



clerk CIS <clerk.cis@lacity.org>

Your Community Impact Statement Submittal - Council File Number: 21-1230-S5 - City Planning Number: CPC-2023-7068-CA - Agenda Item Number: 35

LA City SNow <cityoflaprod@service-now.com>

Tue, Dec 10, 2024 at 1:00 AM

Reply-To: LA City SNow <cityoflaprod@service-now.com>

To: Clerk.CIS@lacity.org, commission@empowerla.org, CPC@lacity.org, APCSouthLA@lacity.org

Cc: J.goodie@mincla.org

A Neighborhood Council Community Impact Statement (CIS) has been successfully submitted to your Commission or City Council. We provided information below about CISs and attached a copy of the CIS.

We encourage you to reach out to the Community Impact Statement Filer to acknowledge receipt and if this Community Impact Statement will be scheduled at a future meeting. Neighborhood Council board members are volunteers and it would be helpful if they received confirmation that you received their CIS.

The CIS process was enabled by the Los Angeles Administrative Code §Section 22.819. It provides that, "a Neighborhood Council may take a formal position on a matter by way of a Community Impact Statement (CIS) or written resolution." NCs representatives also testify before City Boards and Commissions on the item related to their CIS. If the Neighborhood Council chooses to do so, the Neighborhood Council representative must provide the Commission with a copy of the CIS or Resolution sufficiently in advance for review, possible inclusion on the agenda, and posting on the Commission's website. Any information you can provide related to your agenda setting schedule is helpful to share with the NC.

If the CIS or resolution pertains to a matter *listed on the Commission's agenda*, during the time the matter is heard, the designated Neighborhood Council representative should be given an opportunity to present the Neighborhood Council's formal position. We encourage becoming familiar with the City Council's rules on the subject. At the Chair's discretion, the Neighborhood Council representative may be asked to have a seat at the table (or equivalent for a virtual meeting) typically reserved for City staff and may provide the Neighborhood Council representative more time than allotted to members of the general public. They are also permitted up to five (5) minutes of time to address the legislative body. If the CIS or resolution pertains to a matter *not listed on the agenda*, the designated Neighborhood Council representative may speak during General Public Comments.

We share this information to assist you with the docketing neighborhood council items before your board/commission. If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at empowerla@lacity.org.

***** This is an automated response, please DO NOT reply to this email. *****

Contact Information

Neighborhood Council: Mid City

Name: Jennifer Goodie

Email: J.goodie@mincla.org

The Board approved this CIS by a vote of: Yea(13) Nay(0) Abstain(0) Ineligible(0) Recusal(1)

Date of NC Board Action: 12/09/2024

Type of NC Board Action: For

Impact Information

Date: 12/10/2024

Update to a Previous Input: No

Directed To: City Council and Committees, Area Planning Commission - South Los Angeles, Board of Neighborhood Commissioners, City Planning Commission

Council File Number: 21-1230-S5

City Planning Number: CPC-2023-7068-CA


Agenda Date: 12/10/2024

Item Number: 35

Summary: The Mid-City Neighborhood Council has several historic communities and we also are one of the most dense communities in Los Angeles. Our Single Family communities are among some of the most racially and socioeconomically diverse in the City. Mid-City Neighborhood Council (MINC) recognizes the need to address the housing crisis in Los

Angeles, it is important to consider equitable access to emergency services, where developments that provide new housing are not affordable at the cost of being hazardous. The Council also understands the importance of post-evaluation processes, where monitoring and enforcing stipulations outlined in the CHIP ordinance should be implemented in order to clarify policy impacts on the community, and especially on low-income and senior residents, and residents facing housing insecurity. MINC supports section 12.22 A.38(c)(4), (page 59 of the ordinance) where "the Project site does not include lots located in a single family or more restrictive zone (RW and more restrictive zones), or any lots located in a manufacturing zone that does not allow multi-family residential uses (M1, M2, and M3), including sites zoned CM, MR1, and MR2 with no residential uses permitted from an applicable planning overlay." Proposed amendments consider the regulation for affordable developments that are planned for sites that impose hazardous conditions. The amendments, further, propose monitoring and enforcement processes post-construction, clearer language and more equitable community outreach, clear restriction from historic zones and structures, and that request adequate parking and traffic studies with proposed mitigation plans.

Ref:MSG11545874

 **CIS 21-1230-S5.pdf**
170K

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Honorable Mayor Karen Bass
Honorable Members of the Los Angeles City Council
Honorable Members of the Los Angeles City Planning Commission
Honorable Members of the Board of Neighborhood Commissioners

**RE: Citywide Housing Incentive Program / Citywide Code Amendment
CF 21-1230-S5**

The Mid-City Neighborhood Council has several historic communities and we also are one of the most dense communities in Los Angeles. Our Single Family communities are among some of the most racially and socioeconomically diverse in the City.

