angeles has an obligation to sufficiently plan to meet current and future residents' housing needs. The housing element update affords Los Angeles, and the broader Southern California region, the chance to take bold action on lowering housing costs, reducing car dependency, strengthening the local economy, and guaranteeing access to opportunity for Californians of all racial and ethnic backgrounds. We urge you and your colleagues to fully embrace this opportunity to transform Los Angeles for the better.

Finally, it is worth noting that state law imposes penalties on jurisdictions that fail to adopt a compliant 6th cycle housing element update by October 15, 2021. On that date, noncompliant jurisdictions will forfeit the right to deny residential projects on the basis of local zoning, so long as projects include at least a 20% set-aside for below market-rate units[19]. Jurisdictions that want to maintain local control over new development should therefore plan to adopt a compliant housing element update on time.

We would be glad to engage with your office and with the Planning Department throughout the housing element update process. We look forward to a productive and collaborative working relationship with the City of Los Angeles on this critical effort. Thank you for your consideration.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Anthony Dedousis
Director of Policy and Research
Abundant Housing LA

[19] California Government Code 65589.5(d)(5)

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

1 message

Bret Contreras <bretmattc@everyactioncustom.com> Tue, Feb 16, 2021 at 7:45 PM
Reply-To: bretmattc@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Bret Contreras using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Bret Contreras
6312 E Colorado St Long Beach, CA 90803-2202
bretmattc@gmail.com

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Aditi Shakkarwar <ashakkarwar@everyactioncustom.com> Tue, Feb 16, 2021 at 3:18 PM
Reply-To: ashakkarwar@ucdavis.edu
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Aditi Shakkarwar using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Aditi Shakkarwar
6013 Carlton Way Apt 7 Los Angeles, CA 90028-6529
ashakkarwar@ucdavis.edu

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 4:28 PM
To: ashakkarwar@ucdavis.edu

Thank you for your email. Your comment was submitted after the deadline for comments; the comment is marked late, but has been received and will be included in the environmental case file.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Comment on Draft Housing Element, EIR

2 messages

Jeffry Carpenter <jeffry.carpenter@gmail.com> Mon, Feb 15, 2021 at 5:15 PM
To: housingelement@lacity.org

Department of City Planning
City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, CA 90012

ATTN: Cally Hardy, City Planning Associate
RE: Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR

Dear Ms. Hardy:

In my imperfect reading of the draft housing element, I was concerned that there was not adequate attention given to protecting and expanding the mature tree canopy cover. As I monitor the review of new housing proposed in my Neighborhood Council Land Use Committee, more often that not developers propose removing mature trees, finding them inconvenient for their construction processes.

Current City tree protection provisions have proven to be gravely inadequate and I would urge that the Housing Element take note of the need to nurture and expand the urban tree canopy. New housing invariably increases the potential heat island effects of buildings, impacting neighborhood cooling, residential energy conservation and neighborhood livability.

For these reasons, I would ask that the EIR and the Housing Element more directly address the need to assure the protection and enhancement of the urban tree canopy in the course of implementation of new housing supply.

Respectfully,

Jeff Carpenter
Jeffry Carpenter
jeffry.carpenter@gmail.com | (323) 930-1627
215 So. Orange Dr., Los Angeles, CA 90036-3010

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:58 AM
To: Jeffry Carpenter <jeffry.carpenter@gmail.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element - Omgivning Comments

3 messages

Joel Chappo <joel@omgivning.com> Mon, Feb 15, 2021 at 6:27 PM
To: HousingElement@lacity.org
Cc: Lauren Mishkind <lauren@omgivning.com>, Alex Prictoe <alex@omgivning.com>, Simone Barth <simone@omgivning.com>, Roberto Vazquez <roberto@omgivning.com>, Peter Rindelaub <peter@omgivning.com>, Karin Liljegren <karin@omgivning.com>

Ms. Hardy,

Please see attached for comments related to the Housing Element.

We commend the efforts of Planning and look forward to further collaboration,

Joel Chappo
AIA

OMGIVNING
724 S. Spring St., Suite 501
Los Angeles, CA 90014
O: 213.596.5602 x713
M: 310.773.1853
omgivning.com

210215 Housing Element - Omgivning Comments.pdf
90K

Joel Chappo <joel@omgivning.com> Mon, Feb 15, 2021 at 9:54 PM
To: HousingElement@lacity.org
Cc: Lauren Mishkind <lauren@omgivning.com>, Alex Prictoe <alex@omgivning.com>, Simone Barth <simone@omgivning.com>, Roberto Vazquez <roberto@omgivning.com>, Peter Rindelaub <peter@omgivning.com>, Karin Liljegren <karin@omgivning.com>, Javiera Sequeira <javiera@omgivning.com>

Ms. Hardy & Housing Element Team,

If possible, please see attached for an updated response letter with some last minute (minor) edits that should supersede the previous attachment.

Much appreciated,
[Quoted text hidden]

> On Feb 15, 2021, at 6:27 PM, Joel Chappo <joel@omgivning.com> wrote:
>
> Ms. Hardy,
>
> Please see attached for comments related to the Housing Element.
>
> We commend the efforts of Planning and look forward to further collaboration,

Joel Chappo
AIA

OMGIVNING
724 S. Spring St., Suite 501
Los Angeles, CA 90014
O: 213.596.5602 x713
M: 310.773.1853
omgivning.com
<210215 Housing Element - Omgivning Comments.pdf>

210215 Housing Element - Omgivning Response.pdf
90K

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 11:02 AM
To: Joel Chappo <joel@omgivning.com>
Cc: Lauren Mishkind <lauren@omgivning.com>, Alex Prictoe <alex@omgivning.com>, Simone Barth <simone@omgivning.com>, Roberto Vazquez <roberto@omgivning.com>, Peter Rindelaub <peter@omgivning.com>, Karin Liljegren <karin@omgivning.com>, Javiera Sequeira <javiera@omgivning.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

> [Quoted text hidden]
>
> > On Feb 15, 2021, at 6:27 PM, Joel Chappo <joel@omgivning.com> wrote:
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> > Ms. Hardy,
> >
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> >
> > We commend the efforts of Planning and look forward to further collaboration,
> >
> > **Joel Chappo**
> > AIA
> >
> > OMGIVNING
> > 724 S. Spring St., Suite 501
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> > <210215 Housing Element - Omgivning Comments.pdf>

OMGIVNING

2.15.21

Los Angeles Department of City Planning
ATTN: Cally Hardy, City Planning Associate
200 North Spring Street, Room 750
Los Angeles, CA 90012

Subject: Housing Element

Dear Ms. Hardy,

Thank you for the opportunity to comment on the process of updating the Housing Element of Los Angeles' General Plan. We are an architecture office in Downtown Los Angeles (DTLA) dedicated to the revitalization of our city through the reuse of existing and historic buildings. We have touched over 400 existing buildings in and around DTLA in the last 10 years. We've witnessed the strength of City directives to help transform our city and have been highly involved in policy reform such as the Bringing Back Broadway Initiative, the Historic Broadway Commercial Reuse Bulletin by LADBS, Non-ductile Concrete Ordinance, and our Founder, Karin Liljegren, was involved in the 1999 Adaptive Reuse Ordinance. We would like to focus the attention of our letter on the Housing Element Concept - Housing Production. **We believe many of the housing challenges Los Angeles currently faces can be addressed through Adaptive Reuse policy reform by expanding the Adaptive Reuse Ordinance city wide, increasing eligibility for buildings to access greater incentives, and removing density limitations to offset development costs and discourage vacancy.** While we agree that implementing Adaptive Reuse amendments currently drafted in Article 9 of the DTLA Community Plan is a step in the right direction, we believe that it doesn't go far enough. Along with many other stakeholders in the downtown Los Angeles area, we have also submitted a letter with recommendations regarding DTLA 2040, dated 12.02.20, that we understand to be currently under review. Without bold policy reforms we fear that the City of Los Angeles will fall well short of the State's housing production number of more than 455,000 housing units over the next eight years and housing costs will continue to rise while many existing buildings continue to be underutilized.

Benefits of Adaptive Reuse

Creating new housing units through reusing existing underutilized buildings is the most environmentally sustainable way to meet our housing production needs. Building reuse offers substantial environmental savings over demolition and new construction. It can take up to 80 years for a new, energy-efficient building to overcome the negative climate impact created during construction. Reusing existing buildings means not only preserving the embodied energy and value investment made into the building, but also important cultural pieces that contribute to the character of a neighborhood or the city at large. Reusing existing buildings for new residential uses would likely be more acceptable to residents of the surrounding neighborhood, as opposed to a new construction residential project that has potential to create additional construction noise and

increase local traffic patterns. Activating underutilized buildings contributes to the vibrancy of the neighborhood at the street level as well.

Challenges of Adaptive Reuse with Proposed Solutions

Area Zones
Converting existing buildings to new residential uses under the current Adaptive Reuse Ordinance faces its own challenges. The current Adaptive Reuse Ordinance is limited in area to Downtown, Chinatown, Lincoln Heights, the Hollywood Community Redevelopment Project Area, and portions of the Wilshire Center/Koreatown Community Redevelopment Project Area. Existing buildings outside of the Adaptive Reuse Zone, or in M zones would be subject to the entitlements process. The lengthy process creates project uncertainty and adds to the developer's already steep carrying cost associated with purchasing a vacant building without being able to generate revenue. By expanding the Adaptive Reuse Ordinance City wide, converting an existing building would provide more certainty for developers, save on expenses resulting from lengthy entitlements review, and bring housing online sooner via a more streamlined process. As a result, this increase in supply, coupled with a decrease in costs to the developer, has potential to reduce costs for end users of these developments. We recommend city-wide expansion of the ARO zone, as well as allowing residential uses by right in M zones by amending the City's General Plan.

Eligibility
The current ARO limits eligibility to buildings constructed prior to 1974. Many buildings built before 1974 are not considered Historic, and are at risk of being demolished if underutilized or vacant. The current Article 9 Draft of the DTLA Community Plan is working to expand the definition of eligible buildings and City Planning is considering using a rolling date of 25 years to define eligibility. We support a rolling date of 25 years and encourage that date be further shortened to 10 years to access adaptive reuse incentives. The current Article 9 Draft goes even further and allows for a greater range of uses like enabling parking structures to convert to residential uses. The expansion of eligible building typologies coupled with an increase of eligible building area zones would undoubtedly increase the housing production potential, streamline the entitlement process, and reduce costs for the developers and end users of these projects by allowing the conversion of more eligible buildings by right.

Density
Under the current ARO new residential units resulting from conversion must be an average of 750 square feet for an entire building, and each individual unit must be a minimum of 450 square feet, which presents challenges for financial feasibility and accommodating a broader mix of housing sizes, including micro lofts that are not compatible with the current ARO. The additional density alleviates restrictions formerly in place governing minimum unit sizes that has potential to increase housing supply, and affords greater access to market rate units based on smaller unit size. The current Article 9 Draft removes all density requirements. We support removal of all density requirements with no requirements for minimum unit sizes for ARO projects City wide.

Offsetting Construction Costs

The cost of renovating and retrofitting old buildings has doubled in the last 20 years due to new codes, strict interpretations of existing codes and general construction cost escalations. As codes are scheduled to be amended every three years, we foresee the costs escalating further. These buildings need all the help that they can get to offset the high costs and ensure their reuse and reactivation. In addition to expanding ARO zones and eligible buildings to be by right, incentives such as increasing floor area are another impactful benefit. The 2040 Plan maintains the original Adaptive Reuse Ordinance floor area exemption incentive for residential use, which allows for new mezzanines to be added within an existing building's envelope. However following the City's strict definition of mezzanine can often be very limiting. There are many places within existing buildings that can accommodate new floor area. We recommend existing buildings be allowed to have new intermediate floors that do not count towards floor area. For example ground floor spaces that often have very high ceiling heights can easily accommodate an intermediate floor. By replacing mezzanines with an intermediate floor, the developer has more flexibility with the design and layout of the residential spaces, as well as an opportunity to generate increased revenue for a ground floor retail space in a mixed use project. The current Article 9 Draft allows for one-story rooftop additions, the conversion of basements to new uses, and continues to allow mezzanines. Allowing an increase in floor area along with potential for a by right review and approval process is instrumental to removing key barriers by reducing costs, time and risk involved in converting buildings and support project feasibility.

Discourage Vacancy

Increased vacancies and dwindling revenue already loomed large for retail spaces prior to the pandemic, the impact of which will likely increase to many forms of commercial space, including office, retail and restaurants. The idea that a developer can afford to leave space vacant until the right long term tenant comes along and is willing to pay the rent they request hinders the community and the amenities its residents would otherwise enjoy. Vacancy is best discouraged by incentivizing development, and providing a vacancy tax or financial incentive for reactivating vacant spaces for community uses. Ground floor commercial space vacancies and full building vacancies held by families with no plans to develop only to increase generational wealth must be penalized by a vacancy tax or encouraged with incentives to develop new housing units or fill the ground floor mixed use housing projects with long-term tenants.

We commend the efforts of Planning staff and look forward to a fruitful collaboration.

Sincerely,



Karin Liljegren, FAIA,
Omgivning Architecture and Interiors
Principal and Founder

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR

2 messages

Charming Evelyn <bcharmz@aol.com> Mon, Feb 15, 2021 at 4:55 PM
Reply-To: Charming Evelyn <bcharmz@aol.com>
To: "housingelement@lacity.org" <housingelement@lacity.org>

Please see attached comments.

Regards,

Charming Evelyn
Chair - Water Committee
Vice Chair Environmental Justice Committee
Sierra Club Angeles Chapter
Co-Chair CA Conservation Committee - Water
Sierra Club CA
Pronouns: she, her, hers
213-385-0903

City of Los Angeles Housing Element NOP Comments.pdf
94K

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:55 AM
To: Charming Evelyn <bcharmz@aol.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

City of Los Angeles, Department of City Planning
ATTN: Cally Hardy, City Planning Associate
Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR
200 N. Spring Street, Room 750, Los Angeles, CA 90012

Monday, February 15, 2021

Re: LA City Planning Housing Element NOP

Dear Ms. Hardy,

We thank you for the opportunity to submit comments on the LA City Planning Housing Element NOP on behalf of the Sierra Club Angeles Chapter Water and Environmental & Social Justice Committees.

It is typical to encourage infill development without looking at the aspects of increasing air and noise pollution in cities that already predominantly suffer from the worst air pollution standards. We are seeing this play out with communities of color being the hardest hit with Covid-19 in the denser areas of the city. Areas with high asthma and lung disease caused by air pollution. These factors can be mitigated by expanding tree foliage, minimizing the removal of trees and investing in nature-based solutions of rain gardens, bioswales, turf removal, stormwater capture, using drought tolerant plants, ground vegetation and planting more fruit trees.

Infill development can be a positive only if you have less parking, don't add to the traffic and you encourage the use of mass transit, which will lead to less air and noise pollution including GHG. Infill development should encourage walkable, workable, breathable, livable city spaces. Improved non-car transit options- DASH and metro services, frequency of service, mobility hubs, and wayfinding will help continue to improve transportation options and legibility for current users, and increase use and ridership, lowering greenhouse gas emissions.

Using technologies like cool roofs/cool pavement will be needed to combat the urban heat island effect. The draft plan rightfully emphasizes cool roofs and cool pavement as a goal for implementation. Smaller parks are essential and community gardens should be encouraged, where residents can grow their own food. Reclaim paved surfaces like parking spaces for parklets, trees, and plants that capture water.

Hydration stations are crucial to preventing heat related illness, placing these near transit stops, especially bus stops, and pedestrian corridors will greatly improve the plan's efforts to increase climate

resilience. Shade is vital to combating heat, and we strongly support design measures for shade, awnings and other structures in the plan including at bus shelters.

We support creating buffer zones where toxic industries are in close proximity to livable areas and CEQA should not be bypassed at the cost of the health of humans, particularly with development in Brownfield areas.

Sierra Club California supports policies that prohibit new housing developments in Very High Fire Hazard Severity Zones (except for infill in already developed areas consistent with Sierra Club national urban infill policy) to respond to increasing intensity and frequency of devastating wildfires on lives, habitat, property, infrastructure, and the environment. it's important for the city to establish policies to ensure housing is built where it is most appropriate -- High Opportunity Areas -- areas in close proximity to resources and amenities.

Yet, it is also important for the city to be clear about the areas where housing should not be built when there are public health and safety risks, coastal areas due to sea level rise and very high fire hazard zones where there are major fire risks.

As homeless and housing stressed populations continue to grow throughout the city, the homeless tapping streetlights for power is neither safe nor reliable. Power shut-offs to those struggling to pay their mortgages or rents, block rather than assure, access. Including environmental and social justice is an imperative within the City's planning. The plan must also strive to reduce total demand as well as increase environmentally friendlier power by mandating that all new developments and existing public buildings include solar. Demand reductions and local solar will reduce the destructive footprint of solar installations in the desert and other areas on native plants and wildlife.

Access to clean good quality water, must also be taken into consideration. Typically, underserved communities do not have access to clean affordable water and have to rely on smaller agencies that do not make the necessary repairs to maintain their systems. We support the use of tiny homes and encourage more uses of tiny homes to house the homeless, including using the adaptive reuse ordinance to acquire and convert unoccupied, derelict spaces/buildings to affordable/mixed housing uses.

There must be improvements to the RSO, that include ordinance changes that protect more rights for the tenant, such as replacing carpeting, peeling paint, termite protection and a much better process of enforcement and compliance. Prohibit demolition of structurally sound multi-family units subject to rent stabilization unless there is a guaranteed right to return. Establish a guaranteed right for all tenants displaced from demolished housing to return at rents consistent with pre-demolition rates. However, it's crucial that we protect current residents from displacement, provide local job opportunities and emphasize affordable housing while we make those changes.

Create opportunities for organizations and tenants to purchase for sale units.

Los Angeles has a homeless population of over 66, 000 and the pandemic has caused and is causing more homeless families than ever before. Monies from government agencies such as CDLAC should go to housing those less fortunate and close attention needs to be paid to these financial opportunities. Homelessness is expensive and takes a toll on the economy, environment, health care and criminal justice systems, and the lives of fellow human beings.

Trash, human waste and other refuse from homeless encampments pollute waterways and our public city spaces. Since public restrooms and trash receptacles are limited, and because many businesses prohibit the homeless from accessing restrooms, People experiencing homelessness are forced to use whatever location they can find to dispose of their trash and other waste. This phenomenon results in a public health hazard and contributes to additional city costs. This situation must be mitigated, with more apartment sized garbage disposal bins near homeless encampments, LA Sanitation Water Stations and Porta potties where needed, if public bathrooms cannot be installed.

Mobile showers/wash stations should be made available.

Last but not least, the City must include and invite the voices of our Indigenous People to the table, not just one tribe, but every tribe that lives/works within LA City.

Sincerely,

Charming Evelyn
Chair, Water Committee
Vice chair, Environmental & social Justice Committee
Sierra Club Angeles Chapter

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Comments on Housing Element DEIR Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR

3 messages

Clara Solis <claramsolis@earthlink.net> Mon, Feb 15, 2021 at 8:43 PM
To: housingelement@lacity.org

City of Los Angeles, Department of City Planning

ATTN: Cally Hardy, City Planning Associate

Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR

200 N. Spring Street, Room 750, Los Angeles, CA 90012

To Whom It May Concern:

Today was a City of Los Angeles Holiday. I believed that the deadline for submittals would be tomorrow. Please let me know if my comments will be accepted.

I had little time to prepare comments about this important document. However I did want to submit some comments on to housing policies that I feel have detrimentally impacted my community.

Transit Oriented Communities – Density Bonuses:

It may be the case that these bonuses were created with the best of intentions. Planners may have naively thought that density could be added and affordable or low income housing added while not increasing traffic and reducing reliance on vehicles. However, what has occurred in the City of Los Angeles is a perversion that has resulted in little low-income housing being built and the loss of housing for working class residents to greedy developers. Angelenos had a big heart and wanted to help house the homeless with measure JJJ. What our City Council came up with was policies and tweaks that have done little to solve our homeless crisis. I had little time to prepare this statement but which to bring forward these observations on problems with the TOC Density bonuses.

1. The sky rocketing amounts of cash that current landlords can receive for property has led property owners to sell rentals. This previously affordable housing stock is bought up by developers -many times out of state developers whose bottom line is building housing that will make them a fast buck. Often only a small percentage of the housing in TOC developments is given for low income housing, while the majority of the units are too expensive for the current residents to afford. The pricing of these units puts upward pressure on housing costs throughout the community.

2. These developments are supposedly transit oriented, but in reality the new residents of these projects have vehicles which they park in the surrounding neighborhoods. Because these projects are not being built in truly transit oriented communities with markets within walking distance, they are making residents in already dense neighborhoods fight for the little available parking in their community. Further many working class Angelenos work at jobs that are not close to transit. Additionally, the City's definitions of what qualifies for a TOC is not truly transit oriented. See below.
3. What Angelenos anticipated when the passed measure JJJ was that housing would be built next to transit like the Gold Line not near bus lines. Instead, what the City did with their policies is attempt to artificially inflate the areas that qualify for the TOC density bonuses. For example, the City in 2018 passed a measure to reduce DASH headways to 15 minute intervals so that more communities would qualify.
4. Often the communities that are most being impacted by TOC developments are environmental justice communities, because environmental justice communities more often use transit and are more likely to have transit stops in their communities. These communities end up suffering from more traffic and pollution from higher density. Their communities which were once livable and affordable are seeing trees removed and their communities become heat islands which they can no longer afford. It is often the case that these communities are already overburdened by freeways as well. The traffic in their communities won't be abated by community members increased reliance on transit. The traffic that travels and pollutes their community is from pass through traffic from other parts of the city.
5. The TOC program is biased against communities of color and more dense communities. It results in higher density in communities that are already dense and rewards communities that have low density and few transit lines with continuing low density. The TOC's seem intent on building greater density where there is already greater density and maintaining the status quo in lower density neighborhoods.
6. The City of Los Angeles should revoke CF 18-0244 which increases the DASH intervals to 15 minutes. Because of Covid 19, this frequency is not needed in most communities. Further, in most communities it never was implemented. The City of Los Angeles cannot afford this.
7. Rather than rewarding greedy developers with density bonuses that are making our communities unlivable and unaffordable, the city should go back to a system where housing is funded and built by the City funded by fees as was the cases when there was RDA money. It appears that the surge in homelessness has followed the demise of RDA's by Governor Brown.

Small Lot Projects:

Small lot units are removing rent stabilized units and replacing them with market rate units for sale.

Small lot units are removing affordable housing and replacing it with housing that is unaffordable to current Los Angeles residents.

Small Lot units remove housing for seniors and replace it with homes that are not friendly to the disabled or elderly. Three and four story buildings are appearing throughout Los Angeles with kitchens on the second floor which make them inaccessible to the disabled and elderly. That housing for the elderly and disabled is being removed at such a fast pace to be replaced with market rate units is discriminatory.

GREEN SPACE and the ENVIRONMENT

Are removing green space and tree canopy in Los Angeles. These projects are removing trees by the thousands throughout Los Angeles.

They are creating heat islands in our densest and poorest communities.

FAMILIES

Many of the developments have little or no open space for families. Small Lot developments with fewer than 19 units have to provide minimal recreational area for children. Many of these Small Lot Developments have little space other than roof top decks and balconies which are not child friendly. The City must look at what these policies impacts will be on our families and their children.

Thank you,

Clara Solis

(She,her,ella)

323-422-6446

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:59 AM
To: Clara Solis <claramsolis@earthlink.net>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

---

claramsolis@earthlink.net <claramsolis@earthlink.net> Tue, Feb 16, 2021 at 10:59 AM
Reply-To: nobody@earthlink.net
To: Housing Element <housingelement@lacity.org>

I apologize for this automatic reply to your email.

To control spam, I now allow incoming messages only from senders I have approved beforehand.

If you would like to be added to my list of approved senders, please fill out the short request form (see link below). Once I approve you, I will receive your original message in my inbox. You do not need to resend your message. I apologize for this one-time inconvenience.

Click the link below to fill out the request:

https://webmail.pas.earthlink.net/wam/addme?a=claramsolis@earthlink.net&id=11eb-7089-16cb13ba-857c-002128a3c968

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Tara Barauskas <tbarauskas@everyactioncustom.com> Mon, Feb 15, 2021 at 8:48 AM
Reply-To: tbarauskas@communitycorp.org
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Tara Barauskas using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tara Barauskas
1423 2nd St Ste B Santa Monica, CA 90401-3453
tbarauskas@communitycorp.org

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:37 AM
To: Tara Barauskas <tbarauskas@communitycorp.org>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Eddie Isaacs <isaacs_e@everyactioncustom.com> Mon, Feb 15, 2021 at 3:36 PM
Reply-To: isaacs_e@yahoo.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Eddie Isaacs using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Eddie Isaacs
375 E 2nd St Los Angeles, CA 90012-4239
isaacs_e@yahoo.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:48 AM
To: isaacs_e@yahoo.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

CPC-2020-1365-GPA; ENV-2020-6762-EIR

2 messages

Andrea Leon-Grossmann <strategicandvisual@icloud.com> Mon, Feb 15, 2021 at 4:35 PM
To: housingelement@lacity.org

Dear Ms Hardy:

Regarding the EIR for the Housing Element and the community plans there seem to be many issues that seem to be assumed by LA City Planning that is deeply concerning as far as equity and climate change go. As an environmental justice advocate and an immigrant who has been both a renter and a homeowner, I would like to raise many of these concerns.

1) With a gig economy and a culture that demands instant gratification, we must ensure that we are not making assumptions that mixed-used housing is the end-all when it comes to sustainability and that although many may end up working where they live, many more won't as they may get displaced as gig workers are not exploited by an ever-growing industry that pays less than minimum wage and many of those workers would end up traveling farther to make deliveries and short passenger trips while congesting our streets circulating around looking for business. It is already happening to an extent where mixed-use housing exists, I have heard from friends who work for Uber Eats going to Starbucks a block away from the customer's address just because it is raining, or hot.
Besides the emissions from the car driving from far away to the Westside to make a delivery that could have been walked, there is the problem with plastic waste. And that is not just from takeout and delivery, but also from residents who depend on daily deliveries from Amazon and other big box stores. Policies that are implemented in Los Angeles, affect local businesses and beyond. More plastic production means more drilling and more refineries in our city. It also means more warehouses, and most of them are not in LA but in neighboring cities and they also generate emissions and traffic.

Some possible solutions: If upzoning happens in certain areas, declare such areas gig-economy free areas. For deliveries, mandate reusable pods and deliveries may only happen once or twice a week. Our local government must regulate these industries that are poisoning many low-income communities and increasing last mile driven by trucks.
An idea for multifamily buildings that can work is to have communal EVs that can be shared for tenants to run errands AND have parking for them. So car-efficient trips do not have to be replaced with delivery trucks (that come with lots of disposable cardboard and plastic). For higher-end buildings, a concierge service with its own delivery personnel who can run errands for the tenants included in the (higher rent) or (higher) HOAs.

2) It is very important to address the way the City is cracking down on Airbnbs. Many are skirting the law and if it is not properly enforced, adding units so that investors can profit from short-term rentals instead of housing Angelenos will not solve the problem.

3) As we move to go 100% renewable energy, we need to invest in our aging infrastructure like microgrids to make us more resilient. Just a couple of weeks ago we had a 5-hour outage in the Westside because the winds knocked over a poll with transmission lines. If we are going to increase density, we MUST include upgrades to our energy and water infrastructure. Any new market-rate development must be required to underground power lines for the entire block, that is what Torrance has been doing for the last 10+ years, and developers should not be able to pay or get a waiver. They should also be mandated to build rainwater storage and pumps to irrigate drought-tolerant landscaping.

4) As I mentioned, the push to electrify buildings from a health and climate perspective is critical and the easiest way to start is with new construction. Moreover, heat pump water heaters act as clean batteries, overheating their water when power is cheap. This can help avoid outages by lowering MW demand during peaks. Eliminating gas furnaces for heat pumps that heat your home in the winter and cool your house in the summer is another way to keep all appliances electric and just get ONE appliance instead of two.

5) Los Angeles is the biggest urban oil field in the nation and as such we have many active oil & gas oil wells and dangerous gas storage facilities and mercaptan operations. There are also many oil wells that are not part of the California Conservation map as they were simply covered and built on, so they must be properly decommissioned if we are to redevelop the area and **ensure no one lives on top of toxic land**. That means no shortcuts or bypassing CEQA or EIRs on projects for the sake of expediency. **Human health must come first**.

We have a study by the California Council Science and Technology that names the SoCalGas Playa del Rey gas storage facility the most dangerous facility in the state. There are about half a million people in the 5-mile evacuation area (determined by LA County Health) should a blowout occur. And according to a SoCalGas employee deposition, the current technology and state of the storage wells, there is a high likelihood of **catastrophic loss of life** should multiple wells fail (like it could during a significant earthquake). Although there is a resolution to study closing this facility, the danger this facility poses must not be ignored while planning land use and adding a significant amount of density if relocation plans and an emergency plan are not in place, like it is the case today (I checked with the fire department).

As far as solar rights, they must be preserved. Not only families have gone through the expense to install the systems and invest in renewable energy, but rooftop solar has far fewer environmental impacts than solar farms that harm the environment and the loss of energy that is lost through transmission. Solar rooftop must also be a requirement for all new construction, not only we need more distributed generation for reliability, a roof with panels is like a cool roof and it is like having additional insulation.

6) Regarding water, we must mandate not only rainwater collection but close the loopholes we have. For multi-family, we should require underground cisterns connected to irrigation systems.
Although it is now required to pass code, there is a business to rent the systems to pass code and then once the certificate of occupancy is issued, they are returned. The image below is from a couple of weeks ago on Craig's list:

> Screen Shot 2020-09-09 at 11.08.45 AM.png

7) We must preserve our tree canopy. Keeping mature trees is far more important than planting new ones. For the new community plan, we must not only require that the rainwater loophole is fixed but that we also require drought-tolerant landscaping (not astroturf that contaminates our waterways with PFAS). For landscaping, we should also require native trees that can flourish with our climate as well as ban and replace palm trees that have more in common with grass than with trees as they generate little to no oxygen, have little shade, generate a lot of trash and are expensive to maintain.

8) We must also find a better way to transport people than the current electric scooters, the Climate Reality Project LA authored a study that found that e-scooters only have a 28-day lifespan and generate a ton of e-waste, The Guardian has also written about the huge carbon footprint they have.

9) There is little doubt that we must build housing, but we must look at the vacancies that are on the rise. Most vacancies are in luxury (market rate) buildings, while low-income families continue to struggle and some lose the roof over their heads as the financial crisis deepens. We do not need to "incentivize" affordable housing, we must mandate it; otherwise, it will never get built. Developers are in for the money and their advocates (like Abundant Housing) will continue to push for market-based "solutions," the same "solutions" that got us into this hole. We have you, our government, to mandate and regulate these businesses, and ensure the most vulnerable are taken care of. In any event, we also need our city officials to ensure funding to build affordable/public housing gets restored after it was shut down by Governor Brown in 2011 by advocating for it with Sacramento. LA City Planning also needs to take a hard look and assess how many units really need to be built, The Embarcadero Institute has shed light on the misinformation and overinflated numbers put out by developers and Wall Street who want to deregulate zoning and maximize profits at the expense of climate change. Overbuilding housing would come at a carbon footprint we simply cannot afford.

