



NANDC
North Area Neighborhood Development Council



September 22, 2021

TO: Housing Element Staff
Matthew Glesne, Senior City Planner
Blair Smith, City Planner
City of Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

FROM: Empowerment Congress North Area Development Council (NANDC)

Via e mail: HousingElement@lacity.org

Dear Planning Staff,

NANDC supports the goals of the Housing Element of the General Plan currently under revision by the DCP.

The expressed goals are:

The overarching goals of the Housing Element that embody the City's commitment to meeting housing needs are:

To produce and preserve an adequate supply of ownership and rental housing that is safe and healthy; affordable to people of all income levels, races, and ages; and suitable to their various needs.

To ensure housing that helps to create safe, livable, and sustainable neighborhoods.

To ensure that housing opportunities are available to all without discrimination.

To prevent and end chronic homelessness.

However positive the goals, the way these are achieved is extremely important. The Housing Element Document is expansive and wide ranging. NANDC wishes to support the goals and offer some comments on areas that should be revisited or improved.

NANDC reviewed the Housing Element at its duly noticed August 24th Policy Committee meeting and at its September 2 full Board meeting. This letter reflects our comments by Board and stakeholders and contains a myriad list of suggestions and observations with a goal to improve the document. Some of us also were able to attend the PlanChkLA meeting and listen to Matt Glesne's excellent presentation.

NANDC has historically supported affordable housing, housing for low income and very low-income families and individuals. The current proposals under the TOC Program are a dismal failure and amount to a huge giveaway to developers without getting sufficient benefits in return. It is shocking to learn



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that 2/3 of the affordable housing currently being developed in the city is from this TOC program since there are such significant negative impacts that are associated with these on and off menu bonuses with as little as 5% VLI units in return. We would like to specifically tie developer “giveaways” to affordable unit creation (ties in with requiring universal replacement of stabilized and affordable housing units), preferably in a 2:1 ratio.

NANDC went through extensive analysis during the South Community Plan review process, in identifying TODs, transit-oriented districts. Then the TOC program came along and virtually every site in NANDC is transit oriented by its definition. This needs to be evaluated and tightened up because currently extremely incompatible buildings are being built in the middle of neighborhoods that ought to be conserved. Further the exemption from CPIO rules for TOC projects is not a positive step.

Programs like the TOC program are not fixing our housing problems but rewarding developers without getting a reasonable return on our “gives.” NANDC has been able to seek and received numerous additional affordable and work force housing units simply by asking developers to create more affordable units in return for the support of the Council. The failure to key “affordable” to neighborhood norms usually means that the housing provided as affordable is not affordable to current residents of the areas. There are no programs to allow existing residents the right of return. The average median income which is used to define “affordable” should be based within a two-to-three-mile radius of the proposed development. Tenants whose housing is being removed should have first right of return.

The housing element says 90% of homes in LA are married families, people living alone, or family units – this seems to negate a need to develop more “co-living” options which tend to be a monetizing of available bedrooms. These are not projects to house those in need of housing who are currently sleeping in cars or on the streets.

There is consistent focus on luxury, market rate and affordable housing, but middle-income housing is often neglected. More needs to be done to encourage middle income opportunities and conserve existing neighborhoods.

There is no discussion of programs to create home ownership. Home ownership builds family wealth and community stability. But when the cost of a condominium or “starter home” in Los Angeles is over \$500,000, it is very difficult for the average family to save for the 20% down payment let alone cover the monthly mortgage payment. First time home buyer programs that assist with down payments, rebates that help lower the monthly mortgage payments and waving of city fees associated with buying a home, can help our middle and lower middle class community members become homeowners. The Community Redevelopment Agency had a program that saved historic housing and sold homes by lottery to a moderate-income family, the sale price being supported by a “soft second.”

After WWII, affordable home for sale were developed for those returning from the war; townhomes and craftsman bungalows might offer design suggestions. This type of development would need subsidy.



Neighborhoods and people need to be conserved and there is not enough recognition of retaining character defining neighborhoods, culturally and architecturally, and the residents that reside within them and the steps that can be taken to preserve neighborhood character. Other cities are creating culturally significant zones, much like HPOZs and Specific Plans. The Housing Element needs to support these types of tools in creating and preserving housing.

Submitted by

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Per NANDC Board motion of September 2, 2021

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