Subject: Draft Assessment of Fair Housing

Dear Ms. Twum:

Established in 1924, Central City Association (CCA) is committed to advancing policies that enhance Downtown Los Angeles’ vibrancy and increase investment in the region. We share the City’s belief that affordable housing should be accessible to residents of diverse backgrounds and incomes, and that smart, comprehensive planning can improve communities in ways that benefit all residents. We welcome the Housing Department’s efforts to address these important challenges, and we appreciate the opportunity to offer our perspective on the draft Assessment of Fair Housing.

CCA is supportive of many of the proposed goals and strategies identified in the Assessment, but we believe one essential goal is missing: a commitment to reforming land use and development to promote new housing construction throughout the city.

As population and employment continue to grow in the City of Los Angeles, the supply of housing has failed to keep up. This, in turn, has led to historically low vacancy rates and rent increases that consistently outpace household income growth. Although many factors contribute to the shortage, City policies and land use plans play a significant role in hindering development, constraining our ability to respond to skyrocketing demand for housing throughout the region. Downtown has been a bright spot for housing production in the city, and is also home to the greatest concentration of income-restricted and permanent supportive housing in LA, but we must pursue pro-housing policies throughout Los Angeles if we ever hope to relieve the pressure on renters and homebuyers.

Protecting renters from displacement should be a priority for the City, but we must also recognize that the majority of renters who move in any given year do so by choice—not of necessity, and not against their will. Due to our persistent housing shortage and its impact on housing costs, this natural “churn” has left low- and moderate-income families unable to afford the neighborhoods that similarly-situated households called home in generations past. Every time a low income family moves—even into another home within LA—they’re replaced by a relatively higher-income household. This goes to the heart of the challenge to affirmatively further fair housing.

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2 Of the 923,600 renter households that moved into an LA-Long Beach metro household from 2013 to 2015, only 54,700 (5.9%) reported “forced to move” as a reason for their move. (Source: American Housing Survey, 2015.)
Most moves each year are made for positive reasons such as forming a new household, being closer to family, moving into a larger home or better neighborhood, or reducing commuting time, so churn should not be viewed negatively. Rather, this only highlights how our housing shortage affects nearly everyone in the city, how even benign individual choices can lead to increased segregation in a context of extreme housing scarcity, and why finding a solution must be a priority on par with tenant protection and preservation. Equal consideration is especially important for ensuring that policy solutions are designed to complement one another rather than competing for limited resources.

Proposals that could increase the supply and/or reduce the cost of market-rate housing, while also increasing resources for affordable housing construction and preservation, include:

- Reforms and incentives to encourage participation in the density bonus program
- Championing upzones within opportunity-rich City districts that have strong transit connections
- Prioritizing displaced households for placement in income-restricted affordable housing
- Reduction or elimination of parking requirements, especially near transit
- Advocating to expand the range of housing choices available, including changes to minimum unit size, core building standards, parking design standards, and construction materials
- Use of affordable housing funds for acquisition of naturally occurring affordable housing, especially dense multifamily that is unlikely to be redeveloped (but may be targeted for “value-add” renovations or condo conversion)

Housing supply alone cannot address all of our region’s affordability issues, but it is an essential component for any comprehensive solution. The same can be said for preservation, displacement protection, and affordable housing construction. Each will play an indispensable role in resolving this crisis, and so each must be included in the City’s Assessment of Fair Housing.

CCA appreciates your efforts to offer greater opportunity, access, and affordability to our city’s residents, and we hope that the next draft Assessment will address the broader context that we’ve outlined in this letter.

Sincerely,

Jessica Lall
President & CEO, Central City Association of Los Angeles

Cc: Councilmember Gil Cedillo, Chair, Housing Committee
Rushmore Cervantes, General Manager, HCID