There is also little talk about the fact that LA's population is shrinking, not only people are leaving, but there is a significant decline in the fertility rate. So, the overblown projections by developers and their

front groups are even more unrealistic and flawed. Adding the fact that many corporations have now realized that they don't have to pay top dollar for office space and can keep their employees happy and safe working from home, telecommuting has fundamentally changed where people want to live and how they want to live. Anecdotally, the apartment building on 2600 Overland Ave, has had vacancies for years (pictures below) and the one on 10951 National Blvd was sold and is being torn down after having vacancies for years as well (it was only built in 1992). And, if you come visit storefronts on Pico Blvd., we have about 25% or more vacancy rate. Building mixed rate housing may end up being a win for Airbnb, yielding more empty storefronts and a negative impact for everyone who lives here and those who desperately need housing.

We must listen to the different communities where the housing is getting built and ensure locals are housed first. We should also build the housing that the community needs and won't displace members of that community. Building luxury housing in a low-income community leads to displacement, and that doesn't mean that low-income housing can't be aesthetically pleasing, it means that if it is high-end it will cause displacement and gentrification.

As much as it pains me to say it, passenger cars are here to stay. Besides the differently-abled people, we also have safety issues. A good example is female bartenders who get off from work late at night. We must ensure our streets are safe for all and our zoning doesn't displace Angelenos. Without a doubt, this pandemic has clearly shown how much we need affordable housing to be built and the massive glut of luxury housing that goes vacant. Our housing element must ensure we build housing to house Angelenos instead of building housing for investors.

I also expect that LA City Planning joins forces with someone like Redwood Energy, an affordable housing developer that builds net-zero affordable housing that is all-electric and efficient. Through the California Debt Limit Allocation Committee and California Pollution Control Financing Authority there are billions of dollars in public financing that are matched by the federal government to build the affordable housing that we need.

As we move forward, and we emerge from the economic crisis, it is clear many white-collar jobs will forever be changed and telecommuting is now not an option, but a norm. Many who want to live in a larger home away from an urban and can afford it area can do so. But we must look at the vulnerable communities and their communities, not only to build the housing they need but to ensure that the gig economy does not deal another blow too.

Sincerely,
Andrea Leon-Grossmann
CD-5

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:52 AM
To: Andrea Leon-Grossmann <strategicandvisual@icloud.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Scoping element comments

2 messages

Dick Platkin <rhplatkin@gmail.com> Mon, Feb 15, 2021 at 11:59 AM
To: housingelement@lacity.org

I would like to see the following addressed in the DEIR for the Housing Eement.

1) The amount of remaining zoning capacity in each Community Plan area, including commercial and manufacturing zones that allow R3 and/or R4 apartments by-right?

2) The amount of additional housing that can be added through ministerial approvals in each Community Plan area through Accessory Dwelling Units, Junior Accessory Dwelling Units, and small mobile houses?

3) The amount of housing that could be added within each Community Plan area through existing Density Bonus Ordinances, whether TOC Guidelines, CPIOs, Community Benefit Agreements, or SB 1818.

4) The status of local infrastructure and public services to support additional people and residences in each Community Plan area?

5) Latest information on vacancy rates for middle income and luxury apartments in each Community Plan area?

6) The monitoring of housing trends that will take place to determine if the Housing Element's policies and program are rolled out and if they are effective in meeting the element's goals?

Richard (Dick) Platkin, AICP
6400 W. 5th Street, Los Angeles, CA 90048-4710
rhplatkin@gmail.com
Cell 1-213-308-6354

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:38 AM
To: Dick Platkin <rhplatkin@gmail.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jacob Roberts <roberts.jacob@everyactioncustom.com> Mon, Feb 15, 2021 at 3:09 PM
Reply-To: roberts.jacob@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Jacob Roberts using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jacob Roberts
4250 Coldwater Canyon Ave Studio City, CA 91604-1950
roberts.jacob@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:46 AM
To: roberts.jacob@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Noah Schechter <noah.a.schechter@everyactioncustom.com> Mon, Feb 15, 2021 at 1:47 PM
Reply-To: noah.a.schechter@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Noah Schechter using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Noah Schechter
6635 De Longpre Ave Los Angeles, CA 90028-7851
noah.a.schechter@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:42 AM
To: noah.a.schechter@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Julian Billings <jabillings@everyactioncustom.com> Sun, Feb 14, 2021 at 3:20 PM
Reply-To: jabillings@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Julian Billings using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Julian Billings
1423 1/2 Mohawk St Los Angeles, CA 90026-6464
jabillings@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:37 AM
To: jabillings@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Nina Dooley <ndooley@everyactioncustom.com> Sun, Feb 14, 2021 at 12:38 PM
Reply-To: ndooley@verizon.net
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Nina Dooley using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nina Dooley
610 S Gertruda Ave Redondo Beach, CA 90277-4245
ndooley@verizon.net

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:36 AM
To: ndooley@verizon.net

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Rachel Enders <rachel.enders@everyactioncustom.com> Sun, Feb 14, 2021 at 8:41 PM
Reply-To: rachel.enders@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Rachel Enders using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Rachel Enders
22121 Erwin St Apt M118 Woodland Hills, CA 91367-3474
rachel.enders@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:37 AM
To: rachel.enders@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Public Comment

2 messages

Alyssa Leal <riolili@hotmail.com> Sun, Feb 14, 2021 at 7:11 AM
To: "housingelement@lacity.org" <housingelement@lacity.org>

Sent from Mail for Windows 10

Planning Department Housing Element comment.pdf
54K

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:34 AM
To: Alyssa Leal <riolili@hotmail.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Alyssa Leal Moffitt
3504 Rosewood Avenue
Los Angeles, CA 90066
310-390-1189

Cally Hardy
200 N. Spring Street, Room 750,
Los Angeles, CA 90012;
City Planning Associate Case Numbers: CPC-2020-1365-GPA; ENV-2020-6762-EIR February 14, 2021

Dear Ms. Hardy,

I am a resident of Mar Vista and an Angeleno of 21 years. I am submitting a public comment on the Housing Element and general concerns around the RHNA numbers.

The general concern is that the policies proposed in the Housing Element do not take into consideration the needs of park poor, disadvantaged communities and may lead to more displacement when 'affordable housing' is built in job poor areas at prices above the means of the current communities.

One concern is that the RHNA numbers are concentrated on moderate to above moderate income rather than lower income. These numbers do not seem to reflect the needs of Los Angeles with so many working homeless on our streets. Many tech companies plan to continue work-at-home structures and several middle-income workers have left the city during Covid-19. I see a need to reevaluate the RHNA numbers in order to build housing for those that actually cannot find affordable housing.

Secondly, the Housing first approach is inappropriate for historically red-lined communities that are pollution burdened, severely park poor, and economically disadvantaged. Some of the community plans in South and East Los Angeles date back to 2013 and were generalized; as in the case of Watts and the Southeast Plan. In this plan cultural and historic landmarks, even areas with federal historic landmarks, were not placed in a HPOZ and areas marked on Navigate LA as public facilities/open space (and with community-initiated park plans) are called out as only public facilities, making them open game for housing development in areas that are severely overcrowded and park poor.

Thirdly, these communities need new community plans or other opportunities to determine where they need housing, where they need green space, and how they want to preserve their historic spaces. CEQA Exemptions in these areas take advantage of people who have historically been politically disenfranchised and disengaged due to a concentration of poverty and disadvantage. More time and more effort is due in these areas to account for the many barriers to public engagement that occur in historically red-lined areas.

I urge the Planning Department to make considerations for communities that have not had a voice in the planning of their neighborhoods for 7-8 years, that rely on the CEQA process to voice their needs and concerns, and that need green spaces for healthy environments. As a former New Yorker, I can see the advantage of more density and public transportation but not at the expense of green space or of true equity.

Thank you,

Alyssa Leal Moffitt

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Terry Luedecke <terryluedecke@everyactioncustom.com> Sun, Feb 14, 2021 at 10:05 AM
Reply-To: terryluedecke@yahoo.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

Our long-standing affordable housing shortage happened because of the existing planning approach. It can't be the model anymore. The housing element update in Los Angeles is planning for most housing growth on parcels where multifamily development is already allowed instead on land currently zoned for single-family housing only.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

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Personally sent by Terry Luedecke using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Terry Luedecke
5427 Hermitage Ave Valley Village, CA 91607-2015
terryluedecke@yahoo.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:36 AM
To: terryluedecke@yahoo.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Tracey Maligalig <traceysfvyimby@everyactioncustom.com> Sun, Feb 14, 2021 at 2:34 PM
Reply-To: traceysfvyimby@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Tracey Maligalig using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tracey Maligalig
17817 Magnolia Blvd Apt 4 Encino, CA 91316-3321
traceysfvyimby@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:36 AM
To: traceysfvyimby@gmail.com

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

3 messages

john molloy <JOHN@everyactioncustom.com> Sun, Feb 14, 2021 at 7:01 PM
Reply-To: JOHN@flexblepsh.org
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I think that Abundant Housing makes some good points in their assessment of the needs of the Housing Element planning process.
which should be considered as we move forward. We are going to need a vigorous approach to the density issue,

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Personally sent by John Molloy using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

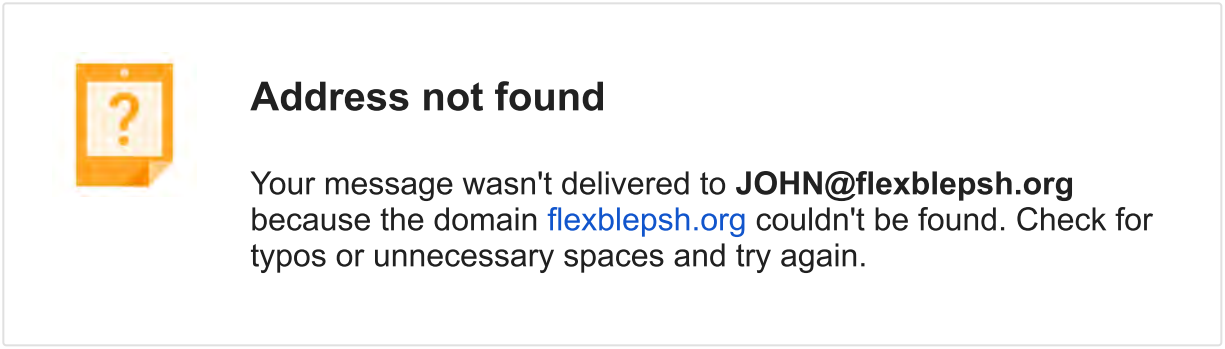
john molloy
2102 Century Park Ln Apt 413 Los Angeles, CA 90067-3306
JOHN@FLEXBLEPSH.ORG

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:37 AM
To: JOHN@flexblepsh.org

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Mail Delivery Subsystem <mailer-daemon@googlemail.com> Tue, Feb 16, 2021 at 10:37 AM
To: housingelement@lacity.org



The response was:

```
DNS Error: 9807461 DNS type 'mx' lookup of flexblepsh.org responded with code NXDOMAIN Domain
name not found: flexblepsh.org
```

Final-Recipient: rfc822; JOHN@flexblepsh.org
Action: failed
Status: 4.0.0
Diagnostic-Code: smtp; DNS Error: 9807461 DNS type 'mx' lookup of flexblepsh.org responded with code NXDOMAIN Domain name not found: flexblepsh.org
Last-Attempt-Date: Tue, 16 Feb 2021 10:37:19 -0800 (PST)

---------- Forwarded message ----------
From: Housing Element <housingelement@lacity.org>
To: JOHN@flexblepsh.org
Cc:
Bcc:
Date: Tue, 16 Feb 2021 10:37:08 -0800
Subject: Re: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
----- Message truncated -----

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Gregory Ramos <gramos3044@everyactioncustom.com> Sun, Feb 14, 2021 at 7:29 PM
Reply-To: gramos3044@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Gregory Ramos using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Gregory Ramos
557 W Virginia Ann Dr Azusa, CA 91702-1841
gramos3044@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:37 AM
To: gramos3044@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Ryan Rubin <rubinryand@everyactioncustom.com> Sun, Feb 14, 2021 at 11:07 AM
Reply-To: rubinryand@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Ryan Rubin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Ryan Rubin
11962 Culver Dr Culver City, CA 90230-6002
rubinryand@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:36 AM
To: rubinryand@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Brent W Scott <bwskott@everyactioncustom.com> Sun, Feb 14, 2021 at 12:54 PM
Reply-To: bwskott@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Brent W Scott using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Brent W Scott
3940 Grand View Blvd Apt 258 Los Angeles, CA 90066-4571
bwskott@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:36 AM
To: bwskott@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Chase Andre <chase.m.andre@everyactioncustom.com> Sat, Feb 13, 2021 at 12:08 PM
Reply-To: chase.m.andre@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Chase Andre using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Chase Andre
26351 Marsala Way Mission Viejo, CA 92692-5231
chase.m.andre@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:32 AM
To: chase.m.andre@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Roseann Boffa <Roseannboffa@everyactioncustom.com> Sat, Feb 13, 2021 at 9:22 AM
Reply-To: Roseannboffa@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Roseann Boffausing Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Roseann Boffa
504 Grand Blvd Apt 4 Venice, CA 90291-4256
Roseannboffa@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:30 AM
To: Roseannboffa@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Kaseem Booker <kaseembooker@everyactioncustom.com> Sat, Feb 13, 2021 at 1:17 PM
Reply-To: kaseembooker@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Kaseem Booker using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Kaseem Booker
418 N Norton Ave Los Angeles, CA 90004-3845
kaseembooker@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:32 AM
To: kaseembooker@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Austin Cyr <AustinCyr427@everyactioncustom.com> Sat, Feb 13, 2021 at 9:31 AM
Reply-To: AustinCyr427@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Austin Cyr using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Austin Cyr
9031 Phyllis Ave Apt 3 West Hollywood, CA 90069-4424
AustinCyr427@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:31 AM
To: AustinCyr427@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Matthew Dixon <northendmatt@everyactioncustom.com> Sat, Feb 13, 2021 at 4:23 PM
Reply-To: northendmatt@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Matthew Dixon using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Matthew Dixon
859 E Promenade Unit B Azusa, CA 91702-6801
northendmatt@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:33 AM
To: northendmatt@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

David Foster <david.collis.foster@everyactioncustom.com> Sat, Feb 13, 2021 at 9:52 AM
Reply-To: david.collis.foster@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by David Foster using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
David Foster
7170 Rosewood Ave Los Angeles, CA 90036-1924
david.collis.foster@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:32 AM
To: david.collis.foster@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Griffin Gill <griffinagill@everyactioncustom.com> Sat, Feb 13, 2021 at 9:50 AM
Reply-To: griffinagill@gmail.com
To: vince.bertoni@lacity.org

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I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Griffin Gill using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Griffin Gill
1602 Silver Lake Blvd Los Angeles, CA 90026-1311
griffinagill@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:31 AM
To: griffinagill@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Cindi Knight <girlfridaysouthpasadena@everyactioncustom.com> Sat, Feb 13, 2021 at 3:52 PM
Reply-To: girlfridaysouthpasadena@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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Personally sent by Cindi Knight using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Cindi Knight
919 Palm Ave South Pasadena, CA 91030-3028
girlfridaysouthpasadena@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:33 AM
To: girlfridaysouthpasadena@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Ryan Koyanagi <ryank.pf@everyactioncustom.com> Sat, Feb 13, 2021 at 10:41 PM
Reply-To: ryank.pf@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

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Personally sent by Ryan Koyanagi using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Ryan Koyanagi
1210 Redwood View Dr Pomona, CA 91766-4117
ryank.pf@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:33 AM
To: ryank.pf@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Gerald Lam <geraldlam05@everyactioncustom.com> Sat, Feb 13, 2021 at 9:29 AM
Reply-To: geraldlam05@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Gerald Lam using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Gerald Lam
1401 Via Andres Palos Verdes Estates, CA 90274-2845
geraldlam05@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:31 AM
To: geraldlam05@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Yurhe Lim <yurhelee@everyactioncustom.com> Sat, Feb 13, 2021 at 10:09 AM
Reply-To: yurhelee@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

It is disappointing that Planning does not intend to pursue an intentional methology in which new homes are concentrated near jobs, transit and high-opportunity neighborhoods in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. I believe these inadequacies are not being addressed.

Planning's analysis suggests that the City can achieve over 80% of its RHNA target without significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

I believe that the facts do not support these conclusions and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning suggests that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. But this is to deny the reality that Los Angeles only permitted 114,000 homes during the eight-year period ending in 2019, leading to a net increase of only 99,000 homes during that time. I believe Planning has not offered convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory where they expect the development of 307,000 more homes to occur likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement. I strongly believe that the City should be on the defense in allowing such development during our worsening homelessness crisis.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, I believe many draft community plan updates highlighted in the Initial Study (including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan) are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started (like Brentwood-Pacific Palisades and Westwood) to avoid zoning reforms that are necessary to accommodate the RHNA goal. I believe this is unfair and that if we don't enforce an equitable, accountable standard to all neighborhoods now these neighborhoods will continue to believe that zoning reforms and updates—which are necessary in every municipality regardless of size or history—do not apply to them.

I strongly oppose Planning's "status quo" approach to the housing element update that cannot meaningfully address our current housing crisis. Fortunately, with 8 months remaining until housing element updates are due, there is still time to create a transformative housing element. I urge you to ask the Department of City Planning to take this important step for Los Angeles' future. I am grateful for our City's Planning department and believe they have the resourcefulness and smarts to make these groundbreaking changes possible.

Sincerely,
Yurhe Lim
1120 S Grand Ave Apt 818 Los Angeles, CA 90015-4380
yurhelee@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:32 AM
To: yurhelee@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jasmine Little <jasmine.t.little@everyactioncustom.com> Sat, Feb 13, 2021 at 11:18 AM
Reply-To: jasmine.t.little@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

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I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Jasmine Little using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jasmine Little
508 S Serrano Ave Los Angeles, CA 90020-3942
jasmine.t.little@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:32 AM
To: jasmine.t.little@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Victoria McCormick <homelessgrouch007@everyactioncustom.com> Sat, Feb 13, 2021 at 1:20 PM
Reply-To: homelessgrouch007@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Victoria McCormick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Victoria McCormick
11325 198th St E Graham, WA 98338-8129
homelessgrouch007@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:32 AM
To: homelessgrouch007@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Tanya Ortiz <ortiz.tanyag@everyactioncustom.com> Sat, Feb 13, 2021 at 10:39 AM
Reply-To: ortiz.tanyag@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Tanya Ortiz using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tanya Ortiz
1217 N Edgemont St Los Angeles, CA 90029-1590
ortiz.tanyag@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:32 AM
To: ortiz.tanyag@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

3 messages

George Papanikolas <georgepapanikolas@everyactioncustom.com> Sat, Feb 13, 2021 at 9:31 AM
Reply-To: georgepapanikolas@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by George Papanikolas using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
George Papanikolas
2379 Venus Dr Los Angeles, CA 90046-1643
georgepapanikolas@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:31 AM
To: georgepapanikolas@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

George Papanikolas <georgepapanikolas@gmail.com> Tue, Feb 16, 2021 at 10:46 AM
To: Housing Element <housingelement@lacity.org>

Can you explain why it's taking three months for LABS to get a building permit to do a remodel on my home? Do you know how much that costs in carrying costs? This is why everything is so expensive and impossible to get done in the city.

George Papanikolas
Mobile: 1-323-547-2347
www.GeorgePapanikolas.com
Instagram/Facebook: @georgepapanikolas

> On Feb 16, 2021, at 10:31 AM, Housing Element <housingelement@lacity.org> wrote:
>
> [Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Alan Pick <alan.pick@everyactioncustom.com> Sat, Feb 13, 2021 at 12:08 PM
Reply-To: alan.pick@aol.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Alan Pick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Alan Pick
422 Howland Canal Venice, CA 90291-4620
alan.pick@aol.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:32 AM
To: alan.pick@aol.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Marlene Rapkin <mrapkin542@everyactioncustom.com> Sat, Feb 13, 2021 at 10:23 AM
Reply-To: mrapkin542@aol.com
To: vince.bertoni@lacity.org

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Personally sent by Marlene Rapkin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Marlene Rapkin
114 Channel Pointe Mall Marina Del Rey, CA 90292-7272
mrapkin542@aol.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:32 AM
To: mrapkin542@aol.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Tieira Ryder <tie.ryder@everyactioncustom.com> Sat, Feb 13, 2021 at 4:16 PM
Reply-To: tie.ryder@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

https://htwws.org/santamonicaairport/ (Close the airport, that space runs into Mar Vista)

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Personally sent by Tieira Ryder using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tieira Ryder

3826 Grand View Blvd Unit 661385 Los Angeles, CA 90066-8265
tie.ryder@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:33 AM
To: tie.ryder@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Rafael Sands <rafaelsands@everyactioncustom.com> Sat, Feb 13, 2021 at 10:00 AM
Reply-To: rafaelsands@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Rafael Sands using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Rafael Sands
12721 Hanover St Los Angeles, CA 90049-3739
rafaelsands@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:32 AM
To: rafaelsands@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Miles Stenehjem <mickyvax@everyactioncustom.com> Sat, Feb 13, 2021 at 3:12 PM
Reply-To: mickyvax@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Miles Stenehjem using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Miles Stenehjem
5556 1/2 E Echo St Los Angeles, CA 90042-4617
mickyvax@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:32 AM
To: mickyvax@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Carla Truax <carlatruax@everyactioncustom.com> Sat, Feb 13, 2021 at 9:23 AM
Reply-To: carlatruax@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

We must use zoning changes to meet our urgent goals for affordable housing in LA.

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Thank you for your time and attention.

Personally sent by Carla Truax using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Carla Truax
2415 Thomas Ave Redondo Beach, CA 90278-1528
carlatruax@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:30 AM
To: carlatruax@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
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Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Bryce Wynn <brycewynn@everyactioncustom.com> Sat, Feb 13, 2021 at 1:48 PM
Reply-To: brycewynn@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I am writting to urge you to instruct the Department of City Planning to heavily revise the housing element update in favor of significant zoning reform and real action rather than attempting to meet the dire housing need without real action to develop housing. LA's development history over the past 10 years is abysmall, and the fact that the department of city planning believes we will develop housing at nearly 4x the rate we have been is unconcsionable. Additionally, what little development there has been has come at the benefit only of those wealthy enough to move into the new luxury development zoning lawsforce, or has come to the massive advantage of those who already own property within the city. The fact that there was no upzoning around the new subway expansion is a disgrace, turning what could have been an amazing public benefit helping to move this city away from its dependence on cars into a further win for the wealthy who could already afford to own seven figure homes in the immediate area.

I encourage you to ask the department of city planning to re-consider, and focus on zoning reforms to help enable them to do so.

Personally sent by Bryce Wynn using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Bryce Wynn
1620 Brockton Ave Apt 3 Los Angeles, CA 90025-3740
brycewynn@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:32 AM
To: brycewynn@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

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Housing Element <housingelement@lacity.org>

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2 messages

Kevin Zelaya <kevz21189@everyactioncustom.com> Sat, Feb 13, 2021 at 9:46 AM
Reply-To: kevz21189@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Kevin Zelaya using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Kevin Zelaya
1139 S Rimpau Blvd Los Angeles, CA 90019-1812
kevz21189@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:31 AM
To: kevz21189@gmail.com

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

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2 messages

Nabeel Zewail <nzewail@everyactioncustom.com> Sat, Feb 13, 2021 at 10:35 AM
Reply-To: nzewail@hey.com
To: vince.bertoni@lacity.org

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Personally sent by Nabeel Zewail using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nabeel Zewail
871 Winston Ave San Marino, CA 91108-1430
nzewail@hey.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:32 AM
To: nzewail@hey.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

LAUSD Comment Letter - Housing Element

4 messages

Smith, Eimon <cp-eimon.smith@lausd.net> Fri, Feb 12, 2021 at 3:14 PM
To: "housingelement@lacity.org" <housingelement@lacity.org>
Cc: "Grazioli, Albert" <albert.grazioli@lausd.net>, "GODEK, GWENN" <gwenn.godek@lausd.net>

Hello,

Please see the attached comment letter regarding the City's Housing Element Update.

Eimon Smith
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-3417 | 21-225-02
C: (323) 787-2556
E-mail | Website

Please note my new email address is cp-eimon.smith@lausd.net
Preferred pronouns: She / her



LAUSD_CityHousingElementUpdate_CommentLetter_20210212.pdf
101K

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:29 AM
To: "Smith, Eimon" <cp-eimon.smith@lausd.net>
Cc: "Grazioli, Albert" <albert.grazioli@lausd.net>, "GODEK, GWENN" <gwenn.godek@lausd.net>, Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>, Ari Briski <ari.briski@lacity.org>

Thank you for your email. Your comments and/or attachments have been received and filed.

I am looping in others from the team, we will be in touch shortly regarding your request for a coordination meeting.

Regards,
Cally
[Quoted text hidden]

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:29 AM
To: Ari Briski <ari.briski@lacity.org>, Blair Smith <blair.smith@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>

FYI
[Quoted text hidden]

LAUSD_CityHousingElementUpdate_CommentLetter_20210212.pdf
101K

Smith, Eimon <cp-eimon.smith@lausd.net> Tue, Feb 16, 2021 at 11:27 AM
To: Housing Element <housingelement@lacity.org>
Cc: "Grazioli, Albert" <albert.grazioli@lausd.net>, "GODEK, GWENN" <gwenn.godek@lausd.net>, Matthew Glesne <matthew.glesne@lacity.org>, Blair Smith <blair.smith@lacity.org>, Ari Briski <ari.briski@lacity.org>

Thank you Cally. We look forward to setting a meeting to discuss our shared initiatives. Please feel free to reach out to me to coordinate a time and date for this discussion.

Eimon Smith
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-3417 | 21-225-02
C: (323) 787-2556
E-mail | Website

Please note my new email address is cp-eimon.smith@lausd.net
Preferred pronouns: She / her

From: cally.hardy@lacity.org <cally.hardy@lacity.org> **On Behalf Of** Housing Element
Sent: Tuesday, February 16, 2021 10:29 AM
To: Smith, Eimon <cp-eimon.smith@lausd.net>
Cc: Grazioli, Albert <albert.grazioli@lausd.net>; GODEK, GWENN <gwenn.godek@lausd.net>; Matthew Glesne <matthew.glesne@lacity.org>; Blair Smith <blair.smith@lacity.org>; Ari Briski <ari.briski@lacity.org>
Subject: Re: LAUSD Comment Letter - Housing Element

CAUTION: EXTERNAL EMAIL

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Los Angeles Unified School District

Office of Environmental Health and Safety

AUSTIN BEUTNER
Superintendent of Schools

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

February 12, 2021

City of Los Angeles, Department of City Planning
ATTN: Cally Hardy, City Planning Associate
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Submitted via: housingelement@lacity.org

PROJECT: Housing Element Update
CASE NUMBERS: CPC-2020-1365-GPA; ENV-2020-6762-EIR

This letter provides comments submitted on behalf of the Los Angeles Unified School District (LAUSD or District) regarding the City of Los Angeles' (City's) Housing Element Update (Project). The District supports the City's Housing Element goals to increase housing production and preservation, ensure neighborhood livability, prevent discrimination, and end homelessness.

The District has similar goals for housing production and development within the District's boundaries. To this extent, the District would like to coordinate with the City to discuss several considerations associated with the Housing Element and residential development within the City.

The City's goals regarding the recommended rezoning in the Housing Element is to limit the continued 'concentrations of poverty' in areas is consistent with the District's desire to provide residential developments for mixed income employees. Specifically, the District would like to maintain flexibility with the housing distribution and workforce requirements.

The District's Facilities Real Estate & Asset Development Department and Office of Environmental Health & Safety would like to engage the City's Executive Planning team in these conversations regarding the District's development within the City and other mutually beneficial initiatives.

Regards,



Eimon Smith
LAUSD Office of Environmental Health and Safety
CEQA Project Manager, Contract Professional

c: Al Grazioli, Director, LAUSD Facilities Real Estate & Asset Development
Gwenn Godek, CEQA Advisor, Contract Professional, LAUSD Office of Environmental Health and Safety

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Ian Lundy <ilundy@everyactioncustom.com> Thu, Feb 11, 2021 at 8:37 PM
Reply-To: ilundy@ymail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

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I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Ian Lundy using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Ian Lundy
1701 Via Arriba Palos Verdes Estates, CA 90274-1234
ilundy@ymail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:24 AM
To: ilundy@ymail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Geneva Vogelheim <gvogelheim@everyactioncustom.com> Thu, Feb 11, 2021 at 7:59 PM
Reply-To: gvogelheim@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Geneva Vogelheim using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Geneva Vogelheim
3770 Keystone Ave Apt 409 Los Angeles, CA 90034-6362
gvogelheim@gmail.com

Housing Element <housingelement@lacity.org> Tue, Feb 16, 2021 at 10:24 AM
To: gvogelheim@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Re: ACT-LA Letter re: Site Inventory for Housing Element

1 message

Cally Hardy <cally.hardy@lacity.org> Mon, Feb 8, 2021 at 5:28 PM
To: Laura Raymond <lraymond@allianceforcommunitytransit.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>, Meredith Abood <maya.abood@lacity.org>, Claudia Monterrosa <claudia.monterrosa@lacity.org>, Jackie Cornejo <jackie.cornejo@lacity.org>, Blair Smith <blair.smith@lacity.org>, Greg Bonett <gbonett@publiccounsel.org>, Cynthia Strathmann <cstrathmann@saje.net>, Mahdi Manji <mmanji@innercitylaw.org>, Joe Donlin <jdonlin@saje.net>, Brady Collins <brady@kiwa.org>, Alexandra Suh <alexandra@kiwa.org>, Doug Smith <dsmith@publiccounsel.org>, Alfonso Directo <adirecto@allianceforcommunitytransit.org>, Housing Element <housingelement@lacity.org>

Laura:

Thank you for your email. Your comments have been received for the record.

Best,
Cally

On Mon, Feb 8, 2021 at 12:23 PM Laura Raymond <lraymond@allianceforcommunitytransit.org> wrote:

> Hi Matt, Cally, Maya, Jackie, Claudia and Blair,
>
> ACT-LA has been working in coalition on recommendations for the Site Inventory in the 2021- 2029 Housing Element. Attached you will find our coalition's letter regarding these recommendations.
>
> Please let us know if you have questions or concerns. This letter follows our earlier letter on policies and programs.
>
> Many thanks,
>
> Laura
>
> --
> **Laura Raymond** (she/her)
> Director | Alliance for Community Transit - Los Angeles
> cell: (646) 344-0381
> website: www.allianceforcommunitytransit.org

--

Cally Hardy (she/her/hers)
City Planning Associate
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA 90012
Planning4LA.org
(213) 978-1643

Housing Jobs & Transit for All

February 8, 2021

Re: Sites Inventory for the 2021-29 Housing Element

Dear Los Angeles Department of City Planning and Housing and Community Investment Department:

To follow up on our letter submitted to you on October 20, 2020 regarding the Program and Policy Recommendations portion of the Housing Element[1], the Alliance for Community Transit - Los Angeles (ACT-LA) offers these recommendations for the "sites inventory" section of the Housing Element.

