

Communication from Public

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Council File No: 22-0268

Comments for Public Posting: Abundant Housing LA supports exempting deed-restricted affordable housing units from thresholds that trigger Site Plan Review, and urges City Council to expand reform to other homes as well. Please see the attached letter for more information.



6/9/2023

The Honorable Councilmembers Harris-Dawson, Rodriguez, Yaroslavsky, Lee, and Hutt
Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

Support – Site Plan Review Exemption for Deed-Restricted Affordable Housing Units – Council File 22-0268

Dear Councilmembers Marqueece Harris-Dawson, Monica Rodriguez, Katy Yaroslavsky, John Lee, and Heather Hutt:

We write on behalf of Abundant Housing LA in support of adopting the proposed ordinance which was requested by **Council File 22-0268** and recommended for approval by the City Planning Commission. The ordinance would exempt deed-restricted affordable homes from the calculation of the number of homes in a project that triggers Site Plan Review (SPR).

Abundant Housing LA is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis. We support reforms to legalize more homes, make homes easier to build, increase funding for affordable housing, and protect tenants, which are all needed to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity. As a community organization, in order to maintain our independence, we do not accept financial support from housing developers or their consultants.

SPR is a discretionary review process that increases the time and cost it takes to build urgently-needed homes in Los Angeles. Discretionary projects, such as those that require SPR, are subject to the California Environmental Quality Act (CEQA) and must go through a burdensome environmental review process, even though the type of housing development that occurs in Los Angeles is almost always environmentally beneficial infill development. The more housing is built in Los Angeles, the less must be built in far-flung areas like the Antelope Valley and the Inland Empire, where natural lands will be consumed and people have fewer transit options and drive longer distances. Delays in the review process make housing more expensive by increasing soft costs such as interest on loans, property taxes, property maintenance and staff time.

Los Angeles Municipal Code Section 16.05 currently requires SPR when a residential project includes 50 or more homes. We strongly support exempting deed-restricted affordable homes SPR threshold calculations, as proposed. This simple policy change will allow Los Angeles to build larger below market rate housing projects more quickly and inexpensively. Furthermore,

we urge you to expand SPR reform to apply to other homes as well, since the shortage of housing at all income levels is at the heart of our housing affordability crisis. With the passage of the Hollywood Community Plan, the City Council has already supported increasing SPR thresholds to 100 or 200 units depending on the parcel. Now is the time to create a citywide standard, which would help create abundance in neighborhoods across Los Angeles and affirmatively further fair housing. Our recommendation is to exempt all housing from Site Plan Review as the ordinance's goals can be better achieved through measures such as the new zoning code and the Landscape and Site Design Ordinance. Other policy options might include adopting a citywide increased SPR threshold, or basing the threshold on a more environmentally friendly metric such as Vehicle Miles Traveled. Any reform should recognize that people are not an environmental impact, and that infill development furthers the city's housing and environmental goals.

For these reasons, we urge you to approve the proposed ordinance and pursue expanded reform that expedites the production of new homes.

Sincerely,

Leonora Camner

Leonora Camner
Executive Director
Abundant Housing LA

Scott Epstein

Scott Epstein
Director of Policy and Research
Abundant Housing LA