



September 15, 2021

**Re: Comments and Recommendations for LA City's 2021-29 Draft Housing Element**

Dear City of Los Angeles Planning Department and Housing and Community Investment Department:

The Alliance for Community Transit - Los Angeles (ACT-LA) coalition respectfully submits this comment letter regarding the Housing Element for 2021-2029 to highlight key priorities and opportunities for more equitable development in our region. ACT-LA is a county-wide coalition of 41 organizations working on the forefront of racial, environmental, and economic justice. Our coalition members include tenants' rights organizations, affordable housing developers, workers' centers, public interest law firms, and public health advocates, among many others. Many of our coalition members serve on the Housing Element Task Force, or are otherwise engaged in community planning and other land use plans or policy-making to advance racial equity, smart growth, and community stability in the creation and implementation of housing policies and programs. Thanks to our coalition's diversity, we view housing policy through an intersectional lens and work to center low-income communities and communities of color in decisions that seek to transform our neighborhoods.

The residents of Los Angeles that we represent have borne the heaviest toll from generations of failed land use policy and environmental injustice, including redlining and exclusionary zoning. Furthermore, the last year has showcased and exacerbated the affordable housing, racial injustice, and public health crises in Los Angeles. It is a critical time to act, and the Housing Element is a tremendous opportunity to ensure that Los Angeles grows in an equitable and sustainable fashion: prioritizing underserved communities, centering their concerns, and providing for them overdue housing justice in Los Angeles.

We therefore call on the City Planning department to advance racial equity, public health, environmental justice, and community stability through the 2021-2029 Housing Element—and to materially benefit our communities with more and better affordable housing opportunities through the Rezoning Program. Specifically, we offer the following comments and recommendations to the Housing Element.

**1. The Draft Sites Inventory demonstrates the magnitude of L.A.'s affordable housing crisis and compels equitable distribution of new deeply affordable housing.**

***a. Realistic Development Potential***

We applaud the Department for developing and utilizing a methodology to assess the realistic development potential using a regression analysis based on historical development patterns. The department's two step approach taking both the likelihood of development and the maximum capacity expected to be developed into account provides a unique model that highlights where, how many, and at

what affordability level housing units are likely to be built in the next 8 years. The department's work highlights the housing opportunities and challenges the city is facing and better informs the creation of new programs and policies to maximize affordable housing production, preserve existing affordable housing, and affirmatively further fair housing.

***b. RSO Protections***

We support the draft Housing Element in ***not*** designating sites with existing RSO housing as low-income sites. All relevant policies and implementation of the Housing Element should be geared to provide maximum protection for RSO units. In the absence of a City-wide no-net-loss requirement, including RSO sites in the inventory but not designating them as Lower Income units adds protections in the form of no-net-loss requirements while protecting them from being targeted for redevelopment under the by-right approval process for recycled sites. That said, the City should enact a city-wide no net loss requirement via the Housing Element implementation process ([Council File #21-0035 \(Martinez - Cedillo\)](#)).

**2. The Housing Element must maximize all opportunities to stabilize rents and maximize tenant protections**

We reiterate suggestions to protect and enhance the Rent Stabilization Ordinance and to further protect tenants that we put forward [in our October 2020 letter](#). We also recommend the following insertions to the Programs and Policies put forth in Chapter 6 of the draft Housing Element.

- Program 31: Reduce the annual allowable rent increase under the RSO. Reduce the annual allowable rent increase, and close the “master-metered loophole,” in the City’s Rent Stabilization Ordinance to help address indirect displacement in gentrifying neighborhoods and encourage energy conservation.
- Program 85: Expand just-cause eviction protections to cover all tenants in the City of Los Angeles and establish a corresponding enforcement program.
- Program 88: Codify a tenant’s right to counsel in an eviction and administrative proceedings. Codify a tenant’s right to counsel that guarantees access to an attorney to all tenants who face displacement.
- Program 88: Create a permanent tenant education program working with community based organizations to inform tenants of their rights and how to access eviction defense resources.
- Program 87: Explore additional opportunities that strengthen the RSO. Explore amendments to the City’s RSO to restrict allowable grounds for eviction, including restrictions on eviction for failure to pay and policies to alleviate rent-debt. The City needs to further explain in detail in this program how they “will continue to implement amendments to the LA Municipal Code to strengthen enforcement, preserve RSO units, prevent displacement of tenants, ensure relocation assistance to tenants...” as a strategy for protecting tenants vulnerable to Ellis Act displacement.

- Program 84: Increase investigation and prosecution of source-of-income discrimination. Develop proactive enforcement mechanisms, such as testers and hearing officers, to identify and prosecute source-of-income discrimination
- Program 86: The Tenant Anti-Harassment Ordinance was enacted this year but in a weaker form than advocated for. Current policy is still lacking avenues to prosecute repeat offenders. We also advocate to add language to track harassment complaints monthly and by Council District.
- Program 84: The City should add a program, committing to adopting a renter access ordinance, in order to ensure that residents are able to access safe and healthy housing regardless of their credit or prior rental history, including failure to pay rent or utility bills during the COVID-19 pandemic, and regardless of whether they have a prior criminal history. The ordinance should require that housing providers publish a list of objective criteria, reasonably related to tenancy, which will be considered when a tenant applies for rental housing, and provide a written explanation when denying an applicant housing. The ordinance should also allow tenants to dispute rejections and, if successful, require landlords to provide the next available comparable unit.

**3. The Housing Element must further environmental justice, improve climate resilience and promote community health.**

ACT-LA believes equitable housing policies must advance justice and utilize equity-based approaches to housing development by supporting alternative housing models, while also protecting community health. It is our hope that the City of LA Planning Department will address LA's legacy of segregation and discriminatory practices in communities throughout the state by increasing affordable housing in communities that have remained exclusionary and requiring cities to conduct both meaningful environmental review of proposed project sites and racial equity analyses to inform future planning and housing decisions.

In 2016, the California Legislature passed Senate Bill (SB) 1000 to incorporate environmental justice into the local land use planning process.<sup>1</sup> SB 1000 requires local governments to address pollution and other hazards that disproportionately impact vulnerable communities in their jurisdiction. Vulnerable communities, formally defined as “disadvantaged communities” include two identification methods: (1) “an area identified by the California Environmental Protection Agency (CalEPA) pursuant to Section 39711 of the Health and Safety Code”; or (2) a “low-income area that is disproportionately impacted by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.”<sup>2</sup> If a local government adopts or updates two or more elements of its general plan after January 1, 2018, which LA City will do with the anticipated adoption of the Housing Element and upcoming safety element this fall, SB 1000 requires the local government to identify any

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<sup>1</sup> SB 1000 is codified at Government Code section 65302, subdivision (h).

<sup>2</sup> Gov. Code, § 65302, subd. (h)(4)(A).