As mentioned previously, ACT-LA is a city-wide coalition of 40 organizations working at the forefront of racial, environmental, and economic justice. Our coalition members include tenants' rights organizations, affordable housing developers, workers' centers, public interest law firms, and public health advocates, among others. Our mission is to uplift communities—through affordable housing opportunities, good jobs and access to high quality public transit—as the Southland transforms into a more sustainable region. Given our commitment to equity, we believe that low-income communities and communities of color must be centered in decisions that seek to transform our neighborhoods.

It is worth mentioning that since our last letter, the impact of COVID-19 on Angelenos has only worsened. The long-term impact on low-income communities and communities of color that have been hardest hit by both the virus and the related economic fallout cannot be overstated. Our city's existing affordable housing and homelessness crises, particularly in low-income communities of color, will only be worsened by this public health pandemic.

Developing the Housing Element in the midst of this disaster demands that we take bold action to meet our region's Regional Housing Needs Assessment (RHNA) numbers in a manner that addresses the lasting impacts of redlining, segregation, and gentrification. **The obligation to affirmatively further fair housing should be a core aim of the sites inventory - not an afterthought.** Site allocation should "serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns." The housing element land inventory and identification of sites must be consistent with a jurisdiction's duty to affirmatively further fair housing - which means "taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."

[1] http://allianceforcommunitytransit.org/las-housing-element-update-could-be-transformative-were-calling-on-the-city-to-take-bold-action-to-improve-housing-affordability/

The Los Angeles Department of City Planning (DCP) has a stated goal of furthering our fair housing obligations through the Housing Element update. However, the draft methodology discussed in the January site selection task force meeting suggests that the current approach to producing the site inventory will focus on existing capacity, and that only after all existing sites are identified will the result be considered from a perspective of affirmatively furthering fair housing. We believe this approach is backwards.

There are many things the city can do to more meaningfully address its obligation to affirmatively further fair housing through the housing element. The city should ensure that the housing element site inventory does not catalyze displacement of tenants, and that the inventory facilitates prioritization of public land for affordable housing. The city should also adopt complementary policies to ensure that adopting an appropriate site inventory does not have unintended consequences. These policies include a universal replacement requirement and a commitment to implementing any program to rezone in an equitable manner. All of this is necessary if the city's housing element is to truly create better access to housing opportunities and avoid contributing to displacement pressure in historically disinvested communities.

a. Adopt a universal replacement requirement to protect rent-stabilized housing and housing occupied by, or affordable to, lower-income households.

As a prerequisite to adopting the site inventory, the city should adopt a universal replacement requirement for all new projects that destroy existing rent stabilized housing or housing occupied by, or affordable to, lower-income households. The city currently has a patchwork of replacement requirements with significant gaps. A universal requirement will clarify the applicability of replacement obligations and remove incentives for developers to avoid value-capture programs where replacement requirements already exist. This policy is a necessary prerequisite to the sites inventory because, without it, the city will face a dilemma: on the one hand, by listing existing tenant-occupied housing on the inventory, it will protect those units by applying the replacement requirement in housing element law to these sites; on the other hand, listing these sites on the inventory could make them a target for redevelopment - creating a risk of displacement for the tenants and a loss of affordable housing for the city. Ultimately rent-stabilized buildings and affordable housing must not be destroyed during this push for increased housing capacity. As discussed below, a universal replacement requirement will allow the city to develop an inventory of sites that are truly appropriate for development - which should not include sites currently occupied by tenants.

b. Ensure that the Housing Element Site Inventory does not catalyze displacement.

The purpose of the site inventory is to identify sites that are suitable for development. Adding a site to the inventory triggers provisions under that Housing Accountability Act and other state laws that limit the city's ability to deny development projects on the site. It follows that the site inventory should only include sites that the city truly wants developed or redeveloped. The inventory should not include sites currently occupied by tenants, where redevelopment would mean displacement. Including these sites on the inventory puts a target on the backs of tenants and housing that is in dire short supply: naturally

occurring affordable housing. This cannot be the path we choose to meet our RHNA goals, especially during such a precarious time for LA's renters. The city should categorically exclude all sites currently occupied by tenants from the site inventory.

c. Prioritize public land for affordable housing to help achieve RHNA targets.

The sites inventory should acknowledge the importance of publicly-owned sites to achieving affordable housing targets. Given RHNA gaps have historically been most significant for affordable housing, the sites inventory should analyze and highlight the capacity for affordable housing on public land. Local and state policy encourages public land to be used first for affordable housing, so identifying development capacity on land owned by the city or other public entities can support the city's long-term planning and compliance with these policies.

d. Commit to principles of equity that will guide any program to rezone.

If the city's site inventory does not include adequate sites to meet the 6th cycle RHNA allocation, the city will be required to adopt a program to rezone to create adequate capacity. Any program to rezone should be guided by principles of equity. It should carefully avoid catalyzing displacement and focus on affirmatively furthering fair housing. From the outset, the city should commit to conducting any program to rezone in a manner that addresses exclusionary zoning, prioritizes production of affordable housing, and does not exacerbate displacement pressures in lower-income communities.

The Los Angeles Department of City Planning (DCP) has a stated goal of furthering our fair housing obligations through the Housing Element update. The site inventory process is a key manner in which to address exclusionary zoning that has long plagued LA, leading to segregation and racial inequities. If the site inventory reveals inadequate capacity to meet LA's RHNA obligation, any program to rezone should include value-capture mechanisms, anti-displacement protections, and focus on high resource, low density census tracts and avoid rezoning in census tracts that are vulnerable to displacement or sites currently occupied by tenants. Anything less will fail to address historic exclusionary zoning and risk displacing low-income communities.

***

At its core, the State Housing Element Law should be understood as a tool to dismantle racial segregation and further fair housing. For the city's inventory of sites to effectively advance this goal, the methodology behind creating the inventory must reflect these goals from the outset - not as an afterthought. To do this the sites inventory, and any subsequent program to rezone, should be crafted to steer the bulk of new housing production towards high-income, low-density, historically exclusionary neighborhoods while preventing displacement in communities facing gentrification and avoiding redevelopment of sites occupied by tenants.

Thank you for the opportunity to weigh in on the site inventory. We look forward to reviewing a draft inventory of sites and expect to provide further comments at that time.

Sincerely,

ACT-LA

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Gary Benjamin <gary.ray.benjamin@everyactioncustom.com> Mon, Feb 8, 2021 at 12:26 AM
Reply-To: gary.ray.benjamin@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

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Personally sent by Gary Benjamin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Gary Benjamin
1046 N Normandie Ave Los Angeles, CA 90029-2445
gary.ray.benjamin@gmail.com

Housing Element <housingelement@lacity.org> Mon, Feb 8, 2021 at 11:36 AM
To: gary.ray.benjamin@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Further expansion of apartments in WLA

2 messages

Hans Schieder <Hansschieder@protonmail.com> Sun, Feb 7, 2021 at 8:59 PM
Reply-To: Hans Schieder <Hansschieder@protonmail.com>
To: "HousingElement@LAcity.org" <HousingElement@lacity.org>

Gentlemen:

I will be brief. I also hope to be perfectly clear.

Your program intends to provide more housing in Los Angeles. Fine. However we, and I speak for many fellow residents in West Los Angeles and Palms, are very concerned with the current state of affairs regarding zoning in our area.

We have seen huge apartment buildings erected in areas previously restricted to three and four stories. Those monstrosities are both eyesores and an inexcusable gift to greedy developers. I attended a crowded meeting regarding the Casden project and everyone there spoke against it! Who the hell authorized it? Are you people too stupid to understand the meaning of the word, "NO!"?

We have enjoyed a safe and pleasant area in which to live and bring up our children. Because of the people who have changed our zoning metrics we now are subject to more and constant traffic, more crime as more cars line the streets, less available resources for everyone and a reduction in air quality. We also are experiencing something just as serious but more difficult to quantify, and that is a real reduction in personal space!

The need for more housing could be easily reduced if the idiots running this state were to stop importing illegals into it! The reduction in the need for more housing would be joined by the reduction in the need to build more roads to accommodate the additional cars they bring into the city.

This entire attempt at expansion needs to end right now! We don't have the water, the electrical power or the roads to accept more people and we are livid at the effrontery of you public officials who are trying to dictate to us, the owners of property in our area how we should live!

As I said at the outset, if you want to build more housing, fine. Just do it somewhere other than in areas that are long established and populated by people who are content with things as they are. We don't want to live in New York!

In other words, LEAVE WLA ALONE!!

Sincerely,

Hans Schieder

Housing Element <housingelement@lacity.org> Mon, Feb 8, 2021 at 11:36 AM
To: Hans Schieder <Hansschieder@protonmail.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Christopher Rhie <chris.rhie@everyactioncustom.com> Sat, Feb 6, 2021 at 6:58 PM
Reply-To: chris.rhie@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Christopher Rhie using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Christopher Rhie
829 S Serrano Ave Los Angeles, CA 90005-2749
chris.rhie@gmail.com

Housing Element <housingelement@lacity.org> Mon, Feb 8, 2021 at 11:37 AM
To: chris.rhie@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Letter to DCP - concerns about housing element approach

4 messages

Anthony Dedousis <anthony@abundanthousingla.org> Fri, Feb 5, 2021 at 8:00 AM
To: housingelement@lacity.org, Cally Hardy <cally.hardy@lacity.org>
Cc: Matthew Glesne <matthew.glesne@lacity.org>, vince.bertoni@lacity.org, Leonora Camner <leonora@abundanthousingla.org>

Dear Cally,

I'm writing to share a coalition letter to the Department of City Planning, regarding 14 community organizations' concerns about Planning's approach to the housing element, as detailed in the initial study for the EIR.

Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program. We think that the assumptions are incorrect, and that continuing down this path would fail to comply with AFFH requirements (since it would create little new housing in high-income, exclusionary areas, and perpetuate patterns of segregation).

We would appreciate the opportunity to discuss our concerns with you whenever you're available. I can be reached at 516-660-7402.

Please confirm receipt of this letter when you have an opportunity. Thanks very much for your help.

Regards,

Anthony

--
Anthony Dedousis
Director, Policy and Research
Abundant Housing LA
515 S Flower Street, 18th Floor
Los Angeles, CA 90071
516-660-7402

Housing Element <housingelement@lacity.org> Fri, Feb 5, 2021 at 9:53 AM
To: Anthony Dedousis <anthony@abundanthousingla.org>
Cc: Cally Hardy <cally.hardy@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Leonora Camner <leonora@abundanthousingla.org>

Hi Anthony,

Thank you, your comments and attachments have been received and filed.

Nick Burns had previously reached out and we set up a meeting with him on this coming Monday from 3-4 to discuss. Would it make sense for you to join that call?

Regards,
Cally
[Quoted text hidden]

Anthony Dedousis <anthony@abundanthousingla.org> Fri, Feb 5, 2021 at 11:15 AM
To: Housing Element <housingelement@lacity.org>
Cc: Cally Hardy <cally.hardy@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Leonora Camner <leonora@abundanthousingla.org>

Hi Cally,

Thanks very much - I'd be happy to join that meeting. Appreciate you looping me in.

Regards,

Anthony
[Quoted text hidden]

Cally Hardy <cally.hardy@lacity.org> Fri, Feb 5, 2021 at 11:44 AM
To: Anthony Dedousis <anthony@abundanthousingla.org>
Cc: Housing Element <housingelement@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Leonora Camner <leonora@abundanthousingla.org>

Great, I will add you to the calendar invite now.

Best,
Cally
[Quoted text hidden]
--

LOS ANGELES CITY PLANNING

Cally Hardy (she/her/hers)
City Planning Associate
Los Angeles City Planning

200 N. Spring St., Room 750
Los Angeles, CA 90012
Planning4LA.org
(213) 978-1643




Climate
Resolve


ABUNDANT
HOUSING LA


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Way
GREATER LOS ANGELES


LWV
LEAGUE OF WOMEN VOTERS®
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PATH
VENTURES


CALIFORNIA
YIMBY


PACIFIC
URBANISM


CENTER for
BIOLOGICAL
DIVERSITY


CSH


INTERNATIONAL
EST 2018
BLACK RESTAURANT
& HOSPITALITY
ASSOCIATION


PATH
MAKING IT HOME


FOTPL
Friends of the Purple Line


S . P . Y
safe place for youth


YIMBY
LAW

February 4, 2021

Mr. Vince Bertoni
Director of Planning
Los Angeles Department of City Planning
200 North Spring Street
Los Angeles, CA 90012

Dear Mr. Bertoni,

Thank you for the opportunity to comment on the process of updating the housing element of Los Angeles' general plan. We are writing on behalf of a coalition of organizations representing the policy, academic, environmental, business, social justice, and affordable housing communities. We support efforts to expand the availability of housing at all levels of income, and ensure that cities meet their obligations to affirmatively further fair housing. **We are concerned that the current community planning and housing element update processes are not on track to achieve this goal.**

Exclusionary zoning and land use practices have led to an undersupply of affordable medium- and high-density housing near jobs and transit, and have perpetuated segregated living patterns and the exclusion of historically disadvantaged communities. The housing and homelessness crisis, together with this year's COVID-19 pandemic, severe wildfires, and civil unrest, illustrate the need for a totally new approach to solving our city and region's housing crisis.

For these reasons, we support a housing element update in Los Angeles that is equitable and balanced, promotes socioeconomic integration, and takes a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

Additionally, it is critical that housing element updates affirmatively further fair housing (AFFH), which is required by state law under AB 686 (2018). According to the State Department of Housing and Community Development (HCD), a housing element must "ensure that sites zoned to accommodate housing for lower-income households are not concentrated in lower resource areas and segregated concentrated areas of poverty, but rather dispersed throughout the community, including in areas with access to greater resources, amenities, and opportunity."[1] Cities should accommodate at least a pro-rata portion of the lower-income RHNA target in high-opportunity census tracts (e.g. if 30% of a jurisdiction's land area is located in high-opportunity tracts, then at least 30% of the lower-income RHNA should be allocated to such tracts.) This includes high-opportunity neighborhoods that have frequently used exclusionary land use rules to shut out lower-income households and affordable housing.

[1] HCD, AB 686 Summary of Requirements in Housing Element Law, April 2020, pg. 6

We have called for Planning to develop a distribution of the Regional Housing Needs Assessment (RHNA) target of 455,000 homes to each of Los Angeles' community plan areas (CPA) for purposes of the sites inventory. Each CPA's target should be based on a formula that includes objective, quantifiable criteria like housing costs, median income, access to transit, proximity to job centers, access to public resources (e.g. parks, schools), patterns of historical exclusion and segregation, and environmental quality.

Planning's methodology should also include CPA-level housing growth targets by income level. Los Angeles' target of 184,000 homes that are affordable to lower-income households must be distributed fairly across CPAs; all neighborhoods, particularly high-opportunity neighborhoods that have historically blocked new housing through exclusionary zoning, must accommodate more affordable housing.

This equitable distribution of housing growth would reduce traffic and carbon emissions, increase access to jobs and transit, open up exclusionary neighborhoods to Angelenos of all backgrounds, and foster economic recovery from the COVID-19 pandemic, while also ensuring that the City's housing element update complies with AB 686's requirement to affirmatively further fair housing. This would also align with Council President Martinez's recent motion calling for "an equitable distribution of new housing around the city based on high quality jobs, transit, and historic housing production."

It is therefore disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update, despite receiving significant feedback from many members of the Housing Element Task Force in support of this approach. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

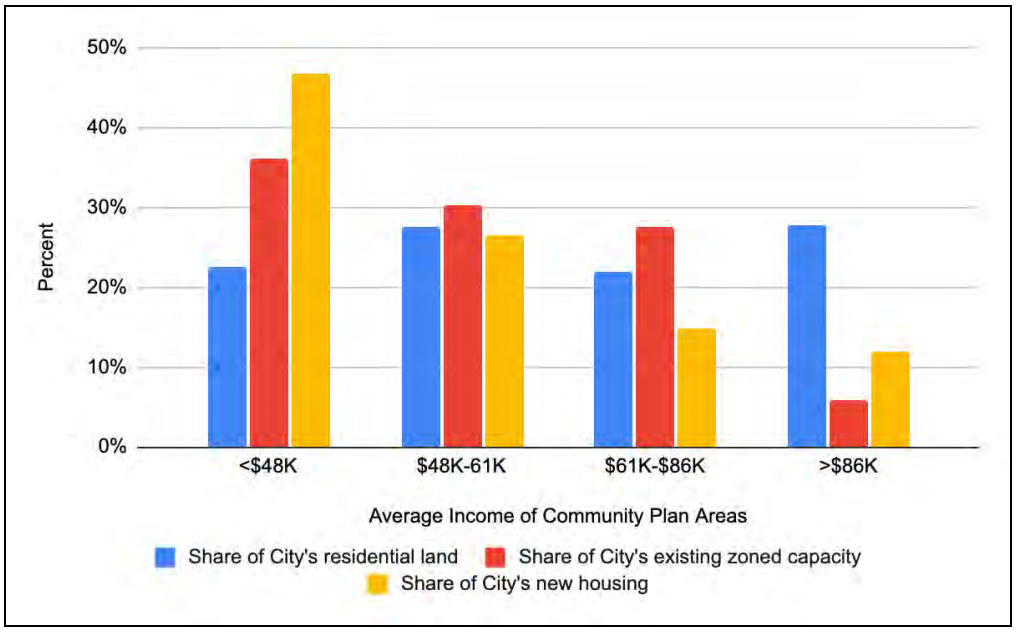
We believe that the facts do not support these conclusions. Additionally, this approach to the housing element update would perpetuate an unsatisfactory status quo, doing little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, excessive water use, displacement of lower-income renters, and segregated neighborhoods. **We must not continue down this path.**

We wish to draw your attention to the following shortcomings of Planning's "status quo" proposal and analysis:

- **Planning's "status quo" proposal fails to affirmatively further fair housing.** By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates

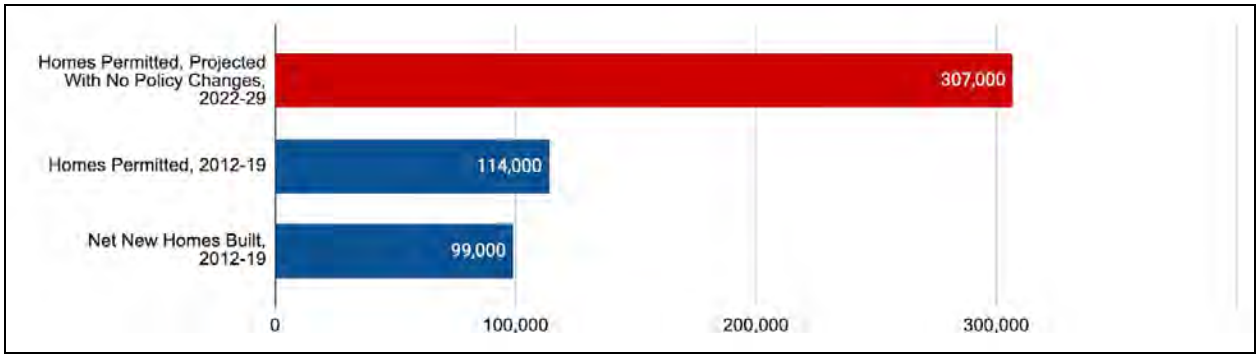
historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

- About one-quarter of the City's residentially-zoned land is in CPAs where the median annual household income is below $48,000. But 36% of the City's zoned capacity is located in these low-income CPAs, helping to explain why 47% of new housing built in Los Angeles between 2013 and 2019 was built in low-income CPAs. Just 12% of new housing was built in high-income CPAs (those with a median annual household income above $86,000), despite these areas making up 28% of the City's residentially-zoned land.[2]



- Planning anticipates that under current zoning (including the nearly-completed Downtown, Hollywood, and Boyle Heights community plan updates), Los Angeles has a realistic development capacity to build 307,000 more homes by the end of the eight-year 6th cycle in 2029.[3] However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019,[4] leading to a net increase of 99,000 homes during that time.[5] Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes. Additionally, their scoping document fails to document how Planning staff arrived at their 307,000-home estimate, nor does it provide an estimate of likelihood of development, a critical factor in assessing realistic development capacity.

[2] Analysis of Dario Alvarez, Pacific Urbanism, and Professor Paavo Monkkonen, UCLA Luskin
[3] Initial Study, pg. 15
[4] Initial Study, pg. 15
[5] California Department of Finance, Report E-5, 2020



- Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, appears to contain a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement. **Planning should decline to include parcels containing RSO housing units in the site inventory, instead identifying additional areas for housing production via rezoning.**
- Since Planning has made overly optimistic assumptions regarding how much of the RHNA target can be achieved without zoning changes, Planning expects that only 93,000 homes need to be accommodated through rezoning and changes to the City's Density Bonus program. Planning anticipates accommodating much of this 93,000-home gap through a series of community plan updates that are already in progress.[6] However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.
- The "status quo" approach does not reflect the input given by the Housing Element Task Force, a diverse group of community leaders, special needs service providers, affordable and market-rate housing developers, and other housing and community development professionals who represent a wide range of expertise. The Housing Element Task Force requested that the City:
    - "update the citywide growth strategy to ensure equity is a core part of future land use decisions,"
    - "develop citywide housing goals by Community Plan areas to ensure more equitable distribution of affordable housing,"
    - "strategically increase housing opportunities in lower density areas,"
    - "provide land use incentives/preferences in high resource areas for affordable housing developments,"

[6] Initial Study, pg. 19-20

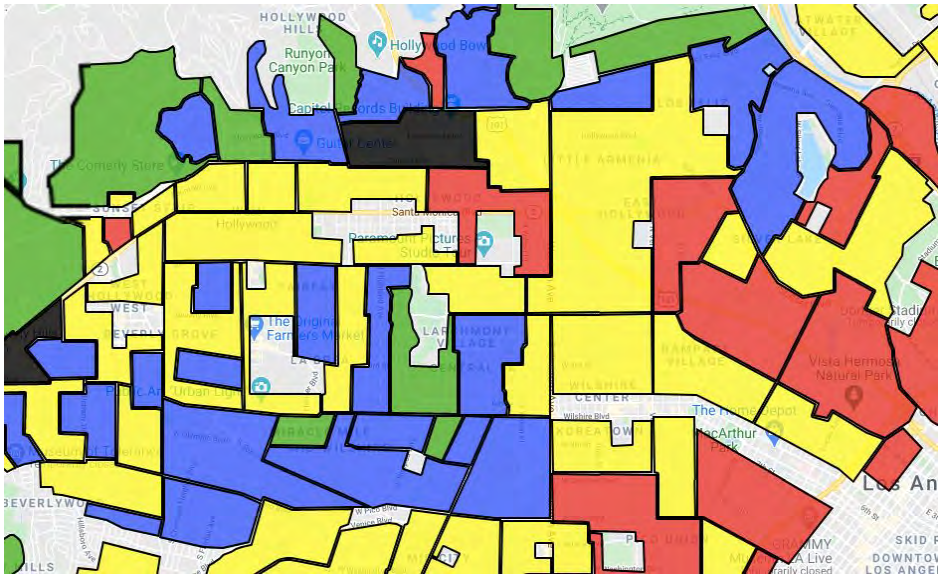
    - “increase access to opportunities and proactively desegregate the City by planning for more affordable and mixed-income housing in high resource areas,”
    - “facilitate missing middle housing options through the new zoning code.”
- The “status quo” plan is directly opposite to the goals developed on the Task Force because it perpetuates patterns of segregation and fails to meaningfully increase housing production in lower-density and higher-opportunity areas.

Finally, it is worth noting that the racist practice of redlining, which divided our city’s neighborhoods by race and income, strongly influenced zoning laws that remain on the books today, defining where affordable housing may and may not be built. On the maps below, you can see that single-family zoning today is frequently concentrated in areas that were labeled “desirable” (green and blue) in the 1930s, and that new apartment production is generally allowed only in areas that were labeled as “declining” or “hazardous” (yellow and red) when redlining was legal. Consequently, Planning’s proposed site inventory map appears to promote most housing growth in areas that were once labeled as “declining” or “hazardous”.

Clearly, a “status quo” approach to the housing element that fails to undertake meaningful zoning reform would simply reinforce the barriers that redlining created in our communities decades ago.

Home Owners' Loan Corporation map of Los Angeles, 1930s

*"Desirable" areas in **green** and **blue**, "declining" or "hazardous" areas in **yellow** and **red***

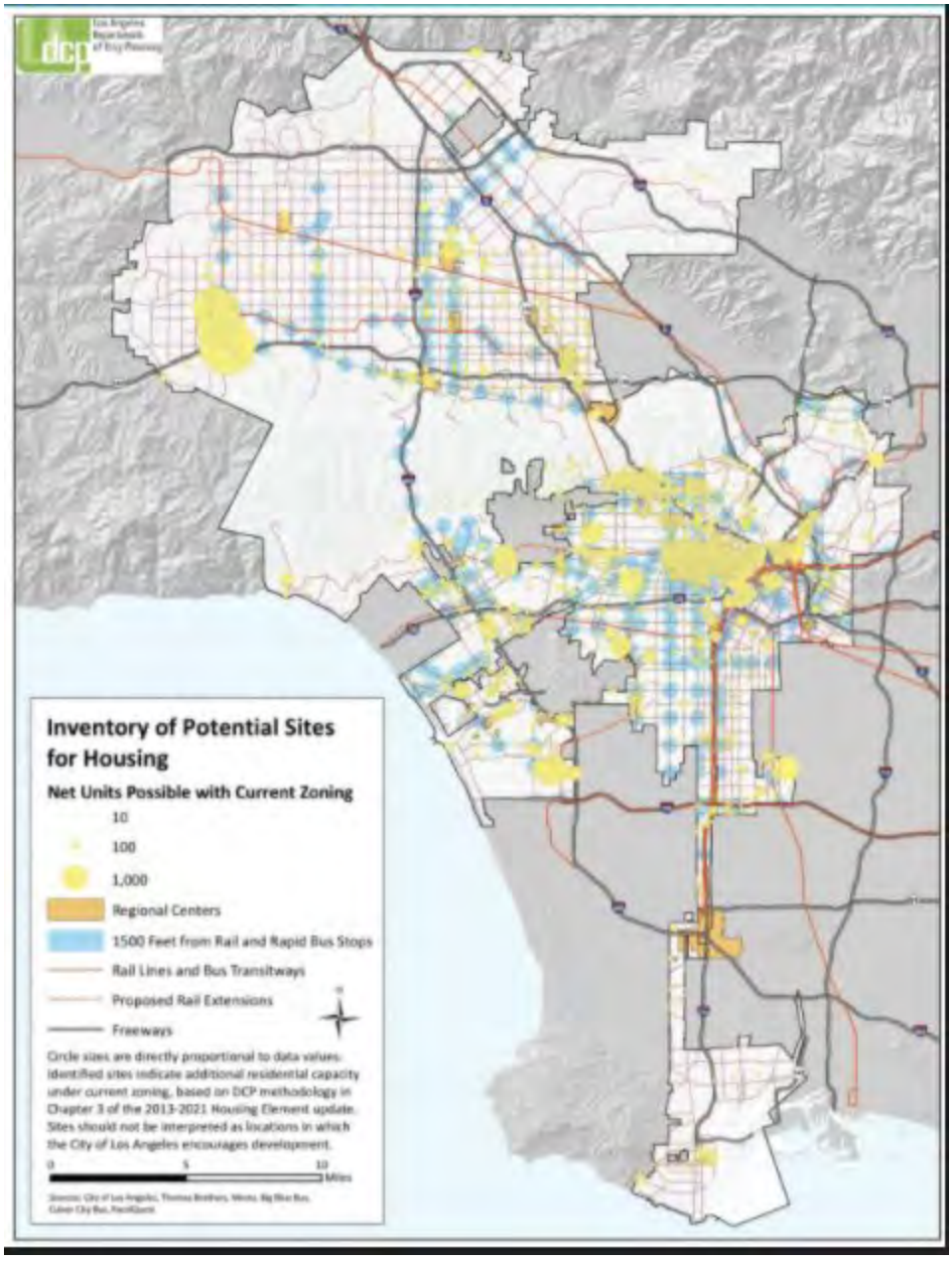


Zoning map of Los Angeles, 2019

*Areas where apartments banned in **pink**; areas where apartments allowed in **blue.***



Inventory of Potential Sites for Housing
Los Angeles Department of City Planning, 2020



For all these reasons, we strongly oppose Planning's "status quo" approach to the housing element update. Fortunately, there is still time to change course and create an equitable, transformative housing element.

While housing element updates are due to HCD by October 15, 2021, the City could request that HCD approve a housing element conditionally. This would give Planning additional time to make necessary revisions. Recently, HCD approved San Diego's housing element update on a conditional basis, giving San Diego an additional six months to "amend the element and

address requirements related to affirmatively furthering fair housing and making findings to demonstrate the likelihood of redevelopment on nonvacant sites." There's no reason why Los Angeles shouldn't take advantage of the opportunity to get the housing element right, especially given that HCD is likely to scrutinize the same issues that we've identified above.

We request the opportunity to meet with you to discuss this matter, and we urge you to instruct the Department of City Planning to revise its approach to the housing element update. Thank you for your consideration.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Anthony Dedousis
Director of Policy and Research
Abundant Housing LA

Marilu Guevara
Executive Director
League of Women Voters of Los Angeles

Chris Carson
Advocacy Chair
League of Women Voters, City of Los Angeles

Shane Phillips
Project Manager, Housing Initiative
UCLA Lewis Center

Brian Hanlon
President and CEO
California YIMBY

Stephen M. Albert, A.I.A.
Housing Element Task Force Member
The Albert Group

Paavo Monkkonen
Associate Professor of Urban Planning and Public Policy
UCLA Luskin School of Public Affairs

Joel John Roberts
CEO
PATH Ventures

Sahar Khundmiri
Advocacy Manager
Safe Place for Youth

Sonja Trauss
President
YIMBY Law

Dario Alvarez
President
Pacific Urbanism

A. Lenise Kouture
CEO and President
International Black Restaurant and Hospitality Association

Lauren Borchard and Mehmet Berker
Founders
Friends of the Purple Line

Bryn Lindblad
Deputy Director
Climate Resolve

David Howden
Director, Los Angeles
Corporation for Supportive Housing

Louis Abramson, PhD
Chair, Homelessness Committee
Central Hollywood Neighborhood Council

J.P. Rose
Staff Attorney
Center for Biological Diversity

Lois Starr
Acting Executive Director
PATH Ventures

Jason Riffe
Director, Housing Initiatives
United Way Greater Los Angeles

Housing Element <housingelement@lacity.org>

Housing Element 2021-2029 Update

4 messages

Alexander Wikstrom <xanderw17@gmail.com> Fri, Feb 5, 2021 at 1:30 PM
To: housingelement@lacity.org

Dear Ms. Hardy,

I am a resident of Beverly Grove who rents. I support the efforts that the draft plans in my area (Purple Line TNP) have made to expand housing opportunity. It is the City's obligation to make more housing possible for people of all incomes. I applaud the proposed change to allow up to 4 units per lot on 6th Street between Fairfax and San Vicente, where I live. I do have concerns that TOC bonuses may lead developers to target RSO-covered units along Orange Street just south of where I live. While I support having more housing in my neighborhood, there is the potential to evict tenants that are likely lower income than the neighborhood as a whole.

