



Rachel Brashier  
Policy Director  
Office of Council Member Marqueece Harris-Dawson  
Council District 8 of the City of Los Angeles

**Re: Comments on the Comprehensive Homelessness Strategy for the City of Los Angeles**

Dear Rachel Brashier,

Thank you for the opportunity to contribute to the City's process in developing a Comprehensive Homelessness Strategy. We want to thank Council Member Harris-Dawson for his continued efforts to confront our long-standing crisis of homelessness in Los Angeles. And he is to be commended for leading the City's homelessness strategy as the Co-Chair of the Homelessness and Poverty Committee of the City Council. There is significant momentum within the City and County to pass and implement solutions that address both the immediate life-threatening conditions so many endure on a daily basis and the root causes that have led to record numbers of Angelenos living on the streets. So it is with great respect for your work and humility we provide our comments here.

First, we echo many of the comments shared at the Homelessness and Poverty hearing on January 13, 2016 that highlighted the need for greater breadth in the plan. To be a truly comprehensive strategy, the issue of domestic violence (DV) as a driver for homelessness must be fully addressed with appropriate policies to advance safe and affordable housing options for victims of DV and in coordination with programs to end violence at home. Likewise, violence and harassment by police and security forces directed towards the homeless serve to worsen the homelessness crisis. Serious attention and resources must be devoted to a shift in culture and in budget towards the decriminalization and humanization of the homeless. And, lastly, we reiterate the calls for a comprehensive strategy that acknowledges that the solution to the crisis of homelessness comes down to (a) stable homes and communities that are protected from the dismantling pressures of displacement; and (b) an ample supply of housing affordable to and supportive of low-income and no-income families. This brings us to our first recommendation.

**Recommendation #1: Add a chapter on "Homelessness Prevention and Anti-Displacement Strategies," complete with a suite of policies and financial mechanisms addressing the diverse forms of displacement that are powerful drivers of homelessness.**

The Economic Roundtable reported last year that each month, over 13,000 people enter homelessness in the County of Los Angeles. As you know, many of these people live in the City of Los Angeles, are not chronically homeless and are living on the streets because they have been forced from their home (often illegally), can no longer afford rent, have lost a job and/or have incurred major expenses from medical care. Many are families who have faced the challenges of overcrowded housing, slum housing, long-term unemployment and skyrocketing rents. The destabilization of their housing severs their connection to their community and schools, and places enormous health costs on family members who lose the physical and mental health-promoting benefits of a stable home.

For these reasons, we recommend the chapter on Homelessness Prevention and Anti-Displacement Strategies include solutions that fall under the following categories:

- **Protection and strengthening of rights for all tenants** of housing covered or not covered by the Rent Stabilization Ordinance (RSO). The RSO’s tenant protections must be proactively monitored and fully enforced as a first line of defense against homelessness. Today, many RSO violations go unnoticed or unchallenged. For tenants living in housing not covered by the RSO, even fewer protections exist. And this must be changed through the adoption of citywide “just cause eviction” law and associated tenant rights applied to all rental housing in the City of Los Angeles.
- **Minimize the harmful effects of the Ellis Act on tenants in Los Angeles.** The Ellis Act allows property owners to evict tenants by replacing rental units with for-sale housing (e.g., condos) or commercial uses. Local implementation of the law has provided substantial loopholes that are devastating to tenants. Since 2013 alone, the use – and abuse – of the Ellis Act has led to thousands of tenants being evicted in Los Angeles as units are converted to condominiums or demolished. These loopholes must be closed at the local level so that landlords cannot illegally abuse the Ellis Act and harm families. The City must also support reform in the State legislature of the Ellis Act.
- **End the loss of public housing.** Public housing remains one of the most critical forms of affordable housing, reaching families at the lowest ends of the income spectrum. Public housing continues to be threatened by redevelopment plans that risk displacing tenants while losing the public housing to privatization.
- **Land use protections for RSO housing.** Preserve housing affordable to low-income families through the application of land use and zoning policies that protect RSO units and other units affordable to low-income residents. (See further details in Recommendation #2, below)

**Recommendation #2: Direct the City to use its land use and zoning powers to protect the homeless, increase our stock of affordable housing and prevent displacement of tenants living on the verge of homelessness. Integrate strategies under Strategies 8A and 8B of the Comprehensive Homelessness Strategy.**

A land use approach can be designed to support equitable development and achieve a net gain of affordable housing by integrating policies that:

- **Apply value capture** to achieve appropriate public benefits (including the creation of new affordable housing, at deep levels of affordability) from new development projects;
- **Strengthen affordable housing incentive programs** to achieve greater and deeper affordability along with replacement requirements;
- **Set an annual allowance on demolitions and condo conversions**, which are key drivers of the displacement of tenants and the loss of RSO housing;
- **Monitor the stock** of housing affordable to low-income residents, and implement additional protections when a net loss of affordable units is observed.

Particularly where there are major public investments – such as along our growing transit network – land use policies afford a tremendous opportunity to advance the City’s goals for ending homelessness. Public transit investment can amplify gentrification and worsen homelessness. However, if we design equitable policies and direct appropriate resources, the City can transform public investments into a more powerful part of the solution. We applaud Council Member Harris-Dawson for recognizing this opportunity by calling on the City to “include a prioritization of transit-oriented developments as it connects to affordable housing” (Homelessness and Poverty hearing, January 13, 2016.) Our third recommendation here pertains to equitable TOD land use policy.

**Recommendation #3: Address the threats and opportunities of transit-oriented development (TOD) by establishing a set of equitable land use policies along existing and planned transit corridors.**

The Alliance for Community Transit – Los Angeles (ACT-LA) coalition, of which SAJE is a member, has recommended a combined approach inclusive of incentives for the creation of new affordable housing and the preservation of existing affordable housing. As our transit system continues to expand, an equitable TOD policy regime can be a fundamental element of a homelessness prevention plan. Accompanying this letter is a policy memo that goes into greater detail on this approach. ACT-LA has worked with its 29-member organizations and residents from throughout the City to set a vision for how development can protect core transit riders from displacement while making our neighborhoods more economically vibrant.

Thank you for your consideration and leadership on these issues. Please do not hesitate to reach out to discuss these ideas further.

Sincerely,

Joe Donlin  
Associate Director  
Strategic Actions for a Just Economy