

Communication from Public

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Council File No: 21-1230-S2

Comments for Public Posting: On behalf of Abundant Housing LA, please see the attached support letter for the Livable Communities Initiative and the motion directing staff to report back with recommendations on implementation.



9/29/2022

The Honorable Mike Bonin, Nithya Raman, Marqueece Harris-Dawson & Kevin de León
Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

Support – Livable Communities Initiative – Council File 21-1230-S2

Dear Councilmembers,

We write on behalf of Abundant Housing LA in support of the motion which was referred to various Council committees on September 16, 2022, in [Council File 21-1230-S2](#). The motion directs City Planning, Building and Safety, the Department of Transportation and other relevant departments to report back with recommendations for how to implement the Livable Communities Initiative (LCI).

Abundant Housing LA is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis. We support reforms to legalize more homes, make homes easier to build, increase funding for affordable housing, and protect tenants, which are all needed to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity. As a community organization, in order to maintain our independence, we do not accept financial support from housing developers or their consultants.

LCI is included in the Housing Element of Los Angeles' general plan as Program 131¹. LCI would involve mixed-use, mixed-income development along transit corridors coupled with improvements to adjacent streets aimed at making them friendlier to people walking, cycling and using public transit. The motion calls on relevant city departments to put forward recommendations that would elaborate on the general concept of LCI. This includes exploration of ministerial reviews, the specifics of an inclusionary zoning requirement, relief from development standards (e.g. parking requirements, minimum unit sizes, maximum floor area ratios, etc), and measures to protect deed-restricted affordable housing, rent-stabilized housing, historic resources and environmentally sensitive sites such as high fire hazard severity zones.

Mixed-use housing development allows people to live closer to jobs, stores and services, which reduces their transportation costs and environmental impacts related to driving. Building close to major transit stops and high-frequency bus corridors expands on these benefits by providing convenient access to transit. Creating complete streets that balance the interests of people using various modes of transportation through measures like wide, well-maintained sidewalks,

¹ ["Housing Goals, Policies, Objectives and Programs."](#) Los Angeles Housing Element. Page 366.

accessible curb ramps, street trees, protected bike lanes, and transit priority lanes creates a safer, more equitable and more sustainable transportation system. Relief from development standards such as minimum parking requirements makes housing more affordable to build and further reinforces LCI's vision of decentering travel in private cars. When homebuilders are allowed to build at a higher density they can divide the cost of LA's expensive urban land over more homes, reducing per-unit costs, and this also reinforces travel modes like transit, walking and cycling.

At this early stage, many details of LCI's implementation have yet to be determined. Generally speaking, we urge the City to apply this concept as widely as possible and to be generous with respect to the related housing incentives. We also urge you to take an evidence-based approach to the inclusionary zoning (IZ) requirements. IZ is an important tool in creating badly-needed affordable housing, when carefully crafted. These requirements must be grounded in rigorous economic analysis with an eye to maintaining project feasibility, in order to maximize the number of subsidized affordable units that can be realistically produced. The appropriate requirements may vary neighborhood by neighborhood due to the different characteristics of housing submarkets, as the City has recognized in its Affordable Housing Linkage Fee implementation². We remind you that state law identifies IZ requirements in excess of 15% for lower-income households as subject to heightened scrutiny and allows the California Department of Housing and Community Development to require economic justification for such requirements when certain conditions are met³, in order to address the potential issue of unintentionally disincentivizing housing production during this severe housing shortage. Both market-rate and deed-restricted affordable homes have important roles to play in addressing the housing affordability crisis, which is driven by our housing shortage.

The motion points out that public engagement is to be a part of the process of developing recommendations on LCI implementation. We would like to be included in the public engagement process and urge the City to use innovative outreach strategies like empaneling a random sample of city residents, educating them on the issue and soliciting their feedback. The City must act courageously to implement LCI and not automatically retreat in cases where there is community pushback. The need to solve the housing affordability crisis and achieve the housing production targets in the Housing Element must be the guiding principle of this effort.

For these reasons, we are proud to support the motion, and we offer our thanks to you for bringing this important proposal forward.

² ["Affordable Housing Linkage Fee."](#) Los Angeles Housing Department.

³ [Assembly Bill 1505](#), Chapter 376, Statutes of 2017.

Sincerely,

Leonora Camner

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