

**PPCC Land Use Committee (LUC) Recommended Comments
on the Draft AECOM Long Term Recovery Plan (LTRG)**

Preface: The PPCC LUC appreciates AECOM’s work in developing the Draft Pacific Palisades Long-Term Recovery Plan (LTRP). While the LTRP represents a significant effort to address the devastation of the 2025 Palisades Fire, the plan does not reference or reflect critical community concerns related to affordable housing, density and public safety in emergency evacuations, as raised by LUC members during our recent focus group session with AECOM and City representatives.

PPCC and the LUC have made clear to all officials the Palisades community’s policy and goals with respect to increased housing density generally and affordable housing specifically: We support affordable housing that does not compromise public safety. We strongly support the return of the affordable housing that existed pre-fire (including our mobile home parks). We oppose, on public safety grounds, development of additional affordable housing, *unless sufficient disaster modeling takes place and adequate evacuation plans are implemented to safely accommodate any increase in housing density*. As explained in the PPCC motion recommended by the LUC and passed unanimously by the Board on April 9, 2026:

“Pacific Palisades is entirely located in the Very High Fire Hazard Severity Zone (VHFHSZ), with extremely limited routes of ingress and egress. PPCC has consistently opposed increased housing density in the Palisades due to the dangerous impacts on public safety in emergency evacuations. During the Palisades Fire on January 7, 2025, at existing levels of housing density, the danger to lives and property presented by crowded conditions on our roads was made shockingly evident, when residents under mandatory evacuation were forced to abandon cars and flee for their lives on foot while emergency vehicles were impeded from entering burning areas.”

Moreover, we emphasize our longstanding concern with the impacts on our already-strained infrastructure from additional housing density. As expressed in a PPCC motion passed unanimously on June 2, 2025:

“The imposition of increased density — without accompanying state funding or resource allocation — exacerbates existing challenges, particularly in areas vulnerable to wildfire, evacuation constraints, and other environmental or geographic hazards, such as the Very High Fire Hazard Severity Zone”

At *then-existing* levels of density on January 7, 2025, Pacific Palisades infrastructure was strained beyond capacity or ability to meaningfully address the significant risks to lives and property, including hydrants that were not working, roads that were impassable, and reservoirs that were empty.

Unfortunately, the LTRP does not mention PPCC’s position on these matters, nor is our community’s concern with increased housing density and the impact on public safety (as expressed in responses to the NORC survey) emphasized in any meaningful way. In fact, the term “Very High Fire Hazard Severity Zone” – central to many of our concerns related to density and emergency evacuation – is mentioned only twice in the LTRP’s 290 pages: once in the Community Overview on p. 9 and as one of the defined acronyms on p. 289.

The following feedback focuses on the Housing Function (RSF 4) – in particular, the “Affordable Housing

Development Project” section (pp. 136-137) – as related to the priorities expressed above. We also comment on the need to support the return of our displaced residents, and submit feedback related to the Economics Function (RSF 2) in addition to RSF 4.

Affordable Housing Development Project:

The LTRP references the use by developers of California’s “Multifamily Finance Super Notice of Funding Availability” (NOFA) to “streamline access to funding for affordable housing development” and to accelerate recovery in Pacific Palisades. As described, the Super NOFA would provide for long term loans for the “acquisition, construction, rehabilitation and preservation of affordable multifamily housing.” The LTRP goes on to identify the individuals who might benefit from NOFA projects, including low-income families, seniors, farm workers and veterans.

The LTRP also cites examples of grants awarded to projects under NOFA: the “Tierra Apartments” (in Santa Monica) and “US VETS housing developments” (not specifically identified) – presumably mentioned as affordable housing projects that would be appropriate for Pacific Palisades. At the same time, the LTRP makes the seemingly contradictory assertion that “affordable housing supports post-fire recovery by stabilizing development without adding new growth or density to Pacific Palisades.” (Emphasis added.)

The Tierra Apartments project is an apparently controversial, large 100% affordable housing project on Wilshire Blvd. in Santa Monica, that according to news reports has been “viewed with skepticism” by neighbors and business owners. The project will consist of six stories with 80 units for seniors and 2 manager units (presumably housing at least two residents with potentially two cars per each unit). We assume the “US VETS” projects also add similar levels of density to the neighborhoods where they are located.

It is difficult to understand how projects such as these, if proposed and funded for our community, would not add “new growth or density to Pacific Palisades.” *No similar such project existed in Pacific Palisades pre-fire.*

We also note our concern with the LTRP’s explanation that NOFA “does not impose a universal public engagement requirement” (while stating only that “public outreach obligations may arise” though other means; emphasis added). *Transparency, adequate notice and opportunity for input are essential requirements for the Palisades community in connection with any proposals for housing projects of this scope.*

In addition, we stress the community’s highly negative reaction to former SB 549 (bill sponsored by Sen. Allen, proposing establishment of a governing authority for Pacific Palisades; later withdrawn), which was initially introduced without outreach to or input from constituents, and which many individuals believed, rightly or wrongly, would have resulted in acquisition of property by the “authority” for development of large, dense and potentially unsafe housing projects (such as Tierra Apartments), that would have in turn faced strong community opposition as posing a serious public safety risk.

