

Planning for an Equitable Los Angeles:

A Guide to Shaping LA's New Community Plans



Photo by Strategic Actions for a Just Economy

Acknowledgements

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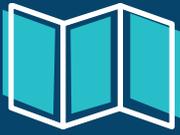
Public Counsel Community Development Project

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DISCLAIMER

This guide was prepared by Public Counsel and ACT-LA and is meant to provide general information. This document is not all-inclusive and is not intended to provide any individual or entity with specific legal advice.



How to use this guide

This guide is a resource for community-based organizations (CBOs) and city residents to advance equitable development through active engagement in the City of Los Angeles community plan update process.

Part I

Provides an overview of the community plan update process and offers key considerations for effective community engagement.

Part II

Provides a toolkit of planning and policy tools to advance equitable development outcomes within these new community plans. These tools are organized according to five broad principles of equitable development.

This guide is non-exhaustive, and meant to spur thoughtful dialogue among engaged residents and organizations. Ultimately, it is the leadership and experiential knowledge of affected low-income communities that will drive an equitable community plan campaign. Specific strategies will be responsive to the unique circumstances and dynamics of each community plan area. This guide is intended to support that effort.

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Introduction

ACT-LA envisions a transit-rich Los Angeles where all people have access to quality jobs, affordable housing, necessary social services, ample transportation options, and a voice in shaping the growth of their neighborhoods.

To realize this new Los Angeles, we must change the way planning and development occurs. Currently, many low-income residents live in inner and outer ring suburbs, miles away from the city's economic centers. Those who are able to live in the city are often without reliable, affordable, or accessible transit, and may not make a livable wage. New investment along transit corridors is often targeted to a higher income demographic and is unresponsive to the needs of existing low-income residents. ACT-LA works to ensure that new smart growth and urban revitalization efforts do not mask, ignore, or deepen the negative human and environmental impacts of the affordable housing crisis. Rather, we believe in, and strive for, an equitable transformation that benefits low-income communities and communities of color.

ACT-LA is committed to a community planning process for the City of Los Angeles that is inclusive and diverse, where all residents have a voice in decision-making. We have identified five core principles that we believe will help facilitate community-led planning and equitable development:

- 1 *growth and preservation of affordable housing;*
- 2 *inclusive economic development that supports workers and businesses;*
- 3 *community health and environmental justice;*
- 4 *livable, publicly accessible, walkable and bikeable public areas; and*
- 5 *community leadership and authentic engagement.*

These principles and several policy tools required to achieve them are laid out in detail in this guide.

An inclusive model of equitable community development does not happen automatically. It requires strong community leadership shaping a comprehensive set of plans, policies and development regulations. For each neighborhood across the city, the community plan update process presents an opportunity to do just that. We hope this guide will support community-led efforts to advance equity, inclusion and opportunity in the City's community plan updates.

Part One



Photo by Nolwen Cifuentes

Community Plan Overview

WHAT IS A COMMUNITY PLAN?

A Community Plan is part of the City’s General Plan, and sets the rules for development within a Community Plan Area.

In California, every city must prepare and adopt a comprehensive, integrated, long-term General Plan to direct future growth and development. The General Plan is the city’s fundamental policy document—think of it as the *Constitution* for a city. It defines how a city’s physical and economic resources are to be managed and utilized over time. Under state law, a General Plan must have certain chapters, often referred to as “elements.” These required elements include a “housing element,” a “transportation element” and a “land use element,” among others.

In Los Angeles, the required land use element of the General Plan consists of 35 distinct “community plans” – each of which applies to a corresponding “community plan area” (CPA) within the city. A community plan sets a vision for future growth in the CPA, and establishes specific rules for development that are consistent with that vision. It dictates what type of development will be permitted, in what locations, and at what densities and intensities.