“disadvantaged communities” within its planning area.<sup>3</sup> If a local government identifies one or more disadvantaged communities in its planning area, its general plan must have either an “environmental justice element” or “related goals, policies, and objectives integrated in other elements” (collectively, “EJ policies”) that “reduce the unique or compounded health risks in disadvantaged communities” by addressing different topics, such as (1) reducing pollution exposure, (2) promoting public improvements, (3) promoting safe and sanitary homes, and (4) promoting public engagement in the local decision making process.<sup>4</sup>

The City of Los Angeles’ General Plan does not have a stand-alone Environmental Justice Element, therefore, SB 1000-related goals, policies, and objectives must be incorporated throughout other elements of LA’s General Plan.<sup>5</sup> The 2015 Plan for a Healthy Los Angeles, a health and wellness element of LA’s General Plan, lays the groundwork to create healthier communities for all LA County residents. As an Element of the General Plan, it provides goals and policies, to evaluate health and environmental justice as a priority for the City’s future growth and development. However, this health and wellness element was adopted before SB 1000 was adopted, and requires significant revisions to meaningfully satisfy SB 1000 requirements. Although updated environmental justice requirements are addressed in the revised “Plan for a Healthy Los Angeles” and the “Health Atlas for the City of Los Angeles,” we are not convinced that these two documents satisfy all SB1000 requirements, and we are concerned to find that critical environmental justice topics are not meaningfully addressed in the City’s draft 2021-2029 Housing Element Update.<sup>6</sup> The City’s lack of compliance with state law requirements under SB 1000 has a significant impact on LA residents, disproportionately impacting vulnerable communities within its boundaries. The City of LA has multiple sources of pollution and interspersed industry, carrying a high pollution burden. Because the City’s draft Housing Element Update will serve as a blueprint for future development, City Planning should create programs that adequately address environmental justice issues. Addressing environmental justice issues will also ensure the furthering of fair housing.<sup>7</sup>

The City of LA contains numerous census tracts that the California Environmental Protection Agency (CalEPA) has designated as “disadvantaged communities.”<sup>8</sup> CalEPA’s screening tool, CalEnviroScreen 4.0, ranks each census tract in the state for pollution and vulnerability. The City of LA’s CalEnviroScreen (census tract) scores are among the highest in the state. Latinx residents make up the largest demographic of the City’s population with 1,922,889 persons (48.6%), followed by White residents, who make up over

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<sup>3</sup> Gov. Code, § 65302, subds. (h)(1)–(2).

<sup>4</sup> Gov. Code, § 65302, subd. (h)(1).

<sup>5</sup> Government Code section 65302(h)(1).

<sup>6</sup> Targeted amendments to the Plan for a Healthy Los Angeles have been proposed by LA City Planning to clarify that the Plan for a Healthy Los Angeles and the Health Atlas for the City of Los Angeles meet the requirements of SB 1000, available at: [https://planning.lacity.org/odocument/0cf2d603-e8b2-496f-9c74-17c757041745/Plan\\_for\\_a\\_Healthy\\_LA.pdf](https://planning.lacity.org/odocument/0cf2d603-e8b2-496f-9c74-17c757041745/Plan_for_a_Healthy_LA.pdf) (last visited August 30, 2021).

<sup>7</sup> Camille Brown, *From Flint to DC, Pay attention to the intersections between environmental justice and fair housing*, Equal Rights Center, <https://equalrightscenter.org/from-flint-to-dc-pay-attention-to-the-intersections-between-environmental-justice-and-fair-housing/>.

<sup>8</sup> SB 535; An article from 2017 states “Of the 22 high pollution census tracts, 20 tracts are industrial areas in greater Los Angeles,” See <https://calepa.ca.gov/wp-content/uploads/sites/6/2017/04/SB-535-Designation-Final.pdf>.

a quarter of the population at 28.5%. Asians make up 11.5% of the population, followed by Black or African Americans at 8.5% of the population, and Native Americans, Pacific Islanders, and those who ID as 'other' make up the remaining 2.8%. Disturbing studies and investigations have found that “people of color are more likely than white people to live alongside power plants, oil refineries and landfills” in LA.<sup>9</sup> Busy freeways and toxic industrial sites cloak neighborhoods with high levels of fine particulate matter (PM 2.5), toxic releases, clean-up sites and hazardous waste. In addition to these compounding pollution levels, LA residents are more vulnerable to the City’s increasing environmental hazards due to additional vulnerabilities from medical conditions such as asthma and cardiovascular disease.<sup>10</sup> Other vulnerabilities identified through CalEnviroScreen, include linguistic isolation, poverty, and rising rent burdens from escalating housing costs.<sup>11</sup>

Housing Justice and Environmental Justice are inextricably linked. Access to safe and affordable housing has a direct impact on public health. The very communities facing the highest rent burden are often the same frontline communities who bear the brunt of the negative impacts brought on by multiple, intersecting crises related to housing, houselessness, and environmental racism. Staggering health disparities are brought on by land uses based on an extractive economy that contributes to environmental degradation, industrial pollution, the climate crisis, and increased health hazards for the frontline communities. According to the last Health Atlas for the City of LA, 21% (or approximately 59,000 individuals) of Southeast LA CPA residents lived adjacent to noxious land uses in 2013.<sup>12</sup>

LA City’s 2021-2029 Housing Element is an opportunity to ensure that housing promotes public health with land use policies that are aligned with practices that create a more productive, equitable, and healthy regenerative use of land. This draft plan must be revised to incorporate the required components of an Environmental Justice Element as the remaining elements of the General Plan do not satisfy state law. The following recommendations account for issues related to environmental justice and public health in development processes, and climate resilient housing to mitigate negative climate impacts and improve community health.

***a. Promote environmental justice and public health in development processes.***

Under Government Code Section 65040.12(e), environmental justice is the “fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement

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<sup>9</sup> Sammy Roth, *Why communities fighting for fair policing also demand environmental justice*, Los Angeles Times (Jun. 4, 2020), <https://www.latimes.com/environment/newsletter/2020-06-04/why-communities-fighting-for-fair-policing-also-demand-environmental-justice-boiling-point>; Mark Olalde et al, *The toxic legacy of old oil wells: California’s multi-billion dollar problem*, Los Angeles Times (Feb. 6, 2020), <https://www.latimes.com/projects/california-oil-well-drilling-idle-cleanup/>.

<sup>10</sup> Doyle Rice, *Study finds a race gap in air pollution--whites largely cause it; Blacks and Hispanics breathe it*, <https://www.usatoday.com/story/news/nation/2019/03/11/air-pollution-inequality-minorities-breathe-air-polluted-whites/3130783002/> (Mar. 11, 2019).

<sup>11</sup> See CalEnviroScreen 4.0; interactive Health Atlas for the City of LA, <https://planning.lacity.org/interactive-health-atlas/index/index.html>.

