

August 21, 2019

Mayor Eric Garcetti
City of Los Angeles
N. Spring Street
Los Angeles, CA 900

Date: 8-21-19
Submitted in: HHH Committee
Council File No: 798 12-1549 SD
Item No.: 730 24
Deputy: PUBLIC

Subject: Council File No. 12-1549-510 & 511; CD 13 & 15

Dear Mayor Garcetti,

The City in this matter is in direct, legal violation of Proposition HHH which is the basis for funding related to this proposed project. The language of the proposition is clear and direct, "...with citizen oversight..." There is no ambiguity in relation to how the proposition was written and presented to the general public.

Official city documents related to this matter are as follows:

Transmittal, July 30, 2019, Council File No. 12-1549-510 & 511; CD 13 & 15
To: Council From: Municipal Facilities Committee

Office of City Administrative Office, July 23, 2019, Council File No. 12-1549-510 & 511,
and CAD File: 0220-05292-0000
To: Municipal Facilities Committee From: Richard Llewellyn, City Administrative Office

The citizen oversight process to date is non-existent. This is surprising on multiple levels. Fundamental city planning principals require comprehensive citizen involvement in any major, moderate and at times, minor land use, zoning, development and/or other urban policy proposals that would have a direct and long term socio-economic, environmental and/or adverse impact on the immediate and surrounding area. Your office was directly responsible in relation selecting the key policy aspects of Proposition HHH, one of which is direct and clear, citizen oversight.

The two reports, which serve as the guiding documents prepared by city staff in relation to this matter are wholly deficient and inadequate in terms of the requirements of Proposition HHH, the principals of conventional city planning practice, the California Environmental Quality Act (CEQA), the City's own community planning process and other related laws governing land use and taxpayer related funds. Proposition HHH funds are administered by the Housing & Community Investment Dept. (HCIDLA).

I directly challenge Mr. Llewellyn, from the City Administrative Office to specifically indicate to your office, the City Council, local stake holders and the general public where the legally mandated citizen oversight requirement within Proposition HHH is addressed in either document submitted to government entities in this City for official review in relation to this matter.

The obvious.

Mayor Garcetti, the recent history of this matter to-date is fundamentally devoid of ANY citizen oversight. This failure has resulted in what can only be considered as a abject failure by the City to address a significant and essential range of land use, socio-economic, environmental, gang intervention, public space, public safety, environmental racism, economic revitalization in a minority community, and cost benefit analysis, all issues directly correlated and essential in any reasonable evaluation of this matter.

This acute failure of citizen oversight serves as a reminder to the City Council, minority communities and the general public of the rancid and racist practices of former Mayor Sam Yorty, and others in the City during the 1950s and 1960s.

The fact that, to-date, there has not been “a single meeting, with any legitimate stakeholder” in the immediate or surrounding area is an embarrassment to the entire City’s planning function and staff. This is textbook environmental racism. In essence, the City is proposing a highly controversial proposal, that violates the area Community Plan and which inherently will have significant and long term negative socio-economic and environmental impacts, while simultaneously shutting off all or any meaningful actions for comprehensive community engagement.

One thing is for certain, former Mayor Sam Yorty would both be proud of your office’s and the City’s acute lack of minority community engagement, and would be your best supporter in this regard. (A vast majority of city planners and urban policy officials would have considered that ugly era, just that, awful, regressive, racist and old history).

The two documents, Transmittal and Office of City Administrative Office fail, completely, to offer your office, the City Council or the general public any information, documentation or general indication that any form of citizen oversight, involvement, open community forums or stakeholder meetings have occurred to-date in relation to this matter.

These planning actions to involve the local community are not a mystery, they are all activities currently being practiced and utilized all over the City by the City Planning Dept, the Dept of Transportation, Cultural Affairs Dept., Parks and Recreation Dept., along with other city entities. Citizen oversight and community involvement is a cornerstone of conventional planning practice. The general public must assume that is why citizen oversight is also a cornerstone of Proposition HHH.

For example, one of the most fundamental reports related to any controversial land use proposal, in any area of the City, is the Community Plan. While the document titled, Office of City Administrative Office, identifies Clean Up, Green Up, and Oil Drilling District (which implies that existing planning and land use documents are essential to incorporate into the review of this matter), the report abjectly fails to identify the Community Plan, Recreation and Parks Reports, Economic Revitalization Reports, Transportation Assessments nor any fundamental City urban

policy reports and documents that are directly related to the community planning zone where this specific project proposal is located.

