

## Communication from Public

**Name:** Westside Neighborhood Council

**Date Submitted:** 11/01/2021 05:39 PM

**Council File No:** 21-1230

**Comments for Public Posting:** Dear PLUM Committee members and Planning Department Staff: Please note that the agenda post that indicates that the Westside Neighborhood Council is opposed to the Housing Element does not correctly reflect our recent CIS issued related to the Housing Element. The Westside Neighborhood Council understands that the City must adopt a Housing Element document to meet the State's requirement for filing by midFebruary. What we oppose is the fact that the rush to approve the Housing Element has been done without a genuine effort to solicit and consider public input. For the recent Housing Committee meeting held on 10/27, the City Clerk failed to send out notices to "interested parties" in advance of the meeting. When the Planning Dept. learned about this, they sent out a notice for the meeting after 12 noon for a meeting that same afternoon. I believe that I was the only neighborhood council representative that spoke that day. Further, limiting public comment to a 20-minute period for all the items on that day's Housing Committee agenda was an inadequate period of time for an issue of such magnitude. Looking to the PLUM Committee agenda for November 2nd, the Housing Element, Safety Element and Health Element are listed as the 14th, 15th and 16th agenda items at the end of the Committee's agenda. Had it occurred to anyone that documents of this importance might deserve a public hearing at PLUM wherein these were THE sole items on the agenda? Or, is PLUM merely saving us the agony of sitting through a meeting when the Committee has no interest in considering any substantive changes to the documents? Communities that happen to be undergoing our community plans now, during this Housing Element cycle, are highlighted to take an inordinate amount of up-zoning and will be further targeted (unless exempted from even more citywide up-zoning planned to make up for the zoning gaps not filled by the community plans). We have been told that the proposed up-zoning as written is not necessarily the up-zoning that will be adopted and that those locations will be confirmed in the coming three-year work project of rezoning to meet RHNA. However, we would like to know whether sites NOT included on Appendices 4.1 and 4.7 can later be added and considered; there are many areas that have not been adequately considered that are not in communities identified as those to be protected from gentrification, high fire severity zones

and sea-level rise endangered areas. There have been no Planning Dept. outreach meetings to help communities review and understand Appendices 4.1 and 4.7 -- especially to help us to understand the potential allowable levels of up-zoning. Appendix 4.7 was not released prior to the deadline for comments due on the Housing Element DEIR-- clearly a violation of CEQA. When first released it was unusable -- a gigantic file that crashed most of our laptops and was not sortable. For your info: Our motion submitted on the day of the Housing Committee meeting for which no City Clerk notice was sent to "interested parties" follows:

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Your Community Impact Statement has been successfully submitted to City Council and Committees. If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at [NCsupport@lacity.org](mailto:NCsupport@lacity.org). This is an automated response, please do not reply to this email. Contact Information  
Neighborhood Council: Westside Neighborhood Council Name: Joseph Roth Phone Number: Email: [wncseat18@gmail.com](mailto:wncseat18@gmail.com) The Board approved this CIS by a vote of: Yea (16) Nay (0) Abstain (0) Ineligible (0) Recusal (0) Date of NC Board Action: 10/14/2021 Type of NC Board Action: Against Impact Information Date: 10/27/2021 Update to a Previous Input: No Directed To: City Council and Committees Council File Number: 21-1230 Summary: In a regular monthly meeting of the Westside Neighborhood Council, the board voted: 1) to authorize Land Use Co-chairs Kim Christensen and/or Barbara Broide to speak at Council proceedings regarding any and all points raised by the WNC in its written communications regarding the Housing Element; and 2) to oppose the Council motion and the Housing Element until adequate notice for public comment and participation is provided.

----- Please correct the manner in which our position is listed. We oppose deliberation without adequate outreach and consideration of public input.



