

February 12, 2018

The Honorable Scott Wiener  
California State Senator, 11th District  
State Capitol, Room 4066  
Sacramento, CA 95814

**Re: SB 827 (Wiener) Planning and Zoning - Transit-Rich Housing Bonus - OPPOSE**

Dear Senator Wiener,

We appreciate and share concerns about the affordability crisis afflicting California, especially in our major coastal cities. In fact, our organizations' members and staff work day and night to address tenant insecurity, overcrowding and homelessness, and the lack of affordable housing in our communities. We know that greater density, especially near transit, can be an important part of both addressing housing needs as well as improving transit access. However, it is clear that in the City of Los Angeles, SB 827 will exacerbate the very issue it seeks to remedy, especially in low-income communities and communities of color.

Our context here in Los Angeles is distinct. Households with the lowest income (earning less than \$25,000 per year for a family of four) reside in our urban core, and make up 75% of our Metro system's core riders. On any given night in the City of LA, over 34,000 people are homeless and zipcodes in South Los Angeles and Westlake are home to the worst residential overcrowding in the country. As the County struggles to meet its need for over half a million additional *affordable* housing units, market forces continue to drive both the development of homes near transit that are priced out of reach for the majority of LA residents (including transit riders) and the destruction of existing homes housing core transit riders. The city is on track to meet its goal of 100,000 new units by 2021 – but the vast majority of those units will be unaffordable to core transit riders.<sup>1</sup> And, since 2001, over 20,000 rent controlled units have been destroyed, and many households have been displaced due to unlawful evictions and harassment.

It is within this context that dozens of housing, community, labor, transportation, and environmental organizations have collaborated to create policies and plans that create more density around transit while *intentionally* producing and preserving deeply affordable units and ensuring local, quality jobs are created as we create a more sustainable city. For example:

- Measure JJJ, on the November 2016 City of Los Angeles ballot, was overwhelmingly approved by 64% of voters. Any zone change or General Plan Amendment project now must include extremely low-income units *and* very-low or low-income units and hire local workers, disadvantaged workers and graduates of apprenticeship programs. Also, Measure JJJ created a Transit-Oriented Communities Affordable Housing Incentive Program (TOC Program), linking increased density and reduced parking requirements within a ½ mile of Major Transit Stops to inclusion of affordable housing and replacement requirements. When the LA County Department of Public Health studied the TOC Program, they estimated that 14,000 affordable housing units would be produced through this program alone over the next ten years. Additionally, affordable housing developers building near transit are now able to build more densely and with less costly parking requirements in 100% affordable projects. The City of LA Planning Department reports high interest in the program since it went live in September 2017.

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<sup>1</sup> "LA's Planning Department has approved nearly 20,000 new housing units in 2017," *Curbed LA*, November 2, 2017, *available at*: <https://la.curbed.com/2017/11/2/16598936/la-affordable-housing-new-units>. See also City of LA 2015 Housing Element Progress Report, Table B, demonstrating City met and exceeded its above-moderate income housing RHNA allocation 3 years ago, but is still woefully behind on its affordable housing goals, *available at*: [https://planning.lacity.org/HousingServices/files/APRs/2015\\_APR.pdf](https://planning.lacity.org/HousingServices/files/APRs/2015_APR.pdf)

- Likewise, El Plan del Pueblo in Boyle Heights and the People's Plan in South LA are the results of intensive, decade-long community engagement processes which pair density increases with significant community benefits that were determined by stakeholders from those communities. Thanks to the coalition work on the People's Plan, LA City Council approved in November an area-wide no net loss program throughout South LA that incorporates various anti-displacement and affordable housing replacement policies that align with the incentive programs tied to transit corridors.
- Other plans such as the Cornfield Arroyo Specific Plan are examples of inclusive planning that gave ample room for community input and will lead to affordable housing set asides near transit lines.
- Los Angeles is currently updating all of its 35 Community Plans, recently tripling the Department of City Planning's community planning staff. Our organizations are committed to moving an equity agenda forward through inclusive and democratic community planning. Per Measure JJJ, the Community Plan updates must build upon the baseline affordability requirements and local hire incentives in place now.

