

THE PEOPLE'S PLAN



EQUITABLE DEVELOPMENT IN SOUTH LOS ANGELES

unidad-la.org/peoplesplan



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Acknowledgements

The People of South Central Los Angeles

present and those passed displaced, incarcerated or fallen from state-sponsored or state-incited violence. The People's Plan is a result of countless contributions from hundreds of residents of South Central Los Angeles who have brought with them the lived experience and wisdom derived from struggle, survival and thriving in response to the many beauties and atrocities that have made South Central ground zero for movements of Black liberation, Immigrant rights and Indigenous sovereignty.

The process to develop the analysis and recommendations found in this document began in 2007 with Mobile Planning Lab community sessions outside of the City's Scoping Meetings and carried through many episodes of the People's Planning School held by SAJE, Esperanza and other partners over the years. Many, many organizations added their expertise to these pages, as well. Among them are SAJE, Esperanza Community Housing Corporation, TRUST South LA, CDTech, St. Mark's Lutheran Church, United University Church, Public Counsel, Legal Aid Foundation of Los Angeles (LAFLA), St. John's Well Child & Family Center, Physicians for Social Responsibility-Los Angeles (PSR-LA), LA CAN.

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About UNIDAD. The United Neighbors in Defense Against Displacement (UNIDAD) coalition is the product of a community collaboration formed to prevent the displacement of residents in South Central Los Angeles and to improve the health and economic well-being of low-income communities of color through responsible development.



Introduction

550,000 people live within the boundaries of the South Los Angeles

(“SLA”) and Southeast Los Angeles (“SELA”) Community Plan areas (“CPAs”) — boundaries that sketch out a community many still proudly call South Central Los Angeles. Sur Centro de Los Angeles. Home. Many more enter each day to attend school or church, play in parks, visit hospitals, or work at the thousands of stores, businesses, factories, restaurants, warehouses, and nonprofits located in these areas. For all of these people, innumerable experiences that make up daily life are fundamentally shaped by this land, the built environment, and the rules about how these may be used.

The Community Plans (“CPs”) and their attached Community Plan Implementation Overlay Districts (CPIOs), in turn, shape the future of the land, buildings, and uses. These plans govern much more than building specifications; they touch all aspects of how land is used. They impact the socio-economic composition of a community by prescribing the nature and mix of an area’s housing stock. They shape a community’s character and economy by dictating the kinds of businesses that are allowed and the types of goods and services that may be sold. Because these plans govern all planning decisions in a community, they also invariably impact existing as well as future uses.

Although local governments have sometimes used this considerable power to exclude people of color or low socio-economic status, it could also be used to unlock a community’s potential, and **to protect its most marginalized members from displacement and community destabilization.**

By the Numbers

The South and Southeast LA Community Plan Areas:

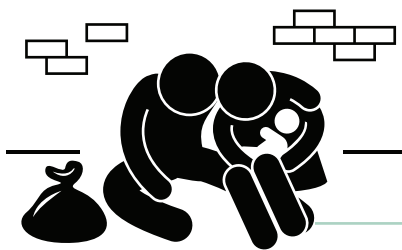
- Contain **550,000 people**, primarily Black and Latino residents greater than the populations of Long Beach, Oakland or Sacramento
- **31 square miles** of land
- **\$100’s of Billions** in land value changes will result from the new development allowed for in the proposed CPIOs

Meeting this challenge is perhaps nowhere more critical than in the SLA and SELA CPAs.



SELA CPA residents face greater economic hardship than anywhere else in the city (SLA placed 4th).

More than half of the community's children live in poverty



More homeless men and women live in the area than anywhere else in the city

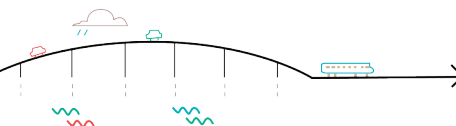
Residents face severely overcrowded housing and poor access to healthy retail food.



1 MILE
12 YEARS OF LIFE



A-town



B-ville

Residents of these communities may live as much as 12 fewer years than residents of wealthier parts of town

Recent developments complicate this already formidable challenge. South Central Los Angeles is seeing a historic influx of public and private investment in major mixed-use commercial projects and multi-modal transportation infrastructure. The passage of Measure M, which renewed a half-cent sales tax to fund Metro transit projects for the next forty years, continues this trend. A combined interest in equitable Transit-Oriented Development (TOD) from lawmakers, investors, and advocates create an opening to define the goals, policies, and strategies in and around the 40 transit stations in South Central LA. The context of investment and urgency of the housing crisis create an opportunity to boldly tackle long-standing issues and firmly place Los Angeles as a city where low-income communities of color can prosper.

Faced with these conditions and opportunities, The UNIDAD Coalition has worked with families, residents, and business owners throughout South Central LA over the last decade to build THE PEOPLES' PLAN: a vision for the community plans that meets our community's needs. From this process emerged recommendations in four broad categories:

- Create a net gain of affordable housing and stop displacement.
- Promote inclusive economic development that supports local workers and businesses.
- Prioritize environmental justice and enhance community health.
- Strengthen community leadership in the land use planning process.

The equitable development proposals described in the People's Plan offer a path forward throughout the Southeast Los Angeles (SELA) and South Los Angeles (SLA) community plan areas to ensure the preservation of the housing, health, and economic livelihood of existing communities. As we anticipate drastic federal cuts to social programs and protections vital to our most marginalized populations, we urge the City of LA—the City Council, Planning Department, and Mayor—to prioritize meaningful public participation and equitable approaches in its land use to ensure that we build better neighborhoods, with the same neighbors.



Equitable Development Principles

“What’s your vision for development in your community?”

We posed this question to residents and stakeholders in South Central LA during a series of workshops and People’s Planning School Sessions. Over the course of these meetings, participants defined the values they wanted to see implemented in the development of their neighborhoods. After much deliberation and reflection, United Neighbors in Defense Against Displacement (UNIDAD) members narrowed down eleven principles for equitable development. These principles guide our advocacy and inform our proposals in the People’s Plan.

