

June 1, 2016

To: Los Angeles City Council Planning and Land Use Committee

From: Richard Platkin, 6400 W. 5th Street, Los Angeles 90048-4710
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Re: CF 16-0422: BASIC STEPS TO CORRECTLY UPDATE THE LOS ANGELES GENERAL PLAN

As a former Los Angeles City Planner who was part of the team that prepared the *General Plan Framework* element, and who has recently taught city planning courses at USC and CSUN, my analysis is that City Planning's proposed work program to update the city's out-of-date General Plan, including its *Land Use Element/Community Plans*, should be rejected and replaced with a proper work program. The existing proposal totally ignores important steps and also improperly sequences the few steps that it does include.

Instead, I offer an alternative work program with nine basic tasks. If followed, it would reliably prepare and implement an updated General Plan according to State of California law and regulations, as well as professional city planning standards.

Task 1) The first task is to produce accurate citywide demographic forecasts since SCAG's inflated demographic projections for the Hollywood Community Plan Update resulted in Superior Court Judge Alan Goodman 2013 dismissal of the plan text, EIR, zone changes, height district changes, and General Plan Amendments. Furthermore, SCAG's previous demographic forecasts for Los Angeles were 500,000 people too high for the General Plan Framework element's 2010 horizon year. Since this failure, City Planning has not yet bothered to explain why its citywide forecast was so inaccurate, while SCAG's only explanation was an in-house paper than blamed its erroneous numbers on a failure to consider the business cycle, including the Great Recession, in its demographic methodology.

Task 2) Next, City Planning needs to establish the General Plan Monitoring Unit required by the *Framework*. Its tasks include accurate periodic measurements of employment, housing, population, infrastructure (maintenance, capacity, and user need), zoning buildout, and plan implementation. Without this information, it is impossible to know if existing or future plans function as intended or if they require mid-course corrections.

Task 3) City Planning should also freeze **re:code LA** since the City of Los Angeles should not legally change the zone for every piece of property in Los

Angeles before it updates its General Plan elements. General Plan implementation, such as zoning, should follow, not precede, the update of the General Plan's elements.

Task 4) After these tasks, City Planning should address the six citywide, non-Land-Use elements that the State of California legally requires, beginning with the four oldest ones: *Conservation, Open Space, Public Safety, and Noise*. The remaining two citywide elements that are up-to-date, *Housing and Mobility*, must then be amended for internally consistency with the updates of the other required General Plan elements.

Task 5) The next task is to review and update existing discretionary elements to make sure they become fully consistent with mandatory elements. The *General Plan Framework and Air Quality* elements are the most high profile, but older optional elements should also be included in this process, especially Service Systems and Infrastructure, which are now celebrating their 50th birthday.

Task 6) After that, City Planning should prepare two new optional elements that many California cities have already addressed: *Climate Change and Economic Development*. The Governor's Office for Research and Planning has already prepared extensive guidelines for these optional elements.

Task 7) Then, with those previous six tasks concluded, City Planning should address the *Land Use* element, more specifically the 35 *Community Plans* and two *District Plans*, discussed in today's report to PLUM. The current proposal, to update the *Community Plan* elements before City Planning updates the citywide General Plan elements, is clearly out-of-sequence. This is because it is impossible to accurately update local plans without fully understanding citywide trends in Los Angeles related to infrastructure, services, zoning capacity, and demographic trends.

Task 8) With this process well underway, City Planning could determine what local zoning should be changed as a result of a properly sequenced planning process. To undertake these comprehensive zone changes first, which is the City of LA's current approach through *re:code LA*, is also obviously out-of-sequence.

Task 9) Finally, with these eight work program tasks completed, the General Plan Monitoring Unit must undertake thorough annual reports measuring housing, employment, and population changes, and then recommending how these data should result in amendments to the General Plan's various elements.