<sup>12</sup> Health Atlas for the City of LA, <https://wattscommunitystudio.files.wordpress.com/2013/06/healthatlas.pdf> (June 2013).

of environmental laws, regulations, and policies.” Environmental justice goals, policies, and objectives should reduce health risks to disadvantaged communities, promote civil engagement, and prioritize the needs of disadvantaged communities. California law further establishes that environmental justice<sup>13</sup> includes:

- the availability of a healthy environment for all people;
- the deterrence, reduction, and elimination of pollution burdens for communities disproportionately experiencing the adverse effects of that pollution;
- government entities engaging and providing technical assistance to communities most impacted by pollution to promote their meaningful participation in all phases of the environmental and land use decision-making process; and
- at a minimum, the meaningful consideration of recommendations from communities most impacted by pollution into environmental and land use decisions.

We are concerned that this draft plan does not sufficiently address the cumulative impacts and disproportionate pollution burden placed on environmental justice communities throughout LA. As a result, this draft plan does not establish sufficient goals and policies to promote positive health outcomes to meet housing needs with a focus on low-income households and disadvantaged communities.

First, the draft plan does not consider the tens of thousands of individuals in the City of LA who live in close proximity to an active oil well.<sup>14</sup> Neighborhood drill sites, sometimes a few feet from homes, greatly increase and compound a slew of toxic emissions such as benzene, a known carcinogen.<sup>15</sup> In addition, high levels of cancer-causing diesel particulate matter are emitted into the air from the countless diesel trucks and emergency diesel generators used to service and sustain active oil wells. It is not just active wells that exacerbate environmental and health harms in LA. Wells that are no longer producing oil and gas are often left uninspected and unmaintained, some since the 1990s, leaking oil, gas, and other contaminants into the air and local groundwater.<sup>16</sup> The toxic practices of the oil industry have taken their toll on frontline communities throughout LA. Impacted residents and their children experience high rates of cancer, miscarriages, frequent nosebleeds, headaches, rashes, and respiratory issues, especially asthma.<sup>17</sup> It is important to note that oil drilling sites are not incidentally concentrated in low-income

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<sup>13</sup> Government Code Section 65040.12[e][2].

<sup>14</sup> Kyle Ferrar, *California Setback Analyses Summary*, <https://www.fractracker.org/2020/04/california-setback-analysis-summary/> (April 2, 2020).

<sup>15</sup> Stories of Oil Drilling in Wilmington, Communities for a Better Environment Story Map, <https://www.arcgis.com/apps/MapSeries/index.html?appid=11f7468097464b6296d441d187f3d4f8> (last visited Sep. 8, 2021).

<sup>16</sup> The Center for Public Integrity, *Deserted oil wells haunt Los Angeles with toxic fumes and enormous cleanup costs*, <https://publicintegrity.org/environment/deserted-oil-wells-haunt-los-angeles-with-toxic-fumes-and-enormous-cleanup-costs/> (March 5, 2020).

<sup>17</sup> New scientific research published in June 2021 documents significant decreased lung and pulmonary function from living near active and inactive drill sites in South Los Angeles, Jill E. Johnston et al, Department of Preventive Medicine, Keck School of Medicine, USC, <https://www.sciencedirect.com/science/article/abs/pii/S0013935121003820?via%3Dihub> (last visited Sep. 8, 2021).





communities and communities of color—this is the result of decades of racist land use decisions such as fast-tracked permit approvals, redlining and racial covenants. The undeniable concentration of oil wells in disadvantaged communities is just one symptom caused by the historical practices of ‘redlining,’ predatory lending, and other inequitable policies that shape modern land use decisions and planning—while forcing low-income communities and communities of color to live in neighborhoods marked by environmental harms and health hazards.

To protect the health, safety and well-being of all Los Angeles residents, we urge LA City Planning to declare oil drilling/production a non-conforming use immediately ([Council File #17-0447 \(Bonin, Cedillo, Harris-Dawson, Koretz, Martinez, Wesson - Huizar\)](#)), prohibiting new oil drilling/production within the City of LA, phasing out existing oil drilling within five years with a just transition for workers and communities.<sup>18</sup> ACT-LA members hope to continue working with the City Planning Department to advance just and equitable housing development that combats the unjust legacy of redlining which continues to limit equitable access to healthy affordable housing options for communities of color to this day.

For example, ACT-LA members are concerned by LA City’s proposal to redevelop Brownfield sites, coupled with broader policies to “provide incentives and promote flexibility for the conversion of non-residential structures to new housing in order to reduce the carbon footprint resulting from demolition and new construction”<sup>19</sup> and proposed programs to increase CEQA streamlining to incentivize energy and resource conservation.<sup>20</sup> We oppose the false solution too often presented to environmental justice communities that health and safety measures (such as environmental review under CEQA) must be sacrificed in order to build affordable housing. In addition, we reject the false narrative that CEQA is a barrier to housing development. The number of lawsuits filed under CEQA has been surprisingly low, “averaging 195 per year throughout California since 2002.”<sup>21</sup> We believe that affordable housing that includes energy and resource conservation can be incentivized in other ways such as more inclusive social housing models, community land trusts, cooperative housing, and nonprofit community-run housing that do not diminish the importance of environmental review or expand the use of CEQA exemptions.

Next, while ACT-LA supports increasing availability and equitable access to safe and affordable housing, we strongly oppose building affordable housing on polluted land without proper remediation. As such, we are concerned by the City of LA’s plan to maximize the use of unused, public lands by remediating toxic sites for affordable housing development. Although chapter 4 of LA City’s draft plan claims that public

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<sup>18</sup> Los Angeles City Council Environment Committee Votes Unanimously to Pursue a Phase-Out of Oil Drilling City-Wide to Protect Public Health (STAND-LA Blog, Dec. 1, 2020) <http://www.stand-la-blog/los-angeles-city-council-environment-committee-votes-unanimously-to-pursue-a-phase-out-of-oil-drilling-city-wide-to-protect-public-health>

<sup>19</sup> Policy 3.2.8.

<sup>20</sup> 2021-2029 Housing Element Update, Policy 3.2.4.

<sup>21</sup> CEQA in the 21st Century: Environmental Quality, Economic Prosperity, and Sustainable Development in California, <https://rosefdn.org/wp-content/uploads/2016/08/CEQA-in-the-21st-Century.pdf> (last visited Aug. 30, 2021).

lands are an option “provided that there are no environmental features that would [negatively] impact the [proposed] development on a site by site basis (4-14),” the draft Housing Element’s definition of Environmental Hazards fails to include man-made hazards such as oil drill sites. We are concerned by Policy 3.2.9, which seeks to create “new residential uses, including live/work and mixed-use, in less-productive industrial, office, and commercial areas when the site can accommodate housing in keeping with citywide industrial land, jobs-housing and jobs preservation priorities.” This policy does not identify or sufficiently discuss plans for clean-up and remediation of industrial sites. Rather, the policy sets forth a broad goal to build on underutilized industrial land without clarifying how the City plans to ensure that prior-industrial land will be tested and cleaned, or what the required soil standard is before proposing an affordable housing project. Providing these details is important and critical to ensuring community members are aware of their rights and able to hold negligent companies accountable for failing to test or clean the soil to the standard required by local and state law.