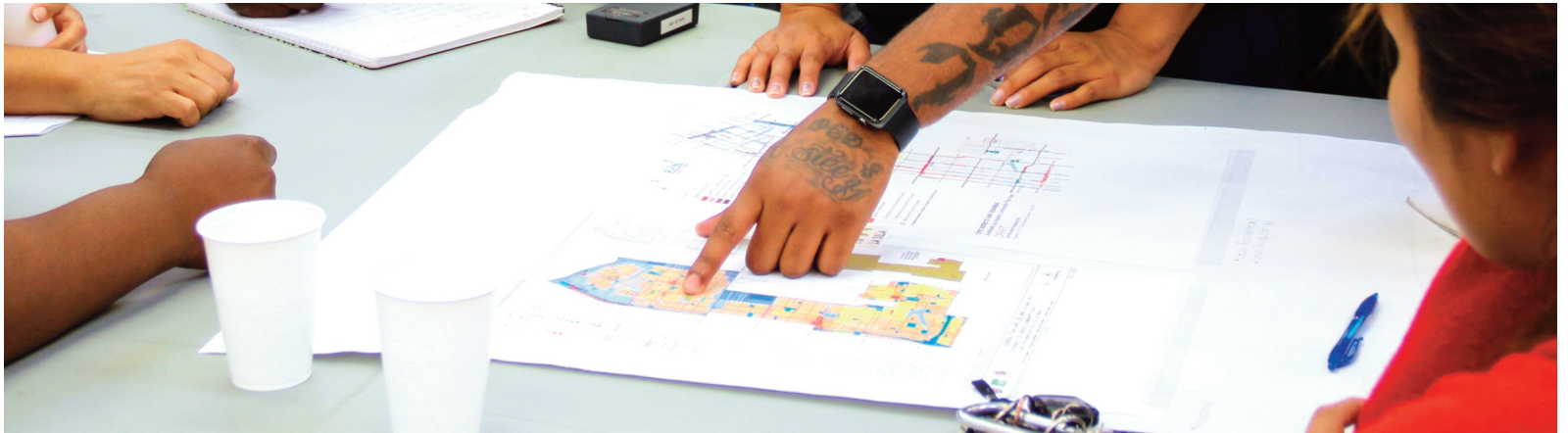


Equitable Development Principles

Land use planning and development should benefit low-income communities and communities of color by:

1. **Investing in people first.** The land should support human development and economic equity;
2. **Doing no harm:** Stabilizing and strengthening communities of color, rather than causing or leading to the displacement of residents from their homes or communities;

3. **Providing tangible economic benefits** for local residents, including housing for low-income households, jobs with family-supporting wages, targeted hiring for local and disadvantaged residents and the opportunity to build equity and wealth among low-income individuals and communities;
4. **Supporting housing as a human right** through the preservation and creation of an ample supply of housing affordable for all residents, including low-income and homeless members of the community;
5. **Strengthening the health and well-being of residents** through accessibility to parks and open space, health care services, walkable and bikeable streets;
6. **Capturing land value for community benefit** that has been increased due to public infrastructure investments and zoning decisions;
7. **Preserving the culture and values** of the local people;



8. **Supporting the rights** of tenants;
9. **Ending the criminalization** of people of color, the homeless, low-income tenants and other members of our community;
10. **Institutionalizing the genuine participation** of low-income communities in decision-making, policy implementation and monitoring;
11. **Advancing the people's control of the land**, including through democratic community-based institutions, such as community land trusts and cooperatives.



