



November 2, 2007

S. Gail Goldberg  
Director of City Planning  
200 N. Spring Street Room 532  
Los Angeles CA, 90012

Dear Gail,

I recently read that the Mayor previewed a new 5 year housing strategy at UCLA that intends to link neighborhoods and businesses with a quality public transportation system; build new housing developments along major transit corridors; and create 20 new community plans that offer residents more affordable housing close to their jobs.

Given that the City has not completed an annual report on Growth and Infrastructure or a 5 year review for any of the 35 Community Plans since 1998, what information did the Mayor use in formulating this strategy?

Calling for a streamlined planning process to encourage development along transit corridors and setting a goal of building 10,000 new affordable housing units by 2012 without any idea of what has happened to the infrastructure in Los Angeles during the last 9 years, seems problematic at best.

The General Plan's Framework Element states that after it is adopted, the City will establish a growth monitoring program that will provide important information regarding the accuracy of future growth estimates and the distribution of that new development by community plan area. This monitoring program is supposed to document annually what has actually happened to the City's population levels, housing construction, employment levels, and the availability of public infrastructure and public services. Information on environmental conditions are also to be monitored on a yearly basis to maintain and update an environmental database, which will be used to facilitate but not replace environmental review for subsequent programs and projects in accordance with CEQA.

Information for the monitoring system are to be taken from the best sources available to the City, such as building permit information and other readily available City data on business; Department of Water and Power and School District information; County Assessor's files; commercially available development data; State Employment Development Department statistics; Census Bureau; SCAG data; University of California Los Angeles Business Forecast; and other data as they may become available.

Infrastructure data is to be developed from a cooperative effort among the City departments responsible for infrastructure and public services. State and regional agencies, such as the Los Angeles Unified School District and the Metropolitan Transportation Authority are important to complete the annual review of the City's growth and infrastructure.

The infrastructure element states that the linkage between future growth and services will occur through the implementation of a monitoring program that provides information regarding "real" demands and service levels in order to guide public decisions regarding infrastructure and service investments. Successful application of this system may mitigate the need to restrict development to ensure adequate level of service.

I do agree with the one of the Mayor's statements during the housing summit that "it is time to have a grown up conversation about the gravity of the crisis of affordable housing in Los Angeles" and that "only with shared responsibility can we address this situation".

I would strongly suggest that the issue of housing in Los Angeles is too important to be handled as "business as usual". The stakeholders of Los Angeles must have a voice in this process and in order to do that, we need to know what has happened to the City's infrastructure since 1998.

The 1998 report mentioned problems within some of the 35 community plans linked to increased population, such as school enrollment exceeding capacity and sewer capacity problems (up to 75 to 100% capacity) to name a few. Recently we have experienced problems with Water and Power which is directly tied to population increases.

Los Angeles has already reached the projected population increase for 2010. We also know that there were undercounts during the last census and thus census data alone is insufficient. Only by measuring consumption of City services can the public and their representatives get the information required to know how (or if) this City can support more growth and what kind of growth that should be. Simply put, we need the charter-mandated accurate assessment of the viability of our infrastructure. The City must complete the annual and 5 year reviews from 1998 to the present.

Most Community Plans have language that reference the monitoring as an integral part of the decision-making process. For example, the Wilshire Community Plan states "If this monitoring finds that population in the Plan area is occurring faster than projected; and that infrastructure resource capacities are threatened in relation to user need, particularly critical ones such as water and sewerage, but also including public schools, police and fire services, and transportation infrastructure; and, that there is not a clear commitment to at least begin the necessary improvements within twelve months; then building controls would be put into effect for the affected portions of the Wilshire Community until land use designations for the Community Plan and corresponding zoning are revised to more appropriately limit new development."

Until the City can accurately address the state of our infrastructure we request that there be a moratorium on all new major development and a postponement of revisions/updates for any community plans.

Further, we suggest that any project which is currently undergoing formal environmental review must be halted unless and until the annual infrastructure updates are completed and in place.

Finally, the City must consider withdrawing any EIR and/or MND approvals it has granted as those approvals are clearly based on incomplete information.

Sincerely:

James O'Sullivan  
President, Miracle Mile Residential Association

Cc Mayor Antonio Villaraigosa  
Cc Councilmember Ed Reyes  
Cc Councilmember Wendy Greuel  
Cc Councilmember Dennis Zine  
Cc Councilmember Tom LaBonge  
Cc Councilmember Jack Weiss  
Cc Councilmember Tony Cardenas  
Cc Councilmember Richard Alarcon  
Cc Councilmember Bernard Parks  
Cc Councilmember Jan Perry  
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Cc Councilmember Janice Hahn