I do not want to discourage new housing in my area, but I believe the housing element citywide and the Purple Line TNP would greatly benefit from considering rezoning the R1-zoned properties roughly between Melrose to Olympic, from City limits with Beverly Hills and West Hollywood east to La Brea to allow more units, ideally at least 4 per lot. The ability for my street, 6th Street to have 4 units per lot would likely produce changes that are not going to result in eviction of existing tenants. Under current statewide ADU laws, these buildings can add 1-2 units already, and changing the zoning to be less restrictive with setbacks and parking could result in more housing along my street. This opportunity should be given to all single-family only lots in the area I described.

I have three reasons for supporting rezoning for more units on R1 zones. First, these areas already include some duplexes or ADUs. If these buildings are demolished, under current zoning laws, these would only be able to be replaced with single-family homes, the most unaffordable housing type. While this does not describe a great deal of properties in the area, these units could still disappear in favor of for-sale housing that is out of reach for the vast majority of Angelenos. Second, fourplexes and other small apartment buildings are part of this neighborhood's character. In areas where duplexes and apartment buildings exist, there is a great variety of unit sizes, which cater to different people with different needs. A single person may very well like a small studio, but even in multifamily settings, there are 3-bedroom units that can house families, friend groups, etc. Third, single-family homeowners, especially in my neighborhood, would be the least burdened by this rezoning. Homeowners would most likely profit greatly from selling their homes for redevelopment as apartments and doing so is completely voluntary, unlike the eviction process. These areas are still within a comfortable walking distance to shopping, restaurants, and transit, meaning that added traffic from higher density would likely not be a concern. I believe these areas could add density and put off plans that could demolish still dense buildings on Orange St.

Beverly Grove is a high opportunity area currently working on a new plan. The Purple Line TNP can be a great document that both emphasizes more housing along major boulevards, as well as within residential neighborhoods as I've described. The Housing Element of the General Plan should consider rezoning at least 4 units per lot in current R1 areas of Beverly Grove, Carthay, etc. The status quo that ends up evicting tenants locally as well as in other transit-adjacent neighborhoods can be mitigated by allowing housing growth everywhere in the neighborhood, as opposed to just 6th Street and Orange Street.

Sincerely,

Alexander Wikstrom

Housing Element <housingelement@lacity.org> Mon, Feb 8, 2021 at 11:48 AM
To: Alexander Wikstrom <xanderw17@gmail.com>

Thank you for your email. Your comments and/or attachments have been received and filed. Your message will also be forwarded to the Purple Line TNP team for review.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org> Mon, Feb 8, 2021 at 11:48 AM
To: Alice Okumura <alice.okumura@lacity.org>, Renata Dragland <renata.dragland@lacity.org>, Matt Gamboa <matt.gamboa@lacity.org>

Forwarding this comment letter as it also contains comments relevant to the Purple Line TNP.

Best,
Cally
[Quoted text hidden]

Renata Dragland <renata.dragland@lacity.org> Mon, Feb 8, 2021 at 5:39 PM
To: Housing Element <housingelement@lacity.org>
Cc: Alice Okumura <alice.okumura@lacity.org>, Matt Gamboa <matt.gamboa@lacity.org>

Thank you, Cally!
Hope all is well.

Renata

LOS ANGELES CITY PLANNING

Renata D. Dragland
Preferred Pronouns: She, Her, Hers
City Planner
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
T: (213) 978-1205 | Planning4LA.org
E-NEWS

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Kira Durbin <caliginger13@everyactioncustom.com> Thu, Feb 4, 2021 at 1:55 AM
Reply-To: caliginger13@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Kira Durbin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Kira Durbin
14716 Albers St Sherman Oaks, CA 91411-3712
caliginger13@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 2:01 PM
To: caliginger13@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Mehile Nomowsky <naumoux@everyactioncustom.com> Thu, Feb 4, 2021 at 10:37 PM
Reply-To: naumoux@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I strongly oppose allowing residents of new TOC developments to participate in the street parking permit program by LADOT, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative city parking permit program. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Mehile Nomowsky using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Mehile Nomowsky
1635 N Vista St Los Angeles, CA 90046-2817
naumoux@gmail.com

Housing Element <housingelement@lacity.org> Fri, Feb 5, 2021 at 8:51 AM
To: naumoux@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Beverly Orange <owensbeverly83@everyactioncustom.com> Thu, Feb 4, 2021 at 10:18 AM
Reply-To: owensbeverly83@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Beverly Orange using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Beverly Orange
509 E Lancaster Blvd # BLV6 Lancaster, CA 93535-3145
owensbeverly83@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 2:02 PM
To: owensbeverly83@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Ji Son <kitanji09@everyactioncustom.com> Thu, Feb 4, 2021 at 10:27 AM
Reply-To: kitanji09@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

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Personally sent by Ji Son using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Ji Son
2724 Cincinnati St Los Angeles, CA 90033-3116
kitanji09@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 2:03 PM
To: kitanji09@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Peter Avildsen <peter@everyactioncustom.com> Wed, Feb 3, 2021 at 10:09 AM
Reply-To: peter@thirdculture.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Peter Avildsen using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Peter Avildsen
161 N Catalina St Los Angeles, CA 90004-4670
peter@thirdculture.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 1:57 PM
To: peter@thirdculture.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Tom Bellino <tombellino@everyactioncustom.com> Wed, Feb 3, 2021 at 1:43 PM
Reply-To: tombellino@gmail.com
To: vince.bertoni@lacity.org

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Sincerely,
Tom Bellino
534 S Coronado St Los Angeles, CA 90057-1816
tombellino@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 2:00 PM

To: tombellino@gmail.com

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Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Carey Bennett <careyjeanbennett@everyactioncustom.com> Wed, Feb 3, 2021 at 2:20 PM
Reply-To: careyjeanbennett@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Carey Bennett using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Carey Bennett
2929 St George St Los Angeles, CA 90027-3025
careyjeanbennett@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 2:00 PM
To: careyjeanbennett@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Mark Bolin <mark.bolin7@everyactioncustom.com> Wed, Feb 3, 2021 at 9:04 AM
Reply-To: mark.bolin7@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Mark Bolin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Mark Bolin
1400 N Edgemont St Apt 107 Los Angeles, CA 90027-5944
mark.bolin7@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 9:57 AM
To: mark.bolin7@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Alexander Booth <alexanderbooth@everyactioncustom.com> Wed, Feb 3, 2021 at 8:33 AM
Reply-To: alexanderbooth@kfalosangeles.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Alexander Booth using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Alexander Booth
225 S Olive St Apt 1511 Los Angeles, CA 90012-4906
alexanderbooth@kfalosangeles.com

Housing Element <housingelement@lacity.org> Wed, Feb 3, 2021 at 9:35 AM
To: alexanderbooth@kfalosangeles.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Brent Bovenzi <brent.bovenzi@everyactioncustom.com> Wed, Feb 3, 2021 at 10:50 AM
Reply-To: brent.bovenzi@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

It is concerning that the current Dept of Planning believes LA can accommodate 450,000 more homes with no significant zoning changes. We know that isn't true, if it were we wouldn't have the housing affordability crisis we do have. LA is zoned for millions of fewer homes than in decades past. That needs to be reversed. People are having to move farther away from job centers to afford somewhere to live, this sprawl is unsustainable from any angle you look at it, climate change, traffic, air pollution, land use, time wasted commuting, etc. How should we change our zoning?

- Upzone all single-family zoning up to a quadplex minimum
- Upzone along all our transit corridors and job centers, making sure to include wealthy neighborhoods instead of exclude them like we have historically done
- Eliminate parking minimums to prioritize space for people instead of space for cars

These sound ambitious but are exactly the measures that other cities are taking to tackle this crisis. LA should become a leader in this, otherwise we risk losing businesses and people looking for somewhere more affordable. Our City Planning can no longer remain beholden to specific wealthy NIMBY groups and should begin to work for all Angelenos.

Sincerely,
Brent Bovenzi
633 Indiana Ave Venice, CA 90291-3013
brent.bovenzi@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 1:58 PM
To: brent.bovenzi@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Chelsea Byers <chels.byers@everyactioncustom.com> Wed, Feb 3, 2021 at 3:58 PM
Reply-To: chels.byers@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Chelsea Byers using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Chelsea Byers
9031 Phyllis Ave West Hollywood, CA 90069-4424
chels.byers@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 2:01 PM
To: chels.byers@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jennifer Carter <jenhcarter@everyactioncustom.com> Wed, Feb 3, 2021 at 9:58 AM
Reply-To: jenhcarter@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

Taking real action will ultimately help cut down on the amount of homeless people on the street, greatly lessen traffic and lower the spread of Covid which is increased when too many people are crammed into small living quarters. These are goals we can all get behind that makes quality of life better not just for people who need something affordable for everyone everywhere. Please listen to the experts at Abundant Housing LA and pass the more ambitious plan to reach these goals.

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Personally sent by Jennifer Carter using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jennifer Carter
4210 La Salle Ave Culver City, CA 90232-3212
jenhcarter@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 1:57 PM
To: jenhcarter@gmail.com

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Housing Element <housingelement@lacity.org>

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2 messages

Anthony Castelletto <adcastelletto@everyactioncustom.com> Wed, Feb 3, 2021 at 11:07 AM
Reply-To: adcastelletto@gmail.com
To: vince.bertoni@lacity.org

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Sincerely,
Anthony Castelletto
3608 Keystone Ave Apt 4 Los Angeles, CA 90034-5622
adcastelletto@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 1:59 PM
To: adcastelletto@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Catherine Curtis <herdingcath@everyactioncustom.com> Wed, Feb 3, 2021 at 9:11 AM
Reply-To: herdingcath@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

Covid has only enhanced the inequities of LA's housing crisis. The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods. When I first moved here over 30 years ago, I was alarmed by how segregated this city was. It has gotten worse in those 30 years.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like our own Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. Funny, that.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Catherine Curtis using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Catherine Curtis
219 S Barrington Ave Los Angeles, CA 90049-3354
herdingcath@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 9:57 AM
To: herdingcath@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Michelle DiBattiste <mi.dibattiste@everyactioncustom.com> Wed, Feb 3, 2021 at 8:25 AM
Reply-To: mi.dibattiste@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Michelle DiBattiste using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Michelle DiBattiste
3827 Mentone Ave Apt 2 Culver City, CA 90232-3120
mi.dibattiste@gmail.com

Housing Element <housingelement@lacity.org> Wed, Feb 3, 2021 at 9:33 AM
To: mi.dibattiste@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jennifer Gill <geneffer@everyactioncustom.com> Wed, Feb 3, 2021 at 8:23 AM
Reply-To: geneffer@pacbell.net
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Jennifer Gill using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jennifer Gill
2424 Wilshire Blvd Apt 519 Los Angeles, CA 90057-3353
geneffer@pacbell.net

Housing Element <housingelement@lacity.org> Wed, Feb 3, 2021 at 9:32 AM
To: geneffer@pacbell.net

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Golden Gonzales-Palmer <goldencgp@everyactioncustom.com> Wed, Feb 3, 2021 at 10:36 AM
Reply-To: goldencgp@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Golden Gonzales-Palmer using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Golden Gonzales-Palmer
19701 Corbin Ln Winnetka, CA 91306-3074
goldencgp@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 1:57 PM
To: goldencgp@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Josh Gray-Emmer <dtlajosh@everyactioncustom.com> Wed, Feb 3, 2021 at 1:07 PM
Reply-To: dtlajosh@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Josh Gray-Emmer using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Josh Gray-Emmer
416 S Spring St Los Angeles, CA 90013-1991
dtlajosh@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 1:59 PM
To: dtlajosh@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Ryan Hass <ryanolehass.re@everyactioncustom.com> Wed, Feb 3, 2021 at 8:39 AM
Reply-To: ryanolehass.re@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Ryan Hass using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Ryan Hass
757 Ocean Ave Santa Monica, CA 90402-2614
ryanolehass.re@gmail.com

Housing Element <housingelement@lacity.org> Wed, Feb 3, 2021 at 9:35 AM
To: ryanolehass.re@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Eddie Isaacs <isaacs_e@everyactioncustom.com> Wed, Feb 3, 2021 at 10:08 AM
Reply-To: isaacs_e@yahoo.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Eddie Isaacs using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Eddie Isaacs
375 E 2nd St Apt 603 Los Angeles, CA 90012-4157
isaacs_e@yahoo.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 1:57 PM
To: isaacs_e@yahoo.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Edgar Jackson <lajrmdlr@everyactioncustom.com> Wed, Feb 3, 2021 at 8:23 AM
Reply-To: lajrmdlr@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Edgar Jackson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Edgar Jackson
10935 Fulton Wells Ave Apt 615 Santa Fe Springs, CA 90670-5929
lajrmdlr@gmail.com

Housing Element <housingelement@lacity.org> Wed, Feb 3, 2021 at 9:32 AM
To: lajrmdlr@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Kyle Jenkins <krljenkins@everyactioncustom.com> Wed, Feb 3, 2021 at 8:25 AM
Reply-To: krljenkins@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Kyle Jenkins using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Kyle Jenkins
12690 Sandhill Ln Los Angeles, CA 90094-3097
krljenkins@gmail.com

Housing Element <housingelement@lacity.org> Wed, Feb 3, 2021 at 9:33 AM
To: krljenkins@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Justin Jones <justinj1@everyactioncustom.com> Wed, Feb 3, 2021 at 3:43 PM
Reply-To: justinj1@hotmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

If you want more housing do a vacancy/underuse tax. Look at all the under-used commercial lots that could have housing stacked on top of retail. No need to fight suburban NIMBYs
Also:
Protected bike lanes for eScooters/last mile solutions
Build more rail
Dynamic congestion pricing (toll lanes) on roads
Permit parking in all residential neighborhoods - raises much needed revenue and discourages junk cars

Sincerely,
Justin Jones
3711 Baldwin St Los Angeles, CA 90031-2965
justinj1@hotmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 2:01 PM
To: justinj1@hotmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Lindsay Kerns <lkkerns@everyactioncustom.com> Wed, Feb 3, 2021 at 8:37 AM
Reply-To: lkkerns@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Lindsay Kerns using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Lindsay Kerns
1529 N Commonwealth Ave Los Angeles, CA 90027-5513
lkkerns@gmail.com

Housing Element <housingelement@lacity.org> Wed, Feb 3, 2021 at 9:35 AM
To: lkkerns@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Robert King <robert.j.king08@everyactioncustom.com> Wed, Feb 3, 2021 at 9:51 AM
Reply-To: robert.j.king08@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Robert King using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Robert King
3921 Wawona St Los Angeles, CA 90065-3839
robert.j.king08@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 1:56 PM
To: robert.j.king08@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jake Malott <jake@everyactioncustom.com> Wed, Feb 3, 2021 at 8:28 AM
Reply-To: jake@wsdci.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Jake Malott using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jake Malott
7190 W Sunset Blvd Los Angeles, CA 90046-4415
jake@wsdci.com

Housing Element <housingelement@lacity.org> Wed, Feb 3, 2021 at 9:33 AM
To: jake@wsdci.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Andrew Menotti <menotticesarini@everyactioncustom.com> Wed, Feb 3, 2021 at 9:40 AM
Reply-To: menotticesarini@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Andrew Menotti using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andrew Menotti
18345 Calvert St Tarzana, CA 91335-7004
menotticesarini@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 1:56 PM
To: menotticesarini@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Fleur Mitchell <ms.fleur.mitchell@everyactioncustom.com> Wed, Feb 3, 2021 at 1:36 PM
Reply-To: ms.fleur.mitchell@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Fleur Mitchell
610 Boccaccio Ave Venice, CA 90291-4809
ms.fleur.mitchell@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 2:00 PM
To: ms.fleur.mitchell@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Christopher Palencia <chris.palencia@everyactioncustom.com> Wed, Feb 3, 2021 at 9:21 AM
Reply-To: chris.palencia@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Christopher Palencia using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Christopher Palencia
741 S Mansfield Ave Los Angeles, CA 90036-4328
chris.palencia@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 9:57 AM
To: chris.palencia@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Daniel Poineau <dpoineau@everyactioncustom.com> Wed, Feb 3, 2021 at 11:32 AM
Reply-To: dpoineau@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Daniel Poineau using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Daniel Poineau
939 S Hill St Apt 635 Los Angeles, CA 90015-3283
dpoineau@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 1:59 PM
To: dpoineau@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Andrew Silver <asilverins@everyactioncustom.com> Wed, Feb 3, 2021 at 9:42 AM
Reply-To: asilverins@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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I am asking you to be Bold and work with City Planning to make real change to address the critical housing shortage that is the root cause of our homelessness crisis. We need to plan now for the Los Angeles of 2050.

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Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

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Personally sent by Andrew Silver using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Andrew Silver
4328 Bellingham Ave Studio City, CA 91604-1605
asilverins@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 1:56 PM
To: Andrew Silver <asilverins@gmail.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Michael Stoppelman <stopman@everyactioncustom.com> Wed, Feb 3, 2021 at 11:44 AM
Reply-To: stopman@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

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Personally sent by Michael Stoppelman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Michael Stoppelman
301 Ocean Ave # B216 Santa Monica, CA 90402-1406
stopman@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 1:59 PM
To: stopman@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Lydia Valdez <lydiavaldez26@everyactioncustom.com> Wed, Feb 3, 2021 at 10:08 AM
Reply-To: lydiavaldez26@yahoo.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Lydia Valdez using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Lydia Valdez
720 N Louise St Glendale, CA 91206-2044
lydiavaldez26@yahoo.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 1:57 PM
To: lydiavaldez26@yahoo.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Alan Wayne <alan.m.wayne@everyactioncustom.com> Wed, Feb 3, 2021 at 8:41 AM
Reply-To: alan.m.wayne@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Alan Wayne using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Alan Wayne
603 Angelus Pl Venice, CA 90291-4916
alan.m.wayne@gmail.com

Housing Element <housingelement@lacity.org> Wed, Feb 3, 2021 at 9:35 AM
To: alan.m.wayne@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jay Williams <jay.will.math@everyactioncustom.com> Wed, Feb 3, 2021 at 8:32 PM
Reply-To: jay.will.math@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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This piecemeal approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Jay Williams using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jay Williams

645 W 9th St Los Angeles, CA 90015-1640
jay.will.math@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 2:01 PM
To: jay.will.math@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jonathan Yang <jonathanyangcalifornia@everyactioncustom.com> Wed, Feb 3, 2021 at 10:57 AM
Reply-To: jonathanyangcalifornia@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Jonathan Yang using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jonathan Yang
1324 N New Hampshire Ave Apt 208 Los Angeles, CA 90027-6038
jonathanyangcalifornia@gmail.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 1:58 PM
To: jonathanyangcalifornia@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Nicholas Ziff Griffin <ngriffin@everyactioncustom.com> Wed, Feb 3, 2021 at 8:56 AM
Reply-To: ngriffin@downtownla.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Nicholas Ziff Griffin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nicholas Ziff Griffin
600 Wilshire Blvd Ste 870 Los Angeles, CA 90017-3224
ngriffin@downtownla.com

Housing Element <housingelement@lacity.org> Thu, Feb 4, 2021 at 9:56 AM
To: ngriffin@downtownla.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

3 messages

Emerson Dameron <edameron@everyactioncustom.com> Mon, Feb 1, 2021 at 1:34 PM
Reply-To: edameron@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Emerson Dameron using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Emerson Dameron
5837 W Sunset Blvd Apt 216 Los Angeles, CA 90028-7341
edameron@gmail.com

Nolan Gray <mnolangray@everyactioncustom.com> Wed, Feb 3, 2021 at 9:31 AM
Reply-To: mnolangray@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Nolan Gray using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nolan Gray
725 Weyburn Ter Apt 104 Los Angeles, CA 90024-7224
mnolangray@gmail.com

Housing Element <housingelement@lacity.org> Wed, Feb 3, 2021 at 9:31 AM
To: edameron@gmail.com

Hi Emerson,

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Brooks Dunn <brooksdunn51@everyactioncustom.com> Mon, Feb 1, 2021 at 2:00 PM
Reply-To: brooksdunn51@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

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I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Brooks Dunn using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Brooks Dunn
2000 Alberta Ave Apt 10 Venice, CA 90291-4565
brooksdunn51@gmail.com

Housing Element <housingelement@lacity.org> Wed, Feb 3, 2021 at 9:32 AM
To: brooksdunn51@gmail.com

Hi Brooks,

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Elias Platte-Bermeo <eliasbermeo97@everyactioncustom.com> Mon, Feb 1, 2021 at 12:00 AM
Reply-To: eliasbermeo97@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Elias Platte-Bermeo using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Elias Platte-Bermeo
4215 Duquesne Ave Culver City, CA 90232-2807
eliasbermeo97@gmail.com

Housing Element <housingelement@lacity.org> Mon, Feb 1, 2021 at 9:35 AM
To: eliasbermeo97@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

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Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Dario Rodman-Alvarez <dario@everyactioncustom.com> Mon, Feb 1, 2021 at 6:38 PM
Reply-To: dario@pacificurbanism.com
To: vince.bertoni@lacity.org

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Personally sent by Dario Rodman-Alvarez using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Dario Rodman-Alvarez
225 E 16th St Los Angeles, CA 90015-3615
dario@pacificurbanism.com

Housing Element <housingelement@lacity.org> Wed, Feb 3, 2021 at 9:32 AM
To: Dario Alvarez <dario@pacificurbanism.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
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Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Nicole Beaudoin <Nicole_m_beaudoin@everyactioncustom.com> Sun, Jan 31, 2021 at 10:29 AM
Reply-To: Nicole_m_beaudoin@yahoo.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Nicole Beaudoin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nicole Beaudoin
1616 S Redondo Blvd Los Angeles, CA 90019-5355
Nicole_m_beaudoin@yahoo.com

Housing Element <housingelement@lacity.org> Mon, Feb 1, 2021 at 9:35 AM
To: Nicole_m_beaudoin@yahoo.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

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Housing Element <housingelement@lacity.org>

need for housing

2 messages

Bruce Schelden <bgschelden@verizon.net> Sun, Jan 31, 2021 at 1:26 PM
Reply-To: Bruce Schelden <bgschelden@verizon.net>
To: "housingelement@lacity.org" <housingelement@lacity.org>

I do not believe we need more housing in the city. Adding more means more people, in an area which is already dense and needs to import practically all of it's water. If you don't build people will not come here which is better for all who are already here.

Housing Element <housingelement@lacity.org> Mon, Feb 1, 2021 at 9:35 AM
To: Bruce Schelden <bgschelden@verizon.net>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

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Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jesse Silva <jessedean@everyactioncustom.com> Sun, Jan 31, 2021 at 7:55 PM
Reply-To: jessedean@me.com
To: vince.bertoni@lacity.org

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Personally sent by Jesse Silva using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jesse Silva
5500 Ridge Oak Dr Los Angeles, CA 90068-2553
jessedean@me.com

Housing Element <housingelement@lacity.org> Mon, Feb 1, 2021 at 9:35 AM
To: jessedean@me.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

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Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Maansi Shah <maansi.shah.28@everyactioncustom.com> Sun, Jan 31, 2021 at 8:57 PM
Reply-To: maansi.shah.28@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Maansi Shah using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Maansi Shah
40221 Tesoro Ln Palmdale, CA 93551-4833
maansi.shah.28@gmail.com

Housing Element <housingelement@lacity.org> Mon, Feb 1, 2021 at 9:35 AM
To: maansi.shah.28@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
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Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Brendan O'Donnell <brodonnell87@everyactioncustom.com> Sat, Jan 30, 2021 at 1:41 PM
Reply-To: brodonnell87@gmail.com
To: vince.bertoni@lacity.org

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Sincerely,
Brendan O'Donnell
1115 Princeton St Apt B Santa Monica, CA 90403-4719
brodonnell87@gmail.com

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To: brodonnell87@gmail.com

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Regards,
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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Benjamin Phelps <bphelps@everyactioncustom.com> Thu, Jan 28, 2021 at 12:50 AM
Reply-To: bphelps@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Sincerely,
Benjamin Phelps
1628 1/2 Edgecliffe Dr Los Angeles, CA 90026-1151
bphelps@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:57 PM
To: bphelps@gmail.com

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Connor Finney <Connfinney@everyactioncustom.com> Thu, Jan 28, 2021 at 11:06 AM
Reply-To: Connfinney@gmail.com
To: vince.bertoni@lacity.org

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Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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Personally sent by Connor Finney using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Connor Finney
3838 Dunn Dr Apt 609 Culver City, CA 90232-2776
Connfinney@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:57 PM
To: Connfinney@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Divine Johnson <divinejohnson03@everyactioncustom.com> Thu, Jan 28, 2021 at 11:36 AM
Reply-To: divinejohnson03@g.ucla.edu
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Divine Johnson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Divine Johnson
2178 Linda Flora Dr Los Angeles, CA 90077-1409
divinejohnson03@g.ucla.edu

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:57 PM
To: divinejohnson03@g.ucla.edu

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Re: RHNA timeline, suggestions for 4415-4421 ledge

1 message

Jena Houman <jenahouman@westside-stone.com> Thu, Jan 28, 2021 at 5:23 PM
To: Housing Element <housingelement@lacity.org>

hi dear sir/madam
is it possible for your dept to consider rezoning 4415-4421 ledge ave in city of los angeles, 91602. Right now , it has four 1 bedroom, 1 bathroom units, it is downzoned to three units per lot but because of SB330 law recently signed, it has become very confusing on what zoning or city would allow to build there. is it possible for you to clarify this case please.
thank u very much in advance

From: cally.hardy@lacity.org <cally.hardy@lacity.org> on behalf of Housing Element <housingelement@lacity.org>
Sent: Thursday, January 28, 2021 4:07 PM
To: Jena Houman <jenahouman@westside-stone.com>
Subject: Re: RHNA timeline

Dear
Jena:

Thank
you for your email. The City is currently developing the Site Selection methodology that will be needed to determine the rezoning need under the Housing Element Update. Please feel free to send us any suggestions for rezoning and we can take them into consideration
during the plan process. Additionally, you can find more information about the plan update on our website planning4LA.org/Plan2HouseLA.
We will be doing additional outreach seeking community input on the Plan in Late February and March.

Regards,
-The
Housing Element Team

On Wed, Jan 13, 2021 at 3:33 PM Jena Houman <jenahouman@westside-stone.com> wrote:

> hi cally
> happy new year
> interested to know what is the time table to determine if any area has to be rezoned in city of la?
>
> or is it something that anyone can make suggestions in regards to a specific property or location to RHNA which would make a good candidate for rezoning?
>
> Regards
> Jena Houman
> Westside Stone & Hardwood
> 2130 Cotner Ave

Los Angeles CA 90025
T 310-478-3888
F 310-478-7398

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Randolph Ruiz <randy@everyactioncustom.com> Thu, Jan 28, 2021 at 8:38 PM
Reply-To: randy@aaaarch.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Randolph Ruiz using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Randolph Ruiz
2222 10th St Santa Monica, CA 90405-1308
randy@AAAarch.com

Housing Element <housingelement@lacity.org> Mon, Feb 1, 2021 at 9:34 AM
To: randy@aaaarch.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Marcos Rodriguez Maciel <marcosrm14@everyactioncustom.com> Wed, Jan 27, 2021 at 5:56 AM
Reply-To: marcosrm14@yahoo.com
To: vince.bertoni@lacity.org

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Personally sent by Marcos Rodriguez Maciel using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Marcos Rodriguez Maciel
7560 Hollywood Blvd Apt 301 Los Angeles, CA 90046-2851
marcosrm14@yahoo.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:56 PM
To: marcosrm14@yahoo.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Abundant Housing's false statements about upzoning is "needed" to accommodate population growth

3 messages

Jay Ross <ross_jay@hotmail.com> Wed, Jan 27, 2021 at 9:10 AM
To: Los Angeles City Planning <housingelement@lacity.org>

Hi Planning Dept.,

Abundant Housing is falsely claiming that upzoning is needed to accommodate L.A.'s growth, and existing housing shortage.

The General Plan from 1990 (or whatever the most recent year) has an exhibit that shows that the city's zoning capacity is nearly 9,000,000.
And that does not including apartments that can be built in C zones, density bonus and TOC incentives, and ADUs.

So, please ignore their false claims, and do your zoning capacity calculations to include all of the above.

My calculations for the West LA Community Plan Area show that there is a capacity currently of 150,000 units, for a population of 90,000.
I used data in the current WLA Community Plan.

West LA already has sufficient zoning for any huge population growth.

Below is where Abundant Housing falsely claims that upzoning is needed.

Abundant Housing L.A.

JosrfaafnuotegSsuaruy 25apo aSntm s1aco0:rfe1s5h uAsMdh ·
The LA Department of City Planning released a preview of our city's Housing Element update, which explains how Los Angeles will accommodate 450,000 more homes by 2029. Unfortunately, Planning's approach is a plan for failure.
Planning believes that the City can achieve over 80% of LA's housing growth target with no significant zoning or policy changes, and that the remaining 20% can be accommodated through several weak community plan updates. The facts don't support this approach, and going down this path would mean failing to build enough housing, particularly in the high-income areas that use exclusionary zoning to keep new people out. It's a NIMBY's dream come true.
It's time to speak out. The Equitable Distribution approach to the Housing Element is the right way to plan for LA's future. Please send this letter to Planning and City Hall to convince them to change course.
https://secure.everyaction.com/ngmpRnpBI0CeMmU913I7Ig2
Also, Planning is having Zoom public hearings on the housing element initial study on Tue 1/26 at 5:15pm, and Thu 1/28 at 11:15am.
This is a great opportunity to make your voice heard on the flaws of Planning's housing element approach. Here is the webinar link and login IDs:
Tuesday - 733-042-203 (English) | 248-966-475 (Spanish)

Thursday - 715-621-491 (English) | 679-132-603 (Spanish)

Jay Ross <ross_jay@hotmail.com> Wed, Jan 27, 2021 at 9:11 AM
To: Los Angeles City Planning <housingelement@lacity.org>, "housing.element@lacity.org" <housing.element@lacity.org>

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Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:56 PM
To: Jay Ross <ross_jay@hotmail.com>

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Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

andy may <andymay@everyactioncustom.com> Wed, Jan 27, 2021 at 10:17 AM
Reply-To: andymay@yahoo.com
To: vince.bertoni@lacity.org

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Sincerely,
andy may
1901 N New Hampshire Ave Los Angeles, CA 90027-1818
andymay@yahoo.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:56 PM
To: andymay@yahoo.com

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Terry Luedecke Luedecke - Move <terryluedecke@everyactioncustom.com> Wed, Jan 27, 2021 at 3:07 PM
Reply-To: terryluedecke@yahoo.com
To: vince.bertoni@lacity.org

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Personally sent by Terry Luedecke Luedecke - Move using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Terry Luedecke Luedecke - Move
5427 Hermitage Ave Valley Village, CA 91607-2015
terryluedecke@yahoo.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:57 PM
To: terryluedecke@yahoo.com

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

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2 messages

Elizabeth Florence <eaflorence@everyactioncustom.com> Wed, Jan 27, 2021 at 3:16 PM
Reply-To: eaflorence@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Elizabeth Florence using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Elizabeth Florence
3333 Motor Ave Los Angeles, CA 90034-3757
eaflorence@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:57 PM
To: eaflorence@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Katherine Wegmann <kmwegmann@everyactioncustom.com> Wed, Jan 27, 2021 at 4:13 PM
Reply-To: kmwegmann@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Katherine Wegmann using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Katherine Wegmann
3608 Barham Blvd Apt U317 Los Angeles, CA 90068-1078
kmwegmann@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:57 PM
To: kmwegmann@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Ann Bickerton <aebickerton@everyactioncustom.com> Tue, Jan 26, 2021 at 12:00 AM
Reply-To: aebickerton@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles is essential to solving Los Angeles' housing shortage.