Policy Recommendations: The People's Plan

1. Create a Net Gain of Affordable Housing Opportunities

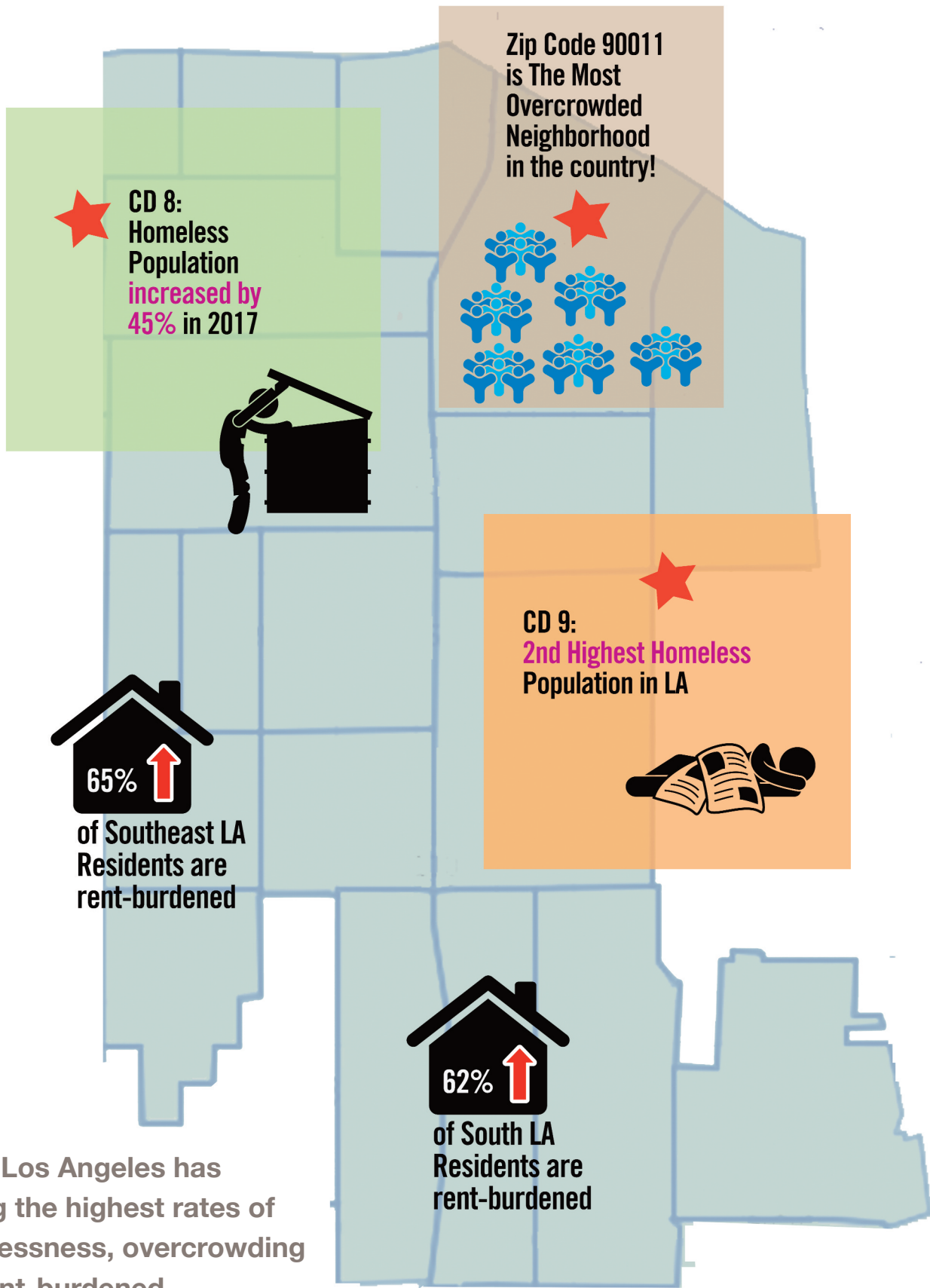
> Overview

Los Angeles County, where renters make up 53% of households, remains one of the least affordable places to live in the United States. 58.5% of renters in the Los Angeles metro area are rent-burdened, spending more than 30% of their income on rent. Renters must work 3 minimum-wage full time jobs to be able to afford a market-rate two bedroom apartment.

In South Central LA, the housing crisis has grown especially acute. Council Districts (CD) 8 and 9, which make up a majority of the Southeast and South LA community plan areas, have the second and sixth highest total homeless populations in Los Angeles, respectively. The remaining Council Districts that comprise South Central, CDs 1, 10, and 14, each rank in the top ten highest homeless populations of all the council districts. Sixty-two percent of residents in South LA and sixty-five percent Southeast LA are considered rent-burdened—the highest levels of any community plan area of Los Angeles. The area also faces some of the highest rates of overcrowding in the nation. In Historic South-Central LA (zip code 90011), 42.2% of units fall within this category making it the most overcrowded neighborhood in the nation.

The impact of housing insecurity is profound: rent-burdened families have been shown to suffer worse health outcomes due to factors such as poor housing quality, overcrowded conditions, the stress of financial and housing instability, or a lack of funds for nutritious food and healthcare. Residents of the SELA and SLA community plan areas have relatively lower household incomes and are significantly more likely to be renters, factors that place them at higher risk of displacement when property values rise in connection with transit investment and new development along transit.

In the face of these challenges, we urge the City to seize this once-in-a-generation opportunity to establish a strong, sustainable framework for a “Net Gain” of affordable housing in the South and Southeast LA CPAs. This requires a set of coordinated land use policies to: (1) produce new affordable housing; (2) preserve existing affordable housing; and (3) enhance and protect the rights of low-income tenants.



South Los Angeles has among the highest rates of homelessness, overcrowding and rent-burdened households.

To achieve a net gain of affordable housing opportunities in South LA, we recommend the following suite of policies and programs to be included in the Community Plans and CPIOs.

PRODUCE



- Ensure strong replacement and anti-displacement protections in the CPIO Incentive Program
- Increase the incentives for 100% Affordable Housing projects by creating a Transfer of Floor Area Ratio (TFAR) Program.
- Establish inclusionary requirements for for-sale housing development
- Enhance opportunities for affordable housing developers and community land trusts to acquire property.

+ PRESERVE



- Create **Displacement Free Zones** (aka No Net Loss)
- Minimize the loss of rent-controlled homes by regulating condo conversions and demolitions

+ PROTECT



- Require new developments to provide existing **tenants a right to return**
- Establish **proactive coordination** between HCID and tenant rights organizations.
- Enhance RSO enforcement
- Establish a Low-Income Renter Advisory Commission (**LIRAC**)

> Recommendations

A. Incentivize new affordable housing production

The Community Plan update process presents an opportunity to direct new growth and density where it is appropriate, namely near major transit corridors. But an increase in allowable residential density (aka “upzoning”) - which generates additional land value - must always be aligned with on-site affordable housing. And any affordable housing that is vacated or demolished must always be replaced and displaced tenants offered a right of return. To achieve this objective, the People’s Plan calls for robust community plan policy language and a strong CPIO Affordable Housing Incentive Program.

A CPIO Affordable Housing Incentive Program will identify sites in the community plan area that are eligible for density increases contingent upon the provision of specific levels of affordable housing and other community benefits. The core elements of a strong CPIO affordability program include the following:

- The CPIO incentive program must cover every parcel designated for increased density in the Community Plan Area.
- Any parcel that is designated for upzoning should have a “base” density that is the same as current zoned density, or if the site was previously zoned industrial, the new base density should be 1.5:1 FAR.
- Increases to the new, higher allowable density should only be permitted for Mixed Income and 100% Affordable Housing developments.
- “Mixed Income” development should be defined in the CPIO as a development project that includes affordable housing at percentages that meet or exceed the Measure JJJ standards for the TOC Incentive Program: 7% ELI; 11% ELI or 20% LI. These percentages should apply to the total project unit count, not the base density.
- 100% Affordable housing developments should be eligible for additional incentives.
- Any project eligible for increased density should be subject to replacement housing requirements in state density bonus law.

Please see the attached matrix for details on the specific changes are necessary to bring the draft CPIOs in line with the principles and objectives of the People’s Plan.

