

## Communication from Public

**Name:** Casey Maddren

**Date Submitted:** 11/21/2021 10:28 PM

**Council File No:** 21-1230

**Comments for Public Posting:** I would like to submit the attached comments on the Housing Element for consideration by the City Council.

November 21, 2021

Los Angeles City Council  
Los Angeles City Hall  
200 N. Spring St.  
Los Angeles, CA 90012

Re: Housing Element Update  
CPC-2020-1365-GPA  
CPC-2021-5499-GPA  
CEQA: ENV-2020-6762-EIR; SCH. NO. 2021010130  
Council File 21-1230

Members of the Los Angeles City Council,

I am writing to urge you not to adopt the proposed Housing Element in its current form. As it stands, the Housing Element proposes a massive upzoning regime without sufficient analysis to justify it. While I understand that Los Angeles must meet State requirements imposed by RHNA, the City already has sufficient zoned capacity to meet these requirements. Furthermore, the proposal to meet affordable housing needs through density bonuses is not backed by a fact-based analysis. In its current form, the Housing Element is likely to further increase speculative development, which will only exacerbate displacement.

My detailed comments are below.

Sincerely,  
Casey Maddren  
2141 Cahuenga Blvd., Apt. 17  
Los Angeles, CA 90068

## **HOUSING ELEMENT**

### **COMMENTS**

#### The City Already Has Adequate Zoned Capacity to Meet RHNA Requirements

According to the 1996 General Plan Framework Element EIR, the City's zoned capacity could accommodate a population of 7.2 million people. With the additional State and local programs that have been enacted since then (i.e. SB 1818, TOC Guidelines, ADUs), LA's zoned capacity has increased even further. The City has offered no credible explanation as to why further upzoning is needed when the 1996 Framework EIR estimates that existing zoning could accommodate up to 7.2 million residents.

#### The Proposed Housing Element Update Does Not Affirmatively Further Fair Housing

AB 686 mandates that the Housing Element include an analysis and determination of consistency with Affirmatively Furthering Fair Housing (AFFH) requirements. In its current form the Housing Element falls far short of this mandate. In spite of the talk of expanding housing

opportunities in high resource areas, there is no actual requirement to create affordable housing in these areas. The Housing Element fails to come to grips with the fact that land in high resource areas is more costly than land in areas that have fewer resources, and that the proposed upzoning regime will only drive the value of land higher. Without strict affordability requirements, upzoning will only create more expensive housing and foment speculative real estate investment. This in no way affirmatively furthers fair housing.

#### The Housing Element Does Not Include a Monitoring Program to Ensure Progress

The current version of the Housing Element does not include a monitoring program to evaluate progress. In recent years the City has increasingly relied on density bonus programs to meet housing needs, but according to City Planning's Housing Progress Dashboard, as of June 2021, Housing Approved through Planning Entitlements since July 2013 shows that 87% of new units approved have been for Above Moderate Income Households, with only 17% for Moderate Income, Low Income and Very Low Income Households COMBINED. This appears to show that the reliance on density bonus programs has produced a severe housing imbalance. With no monitoring program in place, neither City officials nor the public will be able to accurately assess progress or lack of it. In its current form, the Housing Element is designed only to increase overall housing supply, without adequate controls to ensure that housing is available to people at all income levels.

#### Density Bonus Programs Incentivize the Destruction of Existing RSO Housing

Density bonus programs, and especially the TOC Incentive Program, have incentivized the destruction of RSO housing in LA. Since State law allows replacement units to count toward affordability requirements for new projects, in many cases the number of affordable units in density bonus projects are only slightly greater than the number of RSO units lost. In some cases the City has approved TOC projects where the number of required affordable units is actually smaller than the number of RSO units lost. According to data from the LAHD web site, from 2010 through 2020 (inclusive), 9,835 RSO units were removed from the market under the Ellis Act. When we subtract this number from the total number of affordable units approved during the same period, it makes the City's meager number of new affordable units even less impressive.

#### Inadequate Discussion of Co-Living Projects

Co-living residential projects are becoming more common in the City of LA, and the Housing Element fails to adequately define this type of housing. Co-living projects are not the same as boarding houses. If the City considers this a viable approach to providing housing, the Housing Element must include it as a defined category and explain how it fits into the City's overall strategy. Currently, the City is allowing co-living arrangements to proliferate as an undefined and unregulated category of housing, without assessing impacts on neighborhoods and without providing protections for tenants who opt to live in these configurations.

#### Increased Use of Density Bonus Programs Conflicts with the General Plan

The Housing Element proposes upzoning high resource areas to further fair housing, expanding density bonus programs to allow multifamily projects in areas zoned for single-family housing. This appears to conflict with the General Plan. The expansion of TOC Incentives and co-living projects to SFH neighborhoods would seem to require a revision of the General Plan to change current zoning definitions. The proposals in the Housing Element do not appear to have been

coordinated with the proposed New Zoning Code, which lays out an extremely complicated matrix of new zoning definitions in residential areas. In its rush to approve the new Housing Element, the City does not appear to have adequately considered consistency with the New Zoning Code.

## Communication from Public

**Name:** Barbara Broide

**Date Submitted:** 11/21/2021 07:26 AM

**Council File No:** 21-1230

**Comments for Public Posting:** It is disrespectful to schedule an issue as important as the Housing Element on the day prior to Thanksgiving when many are out of town. This topic should have had a separate meeting scheduled by PLUM for discussion. Instead it was one of many items on a full agenda where public comment on all items was lumped together and many were unable to speak. The City has entered into the grace period of 120 days from Oct. 15th and does not have to rush to submit the Housing Element to the State without allowing for additional public input -- input that should be considered. We have voiced our concern that our requests to receive static maps of the key Appendices 4.1 and particularly 4.7 were never given to us so that we might understand the suggested upzoning described for our community. The lateness of the release of Appendix 4.7 was in violation of CEQA as the Appendix had not been released prior to the deadline for comments that were due on the DEIR. We have been told by City Planning staff that we should not be concerned about the upzoning proposed in Appendix 4.7 as the lists of sites can be changed as the three-year mapping process gets underway. We have been told that properties will be able to be added and to be removed from the lists submitted as part of the Housing Element to the State. The submission of this comment is to make certain that that pledge is documented as part of this process. This is especially important because as we review not only our area but others, we see wide arterials upon which no upzoning has been recommended. We do not see the logic in some of the recommendations made. We expect to be able to participate in a true community planning process to determine the best locations to upzone to meet RHNA goals for our area. Additionally, we wish to note that while our area is considered to be a "high opportunity area," it would be inappropriate for the City to assume that it is an UNLIMITED opportunity area. It is our belief that all communities in Los Angeles should offer their residents good access to transit, jobs and educational opportunities. To attempt to cluster large numbers of Angelenos in small and crowded geographic areas appears to be a strategy unsupported by the resources and infrastructure available. And, if added infrastructure and resources must be added to a high opportunity area in order to accommodate new residents, why not provide those resources in the communities

where people now live? ADDED SUGGESTED PROGRAM FOR PREVENTING HOMELESSNESS: While there are a number of programs that seek to reduce the risk of homelessness, not one appears to address the fact that many individuals and families have difficulty establishing themselves in new housing (whether a new resident to the area or because of a need to relocated) because they are unable to come up with the required SECURITY DEPOSIT. The City could establish a program whereby loans of security deposits can be made with installment payments expected over an agreed upon period of time related to income/ability to pay so that the security deposit loan fund can be replenished. In addition, alternative arrangements can be explored with landlords to develop a process for alternatives to up-front security deposits.