



MOUNTAINS RECREATION & CONSERVATION AUTHORITY

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MEMORANDUM

TO: The Governing Board

FROM:  Joseph T. Edmiston, FAICP, Hon. ASLA, Executive Officer

DATE: January 4, 2017

SUBJECT: **Agenda Item VII(d): Consideration of resolution supporting proposed Neighborhood Integrity Initiative Measure S, City of Los Angeles.**

Staff Recommendation: That the Governing Board adopt the attached resolution supporting proposed Neighborhood Integrity Initiative Measure S in the City of Los Angeles.

Background: The City of Los Angeles General Plan has not been updated in over 20 years. In lieu of a modern General Plan, the City Council continues spot zoning and General Plan amendments at an accelerated rate in portions of the City relevant to the mission and objectives of the Mountains Recreation and Conservation Authority (MRCA). The City allows developers to choose their own preparers of environmental documents. City planning commissions meet during the day when affected citizens have a difficult time attending. These factors result in excessive impacts to natural systems, watersheds, viewsheds and passive recreational opportunities within the City. If these practices were permanently changed along with a temporary two year moratorium on projects that require zone changes, General Plan Amendments and changes to existing height districts, the outcomes of land use decisions on these public resources would result in greater net environmental benefit and reduced net environmental damage.

The Neighborhood Integrity Initiative on the March 2017 City of Los Angeles Ballot directly addresses these issues. The full text of the ballot initiative is attached.

The above outlined City planning approval process deficiencies have recently resulted in the key loss of river front open space along Bell Creek via two small lot subdivisions, and they threaten open space in the Northeast Los Angeles hilltop areas. A Zone Change, thankfully reversed by Fourth District Councilmember Ryu, in the Cahuenga Pass prevented a large apartment project that threatened the habitat linkage between Griffith Park and the Santa Monica Mountains. Approximately three years ago a massive apartment complex was approved along

Riverside Drive that, when built, will cut off the habitat linkage between Griffith Park and Elysian Park and forever foreclose a complete El Pueblo to Griffith Park trail. With few, if any exceptions, California Environmental Quality Act (CEQA) impact analysis documents within the City inadequately address impacts to natural resources including wildlife and wildlife movement potential.

The MRCA staff invests inordinate amounts of resources to obtain adequate exactions for public benefits out these projects that require Zone Changes and General Plan Amendments to little, sometimes zero, avail.

The subject initiative would prohibit Zone Changes and General Plan Amendments for more intense land use on properties Citywide for two years. It would require the City, not developers, to pick EIR consultants with the developer still paying the bills. Staff's analysis and experience concurs with the initiative's supporters that 95 percent of development in the City would be totally unaffected by the measure.

The measure includes very specific and well thought out exemptions for needed Zone Changes during the proposed two year moratorium period. Park creation and development would not be affected. The City would be compelled to begin the comprehensive update process of every City Community Plan. Most often the projects that require Zone Changes and General Plan Amendments and additional height allowances either displace existing affordable housing or create a highly disproportionate amount of luxury and non-affordable housing, especially taller projects.

An opponent argument that the initiative would impede the construction of new housing for homeless people appears to be greatly unsupported. Such units are not affected even if they require a zone change or height district change as stated below.

Section E.1. of the initiative states:

The moratorium prohibitions specified in this Section 4 of the Act shall not apply:1. to any Project in which 100% of the units are deed restricted Affordable Housing Units, that seeks a zone change or height district change only, but not a General Plan amendment. An Affordable Housing Unit is defined as a unit that is affordable to households with a gross household income at or below Low Income levels (including Extremely Low Income and Very Low Income) as determined by the California Department of Housing and Community Development (or successor agency) for Los Angeles County on an annual basis, and that is rented or sold for no more than the

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the percentage of gross household income required by Health and Safety Code section 50052.5.

In short, long term environmental protections in the City have permanent public benefits and the proposed initiative is critical to achieving, or at least preventing the permanent loss of, such benefits Citywide.