Set the base FAR in all TOD subareas at 1.5 FAR, with increases in FAR allowed with the inclusion of affordable housing and other community benefits. The Draft South LA CPIO currently sets the base FAR for the TOD Regional subarea at 3:1, which effectively upzones those sites without any affordability attached. Upzoning should occur in coordination with the provision of affordable housing.

Adjust the affordable housing set-asides required for “Mixed Income Housing.”

To qualify for increases in FAR, the CPIOs should require Mixed Income Housing developments to provide a minimum of 7% of the total units for Extremely Low Income households, AND either an additional 4% of units for Very Low Income households (11% total) or an additional 13% of units for Low Income households (20% total). These percentages meet the baseline standards required by Measure JJJ, while accounting for the demonstrated need for deeper affordability in south LA communities.

Expand application of affordable housing incentives to the full ½ mile around a Major Transit Stop.

Ensure strong replacement and anti-displacement protections in the CPIO Mixed Income Incentive Program. Under the current drafts, to be eligible for the Mixed Income Incentives, a project must meet the replacement housing requirements contained in state density bonus law (AB 2222). We strongly support this requirement. To strengthen this commitment, the City should explore options for requiring or incentivizing a right of return for lower income former tenants of any units that are vacated or demolished in the development of any project seeking incentives.

Increase the incentives for 100% Affordable Housing projects by creating a Transfer of Floor Area Ratio (TFAR) Program. As currently drafted, the CPIOs provide 100% Affordable developments with the same benefits as Mixed Income developments. In order to strengthen the incentives for 100% affordable housing projects, the Department should consider creating a transfer of floor area ratio (TFAR) program. Under this TFAR program, 100% Affordable Housing projects could be granted 6:1 FAR and permitted to sell unused FAR to receiver sites (mixed income developments that have already utilized an incentive program), or to an FAR bank established by the City. Selling unused FAR would help generate additional financing to support affordable housing. This program may be modeled after the TFAR program contained in the Cornfield Arroyo-Seco Specific Plan (CASP).

Establish inclusionary requirements for for-sale housing development. Affordable homeownership helps stabilize households and communities, giving them the opportunity to build assets that can be passed on. It can serve as a bulwark against displacement and gentrification, locking households in to an affordable mortgage payment that won't fluctuate. The City should consider requiring for-sale housing developments and condominium conversions to include a percentage of units affordable to low and moderate-income households.

Enhance opportunities for affordable housing developers to acquire property. Affordable housing developers face numerous barriers to acquiring the property necessary to develop much-needed housing for low-income residents. This is especially challenging as land speculation increases in areas near transit. The Community Plans should include policies and programs that support opportunities and resources for affordable housing acquisition, including but not limited to (i) proper implementation and utilization of the state Surplus Land Act, (ii) joint development on city-owned land, (iii) a proactive plan to advance land acquisition goals for community land trusts (CLTs) and affordable housing developers, and (iv) the creation of a centralized, accessible database of land transactions.

B. Preserve Existing Affordable Housing

Production of new affordable housing, alone, is insufficient to address the affordable housing crisis or effectively prevent the impacts of gentrification and displacement. In addition to incentives, the People's Plan also calls for specific policies and programs to preserve our stock of existing affordable housing. *Please see the attached matrix for more detail on specific policies:

Create Displacement Free Investment Zones (aka No Net Loss). The Community Plans should establish and immediately implement an area-wide No-Net-Loss Program, or "Displacement Free Zone," as follows:

Step 1: create an inventory of existing affordable housing. As a result of Measure JJJ, the City is now obligated to create an inventory of existing affordable and rent stabilized housing assets, including housing that is occupied by low income tenants. This inventory should rely on existing data sources, such as the new rent registry, existing covenants, and a listing of RSO properties. For occupancy by lower income households, the Department should look to census data and/or other available sources. This inventory should be updated annually and made publicly available.

Step 2: submit annual reports on existing affordable housing. The City should publish an annual report of the affordable housing inventory. The report should also assess the frequency and location of Ellis Act evictions, condominium conversions, and/or residential demolitions within the CPA.

Step 3: Prevent and recover affordable housing loss. If an annual report demonstrates a reduction in the total number of units within any of the three affordability categories, then additional No Net Loss Tools should be activated for all areas that demonstrate a loss. These Tools should include, but not be limited to: a Recovery Action Plan, created jointly by the Department of City Planning and HCID, with specific programs and investments to prevent further loss of affordable units and steps to increase affordable housing production in

the area; and a requirement that applications for discretionary land use approvals include a Displacement Impact Report. These provisions would cease to apply once the CPA can demonstrate that the loss has been recovered

Minimize the harmful impacts of condominium conversions. The SLA Draft Community Plan includes a Policy that calls on the City to “[e]ase condo conversion pressure in TOD areas by limiting the number of existing affordable and rent stabilized units converted to condominiums annually, and by ensuring that such conversions do not negatively affect the local rental market.” The Southeast LA Community Plan should include this policy as well.

