

Communication from Public

Name: Anthony Dedousis
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Comments for Public Posting: Please see attached for a letter from a coalition of 17 civic organizations, in favor of Planning developing CPA-level RHNA targets as part of LA's upcoming housing element update. This would include neighborhood-level targets that meet Los Angeles' RHNA benchmarks for affordable housing production.



October 6, 2020

Council President Nury Martinez
Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012

Dear Council President Martinez,

Thank you for the opportunity to comment on the process of updating the housing element of Los Angeles' general plan. We are writing on behalf of a coalition of organizations representing the policy, academic, environmental, business, social justice, and affordable housing communities. We support efforts to expand the availability of housing at all levels of income, and ensure that cities meet their obligations to affirmatively further fair housing.

California's Regional Housing Needs Assessment (RHNA) requires Los Angeles to plan for 456,000 new homes by 2029 through its housing element update, **including 184,000 that are affordable to lower-income households**. This affords us an opportunity to address the need for more housing in a way that furthers equity, sustainability, and housing justice. L.A.'s housing element update must increase housing choice and availability, improve access to job centers and transit, and affirmatively further fair housing by reducing segregation and displacement. This requires **every** neighborhood to do its part and accommodate more housing opportunities, including high-opportunity neighborhoods that have historically blocked new housing through exclusionary zoning.

Without a strategy for equitably distributing the RHNA, high-income neighborhoods, where exclusionary zoning is common, are unlikely to contribute their fair share towards meeting housing needs. In this scenario, we would be concerned that the bulk of the housing target would be concentrated in areas already zoned multifamily. These areas primarily consist of renter communities, many of which are historically disadvantaged communities experiencing rapid gentrification and displacement. Focusing housing production in areas with existing density, instead of on primarily owner-occupied, lower-density neighborhoods, will drive more demolition of apartments with existing renters. **Concentrating new housing opportunities in these areas alone, rather than distributing them broadly, is unfair.**

Additionally, a "status quo" approach to the housing element would perpetuate longstanding patterns of racial segregation and inequality in our housing planning, without centering equity and racial justice. Segregation in Los Angeles was created through deliberate policy choices, like restrictive covenants, redlining, and lack of mortgage access. Under a "status quo" approach, neighborhoods with a history of racial and economic exclusion would continue to maintain housing policies that reinforce segregation, increasing the harmful disparities in job, school, and resource access that negatively impact low-income communities of color. Furthermore, segregation limits social cohesion, and social cohesion is crucial for making Los

Angeles more climate resilient. Mixed income neighborhoods support social cohesion goals; segregated ones don't.

We believe that Los Angeles should develop a housing element update that is equitable and balanced, promotes socioeconomic integration, and takes a strategic, citywide view of updating zoning and land use regulations. We need a planning process that allocates housing using a fair and intentional methodology, in which new homes are concentrated near jobs, transit, and high-opportunity neighborhoods. Additionally, as Los Angeles plans for housing growth, there must be no conversion of wildlife habitat to housing. Instead, housing production should be in urban infill areas. Planning for homes in a holistic process will reduce traffic and GHG emissions, while increasing access to jobs and transit for all Angelenos.

To that end, **we ask you to instruct the Department of City Planning to develop housing growth targets for each of Los Angeles' community plan areas (CPA)**, in order to achieve the citywide RHNA target. Each CPA's target should be based on a formula that includes the following objective, numerical criteria:

- Housing costs
- Median income
- Access to transit
- Proximity to job centers
- Access to public resources (e.g. parks, schools)
- Patterns of historical exclusion and segregation
- Environmental quality

Additionally, just as RHNA sets citywide housing growth targets by income level, Planning's methodology should also develop CPA-level housing growth targets by income level. Los Angeles' target of 184,000 homes that are affordable to lower-income households must be distributed fairly across CPAs; **no neighborhood should be allowed to shirk its duty to accommodate affordable housing**. Planning's methodology should also incorporate high affordable housing percentages in the total RHNA allocation assigned to historically disadvantaged CPAs, in order to address existing need.

It is crucial that Los Angeles' housing element update incorporates an analysis of these factors at the neighborhood level. If housing growth is allocated across neighborhoods based on objective criteria, every resident of Los Angeles will ultimately benefit from:

- Lower rents
- Less tenant displacement
- Less income and racial segregation
- A stronger regional economy
- Greater access to jobs, transit, and economic opportunity
- Lower climate emissions and better environmental quality (passenger vehicle emissions are the largest source of California emissions)

We look forward to a productive and collaborative working relationship with your office and with the Department of City Planning on this critical effort. Thank you for your consideration.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Anthony Dedousis
Director of Policy and Research
Abundant Housing LA

Marilu Guevara
Executive Director
League of Women Voters of Los Angeles

Brian Hanlon
President and CEO
California YIMBY

Shane Phillips
Project Manager, Housing Initiative
UCLA Lewis Center

Paavo Monkkonen
Associate Professor of Urban Planning and
Public Policy
UCLA Luskin School of Public Affairs

Stephen Albert
Architect
The Albert Group

Sahar Khundmiri
Advocacy Manager
Safe Place for Youth

Joel John Roberts
CEO
PATH Ventures

Will Wright
Director, Government & Public Affairs
American Institute of Architects, Los Angeles
Chapter

Sonja Trauss
President
YIMBY Law

Dario Alvarez
President
Pacific Urbanism

A. Lenise Kouture
CEO and President
International Black Restaurant and
Hospitality Association

Robin Hughes
President and CEO
Abode Communities

Larry Fondation
Executive Director
United Parents and Students

J.P. Rose
Staff Attorney
Center for Biological Diversity

Chase Engelhardt
Climate Planning & Resilience Coordinator
Climate Resolve

Jose Trinidad Castaneda
Climate Organizer
Climate Action Campaign

David Howden
Director, Los Angeles
Corporation for Supportive Housing

Joshua Baum
President
Westside Young Democrats

David Diaz
Executive Director
Active San Gabriel Valley