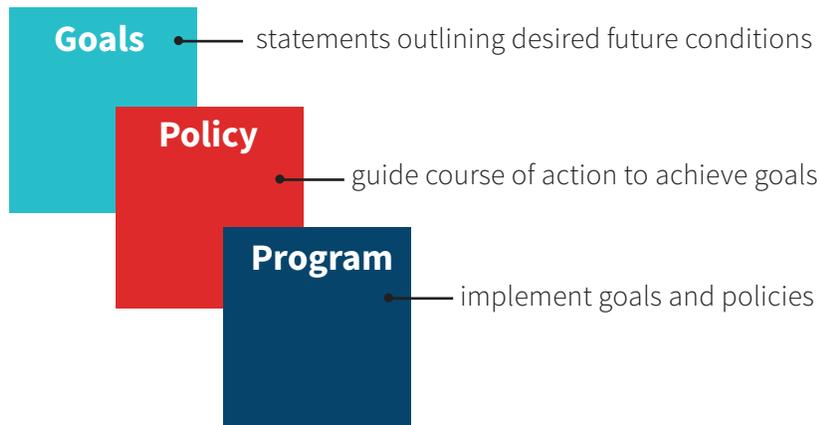
In short, a community plan sets rules and standards for development in a certain area, and is part of the land use element of the City’s General Plan. Why does this matter? Because all land use decisions must be consistent with the General Plan, and therefore, all land use decisions must be consistent with the applicable community plan.



A Community Plan will include both policy statements and zoning regulations.

A community plan may include several different documents, but you can generally understand the plan to have two main components.

First, each new community plan will have a **policy document**. This document will likely include a narrative about the community, and policy language to guide city decisions. Past community plan policy documents have been organized to include “Goal” statements outlining desired future conditions, with a series of corresponding “Policies” that guide a course of action to achieve those goals, followed by a series of specific “Programs” to implement the policies and goals. These Goals, Policies and Programs are often aspirational and may be non-binding. The more specific and mandatory the language, the more likely the policy or program will be implemented.”



Second, each community plan will also result in **changes to the underlying land use and zoning designations** for properties located in the CPA. This is achieved through a change to the City’s land use map, as well as new zoning ordinances. Recently adopted community plans have implemented land use and zone changes through a tool called a Community Plan Implementation Overlay (CPIO) ordinance. The CPIO creates distinct districts, with additional zoning regulations overlaid on certain properties within each district. These regulations may include design standards, use restrictions, and review

Practice Tip:

The more specific and mandatory the language, the more likely the policy or program will be implemented.

Policy Document

- Affects how the city will allocate resources, shape development patterns and assess development proposals for the life of the plan
- Presents numerous opportunities to craft a framework for equity and inclusion

Zoning Ordinance(s)

- Where the rubber meets the road
- Set the parameters of what can or cannot be built, at what density or intensity, for each and every property in the CPA
- Structured to incentivize affordable housing and other community benefits
- Can be structured to incentivize affordable housing and other community benefits – but this won’t happen automatically.

procedures. In the case of the South and Southeast LA Community Plans, the CPIO includes a two-tiered “up-zoning” program that grants additional density and parking reductions to projects that include affordable housing and other community benefits. Whether achieved through a CPIO or another mechanism, each community plan update will utilize some method of changing the underlying land use and/or zoning regulations for properties within the CPA.

It is important to influence both the policy document and the zoning ordinance(s) in order to advance equitable development outcomes. The policy document (including goals, policies and programs) affects how the city will allocate resources, shape development patterns and assess development proposals for the life of the plan. It presents numerous opportunities to craft a framework for equity and inclusion. The zoning ordinance is where the rubber meets the road. It will literally set the parameters of what can or cannot be built, at what density or intensity, for each and every property in the CPA. With community input, the zoning ordinance *could* be structured to incentivize affordable housing and other community benefits, but this won’t happen automatically.

The City periodically updates each community plan.

As the core policy document for growth and development of an entire area in the city, community plans should be updated to keep pace with changing circumstances. State law requires cities to “periodically review, and revise, as necessary, the general plan.”¹ However, state law does not specify how often a city must review and revise its general plan. LA’s Community Plans have often gone for decades without being updated, thus not reflecting the current development environment. When plans are outdated, the City may field increased requests for individual amendments to the existing community plans and zoning code in order to accommodate specific development projects (sometimes referred to as “spot zoning”).

Acknowledging the need to update its out-of-date plans, the City has committed to accelerate the review process, with a goal of reviewing each plan every 6 years. In order to review and update community plans on this expedited timeline, the Department of City Planning (the Department) will review and update three to four geographically contiguous community plans at the same time.²

Measure JJJ, passed by voters in 2016, places additional requirements on community plans. Prior to adopting a community plan update, the City Planning Commission must find that the changes to a community plan will not:

- 1** Reduce the capacity for creation and preservation of affordable housing and access to local jobs; or
- 2** Undermine state density bonus law or any other affordable housing incentive program.