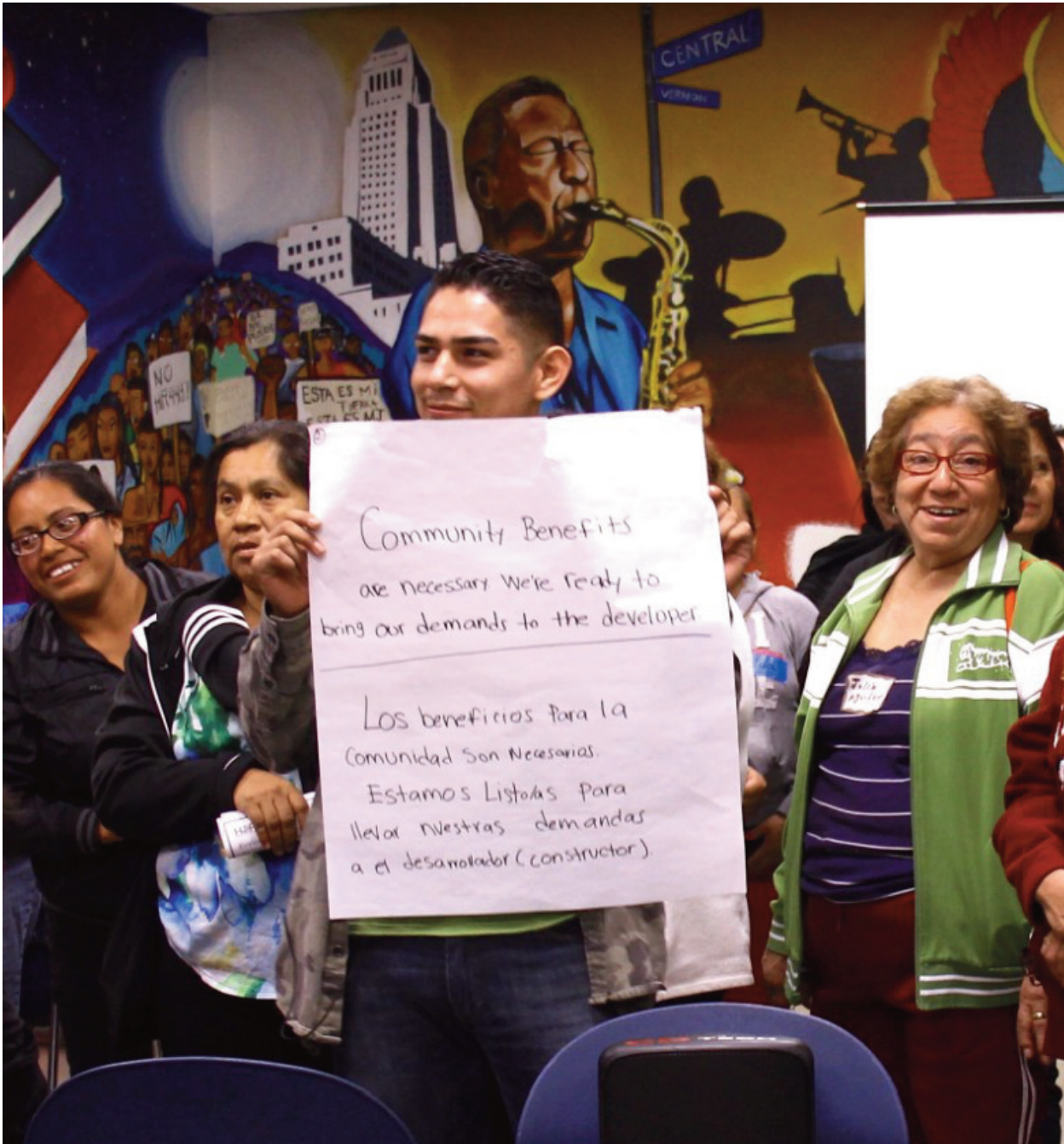
Moreover, in addition to requiring denial of residential conversions when the vacancy rate is five percent or less, both Community Plans should also limit the number of condo conversion that may be approved annually, during years that the vacancy rate is above five percent. These Residential Conversion regulations should apply to the entire CPA, not just the CPIOs. Finally, developers requesting condominium conversion permits should be required to notify existing tenants that the property will be put up for sale and allow them the ability to match offers for purchase.

Minimize the harmful impacts of demolitions. The draft Community Plans are currently silent on the issue of residential demolitions. Given the significant impacts of residential demolitions, the Plans should implement regulations to address the harm (please see the matrix for details). (1) if the vacancy rate in the CPA falls to 5% or less, applications for demolitions should be placed on a wait list until such time that the vacancy rate is greater than 5%; (2) at all times, there should be a limit on the number of demolition permits that may be granted per year; and (3) in order to minimize the harmful impacts of vacant lots, no demolition permit in multi-family residential zoning (R3 zones or higher) should be granted until an applicant has obtained all necessary building permits.

C. Enhance and protect the rights of low-income tenants.

Establish proactive coordination between the Housing and Community Investment Department (HCID) and tenant rights organizations. Community-based organizations (CBOs) like SAJE work to directly with tenants to empower them to exercise their legal and human rights to shelter. Tenant rights CBOs foster relationships with local renters and are best positioned to support the implementation and enforcement of tenant protections.

Establish a Low-Income Renter Advisory Commission. The Community Plans should establish a Low-Income Renter Advisory Commission (LIRAC). The LIRAC would be charged with monitoring the implementation of Community Plan policies. Each LIRAC would be comprised of low-income resident renters and staffed by the City Planning Department. The City Planning Department can partner with community-based organizations to create and implement an outreach plan targeting low-income renters and creating the education curriculum to increase the capacity of residents to participate in the LIRAC.



Establish proactive coordination between the City and tenant rights organizations.

A number of Community Based Organizations (CBOs) and public interest law firms in South Central work directly with tenants to empower them to exercise their legal and human rights to shelter. These organizations foster relationships with local renters and are well positioned to support the implementation and enforcement of tenant protection regulations.

The Community Plans should include a program devoted to fostering effective collaboration and coordination between City departments (like the Department of City Planning and the Housing and Community Investment Department) and tenant organizations working in the CPAs.

Enhance RSO Enforcement. While each draft plan includes policies that call for preservation of rent stabilized units, these policies do not reference any specific tools or programs to achieve this goal. Moreover, these policies are silent on the issues of habitability and tenant protections for residents of rent stabilized units. In addition to the preservation policies described herein, the Community Plans should also include a policy and program to establish and designate neighborhood-based RSO Enforcement Specialists responsible for proactively working with tenants, landlords, and community groups to enhance the habitability and prevent the loss of RSO units in the CPAs.

2. Promote Inclusive Economic Development that Supports Local Workers and Businesses

> Overview

The dismantling of the CRA had a particularly devastating impact on workers, resulting in the loss of important policies that had previously given local residents an opportunity to access some of the benefits resulting from major development projects. Specifically, policies requiring employers to hire locally and from disadvantaged populations, and to pay living or prevailing wages, had helped ensure that residents could share in the opportunities created by new developments in their neighborhoods.

