



October 3, 2023

Kevin Keller, AICP  
Senior Advisor, Office of Mayor Karen Bass  
City of Los Angeles  
200 N. Spring Street, Suite 525  
Los Angeles, CA 90012

**RE: COMMENTS TO DRAFT AFFORDABLE HOUSING STREAMLINING ORDINANCE**

Dear Mr. Keller:

Community Corporation of Santa Monica (Community Corp.) is pleased to support any efforts that streamline the production and incentivize the development of affordable housing units in the City of Los Angeles. Community Corp. is a nonprofit established in 1982 that has since completed 2,023 affordable housing units mostly in Santa Monica, but has now expanded into the City of Los Angeles. Community Corp. completed its first 50-unit development in Mar Vista and is constructing a 102-unit development in Westchester. Community Corp. is focused on delivering high-quality affordable housing in higher income neighborhoods including Council Districts 5 and 11. Developing affordable housing in these communities is especially challenging due to the lack of available sites and the high cost of land. Therefore, Community Corp. urges the Planning Department to provide flexible development standards that encourages the development of difficult to develop sites and assist with bringing more not fewer housing units to the community.

Community Corp. encourages to City of Los Angeles to provide flexibility, within reason, to encourage the production of affordable housing. To this end, Community Corp. recommends the proposed streamlining ordinance to concentrate on expediting the production of housing rather than unduly limiting eligibility or the range of incentives/waivers. These development incentives proposed by Community Corp. are also consistent with State density bonus laws already enacted. Below is a list of recommendations. As drafted, this ordinance would exclude our current pipeline 100% affordable housing projects from getting streamlining benefits under the proposed codified ED-1.

**Eligibility Requirements:**

- a. The draft ordinance imposes a blanket restriction on eligibility by excluding single-family or more restrictive zones. There are many circumstances where a single-family or more restrictive zone may not align with its surroundings, especially if it's adjacent to less restrictive zones. In the attached Exhibit, we've identified just a short list of properties in which a single-family or more restrictive zone is surrounded by less-restrictive zones. These are prime examples of development opportunities that would support multifamily development for 100% affordable housing projects but would be prohibited under the proposed ordinance. Community Corp. understands the aim is to avoid drastic density contrasts, but exceptions should be acknowledged and allowed.

**Suggestion:** Allow for special circumstances to be reviewed by the Director of Planning to determine eligibility.

- b. Projects leveraging Waivers of Dedications and Improvements (LAMC 12.37.I) are rendered ineligible. As this is a decision at the Director of Planning's discretion and only appealable by an applicant, it should not be a reason for ineligibility.

**Administrative Review Process:**

- a. The process focuses on the Planning Department but other City Departments, as mentioned in the ED1 implementation memo, seem to be omitted. Community Corp. asks for further clarification around whether the draft ordinance will allow an expedited process from other city departments for securing building permits.
- b. Pertaining to *Requests for Waivers or Modification of any Development Standard(s) Not on the Menu*, Community Corp. recommends removing the cap of two (2) off-menu waivers/incentives. Setting a limit of two waivers/incentives is arbitrary and hinders the progress for 100% affordable housing developments. State density bonus laws do not place a cap on development waivers; therefore, Community Corp. recommends removing the proposed limit of only two waivers/incentives. We currently have two 100% affordable housing projects in predevelopment that under the proposed revisions, would now be ineligible for ED-1 streamlining benefits due to this arbitrary cap and would take much longer to develop.
- c. Community Corp. is concerned the established limitations on Floor Area, Height, and Yard incentives are further examples of another areas of concern. Rather than imposing these constraints, the City should prioritize efficient processing. Lastly, Community Corp. ask that in the instance where an affordable housing site is not eligible for streamlining that the project be eligible for streamlined permitting once approved.

We thank you for your time and consideration and look forward to working with the City of Los Angeles to create opportunities that deliver affordable housing throughout the City. If you have any questions or require additional information please feel free to contact me at (310) 394-8487 ext. 133 or [Tbarauskas@communitycorp.org](mailto:Tbarauskas@communitycorp.org).

Sincerely,



Tara Barauskas  
Executive Director

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EXHIBIT A