Furthermore, the draft housing element does not adequately address the risks of existing and future environmental hazards such as drought, intense heat, wildfires and floods on publicly owned lands due to climate change. Despite resounding scientific consensus that global temperatures are warming and weather patterns are rapidly intensifying, the draft housing element does not include climate change projections or account for how these changes will influence how housing should be developed and where it can be sited. We encourage LA City Planning to study and account for climate change projections when deciding where housing can be sited. SB 1000 also requires the safety element to include protection from flooding, climate adaptation, and resilience strategies. We were unable to locate an active inventory of proposed locations or approved ones that were analyzed with future climate impacts in mind. In addition, we would like to request more clarity around (1) approval criteria for affordable housing developers and (2) whether priority is being given to those working in frontline communities.

***b. Develop climate resilient housing to mitigate negative climate impacts and improve community health.***

As mentioned, climate change is undeniably affecting all of us, from rising temperatures and seas, shifting precipitation patterns and stronger storms, wildfires increasing in size and occurrence- all of which pose risks to our livelihoods. However, low-income communities and communities of color are often hurt first and worst by the impacts of climate change. In vulnerable communities, climate change can be a new and complicating environmental challenge stacked on top of histories of pollution, disinvestment and discrimination.

The Surging Seas tool, created by Climate Central, states that a “medium” sea-level rise scenario points to a “93% risk of at least one flood over 3 ft taking place between today and 2050 in the Los Angeles Area.”<sup>22</sup> According to this tool, approximately 47% of the total population living in LA’s medium sea-level rise zones are Black, Indigenous, and people of color (BIPOC). To make matters worse, these

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<sup>22</sup> Los Angeles, California, USA, *Surging Seas Risk Finder*, [https://riskfinder.climatecentral.org/place/los-angeles.ca.us?comparisonType=city-council&forecastType=NOAA2017\\_int\\_p50&level=3&unit=ft&zillowPlaceType=place](https://riskfinder.climatecentral.org/place/los-angeles.ca.us?comparisonType=city-council&forecastType=NOAA2017_int_p50&level=3&unit=ft&zillowPlaceType=place).



same communities are overwhelmingly concentrated in nature-deprived areas, and disproportionately exposed to high pollution levels and toxic land uses. A detailed report released by the Hispanic Access Foundation and the Center for American Progress found that, “the United States has fewer forests, streams, wetlands, and other natural places near where Black, Latino, and Asian American people live.” A report by the Liberty Hill Foundation, focusing on the community consequences of expanded oil development in LA notes that “72% of people living near oil and gas drilling in LA County are people of color.” These troubling reports make clear that LA is segregated and so is its pollution. Increasing equitable access to healthy affordable housing throughout LA will require an extensive phaseout of toxic land uses such as oil drilling operations and long-term remediation of the land. Housing justice is inextricably linked to environmental justice. This draft Housing Element should (1) make clear that industrial sites are incompatible with residential areas and (2) lay the groundwork for community-driven development and stewardship.

For example, LA City’s Council District 15 (CD15), a predominately Latinx and Black community with an overwhelming amount of petrochemical and industrial pollution is also extremely rent burdened. Areas like CD15 not only need more affordable housing, but also increased access to healthy affordable housing--which hinges on surrounding land-use designations. Due to the numerous petroleum and industrial sites near residential, schools and sensitive receptors, the Housing Element must declare oil drilling/production a non-conforming use immediately, prohibiting new oil drilling/production within the City of LA, phasing out existing oil drilling within five years with a just transition for workers and communities.

LA City Council recently passed the “Tenant Anti-Harassment Ordinance,”<sup>23</sup> an ordinance banning landlords from harassing tenants throughout LA. Passing this ordinance was a critical step by LA City to meaningfully invest in safeguarding vulnerable tenants against abusive landlords. We hope to build on LA City’s Tenant Anti-Harassment ordinance by expanding the scope of this program to include the impact of the climate crisis, and how it has limited equitable access to healthy affordable housing. For example, urban heat waves are “rapidly increasing in frequency, duration, and intensity with a greater tendency toward more humid nighttime events” a trend that “[has] a high probability of increasing by 42% in frequency and by 26% in duration during severe drought conditions”.<sup>24</sup> This increases health risks to communities with low adaptive capacity, such as those with limited access to air conditioning, air filtration, reliable transportation, access to cooling centers--a large majority of whom are migrant, elderly, or monolingual speakers. An analysis by the American Housing Survey found that 22% of Los Angeles households do not have air conditioning. This percentage increased to 30% for low-income households, making less than \$50,000 a year.<sup>25</sup> We encourage LA City Planning to respond to these findings by implementing strong climate resilience strategies in LA’s Housing Element Update, including but not limited to: (1) mandating proper air conditioning or ventilation systems in leased properties, (2) requiring landlords to install new air conditioning systems as reasonably requested by tenants (especially elders or

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<sup>23</sup> Los Angeles Municipal Code art. 5.3 § 45.30.

<sup>24</sup> Glynn C. Hulley et al., *Rising Trends in Heatwave Metrics Across Southern California*, 8 *Earth’s Future* 7 (2020).

<sup>25</sup> Carlos Granada, *Southern California prepares for heat wave amid Stay Home order, with or without air conditioning*, ABC 7 (Apr. 24, 2020), <https://abc7.com/heat-wave-covid-los-angeles-coronavirus/6127436/>.

families, without handing off the cost to the tenant), and (3) institutionalizing cooling centers and resilience hubs in environmental justice and vulnerable communities. Finally, prioritizing green infrastructure is an important tool in providing natural services that offset intensifying climate change impacts, such as flooding and the urban heat-island effect. It is important to note that communities of color have historically had limited access to green space and parks which can negatively impact community health and resilience. The 2018 *Safeguarding California Plan* highlights the state's growing need to increase equitable access to nature to ensure community health and climate resilience. We urge LA City Planning to invest in programs to: (1) identify park-poor communities, (2) build affordable housing near green infrastructure investments, supported by strong anti-displacement measures to guard against gentrification/displacement, (3) ensure public parks are within walking distance for all communities, and (4) develop and preserve public parks to meet the unique needs of surrounding communities, creating resources for recreation, community building, and local stewardship of the land.

The Clean Up, Green Up (CUGU) (Ordinance #184246)<sup>10</sup> was approved by the LA City Council in 2016 after years of community organizing. The ordinance “authorizes the establishment of a CUGU Supplemental Use District within Boyle Heights, Pacoima/Sun Valley, and Wilmington to reduce cumulative health impacts resulting from incompatible land uses.” CUGU focuses on pollution prevention, pollution reduction, and economic revitalization while supporting small-businesses in complying with regulatory requirements. The CUGU district aims to reduce cumulative health impacts created by incompatible land use/concentrated industrial land use, on-road vehicle travel, and heavily freight-dominated transportation corridors, which are within close proximity to homes, schools, and other sensitive uses. The Housing Element can comply with CUGU goals by declaring oil drilling/production a non-conforming land use, prohibiting new oil drilling/production within the City of LA- starting with the CUGU communities, phasing out existing oil drilling within five years and providing a just transition for workers and communities.