If SB 827 passes, we will lose these incentives for developers to include low-income, very-low income or extremely low-income units in their new buildings near transit. Likewise, provisions in the above cited plans and policies to prevent destruction of affordable units, require replacement of affordable units and mitigate displacement of low-income families would be undermined. The result is that existing rent-stabilized units will be put at even greater risk of destruction, and core transit riders at greater risk of displacement.

If SB 827 passes, we stand to lose out on tens of thousands of affordable homes near transit and we are putting families who depend on rent stabilization at greater risk of displacement at a time of severe housing and homelessness crises.

There is no place for the segregationist planning that defined so much of our metropolitan history, but the antidote to segregationist low-density zoning imposed upon and against communities of color is not an "open the floodgates" approach. As recent research demonstrates, increased market-rate development near transit without concomitant investments in preserving and creating affordable housing, will displace core transit riders in transit-rich neighborhoods.<sup>2</sup> The path to racial and economic justice through city planning starts with listening to the most impacted communities and learning from their experience as they've struggled against waves of disinvestment and displacement.

In Los Angeles, many historically disadvantaged communities have advocated for a path forward that does not rely on segregationist practices nor free-market deregulation. The organizations that are signatories to this letter are working as organizations or in coalition to deeply engage historically disadvantaged communities and craft policy that prioritizes *equitable* development and input from those who have been marginalized by historical planning patterns. We understand that ensuring equity is not only necessary for low-income communities and communities of color; research shows that inequities and residential segregation lead to slower economic growth for the region.<sup>3</sup>

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<sup>2</sup> See, e.g., Dukakis Center for Urban and Regional Policy. "Maintaining Diversity In America's Transit-Rich Neighborhoods: Tools for Equitable Neighborhood Change." October 2010; CHPC, "Why Creating and Preserving Affordable Homes Near Transit is a Highly Effective Climate Protection Strategy," May, 2014; Miriam Zuk and Karen Chapple, "Housing Production, Filtering and Displacement: Untangling the Relationships," Institute of Government Studies, UC Berkeley, 2016.

<sup>3</sup> Chris Benner and Manuel Pastor, *Equity, Growth, and Community: What the Nation Can Learn from America's Metro Areas*, UC Press, 2015

At a time when the Los Angeles region is investing \$160 billion toward new transit infrastructure, it is imperative that Sacramento listens to our region's communities and crafts state housing policies which build upon the significant accomplishments we've made here in LA. Unfortunately, SB 827 will roll back our progress.

Sincerely,

Alliance for Community Transit – Los Angeles (ACT-LA)  
Alliance of Californians for Community Empowerment (ACCE) Action  
Asian Pacific Policy and Planning Council (A3PCON)  
Bend the Arc: A Jewish Partnership for Justice  
California Reinvestment Coalition (CRC)  
Central American Resource Center (CARECEN)  
Coalition for Economic Survival (CES)  
Community Coalition  
Community Development Technologies (CDTech)  
Community Health Councils  
East Los Angeles Community Corporation (ELACC)  
Esperanza Community Housing Corporation  
InnerCity Struggle (ICS)  
Inquilinos Unidos (United Tenants)  
Investing in Place  
Jobs to Move America  
Koreatown Immigrant Workers Alliance (KIWA)  
L.A. Voice PICO  
Little Tokyo Service Center (LTSC)  
Los Angeles Black Worker Center  
Los Angeles Community Action Network (LA CAN)  
Los Angeles County Bicycle Coalition (LACBC)  
Los Angeles Forward  
Los Angeles Neighborhood Land Trust  
Move LA  
Multicultural Communities for Mobility (MCM)  
Physicians for Social Responsibility – Los Angeles (PSR-LA)  
Restaurant Opportunities Center of Los Angeles (ROC LA)  
Santa Monicans for Renters' Rights (SMRR)  
Southeast Asian Community Alliance (SEACA)  
Strategic Actions for a Just Economy (SAJE)  
Strategic Concepts in Organizing and Policy Education (SCOPE)  
St. John's Well Child and Family Center  
Thai Community Development Center  
T.R.U.S.T. South LA  
United Neighbors in Defense Against Displacement (UNIDAD)  
Women Organizing Resources, Knowledge and Services (WORKS)