Mid-City Neighborhood Council (MINC) recognizes the need to address the housing crisis in Los Angeles, it is important to consider equitable access to emergency services, where developments that provide new housing are not affordable at the cost of being hazardous. The Council also understands the importance of post-evaluation processes, where monitoring and enforcing stipulations outlined in the CHIP ordinance should be implemented in order to clarify policy impacts on the community, and especially on low-income and senior residents, and residents facing housing insecurity.

MINC supports section 12.22 A.38(c)(4), (page 59 of the ordinance) where "the Project site does not include lots located in a single family or more restrictive zone (RW and more restrictive zones), or any lots located in a manufacturing zone that does not allow multi-family residential uses (M1, M2, and M3), including sites zoned CM, MR1, and MR2 with no residential uses permitted from an applicable planning overlay."

Proposed amendments consider the regulation for affordable developments that are planned for sites that impose hazardous conditions. The amendments, further, propose monitoring and enforcement processes post-construction, clearer language and more equitable community

outreach, clear restriction from historic zones and structures, and that request adequate parking and traffic studies with proposed mitigation plans.

Limited Infrastructure Consideration: Increased density should require studies that confirm whether existing infrastructure can adequately support growth per project, and per zone, given that a higher rate of density growth will strain local services. There is currently no data that confirms whether existing infrastructure is satisfactory (i.e. water mainlines, sewer pipes, electricity hubs, road and transportation consideration, emergency service coverage, etc..) for the City of Los Angeles per the projected rate of density growth through the 6th Cycle planning period. The City should identify thresholds for development (per unit) that will require additional infrastructural support. Without parallel improvements of infrastructure, density growth can impose hazardous conditions that may subsequently create disparities in living conditions and access to emergency services.

Environmental Impact: Projects using any vehicle of the CHIP ordinance (i.e. State Density Bonus Program, Mixed Income Incentive Program, or Affordable Housing Incentive Program,) should be subject to the State (of California) requirement to complete impact studies for developments proposed in Alquist-Priolo Zones, flood zones, or in adjacency to substandard streets. The City should establish a metric and measurement requirements for air quality baselines, or environmental hazards to guardrail any implementation of CHIP.

Lack of Enforcement: The ordinance does not ensure any short- or long-term oversight of projects and project impacts. It is critical that the City establish a monitoring system to enforce post-development affordability of units, and establish a publicly accessible database of affordable units (i.e. buildings with units subject to affordability restrictions, buildings that were developed with the use of affordability incentives, and properties subject to State Preservation Notice Law.)

Lack of clarity in language: The application must define terms of affordability per state mandated use of HUD figures using actual dollar amounts per project when presented, at the time of application or vesting, and be included on the Los Angeles City Planning website for public access. The ordinance's lack of specificity creates challenges in implementation, as vague language can lead to varying interpretations and inconsistent enforcement. For example, "Affordable Housing," is based on a median percentage of HUD figures for the immediate surrounding area, and the resulting variations create ambiguity that make it difficult to pinpoint what rent amounts are considered 'affordable.' Specific definitions and clear parameters could streamline processes, ensure transparency, and improve predictability for developers and stakeholders alike.

Insufficient Community Input: Communities need adequate noticing, and especially more than a notice mailed 24-days in advance to Neighborhood Councils. With the mail system failing delivery up to 10 days, and reasonable time to coordinate with volunteer Neighborhood Council members, a larger window of at least 31 days should be required.

Historic Resources: Any project within a 100-foot radius of an historic resource should not qualify for ministerial review and should be excluded from CHIP. Developments within a 100 foot

radius of an historic resource, or that fall within an historic overlay zone, should require review by the Cultural Heritage Commission. The project should require design review for any possible design elements that would degrade the designated historic integrity of the community. The Secretary of the Interior's Standards for the Treatment of Historic Properties Standard 9 does not preclude design from mimicking the look of a community, as it safeguards the tax benefits a project receives from maintaining an historic building.

Traffic, and Parking: Increased housing density will effectively worsen traffic and parking shortages, impacting residents' daily commutes, air quality, and road infrastructure maintenance. While many affordable housing projects, especially within Transit Oriented Corridors, rely on robust public transit to offset traffic and parking considerations, the City does not specify any onstreet parking regulations for tenants living in developments that use affordability incentives to build their project. On-street parking for these tenants is currently regulated in the City of Los Angeles by California Assembly Bill 2712 (passed August 28, 2024). Parking requirements lack specific language for requirements regarding on-site or off-site parking, or alternative solutions. The City of Los Angeles should consider the sprawled geography of our City and County, how the historic design of the City was originally focused on private vehicle use, and how the city's economic development is intrinsically tied to residents' ability to travel various distances and to locations that may be difficult with public transit use, in order to maintain employment while securing housing. The City should propose a well-thought-out plan for mitigating the result of increased vehicles per projected density growth, using quantified, calculable measurements of growth impacts.

Thank you for your time and consideration.

Respectfully Submitted,
Mid-City Neighborhood Council