

#14

Westwood South of Santa Monica Blvd
Homeowner's Association
Incorporated November 8, 1971
P. O. Box 64213
Los Angeles, CA 90064-0213

July 2, 2018

Los Angeles City Council
Los Angeles City Hall
200 N. Spring Street, Room 340
Los Angeles, CA 90012

VIA EMAIL: sharon.gin@lacity.org

RECEIVED
JUL - 3 2018
BY: 

RE: **Council File: 18-0437 - Exposition Corridor Transit Neighborhood Plan
Response to Misleading Analysis Commissioned by Abundant Housing LA**

Honorable City Council Members:

At its regular meeting on June 26, 2018, the PLUM Committee unanimously approved some important amendments to the Exposition Corridor Transit Neighborhood Plan (ECTNP). These amendments include removal of upzoning on a portion of Exposition Boulevard and a new zone, called the Neighborhood Mixed Use zone, for a portion of Pico Boulevard and - in approving them - the PLUM Committee was essentially restoring the ECTNP to the form that was recommended by the Planning Department in October 2017.

Immediately after the PLUM meeting, pro-development lobbying group Abundant Housing LA commissioned an analysis to determine the effect of the modifications that had just been approved. The analysis (done by Pactrigo, a firm that provides "intelligence" to real estate developers) concluded that the PLUM-approved modifications would remove 880 dwelling units from the Plan Area. Abundant Housing LA rounded-up to 900 and proceeded to share this misleading figure on social media, presumably in the hopes of generating negative publicity for the PLUM Committee's carefully considered decision.

This letter is a response to the analysis commissioned by Abundant Housing LA.

ECTNP with PLUM-Approved Modifications Exceeds Housing, Jobs Objectives

	2035 SCAG Forecast	October 2017 Plan	November 2017 (CPC/AHLA) Plan
Population	54,444	59,571	60,428
Housing Units	28,497	29,441	29,857
Jobs	43,097	48,296	46,991

Source: *Exposition Corridor Transit Neighborhood Plan Final EIR, May 2018, page 3-16*

As the table above shows, the October 2017 Plan exceeded the housing goals by 944 units, and over 5,000 people. And since the modifications approved by PLUM on June 26, 2018 restore the ECTNP to something very closely resembling the October 2017 version, it follows that - as modified - the Plan exceeds the stated goals by a considerable margin.

AHLA Analysis is Inaccurate, Contradicts City Planning Department Figures

According to the FEIR, the CPC/AHLA changes made in November 2017 added 416 housing units to the ECTNP, compared to the Planning Department's recommended version of the Plan dated October 2017. So, the difference between the Plan with and without the PLUM-approved modifications is less than half of the 900-unit figure Abundant Housing LA has been touting.

PLUM Modifications Restore Job Opportunities to the Plan Area

The Planning Department's analysis in the FEIR shows that the CPC/AHLA changes would have removed 1,305 jobs from the Plan Area. The PLUM modifications restore the balance of housing and employment opportunities in the Plan Area, which is a key objective of the ECTNP and critical to the success of the Plan.

WSSM's Position & Request

For all the reasons outlined in this letter, we urge you not to be influenced by the deliberately misleading analysis commissioned by Abundant Housing LA and ask that you vote to approve the ECTNP with PLUM-approved modifications intact.

On behalf of our constituents, we thank you for your consideration and are available to answer any questions you may have.

Sincerely,



Steve Rogers, Land-Use Committee Chair



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City of Los Angeles 5th District
200 N. Spring Street, Suite 440
Los Angeles, CA 90012

**RE: Exposition Corridor TNP (Council File: 18-0437)
Objection to Palms NC Testimony at June 26 PLUM Committee Hearing**

Dear Councilmember Koretz:

Just as the LA Times incorrectly criticized our community for opposing the Expo Corridor Plan, so did representatives of the Palms Neighborhood Council at the Council's PLUM hearing of June 26. Palms NC (PNC) members expressed "disappointment" at the amendments introduced to the Plan by the Council Office, and criticized the Westside Neighborhood Council for "opposing the plan". The PNC testimony - which they would later quote in a press release - also dismissed concerns about the impact of upzoning on neighborhood character as a "pretense" and "disingenuous".

