

Communication from Public

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Council File No: 13-1482-S3

Comments for Public Posting: September 15, 2019 Planning & Land Use Management Committee Los Angeles City Council 200 N. Spring St. Los Angeles, CA 90012 Re: Council File 13-1482-S3 PLUM Agenda, September 17, 2019, Item 15 Resolution Requesting Transfer of Land Use Authority from CRA/LA Categorical Exemption from CEQA Members of the PLUM Committee, I am writing to express my strong opposition to the resolution requesting the transfer of land use authority from the Community Redevelopment Agency. I must also state that the associated Categorical Exemption and Negative Declaration are illegal and fail to take into account the numerous serious impacts that could potentially result from this action. While the existing CRA/LA has been reduced to a successor agency since the dissolution of RDAs by the State at the beginning of this decade, it is important to preserve the framework it provides for affected communities. Let's be honest. This power grab by the City Council is nothing more than an attempt to override protections that still exist under CRA/LA for affected communities. The Council will no doubt argue that the CRA/LA framework is hampering its efforts to create necessary housing, but all we have to do is look at the Council's pathetic record on creating housing accessible to the people of Los Angeles to realize that Councilmembers are far more interested in serving the interests of real estate investors than serving the people of LA. If we look at permits issued for residential units in LA over the past five years, we see that 80% to 90% of the housing created has been for households making 120% or more of the Area Median Income. Low Income and Moderate Income households, the categories of highest need, are left to scramble for the remaining 10% to 20% of new units. According to data from the Department of City Planning, in 2018 the City issued permits for 20,831 new residential units. Of that total, 19,236 were for Above Moderate Income households. Compare that to 1,595, which is the total number of permits issued for Very Low, Low, and Moderate income households COMBINED. Even worse, if you take that number and subtract the 1,850 RSO units that were removed from the market in 2018, you get a net loss of 255. While affordable units and RSO units aren't exactly the same thing, the result is pretty clear. In 2018 the City of LA added more than 19,000 new units for households

making over 120% of the area median income. But households whose income falls below that threshold had 255 fewer units available to them. While the City Council has done its best to ignore and override the CRA/LA framework, even with its current status as a successor agency it provides important protections for communities, requiring the production of adequate affordable housing and the maintenance of necessary infrastructure. In its desperate efforts to serve the interests of real estate speculators and its complete indifference to rational planning practices, the City Council has created a situation where we are plagued with rampant homelessness, skyrocketing housing prices, plummeting transit ridership, significant decline in the urban forest, and a growing solid waste/recycling crisis. The use of a Categorical Exemption/Negative Declaration to speed the process of usurping the CRA/LA's authority is illegal. Once again the City has failed to do any meaningful analysis of actual impacts. It is clear that transferring land use authority from the CRA/LA has the potential for serious negative impacts in the following areas: Air Quality Biological Resources Cultural Resources Geology/Soils Hazards & Hazardous Materials Hydrology/Water Quality Land Use/Planning Noise Population/Housing Public Services Recreation Transportation/Traffic Utilities/Service Systems Wildfire The City's failure to analyze impacts in these areas is not surprising. For years we have seen the City Council abuse its authority, with reckless disregard for the well-being of the people of Los Angeles. No doubt the City Council will claim this power grab is necessary to resolve the homeless crisis, but all we have to do is look at the Council's record to see that this claim is false. Cash continues to flow from real estate interests to Councilmember's campaign coffers, and City Hall returns the favor by pushing policies that foster gentrification and displacement, by approving car-centric projects that add to congestion, by making spot zoning the rule rather than the exception. To repeat, I strongly oppose the transfer of authority from the CRA/LA to the City. The Categorical Exemption and Negative Declaration violate the law by failing to assess impacts that would result from this action. Sincerely, Casey Maddren
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