



January 27, 2016

Homelessness & Poverty Committee
Councilmember Marqueece Harris- Dawson, Co-Chair
Councilmember Jose Huizar, Co-Chair
Councilmember Mike Bonin
Councilmember Gilbert Cedillo
Councilmember Current D. Price, Jr.
200 N. Spring Street, Room 340
Los Angeles, CA 90012

Re: Council File 15-1138-S1, Comprehensive Homeless Strategy

Dear Councilmembers,

Established in 1924, the Central City Association (CCA) is Los Angeles's premier business advocacy organization, with 450 members employing over 350,000 people in the Los Angeles region. CCA represents a broad swath of the businesses that drive the Los Angeles economy and knows its continued success is dependent upon the ability to tackle complex issues such as homelessness. CCA commends the City for the Comprehensive Homeless Strategy and believes it is an excellent report with strong recommendations.

CCA is focused on short-term and long-term solutions addressing homelessness and we are encouraged by the City and County's partnership. These recommendations are offered as short-term solutions to address the serious homeless crisis facing the City.

Short-term recommendations

- **Fund Additional Outreach Workers-** The City needs additional outreach workers who are connecting homeless individuals to appropriate services and housing.
- **Keep the Winter Shelters Open Year-Round & 24 Hours a Day-** The City has 861 existing winter shelter beds and an additional 440 winter shelter surge beds available for inclement weather. These existing resources should be fully maximized. CCA believes they should be open all day and year-round and they should offer supportive services. This would make it easier to locate individuals and help them secure housing. These facilities should also be considered as possible storage locations for homeless individual's personal property.
- **Fund Urgent Care Beds to Treat Mentally Ill Homeless-** The LAPD estimates 30-40% of arrestees have a mental illness. Many of these individuals are taken to jail or the emergency room and not connected with appropriate services. There are currently five urgent care centers in the County of Los Angeles and LAPD has begun to utilize them as an alternative to jail or ER but people can only stay for 23 hours. There needs to be more specialized bridge housing options

for people with mental illness. It takes an average of 90 days to move homeless individuals from a shelter to permanent housing. Due to a decision from HUD, LAHSA will stop funding 2,000 transitional housing beds in 2016. The City should utilize this existing resource and allocate funds accordingly.

- **Utilize City Owned Property to Open New Storage Facilities**-The City should leverage this existing resource to provide citywide storage for homeless individuals' personal property.
- **Adopt the Draft Ordinance Amending Section 56.11 of Los Angeles Municipal Code**- CCA supports the draft ordinance as amended by the Public Works and Gang Reduction Committee on January 25, 2016 and believes it strikes a balance between balancing the rights of all community members including homeless individuals.
- **Fund Additional Environmental Compliance Officers (ECO)** - Currently there are 16 ECO's and an additional four being trained. This represents 20 ECO's citywide. CCA is concerned this is not sufficient numbers of persons to maintain sidewalks and other public areas in a safe and clean condition.

We hope you will prioritize these items as you deliberate the Comprehensive Homeless Strategy. CCA is committed to partnering with the City and County to support solutions to address homelessness.

Sincerely,



Carol E. Schatz
President & CEO

AFFORDABLE HOUSING AND QUALITY JOBS NEAR TRANSIT

Los Angeles stands at a crossroads. In the midst of a massive transit build-out, we are poised to become a more connected and sustainable city. However, only *equitable* land use development makes it possible to fulfill the great environmental, economic and social promises of transit. We must ensure a net gain of affordable housing and quality jobs available to public transit's core riders.

We don't need a one-size-fits-all approach. Each community should help shape its development. But certain principles – affordable housing, green space, walkable streets, and economic vitality – are important for all our communities. At this key moment, the City has an unparalleled opportunity to put these principles into practice. The Alliance for Community Transit – Los Angeles (ACT-LA) advocates a comprehensive equitable Transit Oriented Communities (TOC) Program in order to:

- **Create new affordable housing** near transit
- **Prevent displacement** of low-income residents in transit-served neighborhoods
- **Grow quality job opportunities** for local residents
- **Promote healthy, sustainable neighborhoods** that are pedestrian and bike-friendly
- **Ensure civic engagement** of core transit riders and transit-adjacent residents

