



**SCANPH**  
SOUTHERN CALIFORNIA ASSOCIATION OF NONPROFIT HOUSING

INNER  
CITY  
LAW  
CENTER



**SUPPORTIVE HOUSING ALLIANCE**



**JUSTICE IN AGING**  
FIGHTING SENIOR POVERTY THROUGH LAW



**ACLU**  
SoCal



**HOPE**  
THE MISSION  
*Formerly Hope of the Valley Rescue Mission*



**DTLA4ALL**

**UNION STATION**  
HOMELESS SERVICES



**ABUNDANT HOUSING AT UCLA**



**SOCIAL JUSTICE**  
LEARNING INSTITUTE



8/26/2024

Vincent P. Bertoni, AICP,  
Director of Planning  
City of Los Angeles Department of City Planning  
CC: Mayor Bass, Los Angeles City Council

**RE: Citywide Housing Incentive Program**

On May 20th, the undersigned organizations submitted a letter expressing our deep concern regarding the City of Los Angeles' Citywide Housing Incentive Program (CHIP). We write to you now in response to the revised ordinance. The CHIP's basic framework for focusing housing growth near transit and high opportunity corridors is sound, and the goal of expediting most projects is welcome. Furthermore, our coalition applauds the City for improvements that have been made to the proposed ordinance over the past two months, including wider geographic eligibility for the Opportunity Corridor Transition Areas and smartly calibrated incentives for family-sized units. Unfortunately, the most substantial changes in the latest draft reduce incentives, and therefore allowable density, across the multiple programs and geographies in the ordinance. Overall, we believe the revised CHIP ordinance would make it even more difficult to accommodate an additional 200,000 new homes and Affirmatively Further Fair Housing (AFFH) by equitably distributing new housing across the city. We are further concerned that by disallowing affordable and mixed-income homes on 72% of land in the City zoned for single-family homes, the CHIP ordinance further incentivizes demolishing rent-stabilized homes in existing multifamily areas.

We know that Los Angeles is in the midst of a historic housing crisis, with nearly half of households struggling to afford rent or mortgage payments and over a third of renters spending

half their income on rent.<sup>1</sup> And while unsheltered homelessness decreased slightly this year, we will continue to see high rates of homelessness as long as housing remains unattainable and unaffordable to half of the City's households. Additionally, the city's existing multi-family zoning and recent development are concentrated in relatively lower-income and renter neighborhoods. The CHIP and housing element process creates the opportunity to rebalance this pattern and ensure that every neighborhood does its fair share to house Angelenos at all income levels. Unfortunately, the CHIP does not significantly alter where multi-family housing is allowed, perpetuating inequitable land use patterns that have led the City into our current housing affordability crisis. That is why we are advocating for key changes to the CHIP to more effectively deploy the innovative incentive programs in the ordinance.

**Namely, we continue to urge the City to allow all CHIP incentive programs in single-family zones** in order to meet its housing targets and more equitably distribute new housing supply. **Making single-family zoned parcels in highest and high opportunity areas eligible for incentive programs is of particular importance**, as these areas are rich in jobs, public investments, and services, and have historically excluded Angelenos of color and lower income Angelenos. We appreciate that City Planning has created a more generous set of standards for the proposed new CT-3 subareas, but we continue to recommend consolidating the Opportunity Corridor Transition Area subareas into a single expanded geography with standards that make missing middle housing feasible to build.

**Specifically, we recommend eliminating the CT-1 and CT-2 subareas and expanding CT-3 to at least a quarter-mile from the rear property lines of parcels abutting the corridors.** Put simply, the CHIP ordinance must fundamentally expand *where* multi-family housing is allowed if it is to:

1. address the City's urgent need for more housing;
2. equitably distribute new development to higher resource areas;
3. and minimize the risk of displacement.

Overall, we must express our disappointment that the revised ordinance fails to make meaningful improvements towards opening up single-family zoned parcels to the incentive programs, despite the role exclusionary zoning has played in perpetuating segregation. Rather, the bulk of the changes seem to be focused on further limiting the potential for the CHIP to build the homes our city desperately needs. In particular, we oppose the removal of the coastal zone from the Mixed Income Incentive Program; the removal of unlimited density incentives in the upper tiers of the Transit Oriented Incentive Area program; the removal/reduction of FAR and height incentives for the State Density Bonus Program; and the removal of FAR incentives in historic areas in the Opportunity Corridor program. These changes will drive further displacement as a greater

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<sup>1</sup> 2021-2029 Housing Element, pg 9.

number of existing multifamily parcels will need to be redeveloped to meet the need for more housing.

We want to reiterate that without allowing mixed-income multifamily housing throughout the City, especially in single-family zoned parcels in highest and high opportunity areas, we will never be able to truly address the critical shortage of affordable housing and reverse historic patterns of segregation. If we do not take bold action to make these needed changes, homelessness will not only remain unsolved, but will increase. **The City must address zoning in single-family zones in order to meet its housing targets, more equitably distribute new housing supply, and more effectively deploy the innovative incentive programs in the CHIP.** We are confident that Los Angeles, with the political courage and leadership of this Council, can tackle this crisis head-on, and CHIP is the key opportunity to do so.

The rezoning program offers a once in a generation opportunity for the city to address the harms of the past, and build a future where all Angelenos enjoy access to opportunity and are able to live in the neighborhoods of their choice. We applaud City Planning for creating a strong framework for where we should be focusing new homes in Los Angeles - near transit and in high opportunity communities - and for creating new streamlined processes to deliver new housing. But walling off single family neighborhoods from these programs reinforces exclusionary zoning and hobbles their effectiveness. We believe the City of Los Angeles can and must do better to undo these historic wrongs.

Sincerely,

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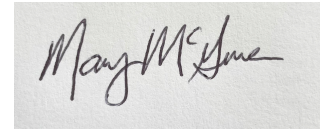
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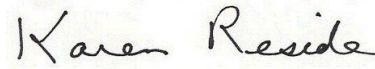
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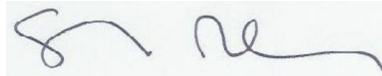
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