

January 19, 2016

Los Angeles City Council – Housing Committee
200 N. Spring Street
Los Angeles, CA 90012
ATTN: John A. White

RE: House LA Initiative – Council Files 14-0057-S1, 15-1007, 15-1002

Dear Councilmembers:

The Alliance for Community Transit – Los Angeles (ACT-LA) writes to share the following comments and recommendations regarding the House LA initiative.

As you are well aware, we are currently experiencing a severe housing affordability crisis. Facing the most unaffordable housing market in the country and unconscionable rates of homelessness, city officials and agencies must do everything in their power - particularly with their land use and planning tools - to close the gap and create an inclusive and livable place for the city's majority: renters and workers.

ACT-LA is a coalition of twenty-nine organizations that came together to advocate for just, equitable, sustainable transit systems and neighborhoods for ALL people in Los Angeles, in particular low-income communities and communities of color. We understand that creating a sustainable, accessible transit system that serves transit dependent households is inextricably linked with ensuring that adequate affordable housing is available in transit areas. Our community-based organizational members and resident leaders are currently seeing unaffordable housing prices displace core transit riders throughout the city, jeopardizing transit ridership and de-stabilizing our communities.

We thank Councilmember Cedillo and the Housing Committee for recognizing the urgent need to meaningfully address our housing affordability crisis. The House LA Initiative could provide a framework for a simplified and efficient development process to help increase affordability. But to achieve this important outcome, the City must prioritize true affordability, and must preserve and strengthen our existing affordable housing tools. To maximize the potential of the House LA Initiative, we offer the following recommendations:

1. Prioritize the creation and legalization of safe, habitable accessory dwelling units that are affordable to Low- and Very-Low Income households [CF 14-0057-S1]

We applaud this Committee's commitment to establishing a process for granting legal status to unapproved dwelling units and a process to allow the development of Accessory Dwelling Units. As noted in the Motion, "Accessory Dwelling Units cannot completely solve the City's housing crisis, but offer a strategy to improve conditions for many." In fact, unapproved dwelling units are a lifeline for many who face difficulties accessing affordable housing in our current crisis. And the process of legalizing certain unapproved dwelling units offers a crucial opportunity to increase our City's stock of safe affordable housing. We strongly recommend that any process for granting legal status to unapproved dwelling units include criteria to create covenanted affordable units.¹

¹ See also, Council 14-1150.

2. Prioritize the use of City-owned land as Sites for Affordable Housing [CF 15-1007]

We strongly support the use of City-owned property for affordable housing development. Given the severity of our affordable housing crisis, we need to utilize every tool at our disposal. Public land is an important tool in the City's toolkit. We urge the Committee to consider additional steps to ensure that we maximize the impact of this essential resource. We recommend that the City consider meaningful land value discounting to support affordable development, and we recommend that the City prioritize projects that provide deeper affordability, including units affordable to households earning 30% of the area's median income. We also urge the City to partner with our member organizations and other community organizations to implement a community-driven process to guide the disposition of public land and/or design of projects selected for City-owned land.

3. Protect the integrity of existing affordable housing incentive programs [CF 15-1002]

We support alternative parking strategies that result in affordable housing development near transit. We urge the Committee to pursue parking strategies that are *coordinated* with affordable housing incentives, consistent with state density bonus law. Otherwise, changes to these strategies risk undermining existing policies.

Land use policies that increase the building envelope must come with policies that produce and preserve affordable housing. The examples cited in this motion – AB 744 and the City Density Bonus Ordinance – are consistent with this principle. These policies provide appropriate parking relief to projects that include new affordable housing and replace any affordable units lost as a result of the development. However, the motion does not explicitly call for new parking benefits to be available only to projects with affordable units. Without linking parking reduction to affordability, the City risks undercutting our existing affordable housing incentive programs, in contradiction of state law² and the City's Housing Element.³

Thank you for taking action on this crucial issue and for your attention to our recommendations and concerns. Please contact our Campaign Director Laura Raymond at lraymond@allianceforcommunitytransit.org with any questions.

Signed,

Alliance for Community Transit – Los Angeles

² See Cal. Gov. Code 65917, which prohibits a city from offering a density bonus or other incentive that would undermine the intent of the state density bonus law.

³ See Housing Element Programs 73 and 101 (“Take care not to undermine the density bonus.”)