The Safeguarding California Plan: 2018 Updates<sup>14</sup> was a collaboration across-departments, agencies, elected representatives, tribal nations, and non-profit organizations. It provides principles, recommendations to guide adaptation efforts, and case studies for the State of CA in addressing climate impacts. The plan emphasizes equity and community engagement as the common ground on which to build policies, projects, and overall decision-making processes. Some of the indicators of climate change that the Safeguarding CA Plan identified were:

- With increasing temperatures, the energy needed to cool buildings during warm weather—measured by “cooling degree days”—has increased.
- Extreme heat days and especially nights have become more frequent since 1950. Heat waves have been highly variable each year, but nighttime heat waves have shown a marked increase since the mid-1970s.
- The area burned by wildfires across the state is increasing in tandem with rising temperatures. Large wildfires account for much of the acreage burned each year

The Safeguarding CA Plan states that public agencies must make “land use and community development decisions that prioritize long-term safety and resilience”.<sup>26</sup> The current Housing Element does not sufficiently incorporate climate change impacts and projections, and community-led solutions or approaches to best support those living in impacted areas from flooding and the urban heat-island effect. Recommendations from the Safeguarding CA Plan that are related to the City’s Housing Element include:

- L3: Coordinate state laws, regulations, guidelines and policies to promote climate resilience and hazard avoidance and mitigation through local, regional and state planning;
- L-5.4a: Support local implementation of general plan statute requirements on climate justice;
- P-1: Promote community resilience and health equity by improving underlying economic, environmental, social, and living conditions;
- P-6.4: Consider collaborating with State agencies focused on green buildings and energy efficiency to include climate adaptation and health and equity considerations into State initiatives, planning, and policies, including updates to the California Building Code and California Energy Efficiency Standards.

**4. The draft element must honestly acknowledge the history of unjust land use in a way that actively foregrounds policies and programs to Affirmatively Furthering Fair Housing.**

The Affirmatively Further Fair Housing analysis in Chapter 4 shows the product of a long history of segregated housing development patterns and structural racism inherent in conventional planning efforts. While we appreciate the department’s affirmatively further fair housing analysis, this analysis makes clear the inequities that exist in the current zoning code. The department’s analysis shows that current zoning places an over-representative share of new unit potential in areas at highest risk of gentrification and displacement. We find it especially troubling that the neighborhoods with a higher share of Black, Asian, and Latino residents have the highest share of identified development potential while the lowest capacity neighborhoods have the fewest people of color. This reflects the past use of zoning to enforce segregation and highlights the moral imperative LA City officials and staff now have to use the required rezone program to affirmatively further fair housing and undo past harms.

The data indeed show how LA City’s planning policies and programs polarize the city, both racially and economically, and cumulatively fails to affirmatively further fair housing. If the City expects the policies and programs of Chapter 6 to serve as the city’s so-called “action plan” over the next eight years of housing in LA City, then Chapter 4 must not only present the data but also (a) identify the current and past policies and programs, which have led to these unjust conditions, (b) identify the risks of inaction, (c) make a commitment to center community needs and reverse decades of racist land use designations through a robust community engagement process, and (d) conduct an additional analysis of the realistic development potential of rezoned sites that subsequently inform the rezoning program.

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<sup>26</sup> Safeguarding California Plan: 2018 Update, California’s Climate Adaption Strategy, (Jan. 2018), <https://www.srta.ca.gov/DocumentCenter/View/4762/Safeguarding-California-Plan-2018-Update>.

For instance, as the Site Inventory Analysis by Opportunity Area (Table 4.26) shows that nearly half of all sites (49%) that the city are accounting for in the Site Inventory are situated in low-resource areas, which effectively targets these areas for displacement and gentrification. In addition to presenting this data, the Housing Element should account for the negative social and economic impact this data reveals and cite relevant policies such as redlining, which continue to have lasting effects on LA residents, especially low-income residents and residents in communities of color.<sup>27</sup> As page 4-41 of LA City’s draft Housing Element says, current policies such as “land use incentives have a much higher rate of producing affordable housing in High Opportunity Areas, [than housing] produced through financial subsidy alone,” and publicly “subsidized affordable developments are overwhelmingly located in lower resource areas.” This suggests that the City should prioritize strategies that utilize the affordable housing land use incentive programs over subsidy programs to racially and economically integrate neighborhoods and also protect tenants in lower resource areas from displacement by strengthening tenant protections.

The Site Inventory Analysis by Opportunity Area (Table 4.26) also shows the outsized share of affordable housing potential in low resource areas as compared to the (small) share of affordable housing in high resource areas. Specifically, Table 4.26 shows that the City’s high and highest opportunity areas (34% of city census tracts) only have 24% of the cities lower income potential. By comparison, the City’s low opportunity and high segregation areas (44% of census tracts) have 54% of the lower income potential. In line with presenting this data, the Housing Element needs to acknowledge the role that policies such as current land use zoning designations continue to play in concentrating poverty, which are exacerbated by repeated use of conventional housing models. In order for the City to counteract these inequities expeditiously and at scale, the Housing Element should rightfully focus onsite affordability in high and highest resource areas and boldly invest resources in a new housing paradigm that includes a wider array of housing models with social housing and community land trusts. Simultaneously, the Housing Element must ensure community-serving investment in historically disinvested areas. This includes investing in place-based strategies that create a net gain of affordable housing, stop displacement, prioritize environmental justice, enhance community health, and strengthen community leadership in land use planning.

In order to meet LA City Planning’s commitment to center community needs and reverse decades of racist land use decisions, the Housing Element must include a robust community engagement process before changing zoning and land use designations. We urge LA City Planning to adequately discuss the demographic characteristics of the areas within the planned update that are subject to potential rezoning as well as how rezoning might impact those characteristics. The Safeguarding CA Plan identifies the importance of working with the most vulnerable to the impacts of climate change to ensure that they do not suffer disproportionately as a result of historical injustice and disinvestment. Recommendations in the Safeguarding CA Plan that are related to this Housing Element work are Recommendations EM-4, E-6 (increase climate resiliency in low-income and disadvantaged communities), L-1 (develop innovative

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<sup>27</sup> Grace Schumker, *Lasting Effects: Redlining in Los Angeles County*, Tufts University (Dec. 2019), [https://sites.tufts.edu/gis/files/2020/07/schumaker\\_grace\\_GIS101\\_Fall2019.pdf](https://sites.tufts.edu/gis/files/2020/07/schumaker_grace_GIS101_Fall2019.pdf).

governance models and equitable public engagement strategies to engage residents), and others including Recommendations L-5, P-1, T-5, B-6, O-5, W-6, and PC-6.