I. ACT-LA proposes a comprehensive Transit Oriented Community (TOC) Program consisting of four land-use policy elements:

1. Amend LAMC Section 12.22 to create TOC Affordable Housing and Economic Mobility Incentives.

Affordable Housing Incentives: New residential and mixed-use developments in a TOC* are granted increased residential density, streamlined approval and/or reduced parking requirements in exchange for including affordable units. This encourages growth and development – for all income levels – in L.A.'s transit served communities. The affordable housing set asides should exceed state density bonus minimums and should include incentives for Very Low- and Extremely Low-Income units in order to be affordable to L.A.'s core transit riders, 70% of whom make less than \$25,000 per year.

Economic Mobility Incentives: New mixed-use and commercial developments within a TOC are granted incentives such as relaxed ground floor retail requirements, expedited approval, reduced parking requirements, etc. in exchange for providing community serving economic development benefits such as local/targeted hire, living wages, healthy food retail, and support for community-serving small businesses.

2. Amend LAMC Section 13 to create a TOC Overlay District.

A new supplemental use district or "TOC Overlay (TOCO) District" will establish standards and requirements for community-serving development and affordable housing preservation near transit. Without altering underlying zoning or use designations, the new district designation overlays additional equitable TOC standards, including bike/pedestrian and complete streets design standards, economic mobility provisions, and a "no-net-loss" anti-displacement program.

- All parcels in a TOCO District retain underlying zoning and density until new station area planning occurs.

* TOC designation would apply to a half-mile around fixed rail and high-use bus station areas.

- Enhanced design standards promote/require bike & pedestrian oriented uses/frontage.
- District includes standards/requirements and procedural mechanisms to encourage community-serving economic development, e.g. targeted hiring requirements for projects with City subsidy, etc.)
- Projects in a TOCO District are entitled to TOC Affordable Housing / Economic Mobility Incentive Program.
- District includes *performance-based standards for neighborhood stabilization*. For each TOCO District, the City will create and monitor an inventory of all affordable units and units subject to RSO. If there is a net loss, preservation policies will go into effect until the loss is reversed.

3. Encourage community-driven TOC planning to implement equity standards.

The above TOC Overlay District requirements may be established as *interim* standards until such time the TOC is subject to a completed Station Area Plan consistent with enumerated standards. A “Station Area Plan” may be a Transit Neighborhood Plan (TNP), Community Plan Implementation Overlay (CPIO), Specific Plan, or other community-led planning mechanism. This two-step process allows the city to establish baseline standards for equitable development, while retaining a local community-driven process for planning and zone changes.

4. Ensure the integrity of the Transit Oriented Communities Program by instituting a citywide Public Benefit Zoning/Value Capture program.

Direct financial subsidy and/or Zone changes, General Plan Amendments, and other discretionary land use entitlements that increase residential density or allow a residential use not previously allowed should include requirements for affordable housing.

II. ACT-LA supports complementary citywide affordable housing policies to enhance equity in TOCs and promote a more inclusive and sustainable Los Angeles.

On-Site Inclusionary Housing: Consider a requirement that a percentage of new *for-sale* housing units be made available to Low and Very Low Income households, with in-lieu fees and alternative compliance options. ACT-LA urges the City to advocate for state legislation to enable municipalities to enact inclusionary zoning programs for new rental units (i.e. “Palmer Fix”).

New Funding Streams for Affordable Housing Preservation and Production: Consider new dedicated sources for funding for affordable housing, including potential tax increment from Enhanced Infrastructure Finance Districts or Community Revitalization Authorities, Redevelopment Residual Funds, and a Linkage Fee.

Preserve Existing Affordable Housing: ACT-LA supports new local policies to restrict demolitions and condo conversions and to preserve at-risk covenanted affordable units and public housing stock.

Expand and Protect Tenant Rights: ACT-LA belongs to the Renters Day LA Coalition and actively supports its citywide policy platform to protect tenants, including quality repairs, increased enforcement of RSO protections, and the creation of a rent registry.

Decriminalize Homelessness: ACT-LA supports the right to rest. When people lose their homes, they shouldn’t lose their rights too. Allocate homelessness resources more wisely. Funds should be diverted from the criminalization of homelessness, which is costly and fruitless, to solving the crisis.