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Your Community Impact Statement Submittal - Council File Number: 25-0600 - Agenda Item Number: 1

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

Tue, May 13, 2025 at 6:53 PM

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

To: philipa474@gmail.com, Clerk.CIS@lacity.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: Rampart Village

Name: Philip Armstrong

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The Board approved this CIS by a vote of: Yea(9) Nay(0) Abstain(0) Ineligible(0) Recusal(0)

Date of NC Board Action: 05/13/2025

Type of NC Board Action: For if Amended

Impact Information

Date: 05/14/2025

Update to a Previous Input: No

Directed To: City Council and Committees

Council File Number: 25-0600

City Planning Number:

Agenda Date: 05/16/2025

Item Number: 1

Summary: Vulnerabilities exist in the City of Los Angeles' management of the process for entitling, covenanting, and permitting Affordable Housing projects that receive Transit Oriented Communities (TOC) or Density Bonus incentives. They include gaps in the management system for recording covenants for the low-income units on the title of the properties and for communicating among the City Departments that covenants have been recorded. As an example, we understand the property address is the only common data element used in the databases of the three City Departments

for an Affordable Housing project and, among themselves, the three Departments may each use a different property address in communicating about the same project. Until January 2025, when LAHD signed off on the clearances for the low-income units, LAHD did not provide, and LADBS did not retain in its recordkeeping system, the information necessary to identify the covenants for the low-income units. For that reason, the RVNC recommends creating a coordinated, comprehensive, and public-facing tracking system that would gather, reconcile, and analyze the data that is currently dispersed in the databases and manual tracking systems of the three City Departments that are collectively responsible for managing the process in which projects with low-income units are entitled, permitted, and covenanted. For these reasons, we believe there are three parts to resolving this problem: 1) creating a management system with performance metrics to capture and track this data and ensure that all of the needed actions are taken; 2) revising the procedures in Section X of the Affordable Housing Incentives Guidelines for LAHD to provide the Contract Number/Agreement Number and for LADBS to capture that data into current and new LA City Permitting Systems; and 3) making the data available to the stakeholders, decision makers, and staff in a format that will allow them to make decisions.



Community Impact Statement for Council Files 23-0426 and 24-0124 and 25-0600.pdf

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Community Impact Statement for Council Files 23-0426, 24-0124, and 25-0600

May 13, 2025

Honorable Members of the Los Angeles City Council,

The purpose of this community impact statement is to draw your attention to vulnerabilities in the City of Los Angeles' management of the process for entitling, covenanting, and permitting Affordable Housing projects that receive Transit Oriented Communities (TOC) or Density Bonus incentives. These vulnerabilities include gaps in the management system for recording covenants for the low-income units on the title of the properties and for communicating among the City Departments whether these covenants have been recorded. Furthermore, these vulnerabilities are aggravated because the current process does not appear to value communication, coordination, transparency, or accountability. As an example, we understand the property address is the only common data element used in the databases of the three City Departments for an Affordable Housing project and, among themselves, the three Departments may each use a different property address in communicating about the same project.

As you are already aware, the Neighborhood Council Budget Advocates provided the [2025 White Paper](#) to Mayor Karen Bass on March 24, 2025. The 2025 White Paper included a set of recommendations for improving the management of Affordable Housing production in the City of Los Angeles and within the Department of Building and Safety:

- Proactively implement a mechanism for data sharing and tracking among the Department of Building and Safety, the Housing Department, the Department of City Planning, and other City Departments for projects specifically including information for identifying and tracking covenants for low-income units;
- Fund the expansion of the Affordable Housing Tracking System to include all relevant data, collecting this data in a public-facing database, especially with regards to tracking covenants for low-income units, on a more timely basis;
- Implement a performance metric for "Low-Income Housing Units Permitted;"
- Integrate this performance metric into current and new LA City Permitting Systems;
- Implement new procedures for clearing low-income units with the Housing Department to ensure that identifying Housing Department project information is captured in those permitting systems;
- Enhance the permitting systems to include the following categories of data: when LAHD approved the housing clearance for the low-income units, whether the projects received Transit

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Oriented Communities (TOC) or Density Bonus incentives, whether the projects were mixed-income projects, and which of the three types of review was needed for projects that fall under LAMC Section 12.22.A.25; and

- Require the Structural Plan Check staff to inform applicants for by-right mixed-income Affordable Housing projects of the requirement to record a covenant with LAHD for the low-income units.

