



August 19, 2021

Vince Bertoni, Director
Los Angeles City Planning
200 North Spring Street
Los Angeles, CA 90012

RE: Rezoning Program in the draft Housing Element (CF: 20-1042)

Dear Director Bertoni,

The Alliance for Community Transit - Los Angeles (ACT-LA) is a county-wide coalition of 41 organizations working on the forefront of racial, environmental, and economic justice. Our coalition members include tenants' rights organizations, affordable housing developers, workers' centers, public interest law firms, and public health advocates, among many others. Thanks to our coalition's diversity, we view housing policy through an intersectional lens. Our mission is to uplift communities—through affordable housing opportunities, good jobs and access to high quality public transit—as the Southland transforms into a more sustainable region. Given our commitment to equity, we believe that low-income communities and communities of color must be centered in decisions that seek to transform our neighborhoods.

Communities that we represent have borne the heaviest toll from generations of failed land use policy and environmental injustice, including redlining and exclusionary zoning. We feel housing justice for our communities means that your department should engage with our communities in a way that centers their concerns with the draft Housing Element and the Rezoning Program as these new policies and programs are revised, finalized, and implemented. In addition, the Rezoning Program should also materially benefit our communities by resulting in more and better housing opportunities from our community's point of view.

We appreciate [Council President Martinez's letter \(dated August 13, 2021\)](#), which was co-authored with six of her Councilmember colleagues and issued to your department, detailing their commitment to equitable distribution of housing throughout LA. We appreciate that many of our coalition's recommendations were included in the Council President's letter, but we write to emphasize the ongoing need to tie on-site affordable housing requirements to rezoning. This fundamental approach would help our city meet the scale of affordable housing needed at this moment in our city's history. Our coalition's top three recommendations to the Rezoning Program are as follows.

1. Design the Housing Element's Rezoning Program to include on-site affordable housing requirements that exceed TOC program standards on every site that is rezoned, and include displacement avoidance and protection measures such as excluding tenant-occupied sites from rezoning. The Rezoning Program should require progressive



tiers of affordability for increasingly higher density development. The Rezoning Program should be limited to high and highest opportunity areas of Los Angeles. The City should simultaneously invest public dollars in community-led planning, affordable housing opportunities and housing stability programs, and other community-serving, health-promoting strategies to protect and uplift residents living in historically disinvested areas and areas that are susceptible to gentrification.

2. Expand the City's affordable housing incentive programs to create mixed-income and 100% affordable housing in communities in the California Tax Credit Allocation Committee (TCAC) high and highest opportunity areas, while subtracting census tracts that have a displacement risk.
3. Enforce the Measure JJJ requirement that community plan updates do not reduce the capacity for creation and preservation of affordable housing or undermine California Government Code Section 65915 or any other affordable housing incentive program by requiring that all increases in allowable density and FAR be aligned with on-site affordable housing standards that meet or exceed TOC. The Community Housing Needs Assessment Process should be based upon citywide housing production goals and utilize a methodology that balances traditional factors such as job and transit access with a new prioritization for high opportunity areas, anti-displacement, healthy and affordable housing, and achieving housing opportunities at the deepest affordability levels.

We appreciate your consideration and are looking forward to ongoing engagement with your department as our city's Rezoning Program and Housing Element is finalized and implemented.

Sincerely,

The ACT-LA Coalition

CC:

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