It must be equitable, promote socioeconomic integration, and take a long term view of Los Angeles' housing needs. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is a serious concern that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes.

The facts do not support this approach, and Planning's "status quo" proposal is flawed for the following reasons:

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Personally sent by Ann Bickerton using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Ann Bickerton
11871 Washington Pl Los Angeles, CA 90066-4640
aebickerton@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:52 PM
To: aebickerton@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

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Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Richard Margulieux <rmargulieux@everyactioncustom.com> Tue, Jan 26, 2021 at 5:39 AM
Reply-To: rmargulieux@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Richard Margulieux using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Richard Margulieux
453 Holland Ave Los Angeles, CA 90042-3255
rmargulieux@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:52 PM
To: rmargulieux@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

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Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Brian Trautman <dynamique@everyactioncustom.com> Tue, Jan 26, 2021 at 6:09 AM
Reply-To: dynamique@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Brian Trautman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Brian Trautman
6355 De Soto Ave Apt B130 Woodland Hills, CA 91367-2634
dynamique@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:52 PM
To: dynamique@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Thomas Atlee <tommyatlee@everyactioncustom.com> Tue, Jan 26, 2021 at 7:34 AM
Reply-To: tommyatlee@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Tommy Atlee using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Thomas Atlee
147 N Norton Ave Los Angeles, CA 90004-3912
tommyatlee@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:52 PM
To: tommyatlee@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Connor Finney <connfinney@everyactioncustom.com> Tue, Jan 26, 2021 at 7:57 AM
Reply-To: connfinney@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Connor Finney using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Connor Finney
3838 Dunn Dr Culver City, CA 90232-2729
connfinney@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:52 PM
To: connfinney@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

William Wright <will@everyactioncustom.com> Tue, Jan 26, 2021 at 10:02 AM
Reply-To: will@aialosangeles.org
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by William Wright using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
William Wright
734 E Kensington Rd Los Angeles, CA 90026-4427
will@aialosangeles.org

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:52 PM
To: Will Wright <will@aialosangeles.org>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Matt Stauffer <stauffermt@everyactioncustom.com> Tue, Jan 26, 2021 at 10:15 AM
Reply-To: stauffermt@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Matt Stauffer using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Matt Stauffer
908 S Hobart Blvd Apt 504 Los Angeles, CA 90006-1265
stauffermt@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:52 PM
To: stauffermt@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Nancy Barba <chickitta@everyactioncustom.com> Tue, Jan 26, 2021 at 10:32 AM
Reply-To: chickitta@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Nancy Barba using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nancy Barba
9069 Carson St Culver City, CA 90232-2502
chickitta@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:53 PM
To: chickitta@gmail.com

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Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Lowell Gordon <lowellkg@everyactioncustom.com> Tue, Jan 26, 2021 at 3:19 PM
Reply-To: lowellkg@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Lowell Gordon using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Lowell Gordon
711 S Olive St Apt 304 Los Angeles, CA 90014-2624
lowellkg@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:53 PM
To: lowellkg@gmail.com

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Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Toby Muresianu <toby955@everyactioncustom.com> Tue, Jan 26, 2021 at 5:30 PM
Reply-To: toby955@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I'm disappointed to see that the housing element update in LA does not include more housing on the Westside, where I am a homeowner, and instead pushes the burden to lower income communities.

We say we want to help the environment. When multiple studies from Berkeley find that building more infill housing near jobs is the best way to reduce emissions, we should listen.

We say we want to fight systemic racism. We know that much of West LA was segregated, in part with single-family-home-only zoning laws still on the books and working as intended (my area, Brentwood, is 84% white in a 30% white city), but keep defending them.

We say are a city that welcomes immigrants. But we won't build housing for them.

We say people not having homes is a crisis. Then we try to lowball our housing targets for the next decade.

We say we listen to science, then reject our own universities' studies in favor of conspiracy theories about millions of secret vacant units somewhere to justify inaction.

And all for what?

What's wrong with housing?

I don't think there's anything wrong with multifamily housing. I don't think there's anything wrong with people who live in it.

But none of this resistance makes sense unless one does.

Are we really doing all this to help wealthy homeowners guarantee their investments will continue to skyrocket during a shortage?

To avoid them having to look at small apartments? And then calling ourselves progressives?

It's time to stop.

Planning’s proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City’s residentially-zoned land that bans it.

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Personally sent by Toby Muresianu using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Toby Muresianu
621 S Barrington Ave Los Angeles, CA 90049-4438
toby955@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:53 PM
To: toby955@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

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Connect Create Collaborate

Housing Element <housingelement@lacity.org>

THE FUTURE OF WEST LA

2 messages

Stephen Randall <randall.stephen@gmail.com> Tue, Jan 26, 2021 at 6:56 PM
To: housingelement@lacity.org

TO WHOM IT MAY CONCERN:

I would like to share my thoughts as you requested regarding a misguided movement to betray the agreement the Westside had with the city (the TOC program) and replace it with a developer-backed, Abundant Housing LA-driven, unrealistic, unnecessary and potentially dangerous plan that would ruin some of LA's most charming, historic neighborhoods, fail to factor in what other cities that have weathered pandemics put in place for protection and create unbearable stress on the local infrastructure – for no gain whatsoever.

My thoughts come in two sections. The first section regards density on the Westside in general and the second is specifically about Century Glen.

As you know, Century City has been, is currently and will continue to add high rises (mostly condos) to Century City proper, adding significant densification. Thanks to Zev Yarovslovky and others, Century City exists cohesively with the surrounding area, even as it grows. It has remained contained. That's been good for all involved. However, there are warning signs of danger.

1. No one saw the pandemic coming. No one knew the huge impact it would have and most importantly, no one knows what the fallout of this pandemic will be in the years to come. We see gigantic changes already as people in large numbers work remotely. Few people believe that we will ever return to everyone working a 9-to-5 office routine. People are moving to less dense areas—real estate in Palm Springs has skyrocketed due to LA refugees. That's good. It will cut down on traffic (good not only for traffic but more importantly for the environment). But what will become of the empty office space? What is the future for the Century City Mall and local retail in general? Are we considering densifying a future ghost town? Are we inadvertently creating a new Detroit? Don't we need to have a clearer view of the future?
2. I'd like to share what I learned in the two months I worked on a SARS research project nearly two decades ago. Right now, we know nothing. Science moves slowly. You've watched how we have learned something important every week about Covid. That will continue. Rest assured density IS a factor. Right now, over-eager urban planners will tell you that overcrowding is the culprit, density is not. You won't hear such optimistic proclamations from epidemiologists, who really understand how disease is transmitted. First, density is simply a milder form of overcrowding. The disease will be more intense in an overcrowded area. But it will also (and even logic tells you this) be virulent in a normally dense area, with many people on the sidewalk, offices and residential hallways, elevators, parking structures, etc. Then there's the danger of public transit—a germaphobe's nightmare. New York's early bad luck in an indicator of the downside of density. In Hong Kong, on the study I was involved in, epidemiologists recognized this. Unable to turn back the clock and make Hong Kong less dense, they opted for a huge draconian public health effort that cost millions. When a virus strikes, there is a mega-bureaucracy to deal with it. And they deal with it in a heavy-handed way. If Angelenos balk at wearing masks, what will they think if they are forcibly required to REALLY quarantine? Will they like soldiers in the street? (Do you want to recreate what's happening in Copenhagen right now?) If you increase density, you have to add a health bureaucracy – otherwise you are sentencing people to death.
3. Always listen to epidemiologists before you listen to urban planners. Epidemiology is a science. Urban planning is not.
4. What have we learned over the past year or two? We don't have enough water for the people already here when there's a drought. We don't have enough electricity when there's a heatwave. We have too few police and firefighters. Classrooms at Westwood Charter and University High School are overcrowded. Our streets are narrow. Public transit (even post-Purple line) is inadequate. This area would suffer greatly from too much density. Right now, our infrastructure lags behind current growth. New growth would be a nightmare.
5. I'm a third-generation Angeleno. My life is not unlike my father's life when he was young. You drove a car where you wanted to go or rode a bus. Technology has changed everything. Changes are happening at warp speed. We don't know what the future of transportation will be. We do know that fewer and fewer people use public transit every year. That will most likely continue in a world of Uber, Lyft, self-driving cars, working from home, etc. We've

watched malls die, restaurants declare bankruptcy and retail disappear while Amazon surges. Never before have we faced such an uncertain future, yet we're thinking of destroying perfectly good neighborhoods as if our current lives are set in stone. They're not.

6. At its core, this move to add more multi-unit is anti-family. Parents want a good healthy lifestyle for their kids. Of course, many choose condos and apartments, but many do not. They should not be punished for seeking a long-accepted lifestyle that represents the American dream. There is no crime in having a backyard. In fact, judging the number of butterflies and birds in mine, it's an ecological oasis.
7. We have much underutilized commercial property in the area, especially along Santa Monica and Pico boulevards. Some mixed-use housing has been developed and remains largely vacant. Why so many vacancies? Price. Building in a desirable location created more unaffordable housing which does nothing to solve the biggest problem we face: lack of affordable housing. Don't ruin existing family neighborhoods when you can target our underutilized commercial areas and turn them into affordable housing, not luxury housing. This requires intensive government involvement, not upzoning and allowing rapacious developers to have their way.

At the risk of going on too long, I would like to add some thoughts about Century Glen specifically and the attempt to expand it to suit turning Century City into an urban destination, thus altering zoning to all or parts of Century Glen. All my previous observations apply to Century Glen as well.

1. Century Glen is already a multifamily area – hundreds of duplexes, apartments and condos mixed with single-family residences. It works, but that's because it was smartly planned and has been extremely careful about smart growth, not uncontrolled growth. Destroying a charming traditional family neighborhood that already meets the qualifications for our new era is criminal, especially when the need has not been established and, given changing times, might not even exist.
2. Theirs is a bullying aspect to upzoning Century Glen. Century City can't utilize land to the north – that belongs to the Los Angeles Country Club. It can't go south because of the Hillcrest Country Club and Rancho Park Golf Course. It can't go east because Beverly Hills actually cares about its residents and will fight tooth and nail to protect them. Of course, there's the soon to be abandoned Fox lot, but that never seems to be mentioned (why is that?). It's much easier for LA City Planners to attack the weakest area – a modest family neighborhood that can't put up the resistance LA faces in the other directions. This is the sneakiest, most unfair form of upzoning. If a corporation did it, we would excoriate them. But municipal governments can get away with murder cloaked with supposedly good intentions.
3. Previous attempts to turn Century City into a nightlife center have already failed. Where is the Shubert? The Plitt theaters? The Playboy Club? Various failed nightclubs on the corner of Constellation and Avenue of the Stars. The Annenberg Photography Museum? Nightlife has never worked in Century City. The mall has one or two restaurants that draw a rowdy crowd and that has already resulted in much violent crime including one murder.
4. For many of us, Century Glen has been our home for decades (37 years in my case). Newcomers push strollers up and down the sidewalk and take advantage of the charms of the neighborhood. Improvements are constant, with remodeled and new homes. How grotesquely unfair to take the neighborhood they chose above all others, invested in, improved, and change the ground rules, turning that neighborhood into something drastically different. It's a bait and switch technique that only a bully would attempt.

Thank you very much for reading this lengthy letter. I hope you do the right thing.

Stephen Randall

1912 Comstock Ave.

Los Angeles, CA 90025

Home: 310-556-2741/Mobile: 310-387-6341

randall.stephen@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:55 PM
To: Stephen Randall <randall.stephen@gmail.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

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Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jonathan Edewards <jedewards@everyactioncustom.com> Tue, Jan 26, 2021 at 8:08 PM
Reply-To: jedewards@gmail.com
To: vince.bertoni@lacity.org

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Sincerely,
Jonathan Edewards
161 S Madison Ave Apt 12 Pasadena, CA 91101-2544
jedewards@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:56 PM
To: jedewards@gmail.com

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Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Julia Griffin <julia.rawivory@everyactioncustom.com> Tue, Jan 26, 2021 at 9:59 PM
Reply-To: julia.rawivory@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Julia Griffin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Julia Griffin
736 N Harvard Blvd Los Angeles, CA 90029-3314
julia.rawivory@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:56 PM
To: julia.rawivory@gmail.com

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Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Sandra Mukasa <sandramukasa@everyactioncustom.com> Tue, Jan 26, 2021 at 10:32 PM
Reply-To: sandramukasa@gmail.com
To: vince.bertoni@lacity.org

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Sincerely,
Sandra Mukasa
742 S Harvard Blvd Los Angeles, CA 90005-2557
sandramukasa@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:56 PM
To: sandramukasa@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

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Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Katherine Aker <kathiaker@everyactioncustom.com> Mon, Jan 25, 2021 at 1:06 PM
Reply-To: kathiaker@icloud.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

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I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Katherine Aker using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Katherine Aker
10402 Mcclemont Ave Tujunga, CA 91042-1816
kathiaker@icloud.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:43 PM
To: kathiaker@icloud.com

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Regards,
The Housing Element Team

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Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Josh Albrektson <joshraymd@everyactioncustom.com> Mon, Jan 25, 2021 at 1:13 PM
Reply-To: joshraymd@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Josh Albrektson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Josh Albrektson
1123 Windsor Pl South Pasadena, CA 91030-3231
joshraymd@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:44 PM
To: joshraymd@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Avinoam Baral <abaral@everyactioncustom.com> Mon, Jan 25, 2021 at 5:22 PM
Reply-To: abaral@ucla.edu
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Avinoam Baral using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Avinoam Baral
425 S Burlingame Ave Los Angeles, CA 90049-4808
abaral@ucla.edu

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:51 PM
To: abaral@ucla.edu

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

David Barboza <dejaybe@everyactioncustom.com> Mon, Jan 25, 2021 at 9:56 PM
Reply-To: dejaybe@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by David Barboza using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
David Barboza
7239 Comstock Ave Unit C Whittier, CA 90602-1353
dejaybe@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:52 PM
To: dejaybe@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Carey Bennett <careyjeanbennett@everyactioncustom.com> Mon, Jan 25, 2021 at 1:20 PM
Reply-To: careyjeanbennett@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Carey Bennett using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Carey Bennett
2929 St George St Los Angeles, CA 90027-3025
careyjeanbennett@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:44 PM
To: careyjeanbennett@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Lauren Borchard <laurenborchard@everyactioncustom.com> Mon, Jan 25, 2021 at 1:22 PM
Reply-To: laurenborchard@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Lauren Borchard using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Lauren Borchard
535 1/2 N Orange Dr Los Angeles, CA 90036-2066
laurenborchard@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:45 PM
To: laurenborchard@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Nicholas Burns III <nkburns3@everyactioncustom.com> Mon, Jan 25, 2021 at 1:27 PM
Reply-To: nkburns3@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Nicholas Burns III using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nicholas Burns III
1740 S Westgate Ave Unit H Los Angeles, CA 90025-3792
nkburns3@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:45 PM
To: Nick Burns <nkburns3@gmail.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Jan 25, 2021 at 11:25 AM
To: Housing Element <housingelement@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Jan 25, 2021 at 11:10 AM
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: vince.bertoni@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Leonora Camner** <leonorasc@everyactioncustom.com>
Date: Mon, Jan 25, 2021 at 11:03 AM
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Leonora Camner using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Leonora Camner
1013 16th St Santa Monica, CA 90403-4331
leonorasc@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:36 PM
To: leonorasc@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Logan Cimino <lcimino300@everyactioncustom.com> Mon, Jan 25, 2021 at 6:53 PM
Reply-To: lcimino300@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Logan Cimino, using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Logan Cimino
6530 Seville Rd Unit 310 Goleta, CA 93117-7125
lcimino300@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:51 PM
To: lcimino300@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Shane Coburn <allundone@everyactioncustom.com> Mon, Jan 25, 2021 at 2:13 PM
Reply-To: allundone@hotmail.com
To: vince.bertoni@lacity.org

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Personally sent by Shane Coburn using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Shane Coburn
4013 1/2 Boise Ave Los Angeles, CA 90066-4801
allundone@hotmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:47 PM
To: allundone@hotmail.com

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Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Emerson Dameron <edameron@everyactioncustom.com> Mon, Jan 25, 2021 at 1:09 PM
Reply-To: edameron@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Emerson Dameron using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Emerson Dameron
5837 W Sunset Blvd Apt 216 Los Angeles, CA 90028-7341
edameron@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:43 PM
To: edameron@gmail.com

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The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Brian Davis <davis.brianj@everyactioncustom.com> Mon, Jan 25, 2021 at 3:01 PM
Reply-To: davis.brianj@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Brian Davis using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Brian Davis
1310 N Avenue 56 Los Angeles, CA 90042-1832
davis.brianj@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:48 PM
To: davis.brianj@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Jan Delos Santos <zanyj@everyactioncustom.com> Mon, Jan 25, 2021 at 3:13 PM
Reply-To: zanyj@yahoo.com
To: vince.bertoni@lacity.org

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Personally sent by Jan Delos Santos using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jan Delos Santos
1515 S Orange Grove Ave Los Angeles, CA 90019-4923
zanyj@yahoo.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:49 PM
To: zanyj@yahoo.com

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Anthony Dedousis <anthonypdedousis@everyactioncustom.com> Mon, Jan 25, 2021 at 1:17 PM
Reply-To: anthonypdedousis@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Anthony Dedousis using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Anthony Dedousis
1942 Rodney Dr Apt 17 Los Angeles, CA 90027-3136
anthonypdedousis@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:44 PM
To: anthonypdedousis@gmail.com

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[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

GREGORY DINA <gregdina@everyactioncustom.com> Mon, Jan 25, 2021 at 2:47 PM
Reply-To: gregdina@gmail.com
To: vince.bertoni@lacity.org

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6427 W 86th Pl Los Angeles, CA 90045-3702
gregdina@gmail.com

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Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Chris Dower <cliffjumpers57@everyactioncustom.com> Mon, Jan 25, 2021 at 7:30 PM
Reply-To: cliffjumpers57@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Chris Dower using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Chris Dower
333 S Doheny Dr Apt 403 Los Angeles, CA 90048-3773
cliffjumpers57@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:51 PM
To: cliffjumpers57@gmail.com

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Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Seth Ellsworth <seth@everyactioncustom.com> Mon, Jan 25, 2021 at 1:09 PM
Reply-To: seth@lhooqdesign.com
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Personally sent by Seth Ellsworth using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Seth Ellsworth
5078 Pickford St Los Angeles, CA 90019-5373
seth@lhooqdesign.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:43 PM
To: seth@lhooqdesign.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Chase Engelhardt <cengelh1@everyactioncustom.com> Mon, Jan 25, 2021 at 3:39 PM
Reply-To: cengelh1@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Chase Engelhardt using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Chase Engelhardt
1635 Stoner Ave Los Angeles, CA 90025-1863
cengelh1@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:49 PM
To: cengelh1@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Brad Foley <brfoley76@everyactioncustom.com> Mon, Jan 25, 2021 at 3:37 PM
Reply-To: brfoley76@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Brad Foley using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Brad Foley
2702 S Normandie Ave Los Angeles, CA 90007-2114
brfoley76@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:49 PM
To: brfoley76@gmail.com

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Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Alexandra Franklin <alexandrafranklin94@everyactioncustom.com> Mon, Jan 25, 2021 at 2:38 PM
Reply-To: alexandrafranklin94@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Alexandra Franklin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Alexandra Franklin
10270 Almayo Ave Apt 204 Los Angeles, CA 90064-3256
alexandrafranklin94@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:48 PM
To: alexandrafranklin94@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Verity Freebern <verityfreebern@everyactioncustom.com> Mon, Jan 25, 2021 at 2:05 PM
Reply-To: verityfreebern@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Verity Freebern using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Verity Freebern
4258 Verdugo Rd Los Angeles, CA 90065-4714
verityfreebern@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:47 PM
To: verityfreebern@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

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Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Andy Freeland <andy@everyactioncustom.com> Mon, Jan 25, 2021 at 6:23 PM
Reply-To: andy@andyfreeland.net
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Andy Freeland using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andy Freeland
645 W 9th St Apt 516 Los Angeles, CA 90015-1651
andy@andyfreeland.net

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:51 PM
To: andy@andyfreeland.net

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Brent Gaisford <brentgaisford@everyactioncustom.com> Mon, Jan 25, 2021 at 3:55 PM
Reply-To: brentgaisford@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Brent Gaisford using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Brent Gaisford
4447 Lockwood Ave Los Angeles, CA 90029-2706
brentgaisford@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:50 PM
To: brentgaisford@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Sister Bernie Galvin <berniegal33@everyactioncustom.com> Mon, Jan 25, 2021 at 3:51 PM
Reply-To: berniegal33@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Sister Bernie Galvin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Sister Bernie Galvin
2404 Mayer Dr Saint Charles, MO 63301-1313
berniegal33@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:49 PM
To: berniegal33@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Rebecca Gimple <beckygimple@everyactioncustom.com> Mon, Jan 25, 2021 at 1:12 PM
Reply-To: beckygimple@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Rebecca Gimple using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Rebecca Gimple
333 E Fairview Ave Apt 218 Glendale, CA 91207-2241
beckygimple@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:44 PM
To: beckygimple@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Drew Glicker <drewglicker@everyactioncustom.com> Mon, Jan 25, 2021 at 1:53 PM
Reply-To: drewglicker@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

Planning's "status quo" proposal fails to affirmatively further fair housing, which is required under state law. By planning for most housing growth on parcels where multifamily development is already allowed, the City is steering housing opportunities away from the 75% of the City's residentially-zoned land that is restricted to single-family housing only. This perpetuates historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households towards lower-income neighborhoods.

Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

Planning's anticipated site inventory, where they expect the development of 307,000 more homes to occur, likely contains a large number of parcels zoned for multifamily residential development. This suggests that a large number of existing rent-stabilized housing units would be redeveloped under Planning's "status quo" approach, increasing lower-income renter households' risk of displacement.

Planning anticipates accommodating 93,000 homes primarily through a series of community plan updates that are already in progress. However, many draft community plan updates highlighted in the Initial Study, including updates for the Westside, Hollywood, Southwest Valley, Southeast Valley, and Purple Line Transit Neighborhood Plan, are unambitious and do little to create significant amounts of new housing capacity. This approach also allows high-resource neighborhoods whose community plan update processes have not yet started, like Brentwood-Pacific Palisades and Westwood, to avoid zoning reforms that are necessary to accommodate the City's RHNA goal. This is unfair.

I strongly oppose Planning's "status quo" approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. I urge you to instruct the Department of City Planning to take this important step for Los Angeles' future.

Personally sent by Drew Glicker using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Drew Glicker
7523 Hollywood Blvd Los Angeles, CA 90046-2856
drewglicker@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:46 PM
To: drewglicker@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

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Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Alexandra Grossi <a3grossi@everyactioncustom.com> Mon, Jan 25, 2021 at 1:20 PM
Reply-To: a3grossi@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Alexandra Grossi using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Alexandra Grossi
2135 Fair Park Ave Los Angeles, CA 90041-1956
a3grossi@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:44 PM
To: a3grossi@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Steven Guerry <steven.guerry@everyactioncustom.com> Mon, Jan 25, 2021 at 1:20 PM
Reply-To: steven.guerry@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Steven Guerry using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Steven Guerry
5346 S Cornell Ave Apt 906 Chicago, IL 60615-5479
steven.guerry@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:44 PM
To: steven.guerry@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Jan 25, 2021 at 10:56 AM
To: Housing Element <housingelement@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Jan 25, 2021 at 10:55 AM
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: vince.bertoni@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **ryan guggenheim** <rguggenh@everyactioncustom.com>
Date: Mon, Jan 25, 2021 at 10:54 AM
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: <vince.bertoni@lacity.org>

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Personally sent by ryan guggenheim using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
ryan guggenheim
2621 1/2 Magnolia Ave Los Angeles, CA 90007-2792
rguggenh@usc.edu

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:35 PM
To: rguggenh@usc.edu

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Andrew Heinzman <saheinzman@everyactioncustom.com> Mon, Jan 25, 2021 at 2:06 PM
Reply-To: saheinzman@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Andrew Heinzman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andrew Heinzman
1866 Greenfield Ave Los Angeles, CA 90025-4400
saheinzman@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:47 PM
To: saheinzman@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Thomas Irwin <thomasirwin13@everyactioncustom.com> Mon, Jan 25, 2021 at 3:01 PM
Reply-To: thomasirwin13@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Thomas Irwin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Thomas Irwin
962 S Woods Ave East Los Angeles, CA 90022-3931
thomasirwin13@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:48 PM
To: thomasirwin13@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Dietrick Jager <dietrick.jager@everyactioncustom.com> Mon, Jan 25, 2021 at 5:05 PM
Reply-To: dietrick.jager@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Dietrick Jager using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Dietrick Jager
1050 Gaviota Ave Apt 5 Long Beach, CA 90813-3847
dietrick.jager@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:51 PM
To: dietrick.jager@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Stanley Johnson <STJOHNSO@everyactioncustom.com> Mon, Jan 25, 2021 at 1:38 PM
Reply-To: STJOHNSO@aerotek.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Stanley Johnson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Stanley Johnson
1120 S Grand Ave Apt 1806 Los Angeles, CA 90015-4398
STJOHNSO@AEROTEK.COM

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:46 PM
To: STJOHNSO@aerotek.com

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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

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2 messages

Justin Jones <justinj1@everyactioncustom.com> Mon, Jan 25, 2021 at 2:03 PM
Reply-To: justinj1@hotmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

If you want more housing do a vacancy/underuse tax. Look at all the underused commercial lots that could have housing stacked on top of retail. No need to fight suburban NIMBYs
Also:
Build more rail
Dynamic congestion pricing (toll lanes) on roads
Permit parking in all residential neighborhoods. Raises much needed revenue and discourages junk cars

Sincerely,
Justin Jones
3711 Baldwin St Los Angeles, CA 90031-2965
justinj1@hotmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:47 PM
To: justinj1@hotmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Jan 25, 2021 at 1:03 PM
To: Housing Element <housingelement@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Tami Kagan-Abrams** <tami@everyactioncustom.com>
Date: Mon, Jan 25, 2021 at 1:02 PM
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Tami Kagan-Abrams using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tami Kagan-Abrams
2430 Hercules Dr Los Angeles, CA 90046-1634
tami@abramsgroup.org

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:41 PM
To: tami@abramsgroup.org

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Jan 25, 2021 at 12:54 PM
To: Housing Element <housingelement@lacity.org>

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I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Sahar Khundmiri** <sahark@everyactioncustom.com>
Date: Mon, Jan 25, 2021 at 12:53 PM
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: <vince.bertoni@lacity.org>

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Personally sent by Sahar Khundmiri using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Sahar Khundmiri
600 Flower Ave Venice, CA 90291-2700
sahark@safeplaceforyouth.org

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:40 PM
To: sahark@safeplaceforyouth.org

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Luke Klipp <lukehklipp@everyactioncustom.com> Mon, Jan 25, 2021 at 3:15 PM
Reply-To: lukehklipp@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Luke Klipp using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Luke Klipp
1320 N Hoover St Los Angeles, CA 90027-6008
lukehklipp@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:49 PM
To: lukehklipp@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Jan 25, 2021 at 11:45 AM
To: Housing Element <housingelement@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Jan 25, 2021 at 11:37 AM
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: vince.bertoni@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Arjun Kolachalam** <arjunk@everyactioncustom.com>
Date: Mon, Jan 25, 2021 at 11:34 AM
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Arjun Kolachalam using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Arjun Kolachalam
1514 N Avenue 55 Los Angeles, CA 90042-1812
arjunk@hey.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:39 PM
To: arjunk@hey.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Martha Kriley <martha.kriley@everyactioncustom.com> Mon, Jan 25, 2021 at 4:02 PM
Reply-To: martha.kriley@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Martha Kriley using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Martha Kriley
3360 E Foothill Blvd Pasadena, CA 91107-6048
martha.kriley@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:50 PM
To: martha.kriley@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Brianna Lee <brianna.c.lee@everyactioncustom.com> Mon, Jan 25, 2021 at 5:35 PM
Reply-To: brianna.c.lee@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Brianna Lee using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Brianna Lee
1422 HI Point St Unit 105 Los Angeles, CA 90035-4804
brianna.c.lee@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:51 PM
To: brianna.c.lee@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Olga Lexell <olga.lexell@everyactioncustom.com> Mon, Jan 25, 2021 at 5:34 PM
Reply-To: olga.lexell@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Olga Lexell using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Olga Lexell
1115 S Elm Dr Los Angeles, CA 90035-1143
olga.lexell@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:51 PM
To: Olga Lexell <olga.lexell@gmail.com>

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Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Jan 25, 2021 at 12:45 PM
To: Housing Element <housingelement@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Jasmine Little** <jasmine.t.little@everyactioncustom.com>
Date: Mon, Jan 25, 2021 at 12:44 PM
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: <vince.bertoni@lacity.org>

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Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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Personally sent by Jasmine Little using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Jasmine Little
508 S Serrano Ave Apt 105 Los Angeles, CA 90020-3908
jasmine.t.little@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:40 PM
To: jasmine.t.little@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Nina Long <ninalong616@everyactioncustom.com> Mon, Jan 25, 2021 at 3:07 PM
Reply-To: ninalong616@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

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Personally sent by Nina Long using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nina Long
433 Kelton Ave Los Angeles, CA 90024-2007
ninalong616@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:48 PM
To: ninalong616@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Jan 25, 2021 at 11:45 AM
To: Housing Element <housingelement@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Priya Manda** <priyamanda28@everyactioncustom.com>
Date: Mon, Jan 25, 2021 at 11:44 AM
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Priya Manda using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Priya Manda
929 W Jefferson Blvd Los Angeles, CA 90089-1621
priyamanda28@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:38 PM
To: priyamanda28@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Aida Marina <amice@everyactioncustom.com> Mon, Jan 25, 2021 at 1:56 PM
Reply-To: amice@aol.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Aida Marina using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Aida Marina
710 Arroyo Dr South Pasadena, CA 91030-2370
amice@aol.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:46 PM
To: amice@aol.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Robert Masys <rmadlo119@everyactioncustom.com> Mon, Jan 25, 2021 at 6:02 PM
Reply-To: rmadlo119@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

Los Angeles must direct more growth through infill in high-opportunity neighborhoods--equity and justice require this!

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Robert Masys using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization. Thank you for listening to this feedback.

Sincerely,
Robert Masys

1045 Manzanita St Los Angeles, CA 90029-3011
rmadlo119@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:51 PM
To: rmadlo119@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Jan 25, 2021 at 1:04 PM
To: Housing Element <housingelement@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Chris McCain** <chmccain@everyactioncustom.com>
Date: Mon, Jan 25, 2021 at 1:02 PM
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: <vince.bertoni@lacity.org>

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Personally sent by Chris McCain using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Chris McCain
6201 Springvale Dr Los Angeles, CA 90042-2019
chmccain@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:42 PM
To: chmccain@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Sean McCormick <sean643@everyactioncustom.com> Mon, Jan 25, 2021 at 1:10 PM
Reply-To: sean643@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Sean McCormick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Sean McCormick
3535 Dunn Dr Apt 105 Los Angeles, CA 90034-4975
sean643@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:43 PM
To: sean643@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Eduardo Mendoza <Mend926@everyactioncustom.com> Mon, Jan 25, 2021 at 3:03 PM
Reply-To: Mend926@usc.edu
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Eduardo Mendoza using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Eduardo Mendoza
3431 Montclair St Los Angeles, CA 90018-2438
Mend926@usc.edu

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:48 PM
To: Mend926@usc.edu

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Greg Morrow <gdmorrow@everyactioncustom.com> Mon, Jan 25, 2021 at 1:24 PM
Reply-To: gdmorrow@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

I encourage you to take a leadership role in fixing LA's chronic inability to meet its housing needs. In my UCLA PhD dissertation (The Homeowner Revolution: Democracy, Land Use and the Los Angeles Slow-Growth Movement, 1965-1992), I explored the origins of LA's housing crisis. One of the main culprits is that the city has down-zoned too much land beginning in the 1970s and has placed the burden of growth on lower-income communities of color to accommodate virtually all of LA's future growth through restrictive land use policies in the highest opportunity areas of the city. This is not only unfair but also assures LA's high housing costs will push more and more people out, hindering its ability to attract talent and undermining its potential.