While the site inventory highlights the current inequities in the distribution of housing potential throughout the city, the rezone program has the potential to undo these harms and focus future growth in communities within high and highest opportunity areas while protecting sensitive communities from increased displacement pressures. As was done with the site inventory, a successful rezone program must conduct an analysis of realistic development potential in high and highest opportunity areas. The rezone program must then use this analysis's findings to adequately allocate and designate affordable housing through the rezone program. To ensure that the city not only zones for an additional 219,732 units, including 121,881 lower income units, but also can reasonably expect developers to build these units, the city must conduct an analysis of the realistic development potential of any rezoned sites. If the city does not conduct this analysis and use its findings to inform the rezone program, the City cannot reasonably expect to address the massive disparities presented in the site inventory, risks falling far short of providing affordable housing, especially in high opportunity areas, and will fail to affirmatively further fair housing. Without conducting a realistic development potential analysis specifically in the rezone program in high and highest opportunity areas, the department will also not have an accurate ability to assess its progress towards meeting goals to affirmatively furthering fair housing.

Overall, Tables 4.26-4.29 highlight the shortcomings of the current distributions of unit potential. Table 4.26 highlights the outsized share of affordable housing potential in low resource areas as compared to the (small) share of affordable housing in high resource areas. Table 4.27 highlights how the highest capacity neighborhoods are those with the lowest environmental and educational scores and lowest capacity neighborhoods are those with the highest environmental and educational scores. Lastly, Table 4.29 highlights that only 14% of the City's affordable housing units over a decade ending in 2018 were developed in the 35% of high and highest resource census tracts. Together, this chapter shows a dire crisis in the distribution of past and future affordable housing and highlights the importance of affirmative furthering fair housing through the rezone program.

5. **To address the glaring deficiencies outlined in the AFFH analysis and to correct a long history of segregated housing patterns, the City's RHNA Rezoning Program must require onsite affordability with rezoning programs and focus rezoning in high opportunity areas. The City must also ensure that while focusing rezoning in high opportunity areas, the City separately, simultaneously, and equitably invests in historically disinvested areas to prevent gentrification and displacement.**

Communities that our member organizations organize with and represent have borne a heavy toll from generations of failed land use policy and environmental injustices, including redlining and exclusionary zoning. Housing justice and equity for our communities means that the Planning Department must engage with historically marginalized and excluded communities in a way that centers their ongoing concerns and works with them to develop solutions, including as the Housing Element and the Rezoning Program are

revised, finalized, and implemented. As a baseline, the Rezoning Program must materially benefit our communities by resulting in more and better affordable, healthy and stable housing opportunities.

We appreciate [Council President Martinez's letter \(dated August 13, 2021\)](#), which was co-authored with six of her Councilmember colleagues and issued to your department, detailing their commitment to equitable distribution of housing throughout LA. We appreciate that many of our coalition's recommendations were included in the Council President's letter, but we write to emphasize the ongoing need to tie on-site affordable housing requirements to rezoning. This fundamental approach would help our city meet the scale of affordable housing needed at this moment in our city's history. Our coalition's recommendations to the Rezoning Program are as follows:

- Design the Housing Element's Rezoning Program to include on-site affordable housing requirements that exceed TOC program requirements on every site that is rezoned, and include displacement avoidance and protection measures such as excluding tenant-occupied sites from rezoning. Rezoning should require progressive tiers of affordability for increasingly higher density development. Rezoning should be limited to high and highest opportunity areas of Los Angeles. The City should simultaneously invest public dollars in community-led planning, affordable housing opportunities and housing stability programs, and other community-serving, health-promoting strategies to protect and uplift residents living in historically disinvested areas and areas that are susceptible to gentrification.
  - Update the City's affordable housing incentive programs to require more affordable housing and strengthen tenant protections. This process should increase affordability and tenant protections across the board, while focusing increased density allowances in communities in the California Tax Credit Allocation Committee (TCAC) high and highest opportunity areas, while subtracting census tracts that have a high displacement risk.
  - Enforce the Measure JJJ requirement that community plan updates do not reduce the capacity for creation and preservation of affordable housing or undermine California Government Code Section 65915 or any other affordable housing incentive program by requiring that all increases in allowable density and FAR be aligned with on-site affordable housing standards that meet or exceed TOC. The Community Housing Needs Assessment Process should be based upon citywide housing production goals and utilize a methodology that balances traditional factors such as job and transit access with a new prioritization for high opportunity areas, anti-displacement, healthy and affordable housing, and achieving housing opportunities at the deepest affordability levels.
6. **The City should maximize housing justice in L.A. by prioritizing permanent housing affordability and community stability throughout the draft Housing Element, especially in the Site Inventory (Chapter 4) and Programs and Policies sections (Chapter 6).**



***a. Public Land***

We support the inclusion of the pipeline of new housing on public land in the Sites Inventory. In addition, the Inventory includes 10,000 units of Lower and Moderate Income units attributed to a “Public Lands program” that would use “300 acres of public land to drive a scaled housing solution that would create ten housing development opportunities with 1,000 units each.” The Housing Element should provide more detail on this proposed program. It appears that this strategy is referenced in Policy 16. But to the extent this is a major policy initiative with the potential to create 10,000 new units of affordable housing on public land, the Housing Element should provide more information on the timeline, funding sources, key stakeholders, and any other relevant information. The Public Lands program (Policy 16) must prioritize models of housing that by design are permanently affordable and enable community control of housing, including social housing and community land trusts.

Councilmembers Mike Bonin, Nury Martinez, and Marqueece Harris-Dawson already initiated an effort in early 2020 to direct the City departments to explore social housing for LA City. This motion, which LA City Council’s Housing Committee members also rightfully affirmed ([CF# 20-0197](#)), directs City departments to explore demonstrating the social housing model on LA City- and other government agency-owned land. By utilizing public land for social housing, LA City would lower the development cost of permanently affordable, public-nonprofit-community developed housing.

***b. Goals and Objectives of the Policy and Programs Section (Chapter 6)***

We offer the following recommendations to the city-stated Goals and Objectives of the draft Housing Element. For Chapter 6 of the Housing Element to serve as the city’s so-called “action plan,” then the goals and objectives should be modified to adequately reflect the scale of affordable housing needed by residents today and that the goals and objectives are inclusive of permanent affordable housing models. The following recommended edits in italicized text are recommended edits to the City-stated Goals and Objectives of the Policy and Programs Section (Chapter 6).

*Recommended Edits to City-stated Goals of the Policies and Programs Section:*

GOAL 2: A City that preserves and enhances the quality of housing and provides greater housing stability for households of all income levels.