By including local and disadvantaged hiring and high-quality job policies in both Draft community plans, the City has taken an important step towards addressing this grievous loss. However, we need actionable tools in the Plans and CPIOs in order to operationalize these goals. The People's Plan calls for the following additional policies and programs to strengthen the Community Plans' economic development provisions and enhance economic mobility opportunities for residents of South Central.

> Recommendations

A. Create Pipelines to Good Local Jobs

Provide incentives for projects that adhere to the labor standards in Measure JJJ.

Pursuant to Measure JJJ, in order to approve a Community Plan update, the City must first complete a comprehensive assessment to ensure that changes to the Community Plan do not “reduce the capacity for the creation and preservation of affordable housing and access to local jobs.” Furthermore, Measure JJJ's TOC Incentive Program requires the City to offer incentives for projects that adhere to the labor standards contained in Measure JJJ, and these incentives may be adjusted through the Community Plan update process.



In order to be consistent with this existing framework, the CPIOs must be amended to include incentives for projects to meet the employment standards contained in Measure JJJ. As the blueprint for growth and investment in South Central for years to come, the CPIO Incentives should be structured to harmonize the dual benefits of on-site affordable housing and quality employment standards in new development. *Please see the matrix for policy details.

Prioritize opportunities for local residents with barriers to employment. The draft plans contain important policies and programs aimed at encouraging job training and hiring for local residents. These policies should be amended to also include the hiring and training of individuals facing barriers to employment, including but not limited to being homeless; being a custodial single parent; receiving public assistance; lacking a GED or high school diploma, having a criminal record or other involvement with the criminal justice system; suffering from chronic unemployment; history of substance abuse; or being a veteran.

Implement a First Source Referral process for new development and redevelopment projects. Create and/or utilize existing pipelines for local and disadvantaged hiring policies and programs. Establish effective monitoring and enforcement mechanisms, including a meaningful community oversight program, to ensure that hiring goals are being met.

Encourage living wage jobs. The Community Plans should couple the local hiring policies with living wage policies. Specifically, the Community Plans should include a policy and corresponding program to “maintain and increase the availability of living wage jobs for community residents.”

B. Create & Protect Opportunities for Local Small Business That Serve Low Income Communities of Color.

Incentivize reduced rent for community serving businesses. The CPIO Commercial Use Incentives should allow FAR adjustments and/or parking incentives for projects that set-aside a percentage of retail space devoted to reduced rent for community-serving small businesses and social enterprises. This will support the retention and expansion of locally-grown business owners.

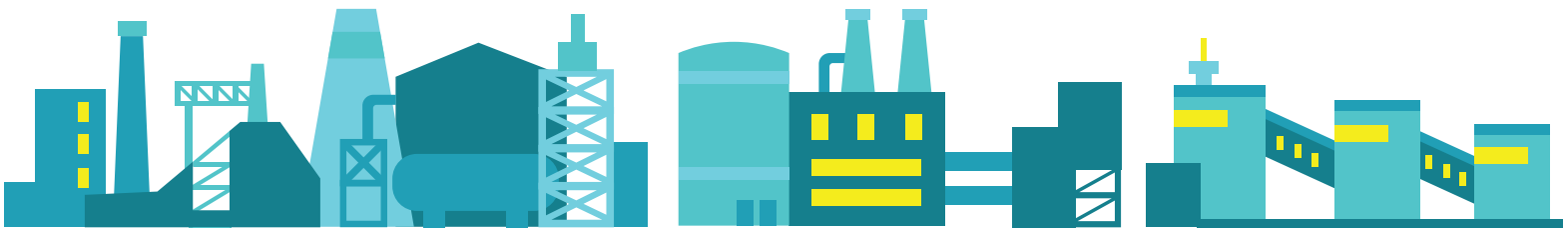
Define appropriate parcel designations and sizes for small businesses. The Community Plans and/or CPIOs should develop innovative parcel designations appropriate and beneficial to small businesses, which may not require the same type or size as larger enterprises. The Community Plans should also include a policy to identify resources to develop retail spaces of the appropriate size for small businesses and designate public space for sidewalk vending.



Provide resources for financing locally based and community-serving small business expansion.

The Community Plans should include a program directing the City to explore the availability of resources and approaches to assist in financing small business startup/expansion for local entrepreneurs committed to benefitting the local community, as well as the financing of construction that supports developers who seek to lease to local and less-credit-ready small businesses. The Community Plans should also include a program directing the City to encourage and create incentives for long-term small business leases.

Explore local procurement policies that support local small businesses. The Community Plans should include a program directing the City to explore options to provide local community-serving small businesses and social enterprises with the first opportunity to secure procurement contracts from new development projects.



C. Promote land use that supports inclusive, sustainable economic growth.

Strengthen regulations relating to predatory lending institutions. These community plans must include strong regulations to address the harmful impacts of an overconcentration of Payday Lenders / Check Cashing Facilities. In addition to the restrictions currently in the draft CPIOs, the City should further restrict these uses within the General and Commercial Corridor subareas and increase the level of review required for approval.

The City should also consider regulations that may address an oversaturation of already approved/permitted Payday Lenders / Check Cashing Facilities. Specific options to consider include: (1) Permanent moratorium on the establishment of new applications for Payday Lenders/Check Cashing Facilities (2) Prohibit new Payday Lender / Check Cashing Facilities from being located in proximity to a Very Low Income Census Tract.

Protect industrial and manufacturing zoning from conversion to other uses. The community plans must maintain consistency with the Industrial Land Use Policy Staff Directive, which calls for the inclusion of community benefits—including affordable housing—in projects that involve an industrial conversion.

3. Prioritize Environmental Justice and Enhance Community Health and Wellness

> Overview

The SLA and SELA CPAs currently suffer from myriad localized sources of pollution, such as proximity to high-traffic highways and industrial uses, in addition to a dearth of health-promoting uses such as parks and healthcare facilities. The community plans offer an opportunity to address these grave health disparities affecting community residents.

