

COMMUNITY COMMENT ON PACIFIC PALISADES LONG-TERM RECOVERY PLAN (LTRP) DRAFT

SUBJECT: Integration of Condominiums, Townhomes, HOAs, Multifamily Housing Systems, and Mobile Home Communities (MHCs) into Recovery Governance and Financial Frameworks

To: City of Los Angeles Recovery Team / AECOM LTRP Draft Team

Re: Long-Term Recovery Plan Draft for Pacific Palisades

This comment provides input on structural gaps in the Long-Term Recovery Plan (LTRP) Draft as it relates to condominiums, townhomes, homeowners associations (HOAs), multifamily housing systems, and mobile home communities within the Pacific Palisades recovery area.

While the LTRP Draft provides a comprehensive Recovery Support Function (RSF) framework, it does not consistently recognize HOAs, condominium associations, multifamily buildings, and MHCs as integrated governance, financial, and infrastructure recovery entities. This omission creates a systemic gap in recovery planning for a significant portion of the housing stock.

1. GOVERNANCE GAP: HOAs AND MHCs NOT INTEGRATED AS RECOVERY ACTORS

The LTRP Draft does not clearly define HOAs, condominium associations, MHCs, or property managers as formal governance partners in recovery operations.

Key gaps include:

- No formal role for HOAs & MHCs in recovery governance structures or decision-making processes
- No framework for HOA board continuity or emergency governance stabilization following displacement
- No clear delineation of decision rights between City agencies, HOAs, MHCs, insurers, and property owners in rebuilding processes
- No integration of HOAs & MHCs into coordinated recovery command & permitting coordination systems

Impact:

This results in fragmented governance at the building level, particularly in condominiums and townhome communities where shared infrastructure requires coordinated decision-making.

Recommendation:

Establish a formal Common-Interest Development (CID) governance framework that integrates HOAs, condominium associations, and MHCs into recovery planning, coordination, and decision-making structures.

2. FINANCIAL RECOVERY GAP: NO STRUCTURED SUPPORT FOR HOAs/CIDs/MHCs

The LTRP Draft does not provide dedicated financial recovery mechanisms for HOAs, condominium associations, townhome communities, or MHCs.

Key gaps include:

- No bridge financing mechanisms for reconstruction of common areas or shared infrastructure
- No stabilization tools for HOA reserve fund depletion following disaster events
- No pooled or group insurance mechanisms for condominium associations
- No structured financial recovery tracking at the HOA, building, or MHC level

Impact:

HOAs and MHCs may face insolvency risks or prolonged financial instability, delaying or preventing rebuilding even when physical reconstruction is feasible.

Recommendation:

Create dedicated financial recovery tools for HOAs, CIDs, and MHCs including bridge financing, reserve stabilization support, and insurance pooling or reinsurance mechanisms for multifamily communities.

3. SHARED INFRASTRUCTURE GAP: PRIVATE SYSTEMS NOT INCLUDED IN RECOVERY SCOPE

HOA and MHC-managed infrastructure is not consistently recognized as eligible or critical recovery infrastructure.

Key gaps include:

- Exclusion or partial inclusion of private roads, retaining walls, drainage systems, and slope stabilization systems
- No clear funding or coordination mechanism for shared infrastructure restoration
- Limited integration of internal community infrastructure with public utility restoration sequencing

Impact:

Buildings may remain uninhabitable even after public infrastructure is restored due to failure of HOA or MHC-managed systems.

Recommendation:

Explicitly include HOA and MHC-managed infrastructure as eligible recovery infrastructure and integrate it into infrastructure recovery planning and funding frameworks.

4. PERMITTING AND RECONSTRUCTION GAP: NO MULTIFAMILY-SPECIFIC PATHWAY

The LTRP Draft does not establish a dedicated permitting or inspection pathway for multifamily or common-interest developments.

Key gaps include:

- No streamlined reconstruction pathway for condominiums or townhomes
- No coordinated inspection sequencing for structural, utility, and life-safety systems in shared buildings
- No building-level permitting framework aligned with shared ownership structures

Impact:

Reconstruction is slowed by fragmented approvals and misaligned inspection processes.

Recommendation:

Establish a dedicated multifamily and CID permitting and inspection pathway that aligns approvals with building-level recovery rather than individual unit-level processes.

5. DATA AND RECOVERY TRACKING GAP: NO BUILDING-LEVEL SYSTEM

The LTRP Draft does not include a comprehensive system for tracking recovery at the building, HOA, or MHC level.

Key gaps include:

- No standardized tracking of HOA or MHC recovery status
- No building-level or MHC occupancy or infrastructure readiness indicators
- No integrated dataset for multifamily recovery progress

Impact:

Recovery progress for a significant portion of housing stock cannot be accurately measured or coordinated.

Recommendation:

Develop a building-level, HOA-level, and MHC-level recovery tracking system that includes governance status, infrastructure readiness, occupancy status, and financial recovery indicators.

CLOSING STATEMENT

The Long-Term Recovery Plan would benefit from explicitly recognizing condominiums, townhomes, HOAs, multifamily housing systems, and mobile home communities as integrated governance, financial, and infrastructure actors within the recovery framework.

Incorporating a Common-Interest Development (CID) recovery framework would improve coordination, accelerate reconstruction timelines, and reduce financial and governance bottlenecks affecting a substantial share of the community's housing inventory, thereby supporting a more equitable and efficient recovery.