Requests for Amendments/Additions to the Housing Function (RSF 4):

At a minimum, the references to Tierra Apartments and US VETS projects on p. 136 should be *deleted*, or explanatory text should be added to make clear that these are types of new projects that are unacceptable to the Palisades community, unless modeling studies were conducted and evacuation plans were implemented

demonstrating that the increased density would not impact public safety during emergency evacuations.

More broadly, the PPCC and community position as expressed above should be clearly reflected in the LTRP (Housing RSF 4 and the Affordable Housing Development Project): New (non-replacement) multi-family affordable housing projects should not be proposed, approved or developed in Pacific Palisades *unless sufficient disaster modeling takes place and adequate evacuation plans are implemented to safely accommodate any additional proposed housing density.*

It is also imperative that the LTRP address the inadequacy of Pacific Palisades infrastructure and the *critical need for substantial infrastructure improvements* before any increase in density from new multi-family housing projects is proposed or permitted.

Additionally, consistent with the PPCC motion unanimously approved on April 9, 2026, the Housing Function (RSF 4) should include a reference to our request that *all permit approvals for density bonus projects be temporarily paused* until sufficient disaster modeling takes place and adequate evacuation plans are implemented in Pacific Palisades.

Finally, the reference to “Affordable Housing Development” in the list of RSF 4 projects in Appendix A (p. 239) must be amended so that the definition clearly indicates that such projects are *subject to sufficient disaster modeling and implementation of adequate evacuation plans to safely accommodate any proposed increase in housing density.*

Support for the Return of our Displaced Residents:

To ensure an equitable recovery, the LTRP should directly address the needs of Palisadians—including condominium, townhome, apartment and mobile home residents—whose destroyed properties constituted the primary source of naturally occurring affordable housing in our community. While many of these displaced individuals may not fit the formal criteria of traditional government low-income programs, their homes were the most accessible options in the Palisades, and providing a viable pathway for them to return is essential to preserving our community's fabric.

Accordingly, we request that the LTRP explicitly advocate for dedicated state, federal and disaster-relief funding earmarked specifically to support the rebuilding of these multi-family structures and mobile home parks and prioritize them over new multi-family developments. Furthermore, because standard regional metrics do not accurately reflect our local economy, the definition of "affordable housing" and its qualifying income thresholds must be clarified and adapted. We ask that these criteria be based on localized Pacific Palisades housing and income data, rather than broad Los Angeles County or California averages, so that aid effectively reaches the fire victims who need it most.

Requests for Additions to the Economic and Housing Functions (RSF 2, RSF 4):

The LTRP should recognize the unique realities facing Pacific Palisades’ small commercial property owners as they attempt to rebuild after the Palisades Fire. Many of these owners are longstanding “mom and pop” or generational stakeholders who lost both commercial and residential properties in the disaster. Under current economic conditions — including extraordinarily high construction costs, insurance challenges, financing gaps, and the limited rents that small local businesses can realistically afford — rebuilding existing commercial

properties at prior scale may no longer be economically viable.

Accordingly, the LTRP should thoughtfully consider opportunities for *context-sensitive “gentle density” within commercial corridors*, including modest increases in height or mixed-use configurations, where appropriate, to help local property owners achieve financially feasible rebuilding projects while preserving community character. As a community, we should be aware that this may include some affordable housing and require formulation of guidelines around how our community may embrace limited affordable housing density maintaining local control over that evolution.

Failure to create viable pathways for these small owners to rebuild may force property sales to large outside developers who are already actively seeking to assemble multiple parcels. Large developers will not connect with community in the way that small commercial property owners do, and that consolidation could ultimately result in faster, larger-scale, and less community-oriented redevelopment than would occur if local owners retain stewardship of their properties as they rebuild.

As noted elsewhere in this document and/or otherwise in the LTRP, any consideration of commercial gentle density should remain tied to infrastructure capacity, evacuation planning and wildfire resilience measures, while prioritizing preservation of the Palisades’ locally-owned commercial fabric and community-serving business ecosystem.

Thank you for your consideration and anticipated incorporation of these comments in the final LTRP.

PPCC LUC: Chair Chris Spitz, Members Reza Akef, James Alexakis, Michael Edlen, Howard Robinson, Joanna Spak, Maryam Zar; Sue Kohl, ex officio/non-voting