As described in the Rampart Village Neighborhood Council's (RVNC's) September 18, 2024 [Community Impact Statement](#) for Council File [23-0426](#), using data for the years 2020, 2021, and 2022 obtained from the Department of City Planning (Planning), the Department of Housing (LAHD), and the Department of Building and Safety (LADBS), the RVNC's Public Safety, Housing & Transportation Committee was able to confirm in only 60 percent of the 821 permit applications observed that the developers of Affordable Housing projects with TOC or density bonus incentives had recorded covenants for the low-income units in these projects. This is the case because when LAHD signs off on the clearances for the low-income units, LAHD does not provide, and LADBS does not retain in its recordkeeping system, the information necessary to identify the covenants for the low-income units. For that reason, in our community impact statement, the RVNC recommended creating a coordinated, comprehensive, and public-facing tracking system that would gather, reconcile, and analyze the data that is currently dispersed in the databases and manual tracking systems of the three City Departments that are collectively responsible for managing the process in which projects with low-income units are entitled, permitted, and covenanted.

When combined with the comprehensive, multilingual online search system for Affordable Housing envisioned by Council File 23-0426 (that would include all covenanted affordable units, including privately financed units created through incentive-based programs), we believe such a public-facing tracking system would give our stakeholders and the City Departments a clearer picture of the low-income units that are available now, of the additional low-income units that will be coming online in the current and future years, and of where in the permitting process those anticipated low-income units are based on the Permit Status.

Regarding the need for a public-facing tracking system for low-income units in the Affordable Housing production pipeline, our efforts to resolve these issues in collaboration with other Neighborhood Councils and the City Departments include the following:

1. In April and May 2023, LAHD initiated a special project in which they matched an LAHD covenant file with an LADBS permit file for 78 out of 80 projects (out of the 821 permit applications we observed) that we identified as having TOC or Density Bonus incentives, with a Permit Status of "Issued," and for which the PSHT Committee could not match an LAHD covenant file. The remaining two permit applications still without a covenant included: 1) a 100% affordable project for which LAHD signed off on the clearance although a covenant had not been recorded; and 2) a mixed-income project for which LADBS issued a final permit without requesting a clearance from LAHD for the low-income units.
2. In the Budget Advocates December 16, 2024 meeting with LADBS, Executive Officer John Weight said he would communicate a glitch to the General Manager for Housing. The procedures for obtaining LAHD sign-off for the low-income units in the permit application are described in Section X of the [Affordable Housing Incentives Guidelines](#). In these procedures:

- a. The applicant provides to LAHD the clearance form, the building permit application, and all of the information needed for the covenant.
- b. Using that information, LAHD determines the rent level of the low-income units and prepares a covenant that establishes the number of low-income units, the affordability level, and the term of affordability.
- c. The owner signs the covenant and has it notarized.
- d. LAHD completes the electronic sign-off of the building permit application and has the covenant recorded by the County Recorder.

However, when LAHD signed off on the permit application, they didn't provide to LADBS the Contract Number/Agreement Number for the covenant that could link the sign-off on the permit application to a specific covenant. If LAHD were to provide the Contract Number/Agreement Number, it could be used to look up the covenant via the [LACityClerk Connect/Resources/City Contracts](#) database. In response to this information describing a glitch, upon careful consideration of the issues addressed, LAHD told us they began adding the Contract Number/Agreement Number on LAHD's clearance form for each affordable housing covenant recorded from January 1, 2025.