**WESTSIDE NEIGHBORHOOD COUNCIL**  
P.O. Box 64370 Los Angeles CA 90064  
[www.wncla.org](http://www.wncla.org) (310) 474-2326



## **OFFICERS**

November 1, 2021

Terri Tippit,  
Chair  
Lisa Morocco,  
Vice-Chair  
Shannon  
Burns,  
Treasurer  
Jane Wishon,  
Parliamentarian

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](mailto:HousingElement@lacity.org), City Council PLUM Committee members, and City Planning staff

## **BOARD MEMBERS**

Barbara Broide  
Kim  
Christensen  
Vicki Curry  
Joanne  
Dorfman  
Caryn  
Friedman  
Karriann Hinds  
Jeff Hronek  
Mary Kusnic  
Jose Lustre Jr.  
Sean McMillan  
Joseph Roth  
Louis Schillace  
Mark  
Sedlander  
Mary Williams  
Jae Wu

**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 PLUM Committee members and Planning Department Staff:

Please note that the agenda post that indicates that the Westside Neighborhood Council is opposed to the Housing Element does not correctly reflect our recent CIS issued related to the Housing Element. The Westside Neighborhood Council understands that the City must adopt a Housing Element document to meet the State's requirement for filing by mid-February. What we oppose is the fact that the rush to approve the Housing Element has been done without a genuine effort to solicit and consider public input.

For the recent Housing Committee meeting held on 10/27, the City Clerk failed to send out notices to "interested parties" in advance of the meeting. When the Planning Dept. learned about this, they sent out a notice for the meeting after 12 noon for a meeting that same afternoon. I believe that I was the only neighborhood council representative that spoke that day. Further, limiting public comment to a 20-minute period for all the items on that day's Housing Committee agenda was an inadequate period of time for an issue of such magnitude.

Looking to the PLUM Committee agenda for November 2nd, the Housing Element, Safety Element and Health Element are listed as the 14th, 15th and 16th agenda items at the end of the Committee's agenda. Had it occurred to anyone that documents of this importance might deserve a public hearing at PLUM wherein these were THE sole items on the agenda? Or, is PLUM merely saving us the agony of sitting through a meeting when the Committee has no interest in considering any substantive changes to the documents?

Communities that happen to be undergoing our community plans now, during this Housing Element cycle, are highlighted to take an inordinate amount of up-zoning and will be further targeted (unless exempted from even more citywide up-zoning planned to make up for the zoning gaps not filled by the community plans). We have been told that the proposed up-zoning as written is not necessarily the up-zoning that will be adopted and that those locations will be confirmed in the coming three-year work project of rezoning to meet RHNA. However, we would like to know whether sites NOT included on Appendices 4.1 and 4.7 can later be added and considered; there are many areas that have not been adequately considered that are not in communities identified as those to be protected from gentrification, high fire severity zones and sea-level rise endangered areas.

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For your info: Our motion submitted on the day of the Housing Committee meeting for which no City Clerk notice was sent to "interested parties" follows:

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This is an automated response, please do not reply to this email.

Contact Information Neighborhood Council: Westside Neighborhood Council

Name: Joseph Roth Phone Number: Email: [wncseat18@gmail.com](mailto:wncseat18@gmail.com)

The Board approved this CIS by a vote of: Yea (16) Nay (0) Abstain (0) Ineligible (0) Recusal (0)

Date of NC Board Action: 10/14/2021

Type of NC Board Action: Against Impact Information Date: 10/27/2021

Update to a Previous Input: No

Directed To: City Council and Committees

Council File Number: 21-1230

Summary: In a regular monthly meeting of the Westside Neighborhood Council, the board voted: 1) to authorize Land Use Co-chairs Kim Christensen and/or Barbara Broide to speak at Council proceedings regarding any and all points raised by the WNC in its written communications regarding the Housing Element; and 2) to oppose the Council motion and the Housing Element until adequate notice for public comment and participation is provided.

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Please correct the manner in which our position is listed. We oppose deliberation without adequate outreach and consideration of public input.

Please also note that the Westside Neighborhood Council submitted two separate detailed letters to the City addressing specific substantive topics regarding the Draft EIR on September 7, 2021 and regarding the Housing Element on September 23 2021 which we are not repeated in this letter.

Sincerely,

*Terri Tippit*

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Terri Tippit, Chair  
Westside Neighborhood Council

*Barbara Broide*

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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](mailto:paul.koretz@lacity.org))  
Daniel Skonick, Planning Deputy, CD5 ([daniel.skolnick@lacity.org](mailto:daniel.skolnick@lacity.org))