Each community across the City should do its fair share to accommodate new housing. Each community in LA should be responsible for a fair share of the city's RHNA housing target. The new community plan updates are not demanding this -- indeed, it is reifying the existing pattern of exclusion through a largely "status quo" planning process. I was horrified when I attended a community plan meeting some time ago in Woodland Hills where planners explicitly affirmed a goal of maintaining the status quo. Communities like ours in Woodland Hills can accommodate more housing -- along major streets and near Major Transit Stops -- without any impact to our many single-family communities. But this approach must also be taken in other high opportunity areas across LA. I am an LA homeowner, but it is homeowner politics, not sound planning, that is guiding these poor decisions.

I strongly oppose City Planning’s “status quo” approach to the housing element update, which would do little to meaningfully address unaffordable housing costs, lengthy commutes, poor air quality, displacement of lower-income renters, and segregated neighborhoods. Fortunately, with eight months remaining until housing element updates are due, there is still time to change course and create an equitable, transformative housing element. LA urgently needs your leadership - I urge you to require each community plan to take a fair share of LA's RHNA target.

Sincerely,
Greg Morrow
19737 Hamlin St Woodland Hills, CA 91367-2813
gdmorrow@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:45 PM
To: gdmorrow@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Babak Mozaffari <bm@everyactioncustom.com> Mon, Jan 25, 2021 at 2:15 PM
Reply-To: bm@contactbm.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

It is disappointing that Planning does not intend to pursue the equitable distribution approach in the housing element update. Planning recently released an Initial Study for the housing element update which contains numerous inadequacies that merit serious concern. Planning's analysis suggests that the City can achieve over 80% of its RHNA target with no significant zoning or policy changes, and that the remaining 20% can be accommodated via already-in-progress community plan updates and changes to the City's Density Bonus program.

The facts do not support these conclusions, and that Planning's "status quo" proposal is flawed for the following reasons:

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Planning anticipates that under current zoning, Los Angeles can expect to build 307,000 more homes between 2022 and 2029. However, Los Angeles only permitted about 114,000 homes during the eight-year period ending in 2019, leading to a net increase of 99,000 homes during that time. Planning offers no convincing rationale for why they expect housing production to nearly triple without significant policy or zoning changes.

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Personally sent by Babak Mozaffari using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Babak Mozaffari
525 Santa Monica Blvd Apt 404 Santa Monica, CA 90401-3613
bm@contactbm.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:47 PM
To: bm@contactbm.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Lorenzo Mutia <lrmutia@everyactioncustom.com> Mon, Jan 25, 2021 at 2:16 PM
Reply-To: lrmutia@yahoo.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Lorenzo Mutia using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Lorenzo Mutia
8400 Snowden Ave Panorama City, CA 91402-4058
lrmutia@yahoo.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:47 PM
To: lrmutia@yahoo.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

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Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Paras Nanavati <paras@everyactioncustom.com> Mon, Jan 25, 2021 at 1:11 PM
Reply-To: paras@pncstudios.com
To: vince.bertoni@lacity.org

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Personally sent by Paras Nanavati using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Paras Nanavati
2285 Cove Ave Los Angeles, CA 90039-3664
paras@pncstudios.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:43 PM
To: paras@pncstudios.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Nicholas Paganini <npaganin@everyactioncustom.com> Mon, Jan 25, 2021 at 2:34 PM
Reply-To: npaganin@uci.edu
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Nicholas Paganini using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Nicholas Paganini
606 Naomi St Redlands, CA 92374-4157
npaganin@uci.edu

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:48 PM
To: npaganin@uci.edu

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Michael Pepe <michaelpepe2@everyactioncustom.com> Mon, Jan 25, 2021 at 1:41 PM
Reply-To: michaelpepe2@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Michael Pepe using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Michael Pepe
2375 E 3395 S Salt Lake City, UT 84109-3037
michaelpepe2@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:46 PM
To: michaelpepe2@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Prabhu Reddy <prabhu.r.reddy@everyactioncustom.com> Mon, Jan 25, 2021 at 3:42 PM
Reply-To: prabhu.r.reddy@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Prabhu Reddy using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Prabhu Reddy
3731 W 227th St Torrance, CA 90505-2524
prabhu.r.reddy@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:49 PM
To: prabhu.r.reddy@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Jan 25, 2021 at 1:03 PM
To: Housing Element <housingelement@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Melanie Rosenberg** <mrosenberg57@everyactioncustom.com>
Date: Mon, Jan 25, 2021 at 1:02 PM
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Melanie Rosenberg using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Melanie Rosenberg
2160 S Beverly Glen Blvd Apt 357 Los Angeles, CA 90025-6037
mrosenberg57@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:41 PM
To: mrosenberg57@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Gabrielle Seiwert <gabrielle.seiwert@everyactioncustom.com> Mon, Jan 25, 2021 at 1:08 PM
Reply-To: gabrielle.seiwert@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Gabrielle Seiwert using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Gabrielle Seiwert
3436 Madera Ave Apt 1 Los Angeles, CA 90039-1957
gabrielle.seiwert@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:43 PM
To: gabrielle.seiwert@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Andrew Selvo <andrewselvo@everyactioncustom.com> Mon, Jan 25, 2021 at 1:13 PM
Reply-To: andrewselvo@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Andrew Selvo using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Andrew Selvo
3021 Kelton Ave Los Angeles, CA 90034-3021
andrewselvo@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:44 PM
To: andrewselvo@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Edda Spielmann <espielmann@everyactioncustom.com> Mon, Jan 25, 2021 at 1:32 PM
Reply-To: espielmann@csun.edu
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Edda Spielmann using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Edda Spielmann
2503 28th St Apt 4 Santa Monica, CA 90405-2970
espielmann@csun.edu

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:45 PM
To: espielmann@csun.edu

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Gregory Sroka <thegregorysroka@everyactioncustom.com> Mon, Jan 25, 2021 at 1:24 PM
Reply-To: thegregorysroka@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Gregory Sroka using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Gregory Sroka
11109 Emelita St North Hollywood, CA 91601-1308
thegregorysroka@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:45 PM
To: thegregorysroka@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Jan 25, 2021 at 1:07 PM
To: Housing Element <housingelement@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Ethan Stanislawski** <ethan@everyactioncustom.com>
Date: Mon, Jan 25, 2021 at 1:05 PM
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Ethan Stanislawski using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Ethan Stanislawski
1940 N Highland Ave Apt 29 Los Angeles, CA 90068-3292
ethan@ethanstanislawski.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:42 PM
To: ethan@ethanstanislawski.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

David Thomas <dgthomas12@everyactioncustom.com> Mon, Jan 25, 2021 at 3:59 PM
Reply-To: dgthomas12@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by David Thomas using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
David Thomas
1234 Wilshire Blvd Apt 324 Los Angeles, CA 90017-1978
dgthomas12@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:50 PM
To: dgthomas12@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Zennon Ulyate-Crow <zennonuc@everyactioncustom.com> Mon, Jan 25, 2021 at 2:13 PM
Reply-To: zennonuc@gmail.com
To: vince.bertoni@lacity.org

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Personally sent by Zennon Ulyate-Crow using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Zennon Ulyate-Crow
PO Box 680 Topanga, CA 90290-0680
zennonuc@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:47 PM
To: zennonuc@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
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[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Henry van Moyland <henryvanmoyland@everyactioncustom.com> Mon, Jan 25, 2021 at 1:16 PM
Reply-To: henryvanmoyland@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Henry van Moyland using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Henry van Moyland
808 S Dunsmuir Ave Los Angeles, CA 90036-4732
henryvanmoyland@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:44 PM
To: henryvanmoyland@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

3 messages

Cally Hardy <cally.hardy@lacity.org> Mon, Jan 25, 2021 at 10:30 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Flora Melendez** <flora.melendez@lacity.org>
Date: Mon, Jan 25, 2021 at 10:26 AM
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: Matthew Glesne <matthew.glesne@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Blair Smith <blair.smith@lacity.org>
Cc: Arthi Varma <arthi.varma@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Jan 25, 2021 at 10:22 AM
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning

LOS ANGELES CITY PLANNING

200 N. Spring St., Suite 525C
Los Angeles, CA 90012



---------- Forwarded message ---------
From: **Elisa Visick** <evisick@everyactioncustom.com>
Date: Mon, Jan 25, 2021 at 10:17 AM
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Elisa Visick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Elisa Visick
429 1/2 N Avenue 57 Los Angeles, CA 90042-3405
evisick@rocketmail.com

--

Cally Hardy (she/her/hers)
City Planning Associate
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA 90012
Planning4LA.org
(213) 978-1643

Blair Smith <blair.smith@lacity.org> Mon, Jan 25, 2021 at 10:56 AM
To: Housing Element <housingelement@lacity.org>

[Quoted text hidden]

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:23 PM
To: evisick@rocketmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Geneva Vogelheim <gvogelheim@everyactioncustom.com> Mon, Jan 25, 2021 at 1:57 PM
Reply-To: gvogelheim@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Geneva Vogelheim using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Geneva Vogelheim
3770 Keystone Ave Apt 409 Los Angeles, CA 90034-6362
gvogelheim@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:46 PM
To: gvogelheim@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Tom Vosburgh <thomas.a.vosburgh@everyactioncustom.com> Mon, Jan 25, 2021 at 6:26 PM
Reply-To: thomas.a.vosburgh@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

The housing element update in Los Angeles must be equitable and balanced, promote socioeconomic integration, and take a strategic, citywide view of updating zoning and land use regulations. This requires a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods.

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Personally sent by Tom Vosburgh using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Tom Vosburgh
11833 Goshen Ave Apt 4 Los Angeles, CA 90049-6346
thomas.a.vosburgh@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:51 PM
To: thomas.a.vosburgh@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Flora Melendez <flora.melendez@lacity.org> Mon, Jan 25, 2021 at 11:42 AM
To: Housing Element <housingelement@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Jan 25, 2021 at 11:37 AM
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: Flora Melendez <flora.melendez@lacity.org>

LOS ANGELES CITY PLANNING

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: vince.bertoni@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Kevin Wilen** <Kevin.wilen@everyactioncustom.com>
Date: Mon, Jan 25, 2021 at 11:34 AM
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: <vince.bertoni@lacity.org>

Dear Director of City Planning Vince Bertoni,

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Personally sent by Kevin Wilen using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Kevin Wilen
7100 Hillside Ave Apt 308 Los Angeles, CA 90046-2349
Kevin.wilen@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:37 PM
To: Kevin.wilen@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Afshin Youssefyeh <youssefyeh@everyactioncustom.com> Mon, Jan 25, 2021 at 4:22 PM
Reply-To: youssefyeh@outlook.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Afshin Youssefyeh using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Afshin Youssefyeh
6524 Orange St Los Angeles, CA 90048-4722
youssefyeh@outlook.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:50 PM
To: youssefyeh@outlook.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Natalya Zernitskaya <nzernitskaya@everyactioncustom.com> Mon, Jan 25, 2021 at 1:46 PM
Reply-To: nzernitskaya@gmail.com
To: vince.bertoni@lacity.org

Dear Director of City Planning Vince Bertoni,

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Personally sent by Natalya Zernitskaya using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Natalya Zernitskaya
2508 Kansas Ave Santa Monica, CA 90404-5243
nzernitskaya@gmail.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:46 PM
To: nzernitskaya@gmail.com

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan

2 messages

Blair Smith <blair.smith@lacity.org> Mon, Jan 25, 2021 at 10:56 AM
To: Housing Element <housingelement@lacity.org>

---------- Forwarded message ---------
From: **Flora Melendez** <flora.melendez@lacity.org>
Date: Mon, Jan 25, 2021 at 10:40 AM
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: Cally Hardy <cally.hardy@lacity.org>, Blair Smith <blair.smith@lacity.org>
CC: Arthi Varma <arthi.varma@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>

Hello.

I'm forwarding an email received by Vince.

Thank you.

~ Angie

LOS ANGELES CITY PLANNING

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

E-NEWS

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Jan 25, 2021 at 10:38 AM
Subject: Fwd: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: Flora Melendez <flora.melendez@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Suite 525C



Los Angeles, CA 90012



---------- Forwarded message ---------
From: **Huixin Zheng** <huixinz2@everyactioncustom.com>
Date: Mon, Jan 25, 2021 at 10:37 AM
Subject: Housing Element Environmental Impact Report - Opposition to Status Quo Plan
To: <vince.bertoni@lacity.org>

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Personally sent by Huixin Zheng using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Huixin Zheng
5103 Palo Verde Rd Irvine, CA 92617-4308
huixinz2@uci.edu
--

Blair Smith
City Planner
Los Angeles City Planning
200 N. Spring St., Room 750
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1886
E-NEWS

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:34 PM
To: Huixin Zheng <huixinz2@uci.edu>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team
[Quoted text hidden]

Housing Element <housingelement@lacity.org>

comment on housing element

2 messages

Edward Rosenthal <edrosenthal@newdowntownbrokerage.com> Mon, Jan 18, 2021 at 9:27 AM
To: "housingelement@lacity.org" <housingelement@lacity.org>

Efforts must be made to allow for micro units for homeless individuals without placing moral judgements on behavior.

Some arrangements must be made to allow the center of DTLA to function on street level for the benefit of small business and residents. Even the clearing of a four-block square area would be beneficial.

Ed Rosenthal
New Downtown Brokerage
453 South Spring Street
Office 1023
Los Angeles, California 90013
edrosenthal@newdowntownbrokerage.com
cell (213)-509-9413
www.poetbroker.com

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:09 PM
To: Edward Rosenthal <edrosenthal@newdowntownbrokerage.com>

Thank you for your email. Your comments and/or attachments have been received and filed.

Regards,
The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

RHNA timeline

2 messages

Jena Houman <jenahouman@westside-stone.com> Wed, Jan 13, 2021 at 3:33 PM
To: Los Angeles City Planning <housingelement@lacity.org>

hi cally
happy new year
interested to know what is the time table to determine if any area has to be rezoned in city of la?

or is it something that anyone can make suggestions in regards to a specific property or location to RHNA which would make a good candidate for rezoning?

Regards
Jena Houman
Westside Stone & Hardwood
2130 Cotner Ave
Los Angeles CA 90025
T 310-478-3888
F 310-478-7398

Housing Element <housingelement@lacity.org> Thu, Jan 28, 2021 at 4:07 PM
To: Jena Houman <jenahouman@westside-stone.com>

Dear Jena:

Thank you for your email. The City is currently developing the Site Selection methodology that will be needed to determine the rezoning need under the Housing Element Update. Please feel free to send us any suggestions for rezoning and we can take them into consideration during the plan process. Additionally, you can find more information about the plan update on our website planning4LA.org/Plan2HouseLA. We will be doing additional outreach seeking community input on the Plan in Late February and March.

Regards,
-The Housing Element Team

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Reminder: Sign Up for Housing Element Office Hours This Week!

Dario Alvarez <dario@pacificurbanism.com> Tue, Dec 15, 2020 at 2:23 PM
To: Cally Hardy <cally.hardy@lacity.org>
Cc: Housing Element <housingelement@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Maya Abood <maya.abood@lacity.org>, Claudia Monterrosa <claudia.monterrosa@lacity.org>, Jackie Cornejo <jackie.cornejo@lacity.org>, Ari Briski <ari.briski@lacity.org>, Nancy Twum-Akwaboah <nancy.twum@lacity.org>, Wajiha Ibrahim <wajiha.ibrahim@lacity.org>, Blair Smith <blair.smith@lacity.org>, Betty Barberena <betty.barberena@lacity.org>

Hello Housing Element Team,

As a follow up to our recent Site Selection meeting and per my previous email, please find the attached brief letter which raises several items for consideration.

I am particularly interested in exploring production rates as actual dwelling units offloaded onto the housing market, especially between now or 2021, when the Housing Element is implemented, and 2025 when we can expect some of the current entitlements to become dwelling units. In other words, if the target of 456 thousand units is actually to be met by 2029 and production rates between now and 2025 continue along current trends (near 7 to 8 thousand net new units per year Citywide), there will be a tremendous scaling effort required starting 2025 in order to meet the target through 2029.

I am eager to engage with all regarding what mechanisms are at our disposal in order to accomplish the housing goals.

Please reach out to me at your convenience with any comments or questions.

Best regards,
Dario
[Quoted text hidden]

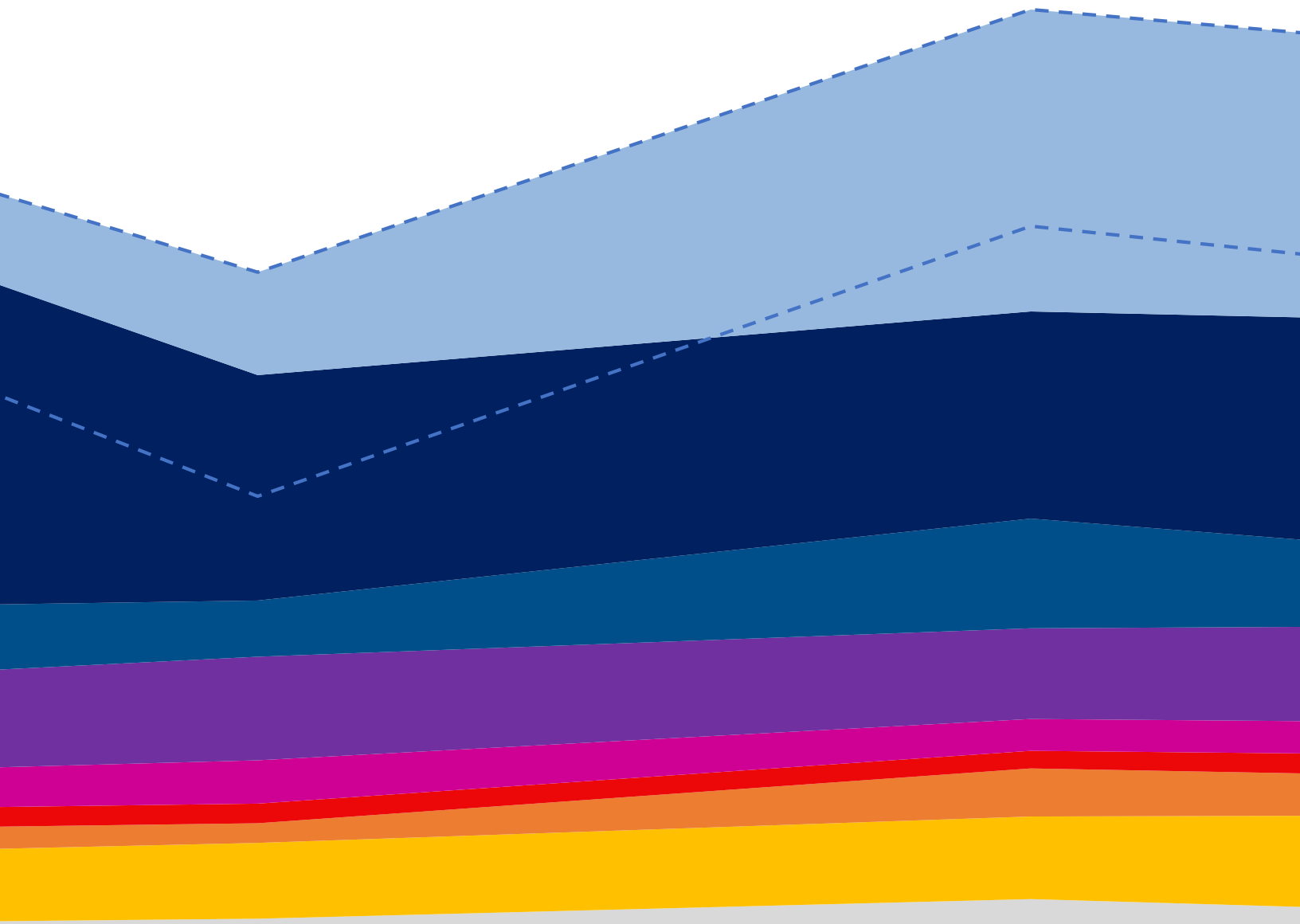
2020 12 15 Memorandum to Housing Element Taskforce - Pacific Urbanism.pdf
858K

Memorandum to

THE CITY OF LOS ANGELES HOUSING ELEMENT UPDATE TASKFORCE

Cc: Department of City Planning
Housing and Community Investment Department

Issued
December 15, 2020



ADDRESS
225 E. 16TH ST.
LOS ANGELES, CA 90015

EMAIL
OFFICE@PACIFICURBANISM.COM

FROM THE OFFICE OF PACIFIC URBANISM

December 15, 2020

Re: Empirical Data and Methods That Inform the 2021-2029 Housing Element

Dear Los Angeles City Planning and Housing and Community Investment Departments,

In response to the Housing Element Team's request for feedback from the Task Force that staff either has not yet had the opportunity to discuss, or the omission of which may substantially limit the efficacy of the Housing Element 2021-2029, Pacific Urbanism submits the following points for consideration:

1) **Re: Production rates.** Operationalizing entitlement requests and/or building permit requests over time as *rate of production*, rather than Certificates of Occupancy, which are actual units offloaded onto the housing market, substantially underestimates the necessary rate of increase from *current annual production* to *targeted annual production*. Targeted annual production required to meet 455,564 net new dwelling units by 2029[1] averages 57,000 net new units per year.
    a) Neither all entitlement nor building permit requests result in completed projects. For those requests that do come to fruition as dwelling units, and especially for entitlements, the lag period from date of application to Certificate of Occupancy, i.e. a dwelling unit offloaded onto the housing market, presents a clear need for mechanisms that will ensure the necessary annual average supply target is met during each year of the lag period. In other words, even if most building permits become dwelling units within five years, specific actions are necessary to ensure sufficient production now through the next five years in order for the 2029 target to be met.
    b) Development trend reports from the Department of City Planning indicate a current rate of planning entitlements approval near 20,000 dwelling units per year and under 6,000 units approved through TOC[2]. Whereas only a portion of these requests will ultimately be offloaded onto the market after the approvals process (1 to 2 years) and construction (1 to 2 years), that is, between 2023 to 2025, current Certificate of Occupancy rates show between 7 to 8,000 net new dwelling units offloaded onto the housing market per year. Policies and programs that will

[1] Southern California Association of Governments. "Regional Housing Needs Assessment." https://scag.ca.gov/housing-elements. Accessed 10 December 2020.
[2] Los Angeles City Planning. "Housing Progress Reports." https://planning.lacity.org/resources/housing-reports. Accessed 10 December 2020.

contribute to a 300 to 400% increase in entitlement requests are separate from those that will produce the 700 to 800% increase in Certificates of Occupancy, which is necessary effective immediately through 2025 when current entitlement request are offloaded onto the market as dwelling units.

2) ***Probability of development*** metrics are a topic of much scholarly attention and are critical for an efficacious Housing Element 2021-2029. In general, we see residential land capacities develop to 50% of their allowed maximum while commercial land develops to 10% of its allowed maximum.
    a) In broad terms, the allowable maximum dwelling unit capacity of the City may need to aim near 2.3 million dwelling units in order to reasonably expect 1.8 million dwelling units. Further, as this increase in allowable capacity alone will not necessarily result in the development of the target units by 2029, additional mechanisms to ensure the required increase in rates of production are necessary.
3) Increased capacity in terms of allowable number of dwelling units is necessary, on the other hand ***workforce capacity development*** in the homebuilding industry is also required. As allowable production has declined over the past five decades through downzoning, etc, the industry has followed suit. The surge in the supply chain will necessitate various forms of increase in production capacity. Who is allowed to participate in this industry growth is central to the overarching priority of advancing equity in various forms. A decentralization of access to participation in the production of low rise, relatively high density, naturally occurring affordable housing ought to be a central concept of the Housing Element 2021-2029.
4) **Commercial conversion** presents the opportunity to generate more affordable housing. Conversions are becoming an increasingly common practice due to COVID-19 and it would behoove the City to facilitate a higher rate of commercial conversions. Also, adaptive reuse can mitigate harmful effects on the environment and on average costs one third of new development.[3]
5) **Accessory Dwelling Units,** and removing obstacles to these, particularly in the Coastal Zone, where demand for housing is high though hindrances to this housing form exist are advisable.

Please contact me with any comments or questions

Sincerely,
Dario Rodman-Alvarez

[3] Castensen, Jennifer. "Vacant Real Estate is the Golden Ticket to the Real Estate Crisis." 12 August 2020. https://www.forbes.com/sites/jennifercastenson/2020/08/12/vacant-real-estate-is-the-golden-ticket-to-the-housing-crisis/?sh=6ff9b86d5c97. Accessed 11 December 2020.



PACIFICURBANISM.COM

Housing Element <housingelement@lacity.org>

Plan to House LA: Population projection and zoning capacity

3 messages

Jay Ross <ross_jay@hotmail.com> Thu, Nov 26, 2020 at 11:58 AM
To: Housing Element <housingelement@lacity.org>, Maya Abood <maya.abood@lacity.org>, Jackie Cornejo <jackie.cornejo@lacity.org>, Blair Smith <blair.smith@lacity.org>, Wajiha Ibrahim <wajiha.ibrahim@lacity.org>, "Matthew.Glesne@LACity.org" <Matthew.Glesne@lacity.org>

Hi Housing Element team:

Have you guys calculated the existing zoning capacity of WLA yet?
In my West LA Comm Plan area,I calculated it to be 160,000, which is far in excess of the current population of 90,000.
What population will the new Huosing Element be zoned to?

On the Housing Element webinar, you cited zoning increases to reduce housing prices. This really doesn't work significantly. The only way to reduce housing costs is to increase income (higher wages, less income inequality), or significant increase in government subsidies (which isn't realistic because your funding is limited).

For the entire city, the current zoning allows for 8,000,000, which also is far in excess of our population of 4,000,000, which is growing very slowly.
Chapters of the current General Plan allude to this. I'll dig up some info on it.

So, because of this high existing zoning capacity, I don't see how upzoning is needed. Will the Housing Element explain how the need for upzoning is determined?
One thing you can do is target growth to areas near transit and on corridors. But, then, you should balance that with downzoning in the interior neighborhoods.
R1 in our area has a HD of 1, which allows hugely tall houses.
Can you limit R1 zones to 25 ft height? And limit R2 zones to 33 ft?

Also, can you downzone some R4 to R3 or RD1.5?
With affordable density bonuses, these zones end up with 6-7 story buildings anyways that are completely out of place.

We don't "need" more zoning. Sufficient zoning capacity exists, and by mandating shorter buildings, you can spread out the population and reduce building sizes to fit into the neighborhoods better, and **still provide all the density that you need.**

I figure populations projections should be done now, since the process started more than a year ago.
Can you provide these soon?

From: ari.briski@lacity.org <ari.briski@lacity.org> on behalf of Housing Element <housingelement@lacity.org>
Sent: Thursday, November 19, 2020 10:19 AM
To: Maya Abood <maya.abood@lacity.org>; Jackie Cornejo <jackie.cornejo@lacity.org>; Blair Smith

<blair.smith@lacity.org>; Wajiha Ibrahim <wajiha.ibrahim@lacity.org>
Subject: Plan to House LA Webinar: Thank You + Recording!

Thank
you for joining The Plan to House LA - Housing Element Webinar last week!

You
will find a recording of the webinar at the end of this message. We will post a public version that includes closed captioning to our website in about one week. If you were not able to download the presentation slides during the webinar and would like a copy
or have any questions or comments, please email housingelement@lacity.org
.

The
ideas discussed during this webinar will shape the Draft of the 2021-2029 Housing Element. If you would like to review and comment on the Draft Plan (anticipated release Spring 2021) please be sure you are signed up for
Housing
Element email updates.

Sign
up for email updates here: https://planning.lacity.org/plans-policies/housing-element-update#get-involved.

Finally,
please take a moment to complete our demographic
survey. By completing the survey you will
help the Department of City Planning to evaluate and improve upon the inclusiveness of our outreach efforts.

Complete
the demographic survey here: https://docs.google.com/forms/d/e/1FAIpQLSeFzV01Y5E103E8ObDTT94ZuYndcNv8VYqG8pLkhH7BLRcnXg/viewform?usp=sf_link.

We
appreciate and value your contributions to this effort.

-The
Housing Element Team

Housing Element Concepts Webinar .mp4

Housing Element <housingelement@lacity.org> Mon, Dec 7, 2020 at 9:49 AM
To: Jay Ross <ross_jay@hotmail.com>
Cc: Maya Abood <maya.abood@lacity.org>, Jackie Cornejo <jackie.cornejo@lacity.org>, Blair Smith <blair.smith@lacity.org>, Wajiha Ibrahim <wajiha.ibrahim@lacity.org>, "Matthew.Glesne@LACity.org" <Matthew.Glesne@lacity.org>

Jay, thank you very much for your thoughts and comments.

In regards to your capacity question, the Housing Element must identify adequate sites to meet the City's RHNA allocation. We do not have the sites and their allowable capacity calculated as yet. The state law on this has changed and recent guidance from the state makes clear that a new type of (complex) methodology is required to come up with a more realistic development potential, particularly for non-vacant sites (see pg 20-21 to dig in deeper). This type of realistic capacity is very different from a maximum buildout calculation that would assume all residentially zoned sites will redevelop into the maximum allowable density housing.

I can tell you the current Housing Element shows a West LA capacity of about 10,000 units (out of about 300k citywide). But again we will be calculating differently this time. There are also new things like ADUs and TOCs that we can get some capacity "credit' for that we did not have 8 years ago.

Upzoning will be needed within 3 years if the City can not demonstrate sufficient realistic capacity. We don't know if it will be needed. We also have several Community Plan updates likely to be adopted in the 3 year period that can count towards any rezoning requirement.

During this Housing Element cycle (2021-2029) we need to show capacity for about 460,000 units (pending final approval from SCAG), up from about 82,000 during the last cycle (2013-2021). Please know that the large increase in RHNA this cycle is based largely upon the new state requirement that the process must address existing housing needs, as expressed through new factors like overcrowding and overpayment (not just future/projected need). The SCAG region scores very poorly in these existing need factors, which the high RHNA allocation is meant to address.

Thank you again for your comments, which have been noted.

-The Housing Element Team
[Quoted text hidden]

Jay Ross <ross_jay@hotmail.com> Tue, Jan 12, 2021 at 8:24 AM
To: Housing Element <housingelement@lacity.org>

To Housing Element,

Yes, please calculate West LA's zoning capacity by including density bonuses, TOC bonuses, and ADUs.
You also should include some of the C zones along corridors. Many apartments are built there these days as part of mixed-use.