Home to seven of the ten most ozone-polluted cities in the country, 84% of the California's residents live in areas of poor air quality. And while all Angelenos suffer the impacts of this unhealthy air, low-income communities, especially communities of color, are especially vulnerable. The CalEnviroScreen Tool identified the SLA and SELA CPAs as among the **top 10% of communities in the state of California that are disproportionately burdened by multiple sources of pollution.**

The primary cause of this vulnerability is the disproportionate proximity of these communities to high-density freeways and highways and to pollution-emitting factories and industries. These uses expose community residents to multi-source air toxins and fine particulate matter from gasoline and diesel-powered motor vehicles. **The health costs of this exposure are severe, ranging from reproductive issues and low birth weight to respiratory and cardiovascular illnesses.** The Union of Concerned Scientists reached the horrifying conclusion that **"70 percent of the cancer risk from the air we breathe is attributable to diesel PM."**

The SLA and SELA CPAs are bound by three freeways and contain over 30 major commercial corridors serving as a "pass through" for vehicular and commercial traffic traveling north-south and east-west. The Community Plans and respective CPIOs must limit the risk that this proximity entails.

Meanwhile, South LA residents are severely underserved by healthcare professionals. Historic divestment of medical service facilities from the area has left community members dangerously out of reach from many health services. No major hospital is easily accessible to most of its residents, and significant portions of both CPAs have been designated **"Health Professional Shortage Areas."** Many low-income South LA residents haven't seen a doctor in years.





Additionally, residents of the SLA and SELA CPAs have access to less than one acre of parkland per thousand residents. Compare that with the 19 park acres per thousand residents enjoyed by residents Hollywood, the 26 acres enjoyed by residents of Bel Air, or the jaw dropping 198 acres enjoyed by Brentwood residents.

Such limited access contributes to both physical ailments such as obesity, as well as psychological ailments such as irritability, mental fatigue, and impulsivity.

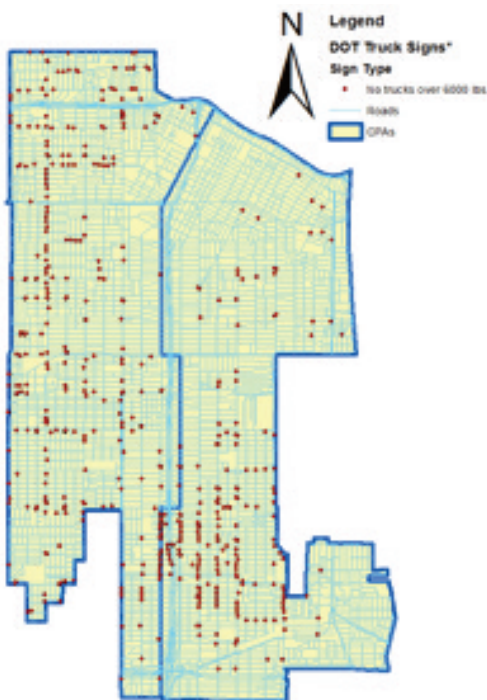
An **equity framework** would harness the opportunity presented by public and private investment and increase much needed resources, community-serving amenities, and opportunities to existing residents.

> Recommendations

Prohibit oil extraction. There are upwards of 30 active oil extraction sites in the CPAs. Urban oil extraction and their related practices produce harmful emissions that seep into surrounding communities. Residents in the CPAs suffer from low-dose chronic exposures to hydrocarbons and other harmful associated chemicals and express symptoms including spontaneous nose bleeds, lingering headaches, chronic fatigue, dizziness, and loss of smell. The city should prohibit all urban oil extraction uses and techniques, including but not limited to acidization, fracking, and urban oil drilling, as all these practices are incompatible with human health.

Increase accessibility and amount of public open/green space. The Community Plans and/or CPIOs should designate surplus City-owned land in Transit-Oriented Districts as Open Space when parcels are feasibly repurposed for park or recreation purposes in compliance with the Surplus Land Act. The Community Plans should include a program to commit resources to improving and maintaining open space in the CPAs.

In September 2016, the Los Angeles City Council voted unanimously to adopt an ordinance to overhaul the City's fee program to fund park acquisition and capital improvements. As part of this process, the City adopted an amendment to the General Plan that created a service standard of 10 park acres per 1,000 people. In order to be compliant with the General Plan and the Plan for a Healthy Los Angeles, the Community Plans should include a policy/program to ensure consistency with the City's fee program to fund park acquisition and capital improvement and meet or exceed the service standard of 10 park acres per 1,000 people.



Protect air quality by limiting truck activity.

The Community Plan should Limit truck routes solely on commercial corridors, away from sensitive receptors like schools and residences. Restrict truck idling and parking on residential streets to limit toxic diesel emissions.

Reduce air pollution from highways.

