

Memo to LA City Planning Commissioners and Affordable Housing Commissioners:

Thank you for the opportunity to present comments at the June 12th Housing Element hearing. Please consider the following additional big-picture comments as you assess our Suggested Amendments:

Do Real Planning for the Future!

We were deeply disturbed by the explanation from Planning Department staff members that *new* programs were not included (or were included with weaker language) in the Housing Element because staff felt that these new programs could not be implemented successfully. Staff need not make these judgments about political feasibility, since the Housing Element will itself be approved by City Council before adoption. Rather, Staff should present for consideration programs in the Housing Element that will realistically enable the City to address its vast and diverse housing needs. Without strong new programs, the Housing Element does not constitute a plan for the future --- it simply summarizes existing City policies and programs that quite plainly will not address the needs of lower-income Angelenos. This is not real planning – and it contravenes the spirit and intent of Government Code Section 65580 *et. seq.*

Inventory Requires Further Analysis, Not Redoing.

We urge the Commissioners to take to heart the real purpose of the site inventory. Land is an essential ingredient for building affordable housing, which is 40% of the target for new construction through 2014. The draft site inventory is not filling that role, because the sites that it identifies as suitable for affordable housing are simply too small and therefore not feasible to build on. The City admits that “*larger size lots may be preferable to some affordable housing developers*” but disingenuously concludes that “*all sites on the Inventory are also suitable for the development of affordable housing.*” (May 28, 2009 Draft, 3-4) The conclusion that “all” sites are suitable for affordable housing, including those that are less than ¼ acre, makes our point that the City is not doing any real analysis of the Inventory.

The State Department of Housing and Community Development confirms in its June 2, 2008 comment letter to the first Draft that “*the adequacy of the sites and zoning has not been established...[and]...City may also need to add or strengthen programs based on a complete analysis.*” Neither we nor the State are asking the City to redo the entire inventory. We are asking the City to be realistic about where new development might happen and where we can expect affordable housing to be built. A meaningful analysis of the inventory is required by law and will reveal critical housing issues the City must address. “*A thorough sites inventory will help the locality determine if additional government actions are needed.*” (HCD Q&A, #18) Most importantly, it will compel programs to address the needs that the inventory cannot on its own meet -- land use programs including preservation of housing and a strong mixed-income housing ordinance.

Housing Element Law is Focused on Affordable Housing Needs!

It bears repeating that while the Housing Element law requires the City to consider the needs of all economic segments of society, the law specifically directs the City to address the needs of its lower-income residents. If the City cannot prove that it has sufficient sites in its inventory for *affordable* housing for persons of lower-incomes, the City must include an adequate sites program in the Element, which shows how the City will find sites to accommodate the unmet need for lower-income households. A jurisdiction's adequate sites program must accommodate 100% of the shortfall of sites necessary to accommodate the remaining need for very-low and low income households during the planning period. (HCD Q&A, #40) Furthermore, sites must be identified as needed to facilitate and encourage a variety of housing types, including specifically, multifamily rental, mobilehomes, emergency shelters and transitional housing. (HCD Q&A, #40).

Preservation Programs Must Be Strengthened – This Draft is Weaker than the Last Element!

Over the last planning period, thousands of subsidized and rent-stabilized units were lost, resulting in greater displacement, severe overcrowding and overpayment situations for Angelenos. Yet, the Draft Housing Element is weaker than the last Housing Element on the issue of preservation. To start, it contains absolutely no programs or policies addressing condo conversions. It also fails to present any meaningful mechanisms to regulate demolitions and to preserve at-risk subsidized housing. Pouring federal, state and city subsidies into building new affordable housing units will not result in a net gain of affordable homes if we can't at the same time preserve what we have. The Housing Element is our opportunity to encourage production of the types of housing we need, while at the same time ensuring preservation of our existing, valuable rental housing stock.

Conclusion

The Draft Housing Element concedes there are insufficient resources to address affordable housing needs – and in our Suggested Amendments we offer land use strategies to address these issues, including preservation and mixed-income housing. Commissioners, it is our sincere hope that you act favorably upon our Suggested Amendments. Let this be an opportunity for the City of Los Angeles to be proactive about its housing crisis.