By including all of the above, I calculated that WLA has unused zoning capacity for 60,000 persons, which is far more than the 10,000 cited in the current General / Community Plan, which is long outdated.

Please send me the criteria and formulas when you decide to calculate, so we can review the calculations.

Thank you,

Jay

From: ari.briski@lacity.org <ari.briski@lacity.org> on behalf of Housing Element <housingelement@lacity.org>
Sent: Monday, December 7, 2020 9:49 AM
To: Jay Ross <ross_jay@hotmail.com>
Cc: Maya Abood <maya.abood@lacity.org>; Jackie Cornejo <jackie.cornejo@lacity.org>; Blair Smith <blair.smith@lacity.org>; Wajiha Ibrahim <wajiha.ibrahim@lacity.org>; Matthew.Glesne@LACity.org <Matthew.Glesne@lacity.org>
Subject: Re: Plan to House LA: Population projection and zoning capacity

[Quoted text hidden]

Housing Element <housingelement@lacity.org>

Housing Element Policy and Program Proposals from ACT-LA

5 messages

Laura Raymond <lraymond@allianceforcommunitytransit.org> Tue, Oct 20, 2020 at 8:49 PM
To: Cally Hardy <cally.hardy@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Jackie Cornejo <jackie.cornejo@lacity.org>, Claudia Monterrosa <claudia.monterrosa@lacity.org>, Meredith Abood <maya.abood@lacity.org>, Housing Element <housingelement@lacity.org>, ari.briski@lacity.org, Blair Smith <blair.smith@lacity.org>, wajiha.ibrahim@lacity.org
Cc: Brady Collins <brady@kiwa.org>, Alexandra Suh <alexandra@kiwa.org>, Jazmine Johnson <jjohnson@psr-la.org>, Rabeya Sen <rabeya@esperanzacommunityhousing.org>, Joe Donlin <jdonlin@saje.net>, Cynthia Strathmann <cstrathmann@saje.net>, Araceli Amezquita <aamezquita@saje.net>, Greg Bonett <gbonett@publiccounsel.org>, Doug Smith <dsmith@publiccounsel.org>, Mariana Huerta Jones <mhuerta@allianceforcommunitytransit.org>, Scarlett De Leon <sdeleon@allianceforcommunitytransit.org>, Sissy Trinh <sissy@seaca-la.org>, Shashi Hanuman <shanuman@publiccounsel.org>, CommunityPartners_Nancy_Ibrahim <nancy@esperanzacommunityhousing.org>

All:

I hope you're well.

Please see attached for a letter from ACT-LA regarding our recommendations for Goals, Policies and Programs in the 2021-2029 Housing Element.

We look forward to further discussion about these strategies.

Best,

Laura

--

Laura Raymond (she/her)
Director | Alliance for Community Transit - Los Angeles
cell: (646) 344-0381
website: www.allianceforcommunitytransit.org

ACT-LA Housing Element Letter 10.20.20 (2).pdf
281K

Housing Element <housingelement@lacity.org> Tue, Oct 27, 2020 at 9:16 AM
To: Laura Raymond <lraymond@allianceforcommunitytransit.org>

Thank you Laura,

We have received your letter and are reviewing, we will be sure to reach out with questions and follow up.

-The Housing Element Team
[Quoted text hidden]

Laura Raymond <lraymond@allianceforcommunitytransit.org> Tue, Oct 27, 2020 at 12:25 PM
To: Housing Element <housingelement@lacity.org>

Thanks!

Could we schedule a meeting to follow up on this after you have reviewed?

Also, are the slides you shared in the meeting available? It seems the slides in the folder are older.

Appreciate it,

Laura

[Quoted text hidden]

Housing Element <housingelement@lacity.org> Mon, Nov 30, 2020 at 5:13 PM
To: Laura Raymond <lraymond@allianceforcommunitytransit.org>

Hi Laura,

Attached is the introductory powerpoint presented at the last task force meeting. Let us know if you have any questions.
[Quoted text hidden]

Task Force Meeting - Concepts .pdf
2840K

Laura Raymond <lraymond@allianceforcommunitytransit.org> Mon, Nov 30, 2020 at 5:31 PM
To: Housing Element <housingelement@lacity.org>

thanks!
[Quoted text hidden]

Housing Jobs & Transit for All

October 20, 2020

Re: Program and Policy Recommendations for the 2021-29 Housing Element

Dear City of Los Angeles Planning Department and Housing and Community Investment Department:

The Alliance for Community Transit (ACT-LA) is a city-wide coalition of 38 organizations working at the forefront of racial, environmental, and economic justice. Our coalition members include tenants' rights organizations, affordable housing developers, workers' centers, public interest law firms, and public health advocates, among many others. Thanks to our coalition's diversity, we view housing policy through an intersectional lens. Our mission is to uplift communities—through affordable housing opportunities, good jobs and access to high quality public transit—as the Southland transforms into a more sustainable region. Given our commitment to equity, we believe that low-income communities and communities of color must be centered in decisions that seek to transform our neighborhoods.

The Housing Element is a tremendous opportunity to ensure that as Los Angeles grows, it does so in an equitable and sustainable fashion. At the same time, the past year has demonstrated that we simply cannot afford to mask, ignore, or deepen, the negative human and environmental impacts of the affordable housing, racial injustice, and public health crises in Los Angeles. With many of ACT-LA's member organizations serving on the Housing Element Task Force, or otherwise engaged in community planning and other land use plans or policy-making, the following recommendations represent our shared vision for Housing Element Goals, Policies and Programs that will advance racial equity, smart growth, and community preservation. We will provide additional input on the suitable sites inventory in forthcoming correspondence.

Background

It is abundantly clear that Los Angeles is in the midst of an affordable housing crisis. According to the "Housing Element 2021-29" presentation developed by the Los Angeles Housing and Community Investment Department (HCIDLA) and the Los Angeles Planning Department, nearly 6 in 10 renters in Los Angeles struggle to pay rent, and more than 30% are severely rent burdened. This results in a sizable part of our city struggling to buy groceries or cover their transportation costs. Displacement pressures are already extremely high for the majority of renting Angelenos, with many families living on the edge of losing their home.

This profound housing instability is why Los Angeles now has the highest number of unsheltered people experiencing homelessness in the country. According to LAHSA's most recent Homelessness Count, homelessness in the City of Los Angeles increased 14% this past year. And, homelessness does not

impact all populations equally. Black Angelenas continue to be 4 times more likely to experience homelessness than their white counterparts. Youth homelessness increased 24% this past year. Since public benefits and wage levels have not kept up with housing costs, family homelessness is expected to increase. More than half of unsheltered adults counted this past year are on their first episode of homelessness, which indicates that even as we create new housing opportunities for the unhoused, the housing crisis is forcing yet more of our neighbors onto the street or into their cars.

These dire conditions demand bold action. HCIDLA's "Displacement Index" clearly shows that rent burdened households are concentrated in Central LA, South LA, East LA, Northeast LA, and significant portions of the San Fernando Valley. These communities must therefore be prioritized for displacement prevention policies. The policies outlined below articulate ACT-LA's shared vision for how the Housing Element can and should address the affordable housing and homelessness crises, and protect vulnerable residents.

Our Regional Housing Needs Assessment (RHNA) goal requires the city produce about 32,000 units per year at various levels of affordability, and yet LA has been averaging about only 1,100 affordable units a year. We have failed as a city to come close to meeting the affordable housing goals set out in the last Housing Element. Meanwhile, market rate units have indeed been built, some of which are still sitting empty. And between 2001 and 2019, over 26,500 units - over 3% of the total rent-controlled housing stock (which makes up roughly 75% of rental housing in Los Angeles) were taken off the rental market using the Ellis Act.

The City must prioritize programs and policies that create and preserve the housing Los Angeles needs the most: units affordable to deeply, extremely and very low-income households.Without a significant commitment to policies and programs that result in deeply affordable units at scale, address vacancy issues in new units, and stabilize communities at risk of displacement, simply building a large number of units will not stem the severe housing crisis we are in.

Summary of Recommendations

ACT-LA has outlined six overarching priorities to guide the City's work in meeting housing needs while also protecting vulnerable residents and the environment. Each priority consists of subsections, which include recommended policies and programs to further these priorities. ACT-LA's six priorities for the Housing Element are: (1) Preserve Affordable and Rent-stabilized Housing; (2) Strengthen Tenant Protections; (3) Facilitate Investment in Social Housing, Community Land Trusts, and Strategic Land Acquisitions; (4) Increase Supply of Deeply Affordable Housing; (5) Further Environmental Justice and Improve Climate Resilience and Community Health; and (6) Ensure Meaningful Community Participation and Capacity Building.

Some of the following recommendations are similar to recommendations we made during the creation and adoption of the City of LA's Assessment of Fair Housing Plan. Given the conclusions researchers have made about the transformative nature of access to high opportunity areas for low-income families, we encourage a particular emphasis on goals, objectives, programs, and policies that desegregate Los Angeles and ensure that high opportunity areas actually create opportunity for people of color and low-income families.

1. PRESERVE AFFORDABLE AND RENT STABILIZED HOUSING

Preserving affordable housing—whether subsidized or naturally-occurring—is necessary to achieve housing policy goals and to ensure an equitable and inclusive city. This requires specific Housing Element goals, policies and programs aimed at eliminating the loss of affordable and rent stabilized units due to demolition or conversion, adequately monitoring our affordable housing inventory, and carefully assessing and mitigating the risk of homelessness before it occurs.

a. Regulate demolition and condo conversions.

Demolitions and condo conversions are city-regulated processes that often precede the direct displacement of tenants, often low-income renters of color. The City should follow the lead of other jurisdictions in California and set an annual allowance for the number of demolitions and condo conversions in a given area, such as a Community Plan Area. In addition, HCIDLA and the Planning Department should work with the LA Department of Building and Safety to ensure that demolitions are properly tracked and labeled. Currently, it is difficult for the data to be tracked from Planning Application to demolition and construction as permits go through various agencies such as DCP, LADBS and HCIDLA. Furthermore, to protect against premature demolition, the City should require that demolition permits be granted only after all building permits have been issued. The Housing Element should include policies and programs to effectively regulate demolitions and condo conversions, including but not limited to the following.

- Residential Conversion Annual Allowance. Establish an annual allowance for the number of condo conversions in a given Community Plan Area.
- Residential Demolition Annual Allowance. Establish an annual allowance for the number of residential units demolished in the Community Plan Area.
- Limit Residential Conversions. Residential Conversion Projects, as defined in LAMC Section 12.95.2, shall be denied if the vacancy rate in the Community Plan Area is five percent or less or if the cumulative effect on the rental housing market is significant.
- Restrict Residential Demolition Permits. No permit for residential demolition in the Community Plan Area shall be issued unless all necessary building permits have been issued for new construction on the site.

b. Ensure "No Net Loss" of affordable housing.

Achieving a net gain of affordable housing requires that the City: (a) preserve existing affordable housing; (b) replace affordable housing lost due to new development and ensure right of return; and (c) incentivize new affordable housing production. The Housing Element should include policies and programs to effectively ensure no-net-loss of affordable housing, including but not limited to the following.

- Area-wide No Net Loss. For each Community Plan Area (CPA), create and monitor an inventory of units subject to a recorded covenant, ordinance or law that restricts rents to levels affordable to lower-income households, including Low-income, Very Low-Income, Extremely Low-Income and Deeply Low-Income; subject to the Rent Stabilization Ordinance or AB 1482; and/or occupied by lower-income households. Publish an annual report of the

affordable housing inventory, including the total number of units, affordability level, as well as the frequency and location of Ellis Act evictions, condominium conversions, and/or residential demolitions within the CPA. If an annual report demonstrates a reduction in the inventory within any affordability category, the City should: (a), create a Recovery Action Plan with specific programs and investments to prevent further loss and to increase affordable housing production in the area; and (b) require applications for discretionary land use approvals in the CPA to include a Displacement Impact Report. These provisions would apply until an annual report demonstrates that that particular loss has been recovered.

- Site-specific No Net Loss. *All* new construction should replace any housing demolished that was affordable to or occupied by lower-income households, or subject to LARSO or AB 1482. Replacement requirements should include housing affordable to or occupied by deeply low-income households at the 15% AMI level (in addition to 30%, 50% and 80% AMI levels). Over 10% of renter households in LA County fall into the 0-15% AMI range and cannot afford rents set to the 30% AMI level.[1]
- Right of Return to Newly-Constructed Affordable and/or Rent-Controlled Units. Households displaced due to demolition or condominium conversion should be offered and have the first right of refusal on leases in the new units whenever possible.
- Enhance HCIDLA's Ellis Act Report Dashboard. HCIDLA recently released an Ellis Act Report Dashboard[2] which tracks the number of units withdrawn under the Ellis Act and the number of units added. This dashboard will be a valuable tool and should be improved to include all replacement unit data, as well as information regarding units withdrawn and added from Conditional Use Permits, the Transit Oriented Communities Program, By Right Developments, SB 330 and other entitlement applications.
- Preserve Expiring Covenants. Coordinate with relevant agencies to ensure the renewal of expiring affordable housing covenants and promote opportunities for tenant purchase or acquisition of units with expiring covenants by affordable housing developers, community-based organizations, or community land trusts to achieve affordability in perpetuity.

c. Assess and mitigate risk of homelessness.

A large part of the City's current homelessness crisis is being driven by unaffordable housing, which is exacerbated by rising rents and results in evictions. The City's plans to meet its RHNA allocation through the community plan updates are primarily focused on increasing the supply of market rate housing which is far out of reach of our poorest residents and residents at highest risk of displacement and homelessness. To prevent these planned investments from exacerbating the homelessness crisis, the Housing Element should include policies and programs to effectively identify and mitigate homelessness risk, including but not limited to the following.

- Homelssness Risk Assessment. As part of each community plan update or major economic development project, the City must do an analysis to identify the number of residents at risk of homelessness utilizing HCIDLA's "Displacement Index," as well as the Homelessness

[1] https://chpc.net/resources/los-angeles-county-annual-affordable-housing-outcomes-dashboard-2020/
[2] https://hcidla2.lacity.org/ellis

Management Informations System (HMIS) used by HUD in developing their Annual Homelessness Assessment (AHAR) Report, and other data sources. Used together, the city should develop a predictive model for analyzing where risk is likely to increase due to proposed public and private investment.

- Adopt Protective Measures to Mitigate Identified Risk of Homelessnes. Based on the findings of the homelessness risk assessment, the City should adopt key protective measures such as increasing proactive enforcement of tenants rights regulations and developing policies to preserve and increase the supply of deeply affordable housing. In addition, these reports should also identify hotels and motels—those currently on the market for sale or those that can be acquired through eminent domain[3]—in at-risk areas that could potentially be acquired and converted to affordable housing, without displacing residents that rely on hotels and motels for housing.
- Preserve Residential Hotels. Prevent the conversion or demolition of residential hotels and enforce the rights of residential hotel tenants through additional resources and proactive enforcement of the Residential Hotel Ordinance and Wiggins Settlement.

2. STRENGTHEN TENANT PROTECTIONS

Displacement is a direct cause of houselessness and a destructive force in low income communities and communities of color. The Housing Element must address displacement risks head-on and include Goals, Policies and Programs that create real tools to minimize displacement and promote community stability.

a. Ensure housing opportunities are accessible to all residents without discrimination on the basis of race, income, ancestry, sex, national origin, religion, sexual orientation, maritial/familial status, age, or disability.

Despite the passage of SB329, housing voucher recipients continue to face discrimination from landlords, particularly in opportunity-rich communities. And, while the City's "211LA" program allows tenants to file reports of illegal rent increases, it does not go far enough in proactively monitoring compliance among the City's existing stock of RSO units. In order to strengthen RSO enforcement as well as the antidiscrmination provisions created by SB329, the City of Los Angeles must direct HCID to: offer outreach and education services to landlords and tenants so they are familiar with the new law's requirements, and establish testers, administrative complaint mechanisms, and hearing officers to identify unlawful practices. Such measures will allow HCID to more adequately report violations; collect, investigate, and remedy complaints; perform regular testing to ensure compliance; and report publicly on the number of complaints and resolutions, testing results, and the overall effectiveness of SB329's implementation. The Housing Element should include policies and programs to strengen enforcement of tenant protection and discrimination laws, including but not limited to the following.

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[3] For an example of this kind of analysis, see Roy, A., Blasi, G., & Coleman, J. (2020). "Hotel California: Housing the Crisis", Los Angeles: UCLA Institute on Inequality and Democracy. Map Example from report, "Hotels and Motels in At-Risk Zip Codes": https://www.arcgis.com/home/webmap/viewer.html?webmap=a40364a4ff464ce9a3aaedaafd0bb304&extent=-118.6056,33.8965,-117.8475,34.2588

- Publicize SB 329 anti-discirimation protections. Establish outreach and education services to landlords and tenants regarding SB329 source-of-income anti-discrimination measures
- Increase investigation and prosecution of source-of-income discrimination. Develop proactive enforcement mechanisms, such as testers and hearing officers, to identify and prosecute source-of-income discrimination.

b. Prevent tenant harassment.

Strong tenant protections can be undermined if unscrupulous landlords push tenants out of their homes through harassment and intimidation. The City should enact a robust tenant anti-harassment ordinance (TAHO) that includes substantial statutory penalties to deter such tactics. To ensure efficacy, the anti-harassment ordinance must have strong enforcement mechanisms that provide both a private right of action for tenants and dedicated HCID staffing. The Housing Element should include policies and programs to prevent tenant harassment, including but not limited to the following.

- Enact a Tenant Anti-Harassment Ordinance. Enact a Tenant Anti-Harassment Ordinance with a comprehensive definition of harassment, strong statutory penalties and an enforcement program that consists of dedicated staffing.
- Improve tracking and reporting tenant harassment complaints.Track harassment complaints monthly and by Council District.
- Prosecute repeat offenders. Initiate legal action against repeat offenders of the TAHO to prevent harm and ensure compliance.

c. Prevent Displacement of Vulnerable Tenants by Strengthening the City's Rent Stabilization Ordinance and Just-Cause Eviction Protections.

State law and the City's Rent Stabilization Ordinance currently leave many Los Angeles tenants without protection from arbitrary or unjust evictions. Whether or not a tenant can be evicted should not depend on the year their housing was built or what kind of entity owns their building. All tenants should have the guarantee that, if they pay their rent on time and abide by their lease, they will not be evicted. And, if they are evicted for no fault of their own, they will receive relocation assistance to help find new housing.

In many circumstances, the annual allowable rent increase under the city's rent stabilization ordinance significantly exceeds the rate of inflation. Allowing rent to increase faster than inflation leaves tenants in gentrifying neighborhoods vulnerable to indirect displacement if new, predominantly market-rate, projects drive up neighborhood rents. The Housing Element should direct the City Council to amend the Rent Stabilization Ordinance to reduce the annual allowable rent increase to a percentage of inflation, similar to the Santa Monica and West Hollywood ordinances.

Furthermore, allowing landlords of master-metered units to impose even larger rent increases creates significant displacement pressure and gives landlords an incentive not to upgrade their gas and electric utilities. Tenants in master-metered units should have the same protections against large rent increases as any other tenant. And, it is well established that households on master-meter utilities use more energy than individually metered households. Removing the incentive to maintain master-metered utilities will

protect tenants from large rent increases and remove the disincentive for landlords to upgrade their gas and electric systems, benefiting both the tenant and the environment.

Lastly, in response to the acute displacement pressures brought on by the COVID19 pandemic, the City appropriated significant funding for tenant outreach and education and legal defense for tenants facing eviction. Yet, the funding currently available will reach only a small percentage of tenants impacted by housing instability. Furthermore, the economic impacts of COVID19 on low-income Angelenos are likely to last many years. In addition, according to a recent report conducted by Stout, the City of Los Angeles saves $3.50 for every $1 invested in eviction representation. Codifying a tenant's right to counsel will therefore not only advance economic justice in the City but also do so in a way that is financially sustainable. Providing a guaranteed right to an attorney will act as a strong deterrent against the thousands of baseless evictions filed and executed each year, dramatically reduce housing instability, and reduce in-flows to homelessness. The Housing Element should include policies and programs to strengthen the City's RSO and Just-Cause eviction protections, including but not limited to the following.

- Expand just-cause eviction protections to cover all tenants. Expand just-cause eviction protections to cover all tenants in the City of Los Angeles and establish a corresponding enforcement program.
- Reduce the annual allowable rent increase under the RSO. Reduce the annual allowable rent increase, and close the "master-metered loophole," in the City's Rent Stabilization Ordinance to help address indirect displacement in gentrifying neighborhoods and encourage energy conservation.
- Codify a tenant's right to counsel in an eviction proceeding. Codify a tenant's right to counsel that guarantees access to an attorney to all tenants who face an eviction.
- Create a permanent tenant education program. Create a permanent tenant education program to inform tenants of their rights and how to access eviction defense resources.
- Explore additional opportunities that strengthen the RSO. Explore amendments to the City's RSO to restrict allowable grounds for eviction, including restrictions on eviction for failure to pay and policies to alleviate rent-debt.

3. INVEST IN SOCIAL HOUSING, COMMUNITY LAND TRUSTS, AND STRATEGIC LAND ACQUISITION

We cannot rely on status quo policies to dig ourselves out of this unprecedented affordable housing crisis. Instead, the Housing Element must be the vehicle to drive LA housing policy into a new future that reimagines social housing and brings land into community control in order to produce the permanent deeply affordable housing that Angelenos so desperately need.

a. Facilitate and invest in a Social Housing program that preserves and creates new permanent affordable housing at all levels of affordability, especially the deepest levels of affordability that reach 30% AMI, 15% AMI, 10% AMI and below.

Currently, most renters in Los Angeles are rent burdened and high rents have become a clear driver of homelessness. The City must dramatically expand its supply of Social Housing to shield low-income

residents from an increasingly unaffordable rental market and provide long-term stability for both households and neighborhoods. The Housing Element should include policies and programs to effectively expand the supply of deeply affordable Social Housing, including but not limited to the following.

- Expand the acquisition and use of publicly- and privately-owned land for the use of Social Housing. Acquire land for Social Housing and designate Social Housing - including but not limited to community ownership models (see below) as the primary intended use for surplus or underutilized public land in the City. Coordinate with City, County, State, Metro and other public agencies to identify sites for disposition for Social Housing development and/or community control through neighborhood-based nonprofit ownership.
- Facilitate innovative models of Social Housing. Facilitate innovative models that seek to lower costs while providing quality housing and supporting family-supporting wages.
- Explore establishing a multijurisdictional joint authority to facilitate Social Housing. Explore opportunities for land assembly across jurisdictions through establishment of a multijurisdictional joint authority that can purchase, assemble, remediate, and entitle land for social housing production and preservation.
- Increase access to financing for Social Housing. Create, and/or partner with other public agencies and private lending institutions to facilitate, low-cost financing opportunities for social housing developers, neighborhood-based nonprofit cdcs, land stewards, homeowners, resident associations, and housing cooperative shareholders.
- Remove limits on the number of public housing units allowed in each council district. Take any legal or electoral steps required to remove any limitations on the number of public housing units allowed per council district.
- Explore new funding and revenue sources for Social Housing. Research all available and/or potential funding sources for social housing and actively seek funding opportunities, including partnering with state and federal agencies or electeds on creating new programs and funding opportunities. Pursue the creation of new revenue sources, including but not limited to new taxes - particularly those that serve to limit residential vacancies and speculative land flipping - as well as the potential use of a newly-created public bank to facilitate financing.

b. Advance community ownership models of affordable housing, such as community land trusts, housing cooperatives and other strategies that create permanent affordability and opportunities for renters and unhoused residents to build equity through ownership.

Rents paid by tenants to corporate landlords benefit a corporation's profit margin rather than Los Angeles neighborhoods and families. In order to keep wealth within our communities, provide permanent affordability and provide equity opportunities to households with low incomes, we must scale up community ownership models of affordable housing. The Housing Element should include policies and programs to effectively expand community ownership models, including but not limited to the following.

- Dedicate publicly owned land to community land-trusts. Dedicate publicly owned land to CLTs who can provide affordable housing in perpetuity by owning land and leasing it to

those who live in units built on that land, and/or offer subsidies for the purchase of land and/or house construction by CLTs[4].

- Remove zoning and land use barriers to CLT development. Consult with existing CLTs to identify ways to remove zoning and land use barriers to future CLT development.
- Convey land to CLTs. Convey city-owned, surplus, and abandoned properties to a CLT including land acquired, remediated, and readied for development by a public agency, land bank or redevelopment authority; surplus land acquired by the city for the construction of roads, schools, bike paths, municipal buildings, public housing, etc.; underutilized surface parking lots; surplus fire stations, school buildings, or other buildings owned by the City; and, abandoned buildings.
- Facilitate transfer of tax foreclosed properties to CLTs. Partner with County of Los Angeles' Treasurer and Tax Collector to facilitate transfer of tax foreclosed residential, mixed-use and vacant properties located within the City to CLTs, subsidize rehabilitation, and support a path to ownership for any current residents.
- Prioritize funding to permanently affordable housing. Redirect existing funding toward affordable housing with permanent affordability via threshold criteria or preferential scoring in the distribution of federal, state, and municipal housing funds for the construction, rehabilitation, or financing of affordably priced homes that are owner-occupied, renter-occupied, or owned and managed as a limited equity cooperative.
- Increase CLT use of current acquisition and rehabilitation programs. Engage CLTs and their lending and development partners in evaluating the City's current funding programs for acquisition and rehabilitation of naturally occurring affordable housing (NOAH) and at-risk deed-restricted multifamily properties, and institute resultant recommendations in order to increase CLT utilization of existing and future NOAH programs.
- Design land use incentives to expand CLTs. Award density bonuses, and/or grant regulatory concessions and design any new inclusionary zoning program in a manner that steers units into CLT portfolios and covers a portion of CLT cost of stewardship.
- Expand funding for CLTs. Research all available and/or potential funding sources for CLTs and actively seek funding opportunities, including partnering with state and federal agencies or electeds on creating new programs and funding opportunities. Pursue the creation of new revenue sources, including but not limited to new taxes - particularly those that serve to limit residential vacancies and speculative land flipping - as well as the potential use of a newly-created public bank to facilitate financing
- Foster new CLTs through technical assistance. Foster the development of new CLTs in the City through allocating City resources for tenant engagement, tenant-ownership training, legal counsel, and CLT technical assistance.
- Transfer properties in receivership to CLTs. Establish a receivership program to facilitate the transfer of ownership of properties in receivership to CLTs.

[4] A recent motion introduced by Councilmembers Buscaino, Krekorian, Martinez, and O'Farrell to explore such a strategy is an important first step. However, in addition to partnering with local CLTs, it is crucial that the City Planning Department support these efforts by identifying and committing land for this purpose in high-opportunity neighborhoods. In addition a motion authored by Councilmember Marqueece Harris Dawson, Cedillo, Wesson also explores donating surplus land to Community Land Trusts for the purpose of affordable housing

c. Limit the speculative use of land and property by extractive investors and corporate entities

During the Great Recession, American households lost trillions in wealth and millions of homes were foreclosed. Black and Latino homeowners were 71 to 76 percent more likely to lose their homes after the crash than white homeowners.[5] After the Great Recession, private equity firms invested upwards of $20 billion to purchase more than 200,000 homes nationwide; they converted owner-occupied homes to rental properties and created new financial instruments to trade rental income streams on Wall Street. This transfer of wealth from LA families to Wall Street further entrenched the racial wealth gap and led to increased neighborhood instability. Especially given the economic crisis caused by Covid-19, the City of LA must be doing everything possible to avoid a similar trend in the coming years. The Housing Element should include policies and programs that accelerate an affordable housing acquisition strategy of single family, multifamily and commercial properties, including but not limited to the following.

- Create Anti-Displacement Overlay Zones. Apply strong displacement protections where federal, state or local incentive programs drive new development. For instance, the federal Opportunity Zones program provides catalytic development incentives in census tracts that are among the most vulnerable neighborhoods in the City. Yet, this federal tax program stimulates provides no guidelines to protect communities. Local regulation can provide necessary protections to keep neighborhoods stable and healthy.
- Enact disclosure requirements for property owners Enact disclosure requirements for LLCs, LLPs, LPs and other corporate or non-individual ownership designations to ensure public transparency and understanding regarding the business practices by corporate owners of housing and land.
- Prosecute predatory landlords and developers. Deepen local institutional capacity to investigate and pursue affirmative cases against landlords with predatory patterns of behavior like frequent/malicious evictions, unlawful evictions, poor habitability records, tenant harassment issues, and violations of RSO, and disclose such records to the public.
- Tax and regulate large real estate portfolios. Adopt regulatory and revenue generating policies to disincentivize the accumulation of large real estate portfolios. These may include policies such as a vacancy tax, a flipping tax, and Out-of-State Property Transaction tax.

d. Facilitate Acquisition of Land and Housing for Community Benefit.

Right of Refusal programs can help preserve the ongoing affordability of dedicated affordable rental housing by giving priority consideration to mission-oriented buyers when the owner of a subsidized rental property decides to stop participating in a subsidy program. They can also be applied to unsubsidized rental properties, helping to preserve the availability of rental units and in some cases facilitate conversion to dedicated affordable rentals. Eligible buyers may include tenant associations, nonprofit and for-profit developers, and/or state or local government agencies. To establish such a program first requires that the City Council pass an ordinance establishing a TOPA/COPA policy.

Once the policy framework is established, tenants trying to exercise the right of first refusal will typically need substantial financial and technical assistance to make a successful offer. HCID should establish a

[5] Bocian, et al., "Foreclosures by Race and Ethnicity: The Demographics of a Crisis" *available at* https://www.responsiblelending.org/mortgage-lending/research-analysis/foreclosures-by-race-and-ethnicity.pdf

technical assistance program that educates tenants on their Cities may also want to identify non-profit organizations that have experience conducting preservation transactions and can act as partners to help tenant associations throughout the process

By creating a right of first offer and a right of first refusal for current tenants and qualified organizations to purchase for-sale rental properties, and supporting the exercise of these rights, the City can help keep property in community hands and remove housing from the speculative market. The Housing Element should include policies and programs to adopt and implement an Opportunity to Purchase policy, including but not limited to the following.

- Adopt an Opportunity to Purchase Ordinance. Direct City Council to adopt an ordinance creating an Opportunity to Purchase policy containing a right of first offer and right of first refusal of for-sale rental property for current tenants and qualified organizations, including Community Land Trusts, neighborhood-based CDCs, tenant organizations, nonprofit organizations, public agencies, and other entities who commit to permanent affordability. Qualified purchasers should have an exclusive window to offer to purchase rental property and secure financing. If these qualified offers are rejected, the same purchasers should have the right to match any third party offers to sell the same property.
- Support Opportunity to Purchase with Technical Assistance. Provide technical assistance to tenants and qualified organizations to exercise their right of first offer and/or right of first refusal.
- Create infrastructure to facilitate notification between buyers and sellers. Develop an infrastructure to facilitate notification between buyers and sellers, in order to maximize participation and effectiveness of the Opportunity to Purchase policy.
- Identify funding to support buyers exercising the opportunity to purchase.Identify dedicated funding to ensure that qualified purchasers under this policy are able to secure financing and make competitive, bona fide offers to purchase when exercising their right of first offer.

e. Develop a strategic land acquisition program to preserve and expand the supply of affordable housing.