WNC strongly objects to PNC assertions that we opposed the Expo Plan and that we have somehow failed to "do our part" to help achieve the goals of the Plan; this is simply not true. Also, we do not accept the PNC implication that sensitivity to R1 neighborhoods - such as those that predominate in our WNC area - should not be a factor in the development of the Expo Plan, or any other amendment to the General Plan for that matter.

We submit the following rebuttal and fact-check points to the PNC testimony and press release:

- WNC's opposition to the Plan was limited to the last-minute modifications made by the CPC, at the request of lobbying group Abundant Housing LA. We did NOT oppose the Plan in the form that was recommended by the Planning Department in October 2017, after four years of careful study and democratic outreach (a process in which we were active and enthusiastic participants).
- WNC has accepted significant upzoning in our area, including almost 30 acres of new industrial zoning that would allow some of the tallest new buildings (148-feet) anywhere in the Plan Area - and 52-feet taller than any of the new zones proposed for the PNC area.
- Upzoning in our Sepulveda station area is second only to the Bundy station area in its contribution to the employment objectives of the Plan. While PNC is fixated on the housing component only, the reality is that the success of the Expo Plan relies on a healthy mix of both new housing and new jobs. While the Plan may include more potential for new homes in PNC area, the upzoning proposed for our area will provide more jobs. It's a balance.
- WNC has supported additional upzoning along a 3/4-mile stretch of Pico (Sub-Area 26). The base density bonuses for this sub-area are less than Abundant

Housing LA requested, but nonetheless it exceeds the upzoning recommended for our area by the Planning Department and is not required to meet the housing and jobs goals of the Plan. Also, this sub-area will allow buildings of significantly increased density and height to be built within a few feet of R1 uses.

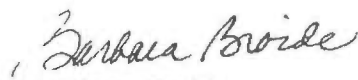
- Even as the Plan was being developed, WNC stakeholders saw a 4-acre site at Pico and Sepulveda approved for a new 13-story, 595-unit development. Now known as the Carmel project, this apartment complex will bring density to our area with a units/acre ratio not previously seen outside of downtown LA and Hollywood. But because it was permitted after the inception of the Expo Plan, the housing contribution made by this massive development was not factored into the Plan's goals, nor were its many impacts included in the environmental study for the Expo Plan. Nonetheless, the Carmel project is one of the most significant new transit-adjacent housing projects in the Expo Plan Area.
- The City needs a variety of housing types, to accommodate people from different walks of life and at all stages of life. While the pro-development lobby loudly blames R1 neighborhoods for the City's housing problems, the truth is that the City needs single-family homes as part of the overall mix. Even Abundant Housing LA founder Mark Vallianatos understands the value of single-family neighborhoods, writing in an LA Times opinion piece from April of this year:

"My family lives in a single-family home that was built in 1923... Houses like mine are an important part of L.A.'s built environment, history and housing stock. In a region with a housing shortage and homelessness crisis, all homes are good homes."

We couldn't agree more. Which is why we have worked alongside the Planning Department and CD5 to design a distribution of new zones (including the recently-added Neighborhood Mixed Use zone for Pico) that delivers the needed new jobs and housing in a way that is sensitive to the single-family streets that characterize so much of the WNC area.

- While the EXPO Plan was being developed, the State legislature adopted a new law that permits construction of accessory dwelling units on virtually every R1 zoned property. This rule means that each R1 lot in Los Angeles is a potential duplex property thus significantly adding to the numbers of new dwelling units within the Expo Plan Area. This effective doubling of the housing capacity of single-family neighborhoods was not included in the projections of housing units for the Expo Plan.

Sincerely,



Barbara Broide



Kimberly Christensen, AICP

Co-Chairs, WNC Land Use Committee

world impacts of some of the legislative fixes and regulations adopted that are meant to address housing concerns?

We have already seen that well-intentioned government policies such as the originally passed SB1818 that was meant to promote affordable housing, ended up creating incentives for the demolition of affordable buildings and units instead. (It took some time to finally amend SB 1818 and while it was in force as originally written and adopted, buildings (peoples' homes) continued to be torn down).