The section below identifies gaps in the Long-Term Recovery Plan Draft as they relate to condominiums, townhomes, HOAs, multifamily housing systems, and mobile home communities (MHC) by **Recovery Support Function** and provides recommendations for their incorporation into the existing RSF framework. These recommendations are submitted to improve the Long-Term Recovery Plan Draft by ensuring that condominiums, townhomes, HOAs, multifamily housing systems, and mobile home communities are fully integrated into recovery planning, operations, and measurement frameworks.

CROSS-CUTTING ISSUE – STRUCTURAL GAP

Issue: HOAs, condos, townhomes, multifamily systems, and mobile home communities are not consistently recognized as governance, infrastructure, or economic recovery actors across RSFs, despite representing a substantial portion of housing and infrastructure in the affected area.

Impact: Fragmented recovery planning for a significant portion of housing stock.

Recommendation: Establish a Common-Interest Development (CID) Recovery Framework integrating HOAs and MHCs into all RSFs as formal recovery partners in governance, infrastructure, finance, housing, and data tracking systems.

RSF 1 – COMMUNITY ASSISTANCE, EVACUATION & RECOVERY

Gap 1: No Multifamily Evacuation or Re-Entry Framework

Issue: Evacuation and re-entry planning is not differentiated for high-density or vertical housing.

Impact: Unsafe or delayed re-occupancy of condos, townhomes, high-rise buildings, and MHCs.

Recommendation: Develop building-level evacuation and re-entry protocols for condos, townhomes, HOAs, and MHCs. Include elevator-dependent and high-rise evacuation modeling.

Gap 2: HOAs and MHCs Not Integrated into Recovery Operations

Issue: HOAs, boards, MHCs, and property managers are not formally included in recovery coordination.

Impact: Fragmented communication and delayed recovery actions.

Recommendation: Establish formal HOA, MHC, and property manager liaison roles in recovery operations.

Gap 3: Lack of Multifamily Population Tracking

Issue: Recovery tracking is not structured at building, HOA, or MHC level.

Impact: Incomplete visibility of displacement and recovery status.

Recommendation: Track recovery by building, HOA, MHC, and unit clusters.

RSF 2 – ECONOMIC RECOVERY

Gap 1: No Financial Recovery Tools for HOAs/CIDs

Issue: HOAs lack structured financial recovery mechanisms.

Impact: Delayed or no rebuilding due to reserve depletion and insurance gaps.

Recommendation: Establish HOA bridge financing and recovery lending tools.

Gap 2: Insurance Market Instability Not Addressed

Issue: Master insurance markets for HOAs are not stabilized.

Impact: Rising premiums and coverage gaps.

Recommendation: Implement insurance stabilization and pooled risk programs for HOAs.

Gap 3: No Economic Tracking for HOA Recovery

Issue: No metrics exist for HOA and MHC recovery progress.

Impact: Inability to measure multifamily recovery.

Recommendation: Create HOA-level recovery indicators including insurance resolution, reserves, and reconstruction status.

RSF 3 – HEALTH & SOCIAL SERVICES

Gap 1: Multifamily Health Impacts Not Addressed

Issue: Health impacts are not differentiated for vertical and MHC housing.

Impact: Underestimation of risk in dense housing environments.

Recommendation: Track health impacts by building type and include shared system exposure risks.

Gap 2: No Multifamily Re-Occupancy Health Protocols

Issue: No standardized health clearance exists for multifamily re-entry.

Impact: Risk of exposure in shared systems.

Recommendation: Establish building-level health clearance protocols including HVAC and shared infrastructure inspection.

RSF 4 – HOUSING RECOVERY

Gap 1: HOAs and MHCs Not Recognized as Housing Recovery Units

Issue: HOAs and MHCs are not treated as formal recovery actors.

Impact: Fragmented rebuilding decisions.

Recommendation: Establish a Common-Interest Development (CID) and Mobile Home Communities Recovery Framework recognizing HOAs and MHCs in recovery planning.

Gap 2: No Multifamily Permitting Pathway

Issue: No dedicated permitting process for multifamily reconstruction.

Impact: Delays in rebuilding.

Recommendation: Create a multifamily permitting and inspection pathway.

Gap 3: Shared Infrastructure Not Fully Included

Issue: HOA and MHC-managed infrastructure is excluded from recovery scope.

Impact: Units remain uninhabitable despite surrounding recovery.

Recommendation: Include private roads, retaining walls, drainage systems, and shared utilities in housing recovery.

RSF 5 – INFRASTRUCTURE RECOVERY

Gap 1: Private Infrastructure Excluded

Issue: HOA and MHC infrastructure is not included in recovery planning.

Impact: Delayed access and re-occupancy.

Recommendation: Include HOA and MHC-managed infrastructure such as internal roads and drainage systems in recovery eligibility.

Gap 2: Utility Restoration Not Coordinated with Occupancy

Issue: Utility restoration is not aligned with building readiness.

Impact: Buildings remain uninhabitable.

Recommendation: Coordinate utility restoration with building-level clearance.

RSF 6 – NATURAL & CULTURAL RESOURCES

Gap 1: HOA and MHC Landscapes Not Included in Ecological Recovery

Issue: HOA and MHC-managed vegetation is excluded from recovery planning.

Impact: Incomplete wildfire resilience and ecological recovery.

Recommendation: Include HOA and MHC landscapes in tree inventory, fuel reduction, and replanting programs.

Gap 2: Cultural Identity of HOA and MHC Communities Not Recognized

Issue: Neighborhood identity within HOAs and MHCs is not formally included.

Impact: Loss of community character.

Recommendation: Recognize HOA and MHC neighborhoods as cultural landscapes in recovery planning.

RSF 7 – Public Safety / Emergency Services and RSF 8 – Governance, Coordination, Data Systems:

Plan did not directly identify RSFs 7 and 8.