1 Gov. Code § 65103(a)

2 http://clkrep.lacity.org/onlinedocs/2016/16-0422_rpt_PLAN_02-21-2017.pdf

WHY IS IT IMPORTANT TO PARTICIPATE IN MY LOCAL COMMUNITY PLAN UPDATE?

Community Plans set the rules for new development.

The community plan will set the rules for new development and determine how and for whom a community will grow. Quite simply, if you wish to influence development to be more accountable to the needs of low-income communities, you will need to influence the content of the community plans.

Community plans pose both threats and opportunities for low-income communities and communities of color.

In Los Angeles, low-income communities and communities of color have been marginalized, harmed and, in some instances, intentionally excluded from opportunities as a result of large-scale planning efforts. For example, racial covenant policies prohibited Black families from purchasing homes in certain communities, the forced removal of families made way for Dodgers Stadium (instead of promised low-income public housing), and a massive freeway build out uprooted whole city blocks and divided LA's eastside neighborhoods. Preventing similar harmful policies and ending poor planning decisions will lie in the hands of informed and empowered residents and community advocates as they engage in the community planning process. The community plan updates present an opportunity to reconcile with the racial impacts of prior planning efforts, learn from past practices, and re-orient planning around equity, inclusion and opportunity.

Community plans create an opportunity to advance an affirmative vision for equitable community growth.

Often, CBOs and low-income residents find themselves in a defensive posture – reacting to unaccountable policies or developments that threaten displacement pressures. But a community plan is inherently forward-looking; it sets the standards for future development and growth.

This is an opportunity to shift the framework and create space for a community-driven vision for inclusive growth.

Engaging in the community plan update gives low-income residents and CBOs the chance to talk about what we're for, not just what we're against. See the People's Plan case study for an example of communities using the community plan update to advance an affirmative vision.

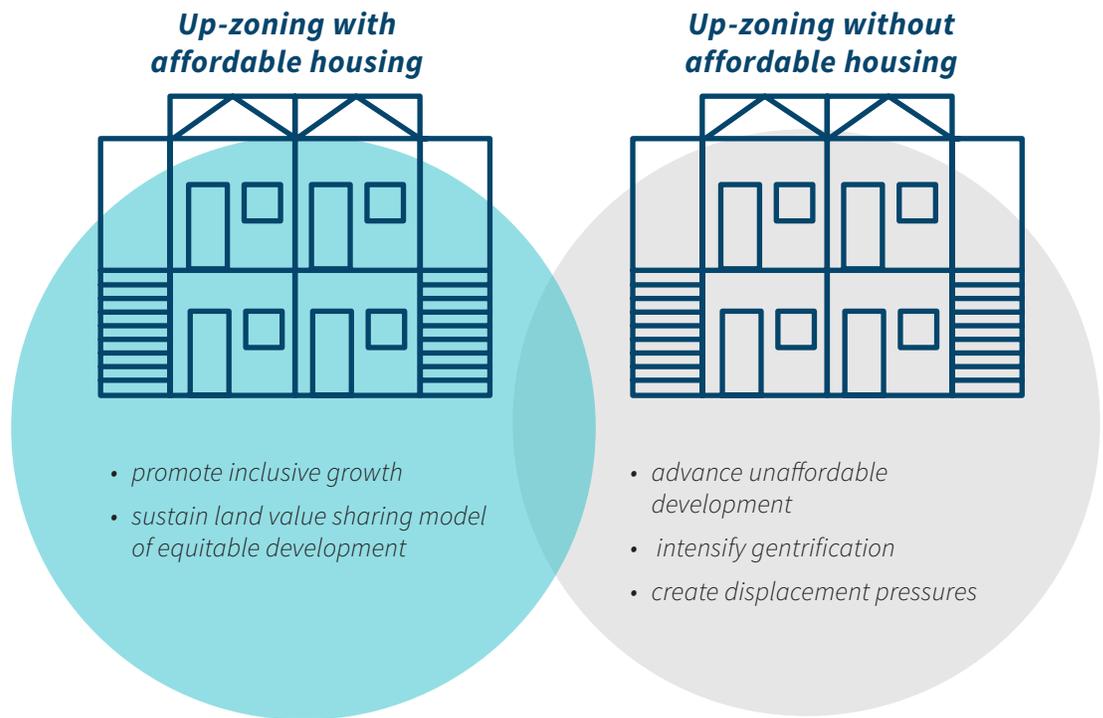
Community plans will either strengthen or weaken equitable development standards.