The report, in the Disposition section contains an erroneous claim. The text is specific, “(the site)...is currently used as a privately operated community recreation space....” The area is leased by a community based, gang intervention and prevention non-profit which constitutes one of the City’s most important programs to reduce crime and recidivism. The text would indicate that, as a privately operated space, fees, membership, strict assess would be the policy governing it’s use.

The text is incorrect. The space is open to the general public during all operating hours. There are no restrictions, other that normal requirements that apply to all City open spaces and parks. A non-profit agency is not a private entity. Since public funds are essential to the organization, your office if any, is well aware that comprehensive public oversight and review of all financial, programmatic and policy aspects are open record. The same applies to this vital recreational resource. It is not ‘private’.

The acute lack of the City’s adherence to law, contained in Proposition HHH has consequences, and has severely and negatively impacted any and all policy decisions to-date. The following constitutes the framework of these inherent policy deficiencies, however, I will be submitting a comprehensive analysis of the following issues to your office and the City Council within a week of this correspondence.

Open Space

The documents fail to address the extreme Open Space Deficiency that exists in both the City (the worst in the US) and this specific community, the worst in the entire City. Thus, there exists no assessment of the loss of precious open space, any mention of what any community would demand, much less a barrio, a one-to-one replacement of open space in the immediate area. The mention of community space, within the confines of a residential structure, implied in the report is wholly inadequate. I sense you can assess this difference.

LAPD Rampart Division

The documents fail to mention that the site is within the LAPD Rampart Division, which although small in size, is the most violent zone of the entire City. Thus, the document subsequently fails to address how essential gang intervention programs are to this barrio, and the negative short and long term impacts on crime, gang reduction, reducing recidivism and offering youth proactive alternatives would be impacted by this proposed project which proposes to significantly ‘Reduce’ existing gang intervention strategies.

Public Safety

The demographic characteristics of this neighborhood exhibits three key factors, high percentages of female headed households, children and youth. The proposed project is 2 ½ blocks from an elementary school, 100 yards from a major public park, and directly adjacent to a major youth oriented gang intervention program.

The profile of targeted clients, ex-offenders, drug addicts or currently with addictions, alcoholism, anti-social and/or violent behavioral patterns, registered sex offenders or with convictions related to violence against women, which are essentially acknowledged by the wide

range and types of social services and interventions this population will require constitutes the profile of a highly unstable populace.

In my professional view, this is the last type of anti-social populace any rational urban policy expert would seek to locate in the middle of a highly vulnerable demographic, single women, children and youth.

However, I have to admit, your office and some members of the City Council may disagree with my assumption.

The key issue, is without any, not meaningful, any citizen oversight this critical arena of public policy analysis is completely devoid in either report.

The report indicates that the HCIDLA staff have established criteria to evaluate the relationship to City policies and strategies in relation to housing locational impacts related directly to this client population. However, not one specific criteria is identified in either report.

Economic Revitalization

The document fails to address local economic revitalization strategies that are having a beneficial impact on a historically struggling, minority oriented commercial corridor, and the long term negative impacts that would occur in relation to this proposed project.

Community Plan

Previously stated, neither report acknowledges a fundamental fact of any controversial land use proposal, that a Community Plan has been adopted for this area. Thus, how this specific proposal negatively impacts the immediate and surrounding community is not assessed in either document in relation to the adopted community plan.

Affordable Housing for Families

The real demand in this specific area is the provision of Affordable Housing for Families. This is the real need in this community. Without community oversight this policy issue has never been addressed by City officials nor the local public to-date.

Cost Benefit Analysis

This proposal offers a contradiction between two social issues and specific actions to address each societal dilemma. The City is responsible to inform the public of the cost benefit contradictions that are inherent in this concept proposal.

One entity is an existing, successful long term gang intervention and prevention program. The main goal of this program is to significantly reduce urban violence, improve avenues to escape gang membership and consequential criminal convictions. A direct long term impact is to reduce homelessness associated with lack of opportunities and/or a history of anti-social behavior.

The proposal, of which there is no stated assurance of successful impact, inherently incorporates the construction of a high rise housing, direct and in-direct management and administration costs, the provision of an extensive array of social services, case management services and

monitoring, continual replacement costs of facility infrastructure and increased demands for LAPD services from current levels.

Both entities have inherent direct costs, which can be assessed on a per client basis.

Without citizen oversight, the general public has no specific data from which to judge the merits of programs and public policies most appropriate to the essential needs of this barrio.