## Communication from Public

**Name:** Elizabeth Lovins

**Date Submitted:** 11/01/2021 09:03 PM

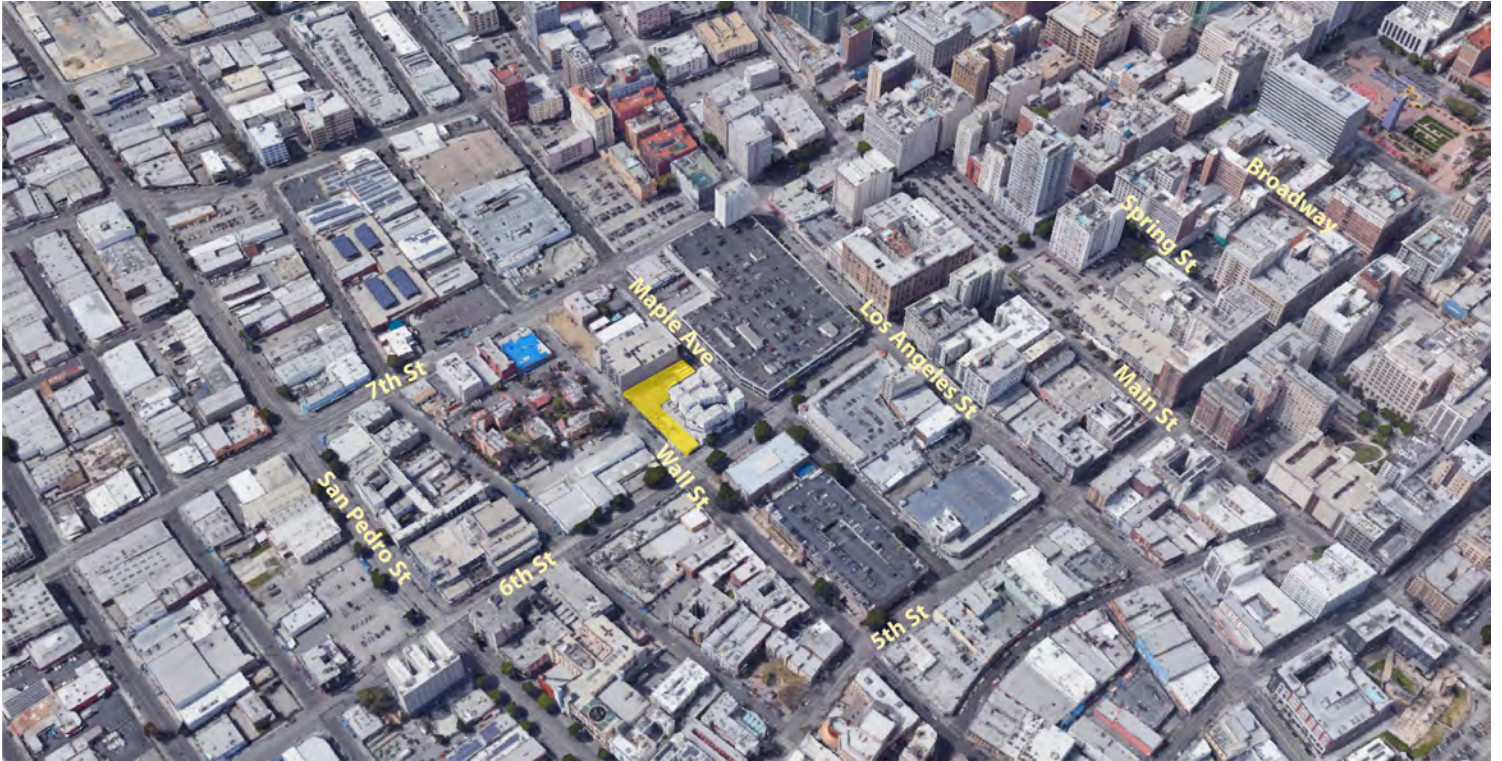
**Council File No:** 21-1230

**Comments for Public Posting:** SENT VIA EMAIL City Council Housing Committee, City of Los Angeles 200 N. Spring Street Los Angeles, CA 90012 Nov 1, 2021 RE: Housing Element Update 2021 CF 21-1230 Dear Honorable Councilmembers, Thank you for all the great work you do and I'm hoping you can help our city today. In Los Angeles, we have a great responsibility toward our cultural past, all things present and how we can responsibly move forward, without causing irreparable harm, such as the extinction of Hollywood, Los Feliz and surrounding environment. I have faith in all of you today, that you can correct the current housing element. And I respectfully ask you to not pass this motion as it is written right now. Sadly, the current plan, takes away historic protections for our world-known, iconic sites importance, like Sid Grauman's Chinese Theater and many others. Again, please do not accept or approve this current Housing Element version, as it is today. Save Hollywood and other historic sites from extinction. This motion is shameful for the irreversible destruction it will cause to our designated National Historic Hollywood District, and other historic landmarks. It's unacceptable. It's criminal. What's next? Will you propose tearing down City Hall? But perhaps this is a simple error? Fortunately, it's not too late, hope is not lost and this mistake can be corrected today. Please make the following (3) corrections to the existing motion: Please do NOT approve the HOUSING ELEMENT 2021-2019 WITHOUT an added condition that any parcel upzoned includes a mandate for the affordability, non-displacement, adaptive re-use, etc called out in the "programs" and Rezoning Appendix 4.7 in the Housing Element, AND That your approval includes a CLEAR CONDITION that any implementation in any Community Plan of any upzoning reflected in this Housing Element be tailored to diminish adverse effects on historic buildings. It is fully possible to meet our City's housing goals without demolishing a single historic building or ruining a single historic district. Please revise the current Housing Element Update 2021 CF 21-1230 to help Hollywood, Los Feliz, and areas of other great historic value, thrive, while preserving and protecting the very culture character and community which makes it a place that is uniquely identified world wide. Please correct up-zoning in designated National and State historic districts and Historic Cultural Monuments. ·

Preserve Historic Buildings and All Significant Cultural Sites. ·  
Protect Existing Affordable Housing and promote re-use. ·  