OBJECTIVE 2.1 Strengthen renter protections, prevent displacement and increase the stock of affordable housing

2.1.3 Provide resources that enable the creation of Affordable Housing from existing unrestricted housing, including *facilitating community stewardship and control, tenant management, and/or tenant ownership.*

Pg 6-11:

GOAL 4: A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present.

OBJECTIVE 4.3 Affirmatively further fair housing in all housing and land use programs by taking proactive measures to promote diverse, inclusive communities that grant all Angelenos access to housing, particularly in Higher Opportunity Areas, increase place-based strategies to encourage community revitalization and protect existing residents from displacement.

*Objective: 4.3.4 Advance place-based strategies that create opportunity and financial strength in areas of disinvestment and with a history of discriminatory and predatory financial practices through asset-building shared equity homeownership that creates stability through community control of resources. Mitigating displacement pressures through shielding housing from market forces allows communities to thrive through inclusivity, stability and self-determination.*

The above recommendations are a portion of recommendations from the Community Land Trust Coalition that are included as an appendix to this letter. ACT-LA fully supports the recommendations of the Community Land Trust Coalition in the attached appendix.

### ***c. Policies and Programs (Chapter 6)***

Overall, we see a majority of the programs continue to prioritize traditional affordable housing and market based solutions. We need to incorporate a wider range of housing solutions that prioritize community control and permanent affordability. While social housing is not explicitly stated in any program (aside from mentions in Programs 14 and 16), we see many opportunities in the programs presently listed in Chapter 6 that should support the creation of social housing and can continue to increase support of community land trusts. We urge LA City planning to consider and incorporate the following changes throughout the following programs.

While the following recommendations offer our feedback on some opportunities in the presently listed programs, the following list is not exhaustive. LA City officials and staff should advance the exploration and implementation of social housing and expansion of community land trusts in as many Housing Element programs and policies as possible.

#### **Opportunities for financing social housing**

As LA City staff and officials ordinarily pursue affordable housing funding, LA City officials and staff should additionally consider financing social housing models to generate a large scale of permanently affordable, community-controlled housing for current and future LA City residents. In addition, LA City's expansion of existing voucher programs, such as Section 8 tenant and project based vouchers, would be necessary to help ensure permanent affordability and operational viability of social housing and community land trusts. The following new and existing programs should include provisions to fund the demonstration and potential expansion of social housing in LA City.

- Housing Vouchers (Programs 2, 41, 42, 100, 102, 104, and 105) - We support housing vouchers targeting a range of populations and the creation of a permanent voucher system with social housing in mind.

- Tax Increment Finance District (Program 66) - We support revenue allocations for social housing using this tax revenue.
- New Revenue Streams for Social Housing (Programs 17 and 20)- Social housing and community land trusts should absolutely be included in these efforts to seek and allocate funding.

*Opportunities for the public to learn about social housing as a model for affordable housing*

As part of addressing the history of unjust housing policies, LA City should make considerable effort toward building community capacity to envision permanently affordable housing that rightfully gives tenants greater control over their own living situations, which should include expanding knowledge of social housing for all members of the public, especially through the following listed programs.

- Neighborhood Awareness of Special Needs Housing (Program 119)
- At least two Community Plan programs (Program 49 and 65)
- Supporting capacity building for tenant control
  - Property Management Training (Program 44)
  - Tenant/Community Opportunity to Purchase (aka TOPA/COPA) (Program 90) - this program should explicitly mention land trusts as potential buyer and owner of land.
  - Support community participation on site visits to places to learn about their social housing models (Program 12)

*Opportunities for fundamental design (environmental and community programming) of social housing*

Every housing model that LA City utilizes or provides for should advance environmental justice by design, in order to provide residents with healthy homes in which to lead their lives. Social housing developments, in particular, should fundamentally incorporate sustainable methods of construction and operations.

- Support sustainable methods of construction and operations (Program 69 to 76)

*Opportunities for sites and land use to incorporate social housing and utilize community land trusts*

LA City officials and staff should prioritize housing production in high and highest TCAC opportunity areas of the city to start to enable equitable access to decades of institutional investment into resources, including schools, job proximity, healthy food, and health care. Simultaneously, LA City officials and staff should also invest in historically disinvested areas of the city to prevent displacement and gentrification. The social housing and community land trust models should be considered for implementation throughout the region and utilized in every area of the city where historically marginalized communities stand to materially benefit from this public investment. Social housing and community land trusts, which are models for permanent affordability and residential stability, should be incorporated fully into the following programs.

- RHNA Rezoning (Program 121) - See Rezoning Program recommendations in Part 4 of this letter. Rezoning Programs should enable for an array of affordable housing options expeditiously and at scale in order to counteract market forces that include real estate speculation, which catalyze

displacement and gentrification. Social housing and community land trust models should be among the array of affordable housing options this rezoning program should establish as early as possible over the next eight years with this Housing Element. At a minimum, for instance, the text of this program should be revised to say: “This program will carefully consider the creation of a diversity of housing types to expand more naturally affordable and deed-restricted affordable options, *including social housing*.”

- Provide Adequate Sites for Lower Income Households on Nonvacant and Vacant Sites Previously Identified (Program 60)
- Public Land for Affordable Housing (Program 15)
- Neighborhood Awareness of Special Needs Housing (Program 119)

*Opportunities for policy that enables use of social housing and expanded use of community land trusts*

One characteristic that distinguishes social housing from the conventional public housing model is the focus on community governance of social housing developments. For example, we envision community governance through social housing as a means to enhance resident stability through community control (e.g. tenant councils) and programming (e.g. social/case workers) that enhance residents’ wellbeing. Because single family neighborhoods have dominated Los Angeles’s landscape for decades and the social housing model has yet to be utilized in Los Angeles, public policy should be changed to enable use of social housing and expanded use of community land trusts. Social housing and community land trusts should be incorporated fully into the following programs.

- Shared Equity Models (Program 4)
- New Models for Affordable Housing (Program 16)
- Preservation of Restricted Units (Program 27)
- New Models of Acquisition, Rehabilitation and Preservation (Program 30) - Should include social housing and Land Trusts
- Anti-Displacement Strategies (Program 122)
- Affirmatively Furthering Fair Housing (Program 124)
- Homeownership for Voucher Holders (Program 2) - Opportunity for land trusts
- Systematic Code Enforcement Program (Program 21) -include database can be used to focus resources identified for foreclosure intervention and displacement prevention
- Comprehensive Homeless Strategy (Program 92) - Social housing should in integrated into comprehensive homeless policy as a permanent supportive housing strategy and a avenue for preventing homelessness

*Concerning programs for advancing equitable development, including but not limited to social housing*

In contrast to the above five subsections of recommendations to the Housing Element policies and program, we recommend the following two programs be eliminated or substantially reworked so that the Housing Element rightfully addresses the history of unjust land use planning by prioritizing the concerns of historically marginalized communities.