3. At the suggestion of LADBS, we discussed these issues with the Bureau of Engineering, which manages the Affordable Housing Tracking System (AHTS). While the Bureau of Engineering supports the AHTS application and enhancements, the creation and entry of project data into AHTS is managed by LADBS, Planning, and LAHD. For that reason, the Bureau of Engineering suggested that we table any questions until a coordination call was scheduled with those departments to further identify what, if anything, needed to be done, to enhance the internal AHTS application to include covenant tracking.
4. Using [ATLAS](#), an interactive map application, LADBS overlaid the City Controller's map of [Affordable Housing covenant projects \(1985-2022\)](#) with the Bureau of Engineering's geocoded addresses for the 821 permit applications we had observed, shared with us the Affordable Housing Application, a [quick app/ search tool](#), and explained how to use its search function. With the aid of this tool, the PSHT Committee searched for about one-third of the 328 addresses (that is, the other 40% of the 821 permit applications that remained after accounting for the 78 projects with a Permit Status of "Issued") for permit applications for which we could not identify covenants and we identified two issues: 1) we only found seven matches in two Permit Status categories, meaning that we couldn't locate the covenants for the remaining addresses although the map displayed the sets of the mapped addresses in the permit and covenant layers; and 2) while four of the seven projects with matches had hyperlinks to the Contract Number/Agreement Number via the [LACityClerk Connect/Resources/City Contracts](#) database, the property locations in the recitals in the covenants for three of those four projects (out of seven with matches) did not include the addresses for the permit applications.
5. Given these results, we asked LAHD to provide to LADBS a Google sheet with the addresses for all of the Affordable Housing covenants they have recorded. We understand that having the addresses for the covenant data layer from a single source will allow LADBS to overwrite that layer in ATLAS and to edit the addresses in the permit application data layer. In response, LAHD informed us that they have not forgotten about this, but they have a significant amount of priority projects that they need to complete before they can address this.

As described above, we believe there are three parts to resolving this problem: 1) creating a management system with performance metrics to capture and track this data and ensure that all of the needed actions are taken; 2) revising the procedures in Section X of the [Affordable Housing Incentives Guidelines](#) for LAHD to provide the Contract Number/Agreement Number and for LADBS to capture that data into current and new LA City Permitting Systems; and 3) making the data available to the stakeholders, decision makers, and staff in a format that will allow them to make decisions. Consequently, we would appreciate your responses to the following questions.

1. In response to the recommendation in our community impact statement for Council File 23-0426, we would appreciate your feedback on whether the funding, personnel, contracts, and any other resources needed to create the comprehensive, multilingual online search system for Affordable Housing would include those needed to create a coordinated, comprehensive, and public-facing tracking system for managing the process in which low-income units are entitled, permitted, and covenanted.
2. Given the City of Los Angeles' current budget constraints, would you consider addressing the issues described above in a timely manner to be a priority for the City Departments who would be responsible for resolving them?
3. Given these vulnerabilities and the mandate in Section 910 of the Los Angeles City Charter for Neighborhood Councils to monitor the delivery of City services and have periodic meetings with responsible officials of City departments, subject to their reasonable availability, what role do you see Neighborhood Councils playing in elevating and responding to the needs of their stakeholders for Affordable Housing going forward?

We provided this information to the City Administrative Officer and the Office of Mayor Karen Bass on April 16, 2025 and we have not yet received a response to the issues raised.

We support Council File [24-0124](#) in that it addresses the manner in which the roll out of the Comprehensive Online Affordable Housing Search System will impact current practices for marketing and tenant selection for newly constructed covenanted affordable housing units in unsubsidized, mixed-income projects created through TOC and density bonus incentives. We support Council Files [23-0426](#) and [25-0600](#) if amended to respond to the issues raised above.

Thank you for your consideration and we look forward to hearing from you.

In service,
Rampart Village Neighborhood Council

PRESENTED BY: Laura Morrison

SECONDED BY:

YES: 9 NO: 0 ABSTAIN: 0 ABSENT: 2 INELIGIBLE: 0

ON THIS DATE: May 13, 2025