Celebrate Hollywood's Diverse Communities. Preserve the  
cultural landscape of Hollywood and Los Feliz. · Protect the place  
where cultural producers live, that is inextricably tied to our  
creative economy and film industry. Preserve the very culture,  
character and community which makes it inspiring for all who live  
here. \*\*\*Special note\*\*\* Why has Kevin De Leon, ignored and  
has not responded to the attached proposal to build affordable  
housing on 260 E. 6th Street, by Epstein & Associates and Urban  
Strategies? This is contrary to his idea to reach a certain amount of  
housing by 2025. They have tried calling and emailing for  
months, with no response. I hope that CD14, is not following in  
the footsteps of Jose Huizar. This makes absolutely no sense why  
De Leon is not even responding to them? \*\*\* Thank you for your  
time and review of this important matter. Again, please do not  
approve this motion. Ensuring our cultural resources, and historic  
residential neighborhoods are protected, is essential to the local,  
state, national and international cultural community – this needs to  
be prioritized. Preserving our past, ensures our future. Thank you.  
Sincerely, Elizabeth A. Lovins -- Director, Hollywood Art Center,  
est. 1912 Research Archivist, UCSB Art, Design, and  
Architecture Museum Los Feliz Resident, since 2003 Lovins  
family Hollywood resident, since 1910



# DTLA DEVELOPMENT SITE +/- 30,000 SQ FT LAND FOR SALE



## 260 EAST 6TH ST

- 29,133 sf land - 3,200 sf corner building
- Currently operating Transit/Busline Depot
- Adjacent to public parking structure
- Street frontage on Maple / 6th / Wall - over 400 linear feet
- Adjacent to award winning "Star Apartments" PSH housing project
- Zoning: LAR 5 / [Q] R5-2D
- Opportunity Zone + TOC Zoning

Offered by:



epsteen & associates

FOUNDING MEMBER | CHAINLINKS  
RETAIL ADVISORS

Cameron Crowner | BRE# 00924460  
(310) 451-8171 ext. 240  
ccrowner@epsteen.com

**Urban Strategies | Real Estate Advisors**

Jack Illes  
(619) 540-3286 | jack@urban-california.com



## Property Profile

<b>Location:</b>	SWC of Wall St. & 6 <sup>th</sup> St.
<b>APN's:</b>	5148-023-12; 5148-023-13; 5148-023-16; 5148-023-17; 5148-023-25
<b>Zoning:</b>	LAR 5 / [Q] R5 – 2D / Transit Oriented Communities – Tier 3
<b>Property Dimensions:</b>	95' Maple Ave; 50' 6 <sup>th</sup> St; 256' Wall St; 207' Maple to Wall (rear boundary)
<b>Year Built:</b>	1982
<b>Existing Improvements:</b>	Approximate 3,250sf free standing building on the hard corner. Land area is an asphalted vehicular parking lot & storage area. Perimeter fencing on both Maple Ave & Wall St. Underground diesel fuel tank on premises (which is monitored).