In addition to land use policies such as inclusionary zoning, value capture, and no-net-loss, the City should adopt a strategic land acquisition program to help meet the need for preservation and production of affordable housing. Strategic acquisition, or "land banking", is a process to acquire land and property for preservation and/or future development.[6]A land bank established as a public, quasi-public or non-profit entity can serve three critical functions: speed; reducing barriers; and cost savings. When properly structured to fulfill these objectives, a land bank may be able to acquire a property more quickly than an affordable housing developer who must adhere to complex funding requirements from multiple sources. The land bank can reduce barriers to acquisition by helping coordinate inspections, permitting and other entitlement processes. Lastly, a land bank can add efficiency to the system by using its relative size and coordinating capacity to achieve economies of scale which together can reduce the cost for the non-profit

[6] Kildee, D. and Hovey, A. "Land Banking 101: What is a Land Bank" Center for Community Progress, distributed by U.S. Department of Housing and Urban Development, Neighborhood Stabilization Program, accessed June 2020.

developer, CLT, low- or moderate-income homeowner or tenant group who will be the ultimate steward. A land bank operates with a clear mandate and operating directives, which in this case should ensure that disposition of property will achieve goals that include enhancing residential stability of current residents, retention of public investment, long-term affordability, and building capacity and advancing self-determination of impacted, lower income communities. The Housing Element should include policies and programs to implement a land acquisition policy, including but not limited to the following.

- Create a City Land Bank. Research best practices for establishing a public land bank and make recommendations to the City Council for implementation of a public land bank.
- Land Acquisition Strategies. Develop strategies to assist community land trusts and affordable housing developers with property acquisition. Coordinate with non-profit developers and community land trusts to take advantage of off-site acquisition options provided under Measure JJJ.
- Land Sales/Property Transactions: Collect and make information about land sales and property transactions in the Community Plan Areas more publicly accessible to support opportunities for purchase by affordable housing developers, community-based organizations, or community land trusts, and to enhance communities' access to information regarding changes in their own neighborhoods.

4. INCREASE THE SUPPLY OF DEEPLY AFFORDABLE HOUSING

While our city needs to increase the supply of housing, market rents on new construction far exceed what the vast majority of tenants can afford. Extremely low-income households face the worst rent burdens, are more likely to be severely rent burdened, and face the most acute housing shortage for their income range. Creating an adequate supply of deeply affordable housing (DLI and ELI) is a critical strategy to prevent further homelessness and protect the most vulnerable residents of LA.

a. Produce an adequate supply of affordable housing to meet current and projected need.

The Housing Element should include policies and programs to effectively produce affordable housing to meet current and projected needs, including but not limited to:

- Inclusionary Zoning. Adopt city-wide inclusionary zoning requirements on new rental and for-sale development that is structured in such a way as to incentivize construction of deeply affordable units, with the option to satisfy affordable housing requirements through off-site construction significantly restricted.
- Density Bonus. Explore an expansion of density bonus program, with restrictions on buildings occupied by tenants within 10 years.
- Deep affordability. Identify and implement incentives for new development to contribute towards the community's deeply low-, extremely low-, and very low-income housing needs.
- Public Investment in Affordable Housing. Utilize public land and funding for the construction of new housing for deeply low-, extremely low-, very low-, and low-income households.

- Strategic Use of City-Owned Land. Devote City-owned land exclusively to the creation of 100 percent affordable and/or supportive housing projects through below-market or no-cost sale or lease to non-profit developers or community land trusts.
- Surplus Land. Prioritize the creation of affordable housing by facilitating below-market sale or lease of surplus and other underutilized property to affordable housing developers, or for the creation of new park space where there is a demonstrated need for one or the other, consistent with state law.
- Vacancy Penalty. Support the adoption of a vacant homes penalty assessed on sites with vacant residential and commercial units; prioritize the use of revenue for the creation and preservation of deeply affordable housing, including supportive housing and land acquisition by community land trusts.

b. Equitably Distribute Deeply Affordable Housing Around Transit Corridors.

According to the City Planning Department's Inventory of Sites, there are 308,000 potential units on developable land in the City of Los Angeles, and 85% of these sites are within ½ mile of transit. Given that low-income renters are more likely to be transit-dependent, it is crucial that developments on these sites include units dedicated to the deepest affordability levels. The Housing Element should include policies and programs to effectively and equitably distribute deeply affordable housing around transit corridors, including but not limited to the following.

- Value Capture. Require that community plan updates implement value capture zoning such that any upzone is connected to affordability requirements equal to or greater than the Transit Oriented Communities program.
- Affordability in High Opportunity Areas. Require that community plan updates in high opportunity neighborhoods accommodate multi-family residential development with affordability levels equal to or greater than the TOC program.
- Homeowner Assistance. Expand and fund homeowner assistance programs for low- and moderate income households.
- Prioritize housing for displaced residents. Create a program that gives first priority of affordable housing units in TOC buildings to tenants of former buildings on that site, or tenants who have been evicted under the Ellis Act.

c. Reduce barriers for production of all affordable housing that does not result in the removal of existing units and/or displacement of tenants and that does not expose low-income communities of color to environmental harms.

New construction of 100% affordable and/or permanent supportive housing should have a clear and streamlined process from application to certificate of occupancy. The Housing Element should include policies and programs to effectively reduce barriers for production of affordable housing, including but not limited to the following.

- Affordable Housing on Vacant and Underutilized Land. Explore a citywide program that allows the production of affordable housing on vacant land, commercial buildings, or buildings unoccupied in the last 10 years, by right.

- Affordable Housing on Religious Institution property. Establish a program that encourages development by right of 100% affordable housing projects in key areas, including on land owned by religious institutions.
- Remediation. Create a program that requires - and funds - the environmental remediation of all housing sites and mitigation of impacts by neighboring sites.
- Innovation. Explore innovative solutions to increasing production of 100% affordable housing.
- Remove Obstacles to Permanent Supportive Housing. Identify and eliminate barriers to the funding, approval, and development of permanent supportive housing.

d. Provide reparations for Black Angelenos with affordable housing.

Los Angeles should take proactive steps to address the past and continuing harms of redlining, racial covenants, housing discrimination, predatory home loans, and disinvestments in Black neighborhoods by providing reparations for Black Angelenos with access to affordable rental housing and homeownership opportunities. The Housing Element should include policies and programs to provide reparations for Black Angelenos with affordable housing, including but not limited to the following.

- Set aside a percentage of affordable units for Black families. for Require a percentage of affordable housing rental units and for-sale units be set aside for eligible Black families.
- Establish a "Certificate of Preference" Program for Displaced Black Residents. Establish "Certificate of Preference"[7] for displaced Black residents to be entitled to priority in renting or buying units in the neighborhoods from which they were displaced.
- Support Black Homeownership. Fund a homeownership assistance program for Black families and support current homeowners with funds for rehabilitation of their properties.

5. FURTHER ENVIRONMENTAL JUSTICE, IMPROVE CLIMATE RESILIENCE AND PROMOTE COMMUNITY HEALTH

Access to safe and affordable housing has a direct impact on public health. The very communities facing the highest rent burden are often the same frontline communities who bear the brunt of the negative impacts brought on by multiple, intersecting crises related to housing, homelessness, and environmental racism. These health disparities are brought on by land uses based on an extractive economy that contributes to environmental degradation, industrial pollution, the climate crisis, and increased health disparities for the frontline communities. For example, according to the Health Atlas for the City of LA, 21% (or approximately 59,000 individuals) of Southeast LA CPA residents lived adjacent to noxious land uses in 2013. The Housing Element is an opportunity to ensure that housing promotes public health with land use policies that are aligned with practices that create a more productive, equitable, and healthy regenerative use of land. Therefore, the recommendations, below, account for issues related to habitability, overcrowding, access to an adequate supply of safe affordable housing, and the need for climate resilient infrastructure and zoning policies.

[7] For example, this motion introduced by Councilmembers Harris-Dawson, Price, and Wesson in 2018 would create a neighborhood stabilization program for South LA.

a. Promote environmental justice and public health in development processes.

The City's Health Element names the harmful health impacts of displacement on individuals, families, and communities when development and infrastructure investment is pursued without regard for low-income residents already residing in the area; the need for both preservation and production of affordable housing to avoid rising rents, evictions, and increased homelessness; and centering land-use policies on a goal to reduce "health disparities and advancing health, equity, and sustainability in Los Angeles." The Housing Element can achieve consistency with the Health and Wellness Element by including policies and programs to advance environmental justice and community health, including but not limited to the following.

- Health Impact Assessments. Integrate health impact assessments into environmental impact reviews (EIRs), evaluating proximity to industrial land use/brown fields; health impacts of exposure to industrial and other noxious land uses; displacement impacts; and risk of increased evictions, homelessness, and susceptibility to overcrowded and substandard housing.
- REAP. Identify ways to ensure the Rent Escrow Account Program (REAP) is meeting its intended goals.
- Healthy Homes. Ensure all appropriate City departments are trained to identify and address environmental hazards, including, but not limited to mold, asbestos, and lead hazards affecting tenants, and develop strategies to prevent and mitigate the negative health impacts of repair or construction work that may release environmental hazards, including providing meaningful relocation assistance at the expense of the property owners, and enforcing tenants' right to return to their repaired rental units.
- Receivership Program. As a deterrent to slum housing practices and to facilitate community ownership goals, establish a receivership program for properties in REAP that do not achieve compliance so that tenant groups, CLTs and social housing entities can act as receivers and stewards of delinquent properties.
- Health and Habitability Training and Outreach. Require property owners and property managers to undergo training on responsible management of environmental hazards and tenants' right to live in habitable housing, and partner with community-based organizations to assist in outreach to tenants to inform them of their rights to live in habitable housing, regardless of income, race, or immigration status.
- Healthy Development Standards. Identify and adopt development standards that promote healthy air and water quality.
- Use an EJ lens in Planning. Integrate the CalEnviroScreen into land use planning to target critical investments increasing access to affordable housing in underserved and highly impacted areas.
- Industrial sites / brownfield sites. Advance new standards such as requiring EIRs to include health impact assessment for a 2-mile radius; enhanced site remediation and polluter accountability strategies; prevent development in proximity to brownfield sites until full EIR/HIA and remediation is done; provide support to affordable housing developments for environmental review and remediation, including identifying funding opportunities based on polluter-pay principles.

b. Plan for climate resilience.

Low-income communities are more likely to disportionately bear the burden of climate change. For example, low-income communities that are park-poor and have less green infrastructure investment are also more likely to acutely feel the effects of extreme weather events due to climate change. The Housing Element should include policies and programs to enhance climate resiliency as a component of housing development, including but not limited to the following.

- EJ in infrastructure. Work with the City's Climate Emergency Mobilization Department to ensure infrastructure alignment with principles of environmental justice and a just transition framework that puts an end to environmental racism and, thus, the displacement of low-income communities and communities of color, and uplifts public health through affordable housing.
- Education and training. Train City departments, property owners, and property managers on tenants' rights to live in habitable housing, the health effects of environmental hazard exposure, and appropriate management of environmental hazards such as lead and asbestos to prevent tenant exposure.
- Land use compatibility. Prevent instances of incompatible land use by establishing strict health and safety buffers between hazardous and sensitive land uses, including a 2500-foot health and human safety buffer between oil extraction sites and sensitive land uses, and a 500-foot buffer between other noxious land uses, such as auto-related uses, and sensitive land uses
- Green and Renewables Infrastructure. The City should convene stakeholders to develop green and renewable energy standards for housing development.

6. ENSURE MEANINGFUL COMMUNITY PARTICIPATION AND CAPACITY BUILDING

Public resources can go further when they are used to amplify actions being taken independently by community organizations. For this engagement to be transformative, however, it must be aligned—in both content and process—to actionable processes and policies that can improve equity outcomes for people. Ensuring the success of the aforementioned programs requires that the city partner with existing community-based organizations with established networks of trust with residents in their respective neighborhoods. Such partnerships will ensure information is distributed in a linguistically and culturally appropriate manner, and also allow the city to gather data on the effectiveness of new Housing Element policies and programs on directly impacted communities. The Housing Element should include policies and programs to ensure CBOs are integrated into implementation and evaluation of Housing Element programs, including but not limited to the following.

- Budget for seed grants or community contracts to support the participation of community-based organizations (CBOs) in tracking and evaluating housing element policies and programs.
- Develop a list of mission-based nonprofit organizations in each Community Plan Area and distribute RFPs annually to develop contracts with organizations that work directly with

tenants, individuals experiencing homelessness, and other vulnerable populations so as to ensure the success of new housing policies and programs. HCID can achieve this through distribution of funds from housing block grants, and/or the establishment of community contracts with CBOs. These partnerships will ensure the effective implementation of Housing Element policies and programs.

***

The Housing Element update and 6th cycle RHNA can be transformative for Los Angeles, with the potential to vastly improve housing affordability and the quality of life for millions of Angelenos if done right. After decades of underproduction of affordable housing, exclusionary zoning, and a lack of preservation of low-cost housing, our city must commit to take bold action and adopt affirmative policies and programs that will result in deeply affordable units at scale, address vacancy issues in new units, and stabilize communities at risk of displacement, while simultaneously building new housing units. Our coalition is eager to be a thought partner with the City in the implementation of the policies stated in our letter and we look forward to continued collaboration on making Los Angeles a city where everyone can thrive.

Sincerely,

ACT-LA

Connect Create Collaborate

Housing Element <housingelement@lacity.org>

Re: Brentwood

11 messages

Matthew Glesne <matthew.glesne@lacity.org> Fri, Jun 12, 2020 at 9:20 AM
To: Bisnoff Email <bisnoff@gmail.com>, Blair Smith <blair.smith@lacity.org>
Cc: Housing Element <housingelement@lacity.org>

Thanks Michelle, we are having another Housing Element kick-off webinar with live Q&A on Wednesday, June 17th, 2020 at 1:00 p.m. - 2:00 p.m.This is a great opportunity to learn more and ask questions. We also have a digital webinar that provides a lot of the information we provided at our earlier February and March workshops, with opportunities to directly include your comments.

We'd be happy to talk with you or a small group. If you would like to request a more formal presentation or virtual attendance at an event, please provide us more information on the request so we can run it through our external affairs channels and check availability. Thanks.

Matt

On Thu, Jun 11, 2020 at 10:36 PM Bisnoff Email <bisnoff@gmail.com> wrote:

> Dear Matt,
> Hope you are well.
> We would like to schedule a Zoom meeting as soon as possible regarding the Housing Element. We would like to hear more about the process, particularly given our high fire zone.
>
> Thank you
> Michelle
>
> --
> *Michelle A. Bisnoff*
> *Chair, Brentwood Community Council*
> *Commissioner, City of Los Angeles Innovation and Performance Commission & Chair, Fund Committee*
> *Board Member, County of Los Angeles Animal Care Foundation*
>
> *Disclaimer and Privacy Statement: While I am member of the Brentwood Community Council, the foregoing may not represent the ratified position or views of the BCC.*

--

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T: (213) 978-2666

Bisnoff Email <bisnoff@gmail.com> Fri, Jun 12, 2020 at 11:02 AM
To: Matthew Glesne <matthew.glesne@lacity.org>
Cc: Blair Smith <blair.smith@lacity.org>, Housing Element <housingelement@lacity.org>

Hi Matt & Blair,

Hope you are both well - yes, we will be participating in the call on June 17th, however, we'd like to have a full meeting devoted only to this topic as it relates to the 15.5 square miles within the Brentwood portion of the Brentwood/Palisades Community plan, which covers 31,000 residents, 13 HOA's and 4 business districts.

In particular, we notice the City housing element map through 2021 still includes parcels targeted for upzoning in Very High Fire Severity Zones - in fact, one of those parcels burned to the ground. We are confused and would like clarity on how City and SCAG methodology relates to high fire zones. In fact, I literally just got off a call with the Chair of the California Fire Chief Association and they are categorically opposed to upzoning in these areas.

One question that would be helpful to discuss is: Why is the City Housing Department including designated high fire zones areas in upzoning maps, and, is it the Housing departments plan to continue doing so?

Also, Brentwood/Palisades seems to have been targeted for housing for the addition of 20,000 units of housing? Yet, all of the Palisades is a fire / coastal zone, so they should be exempt from all infill upzoning, and Brentwood is 85%+ fire zone. We are confused why the City is using the 20,000 number as a starting point for increasing density in our neighborhood?

Finally, we have zero issue with density near Wilshire Boulevard: that is the only access point in Brentwood for mass transit and it makes total sense. In fact, 51% of our residents live in that high dense zoning area and we believe a roughly 50/50 split is a nice balance in the community with R1. However, San Vicente Blvd has a specific plan, it is a protested scenic byway with historic designation and has no mass transit and we are not inclined to increase housing density on that street from Bundy to the Santa Monica border at 26th Street.

Thank you
Michelle

Michelle A. Bisnoff
Chair, Brentwood Community Council
Commissioner, City of Los Angeles Innovation and Performance Commission & Chair, Fund Committee
Board Member, County of Los Angeles Animal Care Foundation

Disclaimer and Privacy Statement: While I am member of the Brentwood Community Council, the foregoing may not represent the ratified position or views of the BCC.

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Matthew Glesne <matthew.glesne@lacity.org> Fri, Jun 12, 2020 at 3:51 PM
To: Bisnoff Email <bisnoff@gmail.com>
Cc: Blair Smith <blair.smith@lacity.org>, Housing Element <housingelement@lacity.org>

Thanks Michelle. Appreciate your thoughts and we will pass this meeting request along.

However, I'd like to get more clarity on your concern(s). It isn't clear to me which 20,000 figure you are referring to in the current housing element. I thought you might be referencing the "inventory of sites" selected for Brentwood in Table 3.1/Map 3.1 in Chapter 3, which is a required element under state law. But please know that those maps/tables are meant to only reflect where current zoning allows for housing unit development to occur (as of 2013). It is not a map of parcels targeted for upzoning or changing what can be built in any way. Also, there are only 64 sites in all of brentwood/palisades identified - which would result in **1211 units,** if all built out to max capacity under today's zoning. Please clarify so we can best address your question. Thanks

Matt
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Bisnoff Email <bisnoff@gmail.com> Fri, Jun 12, 2020 at 5:08 PM
To: Matthew Glesne <matthew.glesne@lacity.org>
Cc: Blair Smith <blair.smith@lacity.org>, Housing Element <housingelement@lacity.org>

Ok thanks for clarifying - we were aware of the prior Element through next year, however:
1. We are concerned those parcels in high fire zones are even listed? Why is that area considered at all?
They actually don't qualify under CEQA - are they being listed under a policy that doesn't acknowledge CEQA? We know that most of the State Bills being heard on June 18th wish to abolish CEQA but didn't think it was abolished yet?

2. We are looking forward to the next element process, however your Board Member, Abundant Housing, has stated that the Brentwood Palisades community plan should have 20000 new units of housing, however only 1 square mile of Brentwood is eligible due to fire zones and none of the Palisades is eligible at all - leaving 20000 units jammed into Brentwood. Are you serious? Is that what the City intends to do?

M
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Matthew Glesne <matthew.glesne@lacity.org> Mon, Jun 15, 2020 at 11:49 PM
To: Bisnoff Email <bisnoff@gmail.com>
Cc: Blair Smith <blair.smith@lacity.org>, Housing Element <housingelement@lacity.org>

Thanks for your further clarification Michelle.

1. We'd be happy to further discuss the site selection criteria and fire zones.
2. A proposal from one of our task force members does represent the intentions of the City. Please know we also have a Bel Air neighborhood council member on our task force.

Our external affairs folks are asking how many you anticipate being on the call you are proposing?

Matt
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Bisnoff Email <bisnoff@gmail.com> Tue, Jun 16, 2020 at 7:15 AM
To: Matthew Glesne <matthew.glesne@lacity.org>
Cc: Blair Smith <blair.smith@lacity.org>, Housing Element <housingelement@lacity.org>

About 150 people
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Bisnoff Email <bisnoff@gmail.com> Tue, Jun 16, 2020 at 7:30 AM
To: Matthew Glesne <matthew.glesne@lacity.org>
Cc: Blair Smith <blair.smith@lacity.org>, Housing Element <housingelement@lacity.org>

Just to clarify:

1. Is the City indicating that the Abundant Housing plan to add 30000 units of housing to the Brentwood community plan is the goal of the City?

2. The Housing Element Board that was selected doesn't include anyone from our CP area and we are the target for the most density?

3. Is the City aware that Board Member Abundant Housing has blog posts and other information posted on their site which equate anyone who owns a home as being racist? How did we get to be racists for working hard, paying taxes and buying a house? How are we to assume the City is considering everyone's concerns equally with this rhetoric?

We are really having trouble with this - to an extreme level, particularly as very high fire zones are exempt from further development and virtually every state housing bill being heard on June 18 enshrines that issue.

Please let me know any date and time when you are available for a Zoom meeting.
[Quoted text hidden]

Matthew Glesne <matthew.glesne@lacity.org> Wed, Jun 17, 2020 at 11:24 PM
To: Bisnoff Email <bisnoff@gmail.com>
Cc: Blair Smith <blair.smith@lacity.org>, Housing Element <housingelement@lacity.org>

Hi Michelle, I wanted to share that the state (HCD) just put out a guidebook on the Housing Element site selection process. It has some guidance on how to treat fire zones and other environmental constraints:

(Pg. 10) Environmental Constraints Government Code section 65583.2(b)(4) *Provide in the analysis a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites. The housing element need only describe those environmental constraints where documentation of such conditions is available to the local government. This analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities. This information need not be identified on a site-specific basis. However, local governments will find it beneficial to describe site specific environmental conditions when demonstrating site suitability and realistic buildout capacity of each site, as these types of impediments to building must be considered when determining how many residential units can be developed on the site.*

As you mentioned, there are several barriers to hillside/fire zone development, even when the zoning allows for new housing. We will need to look at those factors in sensitive areas and make sure they do not preclude housing development. We welcome your comments on this and other matters.

Matt

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Bisnoff Email <bisnoff@gmail.com> Thu, Jun 18, 2020 at 6:59 AM
To: Matthew Glesne <matthew.glesne@lacity.org>
Cc: Blair Smith <blair.smith@lacity.org>, Housing Element <housingelement@lacity.org>

It appears that this section of Code doesn't actually guarantee there will be no upzoning in Very High FIre Hazard Severity Zones, even though CEQA would prohibit such building?

Michelle A. Bisnoff
Chair, Brentwood Community Council
Commissioner, City of Los Angeles Innovation and Performance Commission & Chair, Fund Committee
Board Member, County of Los Angeles Animal Care Foundation

Disclaimer and Privacy Statement: While I am member of the Brentwood Community Council, the foregoing may not represent the ratified position or views of the BCC.

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Bisnoff Email <bisnoff@gmail.com> Thu, Jun 18, 2020 at 10:11 AM
To: Matthew Glesne <matthew.glesne@lacity.org>
Cc: Blair Smith <blair.smith@lacity.org>, Housing Element <housingelement@lacity.org>

Matt,
The Housing Element Task Force membership doesn't represent a cross section of Los Angeles and we're wondering how it was selected?
There is only 1 person on the task force who appears to be a single family homeowner - although the City Housing Element presentation states that 70% of City land is zoned for SFH, and no one is from the area being targeted for the highest level of density.

Again, based on a review of their various websites, the combined belief of these Task Force members is that no community should have ***any*** portion that is zoned only for single family homes AND the parcel maps for the Housing Element do not contain overlays for coastal zones, fire zones, liquefaction and earthquake zones - all of which have been concerns for decades. It appears to us that this is simply a Task Force being used to railroad our community into extreme, unlimited density.

Finally, after reviewing the City of Los Angeles Municipal Facilities Committee Agendas again, less than 100,000sf of more than 1,000,000sf of City surplus property sprinkled throughout the entire City of Los Angeles, has been released for affordable housing RFP's since 10/2018. Virtually all of those parcels are infill. Why is the Housing Element seeking to increase density in our community without first demanding that all of those parcels be released immediately? Have those parcels been included in the maps used by the Housing Element?

Thank you
Michelle

Michelle A. Bisnoff
Chair, Brentwood Community Council
Commissioner, City of Los Angeles Innovation and Performance Commission & Chair, Fund Committee
Board Member, County of Los Angeles Animal Care Foundation

Disclaimer and Privacy Statement: While I am member of the Brentwood Community Council, the foregoing may not represent the ratified position or views of the BCC.

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Housing Element <housingelement@lacity.org> Thu, Jun 18, 2020 at 10:27 AM
To: Jackie Cornejo <jackie.cornejo@lacity.org>, Claudia Monterrosa <claudia.monterrosa@lacity.org>

FYI
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Housing Element <housingelement@lacity.org>

DCP Housing Element Workshop 2-24-2020: Public Comment

1 message

Severin Martinez <severin.martinez@lacity.org> Tue, Feb 25, 2020 at 3:20 PM
To: raymonyu@hotmail.com
Cc: Edward Yu <edward.yu@lacity.org>, Housing Element <housingelement@lacity.org>

Hi Raymond,

Thank you for attending yesterday's Housing Element workshop hosted by our partners at the Department of City Planning. You provided me a very detailed public comment regarding traffic signals in Chinatown. I have cc'd Edward Yu from our District Operations who appeared to be the intended recipient of your comments which I have attached as a .pdf

Thanks again for being civically engaged and taking the time to attend the public meeting yesterday.

Severin

--

Severin Martinez

Transportation Planning Associate II
Transportation Planning + Policy

Los Angeles Department of Transportation
213.972.4967

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20200224_HousingElement_YuRamond_PublicComment.pdf
111K

HOUSING ELEMENT 2021-2029
THE PLAN TO HOUSE LA : COMMUNITY WORKSHOP
February, 24, 2020 – 5:00-7:30pm
Pico House – 424 North Main St, 20012

LOS ANGELES CITY PLANNING

Los Angeles HOUSING+COMMUNITY Investment Department

WRITTEN COMMENT SHEET

Name: Raymond Yu 90 LADOT Ed Yu
Affiliation: Upper Chinatown LA building changes
Email Address: ramonyu@hotmail.com

Your email address will be added to our interested parties list that receives progress updates from Department of City Planning staff

Thank you for your interest in this effort! We welcome your thoughts and comments:

I would like to require LADOT Central Engineer Edward Yu and Central Engineers ordered to go to N. Broadway and Bernard Street to take down and replace all of these 8" current existing [8]s currently mounted on horizontal cornered junction trfc. signal light sidewalk poles below the mast arm vertical overhead 12" [8] poles since they're [8] 8" & 12" [8] MISMATCHED the different sizes by converting and changing upgrading them into at least 12" large big size [8] ones they must be SAME SIZE all corners including Royal Pagoda Motel replaced by R.P. Hotel stuffine rooftop lounge prior to have Bernard St. back road for truck construction vehicle access only to replace 942 N. Broadway Chinatown LA by building Harmony Towers Underground Parking Lot to Rooftop lounge same as Royal Pagoda Hotel and Elysian P./Solano Cyn. Lofts NOW TILL 29FEB2020 CONST. STARTS APR 2020

Please drop this sheet into the comment box at tonight's meeting. If you prefer to submit your comment later, you can:

1.) Email project staff at **housingelement@lacity.org.** In the subject line, please indicate:

Housing Element Update Public Comment

OR

2.) Send mail to:

Housing Element Update
Los Angeles Department of City Planning
200 N Spring St
Room 750
Los Angeles, CA 90012

Housing Element <housingelement@lacity.org>

Fwd: Promote sustainability and affordability in the Housing Element Update!

1 message

Blair Smith <blair.smith@lacity.org> Wed, Dec 30, 2020 at 8:43 AM
To: Housing Element <housingelement@lacity.org>

Comment

---------- Forwarded message ---------
From: **Laura Krawczyk** <laura.krawczyk@lacity.org>
Date: Tue, Jan 7, 2020 at 12:16 PM
Subject: Fwd: Promote sustainability and affordability in the Housing Element Update!
To: Vince Bertoni <vince.bertoni@lacity.org>, Arthi Varma <arthi.varma@lacity.org>, Conni Pallini <conni.pallini-tipton@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Cally Hardy <cally.hardy@lacity.org>, Blair Smith <blair.smith@lacity.org>

FYI

On Tue, Jan 7, 2020 at 11:34 AM Margaret Wynne <margaret.wynne@lacity.org> wrote:

> FYI on the below. Can you share with Matt Glesne, Cally, etc?
>
> ---------- Forwarded message ---------
> From: **Mayor Garcetti** <mayor.garcetti@lacity.org>
> Date: Tue, Jan 7, 2020 at 11:07 AM
> Subject: Fwd: Promote sustainability and affordability in the Housing Element Update!
> To: Margaret Wynne <margaret.wynne@lacity.org>, Ana Gomez Orellana <ana.gomez@lacity.org>
>
> FYI
>
> These are starting to come in ~ Billie Jean
>
> ---------- Forwarded message ---------
> From: **GREGORY DINA** <gregdina@everyactionadvocacy.com>
> Date: Mon, Jan 6, 2020 at 1:23 PM
> Subject: Promote sustainability and affordability in the Housing Element Update!
> To: <mayor.garcetti@lacity.org>
>
> Dear Mayor Eric Garcetti,
>
> California is in the midst of a housing crisis. Decades of resistance to new housing, especially in coastal communities, have resulted in unbearably high rents, worsened inequality, and displacement of low-income residents. Los Angeles County especially needs much more housing, for people of all incomes, near our growing transit system and major employment centers, if we ever hope to reverse these trends.
>
> Carrying out the 6th Cycle Housing Element process will be challenging. But dismissing it on this basis is not an option. We must ensure that we are doing everything we can to further the objectives of this state process, which are:
>
> (1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.
>
> (2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reduction targets provided by the State Air Resources Board pursuant to Section 65080.

(3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.

(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.

(5) Affirmatively furthering fair housing.

Based on these values and goals, I ask that our Housing Element Update include the following policies:

- Increase zoned capacity by at least double the production target, or possibly more depending on past development patterns. The focus in the suitable sites inventory and zoning changes should be on legalizing widespread medium-density multifamily homes.

- Conduct public outreach to emphasize necessity of complying with State Law, emphasizing the values of affordability, diversity, environmental sustainability, and equity. We should be asking WHERE and HOW to build the housing, not whether.

- Raise money to build more affordable housing; this could be achieved through local bonds funded by parcel tax (e.g. Measure HHH), tax on sale of property, AirBnB tax, congestion pricing, and street parking fees. Affordable developers should gain access to public land and requirements should be waived for affordable projects when possible.

- Practice evidence-based suitable sites inventory by allowing more housing in “high opportunity” neighborhoods. Identify locations based on objective measures – job accessibility, transit accessibility, air quality, etc.

- Prioritize 4-story buildings over large developments

The Housing Elements update needs to reflect the affordability, livability, and sustainability benefits of more housing. Residents of L.A. county are calling for lower rents and a more sustainable and prosperous region, where everyone has more choices of where to live and how to pursue their dreams. Density, when well planned, enhances the social and economic life of the city.

Personally sent by GREGORY DINA using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
GREGORY DINA
6427 W 86th Pl Los Angeles, CA 90045-3702
gregdina@gmail.com

--

Eric Garcetti @MayorOfLA

Margaret Wynne
Legislative Deputy
Office of Mayor Eric Garcetti
213.978.8391

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Eric Garcetti @MayorOfLA

Laura Krawczyk
Planning and Development Manager
Office of Mayor Eric Garcetti
213.978.4636
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