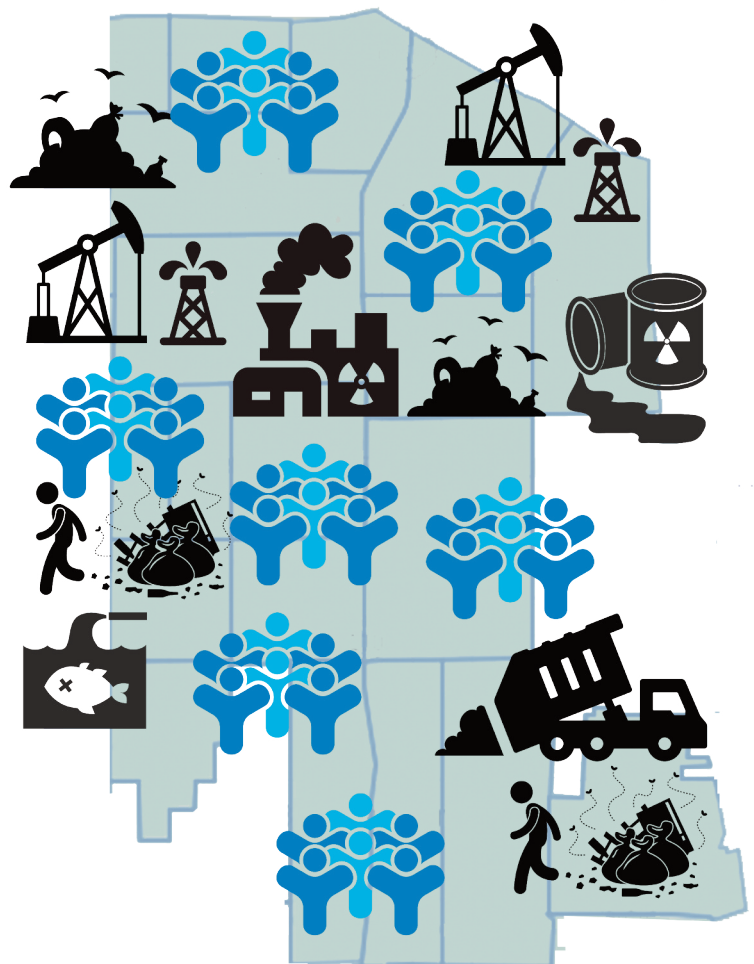
The Community Plans should create green buffers next to highways that are not publicly accessible to reduce the amount of particulate matter in residential areas. Further, the Community Plans should require the installation of high efficiency filtration systems (MERV 17 to 20) for all housing within 500 feet from sources of pollution including freeways and existing oil drilling sites.

Develop policies that reduce residential/industrial land use conflicts and provide incentives to mitigate exposure to harmful air pollutants emitted from industrial uses of land. There are countless neighborhoods in the South and Southeast Community Plans that are saddled with the environmental burden of noxious industrial land uses.

In fact, 21% — approximately 59,000 individuals — of Southeast LA residents live adjacent to noxious land uses.

Furthermore, the communities that are most disproportionately impacted by these conditions are low-income communities and communities of color. Scientific studies show that living in close proximity to industry increases rates of asthma, heart disease and low birth weight.

Given this reality, we recommend that the Community Plans include policies that reduce residential to industrial land use conflicts, while also providing incentives to businesses residing on industrial parcels of land to reduce harmful air pollutants and mitigate the pollution burden on surrounding communities.



4. Strengthen Community Leadership in the Land Use Planning Process

> Overview



The Community Plans – and this current process to update the plans – should follow and enhance best practices designed to deepen public participation, especially among residents who are typically left out, due to cultural, economic or social barriers. The current Community Plan update process has now spanned 10 years. This inordinate amount of time does not, however, justify any speeding up of the planning process that could come at the expense of the well-being of our communities.

Further, we note that the Community Plan update process for South LA and Southeast LA had previously been independent public processes. Now, they are merged into a singular process. While there may be benefits to asking residents and stakeholders to attend fewer meetings, we must name the risk that this represents in diminished opportunity for public process.

Where there were previously two environmental review processes and two City approval processes, there is now just one. This gives residents half the opportunity to weigh in on critical matters and doubles the amount of information they must process – especially for residents, students, small business owners and organizations who reside, study and/or operate in both Community Plan Areas. This is an unfortunate outcome to a perceived effort to speed up the Community Plan Updates, which could result in unnecessary harm to the most marginalized members of the community who typically have the least access to resources necessary to weigh in on documents that are heavy with technical jargon. Thus, we call for every opportunity to be given and every available resource to be exhausted to be sure that the Community Plans are not approved without significant and authentic community involvement.

In light of the current changes in process, we further make the following proposals that should affect planning in South LA and Southeast LA going forward:

> Recommendations

Enhance Language Access of All Planning Documents. Language access for the Community Plans and CEQA-related documents continues to be a challenge. The City of Los Angeles must set a new standard for full disclosure of its planning documents through the translation into the various languages spoken in our communities.

Hold Community Planning Meetings at Night and/or On the Weekends at Locations in the Community. City planning hearings typically take place at City Hall during the middle of the work day. The distance from community neighborhoods and the conflict with the work day represent two enormous barriers for resident participation. For these reasons, we recommend that hearings pertaining to development in South LA and Southeast LA held by the City Planning Commission, the Planning and Land Use Management Committee of City Council, and the full City Council be held at night and/or on the weekends at locations in the Community Plan Area.

Exercise the Discretionary Power to Pace the Planning Process According to Community Needs. The City of Los Angeles should assess regularly how the planning process is being heard and understood by local residents – prioritizing the most disenfranchised members, including people of color, low-income people, the homeless and people for whom English is a second language. When it becomes clear that residents need additional time to review plans, that time should be given in the acknowledgement that land use decisions have a multi-generational impact on the lives of residents and the communities impacted by these decisions.



Conclusion

The South and Southeast LA Community Plan updates represent a watershed moment for our city. This is an opportunity to reaffirm a commitment to real planning, done in partnership with those communities that have historically been excluded from – and harmed by – the planning process. This is an opportunity to be forward-looking and bold in creating the conditions for healthy community-serving development without displacement. We believe that done correctly, these Plans could effectively coordinate public and private investment with the strengths and assets of the South Central community in order to promote inclusive, equitable, just growth. With these opportunities in mind, we submit this, the People's Plan.

The Same Neighbors, Better Neighborhoods approach highlighted in the People's Plan offers an opportunity to create better neighborhoods for existing residents and in the process, accommodate the expected influx of new residents while maximizing the potential of infill development and transit-oriented development. Done correctly, public and private investments can be used as a tool to raise the standard of living for existing residents by increasing housing affordability through lower housing and transportation costs, increasing healthy housing standards, linking workers to employment centers, creating living-wage jobs, protecting community-serving small businesses, preventing displacement, and increasing the resources available to community residents.

The equitable development solutions in the People's Plan are practical, implementable, and replicable. Los Angeles can still become a city where working class residents and future generations can achieve prosperity but **the time to act is now!**



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