## Offering Summary

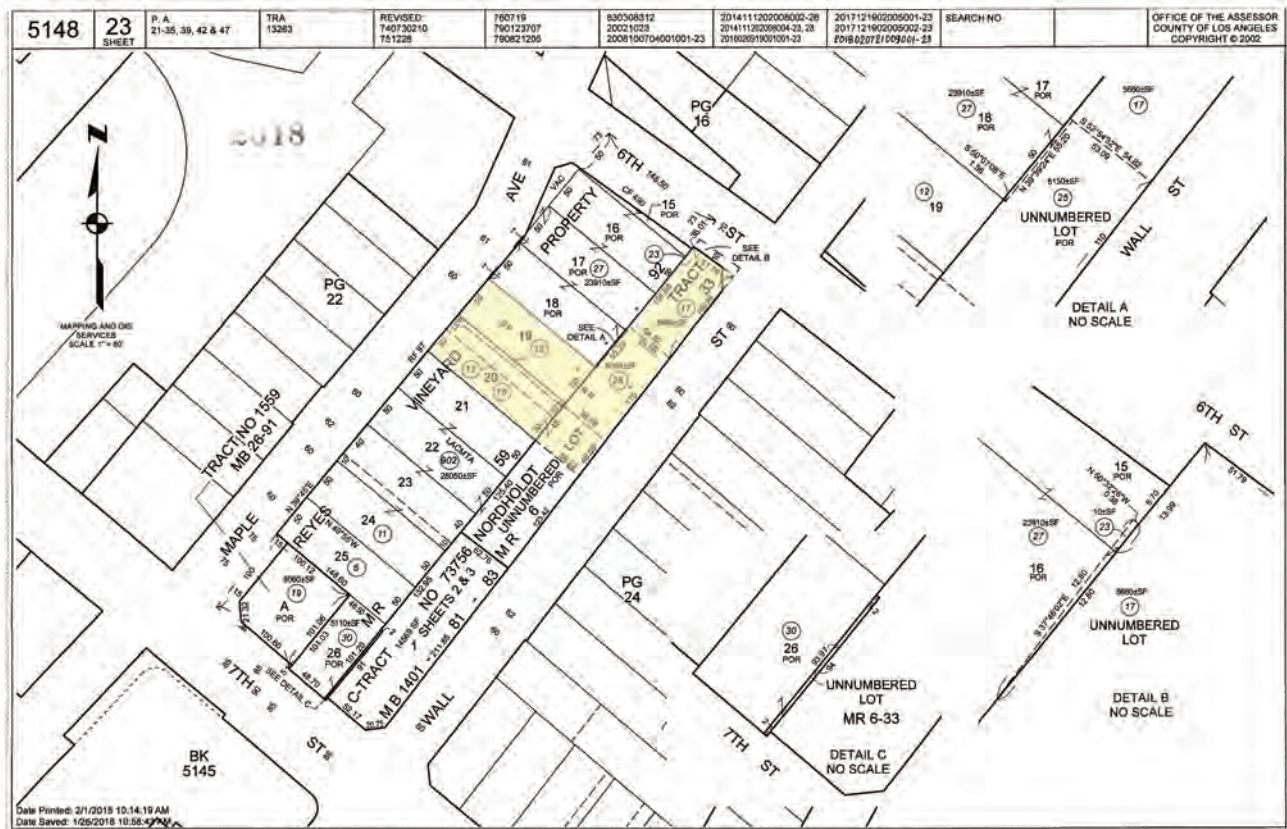
<b>Description:</b>	Prime developable site for housing with favorable density. Flag shaped lot that has frontage on three streets. The existing bus line business operates on a M-T-M lease.
<b>Price:</b>	Upon Request



Cameron Crowner | BRE# 00924460  
(310) 451-8171 ext. 240 | ccrowner@epsteen.com

**Urban Strategies | Real Estate Advisors**

**Jack Illes**  
(619) 540-3286 | jack@urban-california.com



Offered by:

**epstein & associates**



FOUNDING MEMBER CHAINLINKS RETAIL ADVISORS

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This information is deemed reliable, but not guaranteed. All information should be independently verified for its accuracy and completeness before relying upon it.