Many of the conversations driven by pro-housing density advocates promote ideas that have never been proven true and are basically hypotheses promoted by housing advocates and academicians. It is dangerous to accept unproven ideas as fact. If the City wishes to test some of the proposed theories, then it should admit that that is what is being done and the appropriate pilot project structure should be designed so that data can be gathered along the way that allows for review and evaluation in a defined project area. Angelenos have learned that their City, while sharing characteristics with other metropolitan areas, has sufficient unique characteristics to make it unwise to assume that programs adopted from other cities will yield the same results when adopted and implemented in Los Angeles. We need to consider the incremental testing and modification of programs to determine what is true for Los Angeles.

During my time as a UCLA student taking urban planning courses, I learned that good (successful) urban planning is an evolutionary process – not a revolutionary force.

Pretending that we have the solutions at hand with new programs never before implemented is a potentially dangerous situation which could lead us down paths with significant unintended negative consequences. That is not to suggest that we fail to take action. It does suggest, however, that we retain the ability to question, to modify and to seek an evolutionary process – as opposed to those who promote a pro-housing agenda that would, for many communities result in a new form of the 1960's urban renewal failed development philosophy.

What is the difference between transit-oriented development and transit-adjacent development? Do people who live in buildings close to transit, regularly use transit? Do people who live in luxury/market rate housing near transit use transit? Does transit use relate to socio-economic status? Is Metro's transit user profile consistent across the City? In the transit corridor plan areas, what percentage use transit? What percentage have cars? What percentage relies on bicycles for regular use? How many vehicle and bicycle parking spaces are actually in use in buildings within the half mile circle around transit stations? What incentives prove more /most successful to increase ridership amongst those living near transit? Do people who live in luxury units near transit use transit? At what rate? Do people who live in low-income units have cars and/or need vehicles for their jobs? (The City does not require

any parking to be provided in 100 percent low income buildings under TOC guidelines.)

Finally, and perhaps one of the most important factors in getting affordable and particularly low income housing built, lies in the fact that projects are not getting constructed because of the complicated financing arrangements that are needed. (The steps involved in the processing of applications may also be a hurdle- particularly for those new in the field.) The City has provided very healthy density bonuses for these types of projects and yet City Hall's doors are not being beaten down by applicants to do so. Why? \$\$\$\$. The way that these projects are financed has gotten more difficult as the need has increased. And, the tax overhaul recently enacted put new hurdles before the developers. There is a clear need for more affordable housing developers. And, once the buildings are built, there needs to be the ability to manage the properties – both the physical plant and to build successful community among residents.

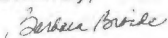
As is always the case with complicated issues, there are those who seek oversimplification of the problem in the search for easy answers. There are well-intentioned but unfounded "solutions" presented that have unintended consequences that can bring with them significant negative impacts. For anyone to claim that they know THE solution to the problem is folly. There isn't going to be A solution and as we have seen in so many other land use issues, there is a need to tailor strategies specifically for each community -- not a one-size-fits-all approach.

The pro-housing debate has been co-opted by those who seek almost wholesale upzoning of the urban landscape --without recognition of the need to seek a jobs/housing balance, without acknowledgement of infrastructure capacity, or of the need to acknowledge the existence of and importance of respecting viable communities. They seek the de-regulation of CEQA and zoning laws as well as the removal of the role of communities (and cities) in defining their futures. The pro-housing advocates fail to address the need to restore public housing programs, mandatory inclusionary housing, and the importance of clamping down on evictions.

We will do our best when we reject oversimplified solutions and come together to forge strategies to address the many levels of our housing crisis. We will fail if we seek to attack and vilify those who have opposing views. This crisis did not develop overnight and, realistically, will not be solved overnight either.

Good questions and good data will help to guide us toward good solutions.