- CEQA Streamlining Measures (Program 55) - CEQA streamlining measures that seek to override the concerns of community members present a false choice between expediency and equity. Community members, especially those who have endured decades of environmental injustice, need legal accountability tools including CEQA to be able to hold developers and successive government agency officials accountable to requisite mitigation measures, including full remediation of environmental degradation. In fact, CEQA provides community members with a process by which to remedy environmental harms and require developers to build safe and healthy homes/communities. Streamlining CEQA as LA City planning describes in this program weakens an important process community members use for cross-sector environmental review and long-lasting accountability. Because of these untold consequences to community members by weakening CEQA protections and to avoid exacerbating institutional inequities in land use planning, this program should be removed from the Housing Element.
- Community and Neighborhood Council Development Review (Program 77) - Neighborhood council development review priority exacerbates institutional inequity by giving Community and Neighborhood Councils, which principally include land owners, additional and privileged access to review property development. As a part of the city's efforts to start addressing the history of unjust land use in high and highest opportunity areas, LA City officials and staff need to prioritize the perspectives of historically marginalized communities in local development review.

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If done right, the Housing Element update and 6th cycle RHNA can be transformative for Los Angeles, with the potential to vastly improve housing affordability and the quality of life for millions of Angelenos. After decades of underproducing affordable housing, perpetuating exclusionary zoning, and lacking policies to advance environmental justice in the City of LA, we call on our city officials and staff to take bold action. We urge you as public stewards to craft and adopt affirmative policies and programs that will result in vast numbers of deeply affordable units, stabilize communities at risk of displacement, unlock affordable housing in high opportunity areas, while simultaneously and equitably investing in historically disinvested areas to prevent gentrification and displacement. Our coalition remains ready to be a thought partner with the City in the implementation of the policies stated in our comment letters and we look forward to continued collaboration on making Los Angeles a city where everyone can thrive.

Sincerely,

Alliance for Community Transit - Los Angeles (ACT-LA)

**Attachments:**

- A. Los Angeles Community Land Trust Coalition Housing Element Recommendations
- B. [Oct. 2020 ACT-LA comment letter](#)

# HOUSING ELEMENT RECOMMENDATIONS BY LOS ANGELES COMMUNITY LAND TRUST COALITION - 9/2/21

## City of LA Housing Element - [CHAPTER 6 HERE](#)

Pg 6-7:

**GOAL 2: A City that preserves and enhances the quality of housing and provides greater housing stability for households of all income levels.**

OBJECTIVE 2.1 Strengthen renter protections, prevent displacement and increase the stock of affordable housing

- 2.1.3 Provide resources that enable the creation of Affordable Housing from existing unrestricted housing, *including facilitating community stewardship and control, tenant management, and/or tenant ownership.*

OBJECTIVE 2.2: Promote more affordable ownership opportunities and ownership retention strategies, with an emphasis on stability and wealth building for underserved communities.

- 2.2.1 Expand ownership models that increase the ability for households to attain homeownership, including alternative forms of shared and limited equity ownership.
- 2.2.3 Expand ownership and wealth generation opportunities through accessible education and technical assistance, especially in communities of color.

Pg 6-11:

**GOAL 4: A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present.**

OBJECTIVE 4.3 Affirmatively further fair housing in all housing and land use programs by taking proactive measures to promote diverse, inclusive communities that grant all Angelenos access to housing, particularly in Higher Opportunity Areas, increase place-based strategies to encourage community revitalization and protect existing residents from displacement.

*Objective 4.3.2 Advance place-based strategies that create opportunity and financial strength in areas of disinvestment and with a history of discriminatory and predatory financial practices through asset-building shared equity homeownership that creates stability through community control of resources. Mitigating displacement pressures through shielding housing from market forces allows communities to thrive through inclusivity, stability and self-determination.*

Programs - pg 6-14:

**2. Homeownership for Voucher Holders Goal #: 2, 4 Lead Agencies: HACLA Funding**

**Source:** HUD Objective: Increase homeownership opportunities among voucher holders. Allow Section 8 participants to become homeowners by using their Vouchers to purchase a home.



Depending on funding levels and lender support, HACLA will continue to explore the feasibility of utilizing the homeownership program within the context of public housing revitalization activity. *Explore facilitating long-term stability and wealth-building by incorporating a Community Land Trust model that supports homeowners and facilitates resales to future low- and moderate-income families.*

**4. Shared Equity Models Goal #: 2, 4 Lead Agencies: LACP Supporting Agencies: HCID**

**Funding Source: General Fund Objective:** Study barriers to the greater utilization of shared ownerships models. Use these models as a tool to facilitate affordable homeownership. Explore barriers and consider providing assistance to and incentivizing the development of shared-equity ownership models such as Limited Equity Housing Cooperatives (LEHCs), Community Apartments and housing owned by Community Land Trusts (CLTs) or Tenancy in Common (TICs) in the Zoning Code and housing funding processes. *Prioritize public support for LEHCs on land held by CLTs Partner project-based rental subsidy programs with cooperative ownership models to support deeper affordability levels.* Consider policies to require that on-site affordable for-sale units in mixed-income projects be sold to a qualified nonprofit, with an emphasis on CLTs. Promote the State property tax exemption for property that is owned by a CLT and that is being—or will be—developed or rehabilitated as rental housing, LEHCs, or owner-occupied housing per Section 214.18 of the Revenue and Taxation Code. Explore securing tax-defaulted properties through Chapter 8 Agreement Sales for Community Land Trusts (CLTs) to create long-term affordable housing. Explore conveying public land / tax foreclosed / receivership properties to CLTs and prioritize CLTs in current acquisition and rehabilitation programs.

Pg 6-30

**21. Foreclosure Registry Goal #: 2, 3 Lead Agencies: HCID Supporting Agencies: LADBS**

**Funding Source: Foreclosure Registration Fees Objective:** Maintain a database of contact information of all residential properties within the City of Los Angeles that are subject to Ordinance No. 183, 281 (Amended 2014). Maintain and enhance a dashboard to show results and identify trends impacting neighborhoods, including statistics on initial foreclosure recordings (Notices of Default - NOD) and on the portion of those defaults which proceed to foreclosure (Real Estate Owned - REO); *ensure database can be used to focus resources identified for foreclosure intervention and displacement prevention;* continue education and awareness of Ordinance and increase outreach to over 95% of responsible parties on all new foreclosures recorded in the calendar year. The Foreclosure Registry Ordinance (183281, Amended in 2014) was established in 2010 as a mechanism to protect residential neighborhoods, including abandoned properties, from blight through the lack of adequate maintenance and security as a result of the foreclosure crisis. Any lender (or beneficiary or trustee who holds or has an interest in a deed of trust) who either issues a notice of default or forecloses upon on a residential property located within the City of Los Angeles must register that property with and provide contact information to the Housing and Community Investment Department (HCID) in case any exterior blight issues arise on the property in relation to foreclosure, along with completing required monthly lender inspections for as long as the property remains in foreclosure.