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## Communication from Public

**Name:** Richard Platkin

**Date Submitted:** 11/01/2021 02:55 PM

**Council File No:** 21-1230

**Comments for Public Posting:** 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 Co-Chair, Greater Fairfax Residents Association rhplatkin@gmail.com 213-308-6354 6400 W. 5th Street, Los Angeles, CA 90048-4710 The Draft Housing Element represents an unsuccessful response to three contradictory realities. First, LA is vastly over-zoned. It has been 25 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, SB 1181 and TOC Guidelines. 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, according to the 2020 U.S. Census. 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 to allow even greater densities. 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 apartment and/or mixed use retail-residential 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 current 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 require for their mega-projects is not immediately available, they can apply for discretionary zoning waivers, which City Hall decision makers grant 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 Turner Center. The Turner Center model downplays most available zoning, and it conveniently concludes that LA should up-zone in the popular neighborhoods where, quite understandably, private developers prefer to build their expensive and most profitable apartments. These are some of the methods that the Housing Element model uses to produce exactly what these real estate developers want: up-zoning in neighborhoods that their business models and financial advisors identify. If/when the City Council the Housing Element’s, its policies, as implemented through land use ordinances, would save the developers considerable time and money. As a result, the City Council adoption of the 2021-2029 Housing Element would allow their Return on Investment (ROI) to substantially increase. 1) The Turner Center/s model is based on 13 variables. In combination, they are supposed to reveal the likelihood that any 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 time 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 credible 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 City Council-adopted 1996 General Plan Framework Element required. Likewise, per the Framework Element’s stipulat

**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  
Co-Chair, Greater Fairfax Residents Association  
[rhplatkin@gmail.com](mailto:rhplatkin@gmail.com)  
213-308-6354  
6400 W. 5<sup>th</sup> Street, Los Angeles, CA 90048-4710

The Draft Housing Element represents an unsuccessful response to three contradictory realities.

**First, LA is vastly over-zoned.** It has been 25 years 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, SB 1181 and TOC Guidelines. 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, according to the 2020 U.S. Census.

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 to allow even greater densities. 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 apartment and/or mixed use retail-residential 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 current 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 require for their mega-projects is not immediately available, they can apply for discretionary zoning waivers, which [City Hall decision makers grant 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](#) Turner Center.** The Turner Center model downplays most available zoning, and it conveniently concludes that LA should up-zone in the popular neighborhoods where, quite understandably, private developers prefer to build their expensive and most profitable apartments.

These are some of the methods that the Housing Element model uses to produce exactly what these real estate developers want: up-zoning in neighborhoods that their business models and financial advisors identify. If/when the City Council the Housing Element's, its policies, as implemented through land use ordinances, would save the developers considerable time and money. As a result, the City Council adoption of the 2021-2029 Housing Element would allow their Return on Investment (ROI) to substantially increase.

- 1) **The Turner Center/s model is based on 13 variables.** In combination, they are supposed to reveal the likelihood that any 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 time 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 credible 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 City Council-adopted 1996 General Plan Framework Element required. Likewise, per the Framework Element's stipulations, LA's Department of City Planning has not prepared a required annual report on user demand and capacity of LA's infrastructure and public services since 1999. This may explain why the draft Housing Element's 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's commitment to up-zoning supersedes sound planning principles, in particular as the Framework's policy of ensuring sufficient infrastructure capacity prior to up-zoning that increases permitted densities ([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 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 but unmonitored up-zoning, based on the dubious claim that widescale up-zoning will somehow fill the low income housing shortfall.

Furthermore, because zoning laws cannot mandate the rent structure of apartments constructed after 1978, 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 the 2021-2019 Housing Element's up-zoning, this appears to be a missing component of the new 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 SB 1818 or TOC apartment projects to confirm that developer-pledged low-income rental 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 available 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 when conducting financial checks of prospective tenants.

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 Turner Center's model that Los Angeles City Planning (LADCP) is relying on for its 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 these statistical relationships into the future, they cannot anticipate and self-correct for the unpredictable 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 or when 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, civil disturbances like 1965 and 1992, recessions, depressions, wars, and climate change induced mega-storms. Parcel levels forecasts from the Turner Center's model also cannot anticipate new government and state 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 and amended 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, over-crowding, and out-migration.
- 4) Planning out of sequence.** Up-zoning ordinances are not integrated into the planning process, and they therefore often overlook important planning issues. Even though the General Plan Framework's Policies 3.3.1 and 3.3.2 require up-zoning to be based on 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.