Sincerely,



Barbara Broide

July 3, 2018

President Herb Wesson
LA City Council Members
Los Angeles City Hall
Via email: Sharon.gin@lacity.org

RE: Council File 18-0437 (and beyond)

Dear President Wesson and Honorable City Council Members,

The current discussions around the development of the Exposition Corridor Neighborhood Transit Plan have raised many questions that don't relate to the specific recommendations of the Plan (which I support as modified by Councilmember Koretz and the PLUM Committee) but rather are a reflection of things NOT said, not discussed and that rest just below the surface. I raise some of these issues in the following letter in the hope that the questions raised can be addressed as we move forward in the fashioning of City housing and land use policy. And, if there is one point that I would like to stress, it is that whatever policies / strategies are adopted in the effort to create more affordable and low income housing, it is that the City incorporate within those programs **a data collection and evaluation component** so that future decisions can be based upon a source of factual data-driven information. Such an approach will help to lead us away from adopting hypotheses as facts, emotional pleas as valid cause and will hopefully result in stronger and more soundly based future public policy.

As the City has seen, the housing problem and lack of sufficient affordable and low income housing is a reflection of a complicated set of issues for which easy answers do not exist. While some like to oversimplify the situation by blaming "NIMBYs" for the problems the City faces, that approach fails to seek the underlying conditions that have helped to create the crisis situation we face. The practice of slapping labels on those who oppose one's point of view in an attempt to discredit those other points of view is a counterproductive strategy that seeks to divide rather than bring people together to build solutions to get to the root of the issues before us.

Across the United States, and particularly felt in Los Angeles, the so-called elephant in the room that receives little discussion in the housing debate has to do with factors at the NATIONAL level. Our crisis has its roots in the national crisis where the HUD affordable housing programs must be restored. The waiting list for Section 8 vouchers is years long and there is a need to fashion the program so that the number of landlords willing to accept those vouchers is increased. At the California level, the CRA housing programs must be restored. Locally there is a need for strong constraints on evictions and unlimited/unreasonable rent increases. The wholesale re-zoning of our communities is not going to address these important underlying issues that

greatly contribute to our housing problems. Pro-housing advocates need to dedicate their efforts beyond lobbying for more supply; they need to be part of the force seeking to address these policy issues at the state and national levels (and, in my opinion cease their legislative efforts to gut local municipal zoning and planning roles).

The oversimplified approach to the housing issue that relies on a supply and demand /trickle-down economic theory taken by groups such as Abundant Housing does not reflect the reality of the situation. We see increases in homelessness in neighborhoods where there is new market housing. Why? This is likely because the real estate marketplace exists to promote and maximize profit. We do not see investors or landlords reducing rents to meet the demands for affordable housing and lose money. We see units, floors and/or buildings kept vacant (or converted into short term rentals) until conditions change. Or, landlords offer free promotions such as free parking. Those excess units are not rented out at affordable rates to meet housing demand.

Developers abandon one market for another when the costs and profits associated with development are more favorable in other locations. Larger economic factors such as the mortgage crisis and changes in loan financing as well as larger scale economic events such as the last recession also play a large role in what actually gets built and when. Recent changes in the tax code created new challenges for low income housing developers when tax credit rates were changed.

One of the problems faced not only in Los Angeles, but in cities around the world lies in the fact that the demand for housing located in desirable areas will likely always exceed the supply available. People are mobile and come to places that are pleasant to live in and where jobs are available. Add to that natural population growth and influx from other places (including other countries) and you have a situation where rising property values are likely always going to be a given (minus periodic corrections or aberrations in the marketplace such as the mortgage crisis). With rising property values come higher rents. This is seen around the world in all major cities. Despite having very dense population centers and much development both New York and London are still very expensive places to live.

Another factor rarely (if ever) raised in discussions about the rising costs of housing has to do with attempting to understand the impact of real estate speculation on escalating costs. Do radio listeners in other cities also hear advertisements seeking people to learn the practice of "flipping" houses for profit? What is the role of foreign investment in the high/ escalating cost of housing? Is there a way to quantify the numbers of units left empty that were purchased for investment without the intention of being rented? (Is there anything a City can do to create disincentives for that practice?) What kind of analysis and monitoring does the City plan to do to determine the impact of legalization of short-term rentals on housing costs and/or on the loss of rental units? What kind of data will be collected by the City to measure the real-