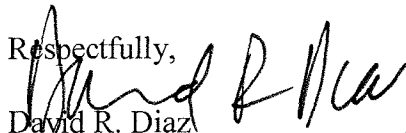
Mayor Garcetti, the City's abject failure to adhere to its own law in relation to Proposition HHH is a central reason for this major public controversy, the acute lack of meaningful evaluation, identification and dissemination of essential data and information, the failure to identify and evaluate a significant range of socio-economic, gang intervention, negative environmental impacts, environmental racism, open space policy, public safety, cost benefit analysis, and/or other important urban policy issues.

Neither your office, nor the City can permit a citizen engagement process that mirrors the racist era of former Mayor San Yorty. Your office needs to terminate all current action on the proposed project identified in the two reports (the only two reports to-date), mandate that HCIDLA adhere to the 'citizen oversight' and establish a comprehensive level of stakeholder meetings, general community meetings and seminar to inform the community of the inherent comprehensive level of issues directly related to this matter.

Without suspending all and any further efforts until Proposition HHH mandate requirements are met, the City is essentially inviting actions against the City in the future.

Mayor Garcetti, let me clearly restate the very last phrase of Proposition HHH that was submitted to the voters (I will assume your office had a direct role in developing the initiative language, I could be wrong)

"...shall the City of Los Angeles issue \$1,200,000,000 in general obligation bonds with citizen oversight and annual financial audits?"

Respectfully,

David R. Diaz
Director of Urban Studies, Retired
CSU Los Angeles
PO Box 412515
Los Angeles, CA 90041

cc.

Herb Wesson, President, City Council
Gil Cedillo, Chair Housing Committee
Marqueece Harris-Dawson, Chair PLUM Committee
Municipal Finance Committee
Richard Llewellyn, City Administrative Office
Los Angeles City Council Members

Proposed Residential Development

The proposal is within the LAPD Rampart Division, which on a per capita basis is the most violent zone in the City of Los Angeles

The proposal is within the Pico Union, Westlake and Echo Park areas which exhibit the worst per capita open space in the City, California and the US

Client Population Characteristics Defined for the Proposed Action and Associated Impact Assessment

Conventional Behavioral Patterns

- violent
- predators
- sex offenders,, registered sex offenders
- multiple convictions
- high rates of recidivism
- high rates of violent anti-social behavioral patterns
- high rates of severe drug addiction
- high rates of alcoholism

high rates of NON-COMPLIANCE with parole, probation and/or court mandated remedial services and participation requirements

Social Services/ Mandated & Direct and In-Direct Costs to City

- Mental health
- drug abuse
- alcohol abuse
- anger management
- educational enhancement
- job training
- job interviews
- LAPD interventions in relation to problematic clients
- Emergency response medical care: OD's; psychotic episodes; irrational violent behavior

% of posit
negat

projected level
of drop as to
proj level
of crime
in this pop

Project Management: Annual Costs

- Project Director
- Project Staff (more than 4)
- Janitorial
- Bldg Maintenance

Units: Direct and In-Direct Costs

- Furniture
 - kitchen
 - bedroom

bathroom
living room
Annual Replacement Costs

Cost of Construction,,,

total development cost: Estimate vs Actual Final Cost
estimated cost per unit

Social Impacts of Client Population

violence against minors
violence against children
violence against women, esp single women and single mothers
violence against the public

predators in direct vicinity of a major public park that exhibits a high usage rate by families,
children and youth

predators in direct vicinity of a major youth oriented gang intervention and prevention program
estimated rate of recidivism among client population
sexual predators in direct vicinity of children and women

estimated types of crimes to be anticipated from this client population

Community fear and apprehension

Avoidance of the area behavioral patterns of patrons to both urban recreational resources and
the commercial corridor along Sunset Blvd.

Recreation and Open Space Policy

Neighborhood, the worst per capita open space in the US

Acute lack of recreational amenities for youth

Acute lack of recreational amenities oriented to gang prevention and intervention policies

The rationale for the site: High demand for youth and gang members for pro-active, positive
recreational and counseling programs and amenities

Highest usage rates, weekly, monthly and annually on a square foot basis of any recreational
center in the City or County of Los Angeles

The most successful gang prevention and intervention recreational amenity in this area of the
City, and the entire County

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DRP

Higher usage rate, per square foot of open space that Echo Park which is XXXXX times larger
One of the few open spaces targeting gang members and potential gang members in the
Rampart Division, the smallest and most violent LAPD precinct in the City.

