

The Neighborhood Council Sustainability Alliance supports Council File 20-0189 if amended.

The Neighborhood Council Sustainability Alliance recognizes that building infill housing is one of the most important solutions for addressing carbon emissions and the housing crises in Los Angeles. As such, we appreciate CF 20-0189 for acknowledging the success of the Transit-Oriented Communities program in producing both market-rate and below-market-rate (BMR) housing. We also applaud the motion's intent to improve the program to better support LA's goals to bring down the cost of housing, stem homelessness, and reduce displacement.

However, we are concerned that the action recommended by CF 20-0189 is too narrow in focus and may do little to nothing to solve some of the deficiencies of the TOC program. We think it is a good idea to study whether higher priced sub-markets can support greater proportions of BMR units. But we also believe that the city council should comprehensively review and revise the TOC program.

We suggest the following revisions to the TOC program:

- Eliminate parking minimums for all TOC projects, not just those within a quarter-mile of a rail stop. If the point of TOC is to build more housing adjacent to transit, then it should be legal to build the most naturally affordable housing types for those who are either transit-dependent or desire a car free lifestyle.
- Disincentivize the removal of rent-stabilized housing. Some TOC projects have demolished rent-stabilized multi-family housing. Policies should be created to either prevent TOC from being used to demolish RSO housing, or only allow it if vulnerable tenants are relocated to a suitable alternative home in the neighborhood and given a right of return once the project is built at the same rent.
- Create incentives to provide a greater proportion of BMR units. Consider creating a tiered structure which gives landlords more generous incentives if they provide a greater percentage of BMR units.
- - at scale.
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