Negative Impacts

- Acute loss of open space
- Requirement to replace this level of open space on a one-to-one square footage basis, if not a larger space in the IMMEDIATE AREA
- Regressive social impacts in relation to the loss of open space and recreational amenities
- Regressive impact on local gang intervention and prevention programs and strategies
- Clear social symbol to the youth in this community, the City does not care about you
- Anticipated increase in anti-social behavioral patterns
- Anticipated increase in gang membership and regressive actions in the immediate and surrounding area
- Social costs of an increase in gang related violence

Direct and In-Direct Government Costs directly related to an increase in gang related violence

- LAPD
- LAFD
- County Criminal court system
- CA Youth Authority
- CA prison system

Alternative Location for a Gang Intervention and Prevention oriented open space and recreational center in the IMMEDIATE AREA

City direct and in-direct costs in locating a new open space site and building costs for a new facility and land

Negative Impacts on Gang Intervention and Prevention Programs and Policies

Why target "Success" in a community that needs to retain all forms of positive programs and resources

Negative Impacts on Sunset Blvd. Commercial Corridor

- negative influx of indigent populace
- community fear of violent and/or anti-social behavioral patterns

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constant flow of a population group prone to anti-social and/or predator actions

loss of sales activity

reduction in pedestrian activity by current consumers

loss of city tax revenues

increased police activity and profile along the main commercial corridor

loss/reduction of commercial property value

opinions of current business owners and associations

increase homeless activity along Sunset Blvd.

Alternatives to the Proposed Location

city policies in location of housing for populations that exhibit high levels of substance abuse, alcoholism, violent behavioral patterns, registered sex offenders and/or other anti-social personal histories

LA county policies in relation for locating housing for this population

State policies and guidelines for locating housing for this population

Identification of appropriate alternative sites in the surrounding community

Identification of appropriate sites a distance from elementary schools, major public parks and recreational resources, and zones with a significant single women head of household neighborhoods

Identification of sites that do significantly minimize intrusions into high density, family oriented locations

Regressive Socio-Economic Impacts

impacts on families

impacts on children

impacts on single women

impacts on youth

impacts on economic revitalization strategies

impacts on local housing

Land Use and Environmental Racism

density dumping of a problematic population group in a minority area

negatively impacting a successful recreation and open space vicinity in the worst per capita

open space district in the entire city

negatively impacting a gang intervention and prevention program in the most violent LAPD precinct in the entire City

negative impact on local anti-social behavioral patterns

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introduction of a violent population group in the middle of a dense, family oriented area with a high percentage of female headed households and youth
increase in homeless population in a struggling minority area that has experienced some recent success in economic revitalization and property valuation

acute lack of meeting directly with essential stakeholders
failure of the city planning process to conduct even one public meeting on the proposed development directly in the neighborhood being targeted by a regressive land use proposal
failure to discuss any alternatives to minority community leaders, the general public and local businesses

Adherence to City, County and State Policies in relation to Location of Residential Facilities for this Client Population

Analysis of how this proposal adheres to City policies in relation to location of residential facilities for problematic population groups

Planning process that utilizes current LA County policies in relation to location of residential facilities for problematic population groups

Planning process that utilizes current State policies in relation to location of residential facilities for problematic population groups

Exhibit conventional land use and city planning practices in the identification of a legitimate range of alternative sites, utilization of criteria that protects vulnerable populations, specifically female single headed households, teen females and children.

Provision of specific measures to be implemented to insure public safety and defend vulnerable populations from what is acknowledged as a predator populace, a significant percentage of single males with criminal records that include violence and violence against vulnerable groups..

Contradictions to:

Area Community Plan,

Long Term Gang Intervention and Prevention Programs and Policies,

acute open space deficit in this area

local economic revitalization strategies,

Relationship to City policies and strategies in relation to housing locational impacts related directly to this client population

Provision of Affordable Housing for Families that is the real need in this community

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Cost Benefit Analysis for City Taxpayers and Policy makers

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Both entities have inherent direct costs, which can be assessed on a per client basis.

The City is required to inform the mayor, city council, civil administrators and the local public of the per client costs associated with each entity. This cost benefit analysis is essential in establishing a rational assessment of which type and levels of services meet actual local community demands and offer continual long term benefit.

Thus, the City is required to provide a cost benefit analysis on a per client basis, on an annual basis of the proposed project. This is a required level of fundamental public policy financial and data analysis that offers all stakeholders a reasonable comprehension of long term direct costs to the City and which strategy offers the optimum cost per client benefit to the local community and the City.

— Comprehensive analysis of
Alternative Site in the
immediate & surrounding community

David Diney 412515
PO Box 1
Los Angeles, CA 90041