At a more granular level, the community plans will ultimately determine the fate of hard-won community victories in advancing inclusive development policy.

Over the years, CBOs and advocates have made important strides in advancing land value sharing (also called “public benefit zoning,” “value capture,” or “land value recapture”) policies to support public benefits. These programs are centered on the fact that when public decisions increase the residential development capacity of a particular property, the value of that property increases. A portion of this new unearned land value – the direct result of a public decision— should be shared with the community in the form of public benefits.

Pairing density increases or “up-zoning” with the provision of a certain amount of affordable housing is a standard land value sharing strategy, and is a main ingredient in growing LA’s housing supply in a way that is inclusive, strategic and equitable. This basic land-value-sharing concept is embedded in state law (the density bonus law), and has been strengthened in local policies like the Cornfield Arroyo Seco Specific Plan (CASP), Measure JJJ, the Transit Oriented Communities Affordable Housing Incentive Program, and the South and Southeast LA Community Plan CPIOs. These programs are all structured to align density increases with a net gain of affordable housing.

Different outcomes of up-zoning



Most community plans will involve some level of up-zoning, which increases the development capacity of a site. This could result in two very different outcomes. Up-zoning sites without any corresponding affordable housing program will advance unaffordable development, intensify gentrification and displacement pressures, and undermine a wide range of equitable development policies.

Up-zoning that is aligned with affordable housing, as part of a mixed-income and affordable housing incentive program (like the South and Southeast LA CPIOs) will promote inclusive growth and sustain the land-value-sharing model of equitable development.

CBOs and low-income residents have a vital role to play in determining which direction their community plan will go.

To that end, CBOs and city planning officials should be aware that Measure JJJ now requires that community plan updates not undermine existing affordable housing programs.³ If a community plan were to up-zone sites without a corresponding provision for affordable housing, it would directly undermine other existing affordable housing incentive programs in violation of the Measure JJJ requirement. Thus, all community plan updates should include a program that aligns all up-zoning with affordable housing at levels that meet or exceed the Measure JJJ standards (see Section II of the Toolkit for more detail).

Measure JJJ also resulted in the adoption of a citywide Transit Oriented Communities Affordable Housing Incentive Program (TOC Program), which grants density increases, parking reductions and other incentives to projects that are located within one-half mile of a Major Transit Stop and provide certain percentages of on-site affordable housing. The TOC Program Guidelines allow various levels of density and require various levels of affordable housing depending on the proximity and type of transit station. Per Measure JJJ, these incentives and affordable housing percentages can be adjusted for a certain area through the community plan update, as long as the affordable housing requirements meet or exceed the TOC Program requirements. Thus, CBOs should monitor any proposed affordable housing standards closely, and advocate for affordable housing incentives that are at least as strong as the TOC Program Guidelines.



Photo by Mike Dennis

3 Los Angeles Municipal Code 11.5.8(A)(2)

WHAT DO I NEED TO KNOW TO EFFECTIVELY PARTICIPATE IN MY COMMUNITY PLAN UPDATE?

OK, so engaging in the community plan update process is really important. But how do we start?

This section will provide you with an overview of the community plan update process, an overview of the environmental review process that occurs during a community plan update and upcoming changes to the zoning code through re:code LA. Understanding these processes will help CBOs prepare for a successful, community-driven campaign.

It is never too early to begin preparing for a community plan campaign.

The Los Angeles City Council has committed to concurrently updating community plans in adjoining CPAs. It is never too early to begin planning for a community-driven campaign to engage in the community plan updates. Identifying community priorities, concerns and recommendations requires significant organizing and engagement. Beginning the process early and developing a cohesive policy platform in advance of the city's formal process will enable more effective engagement.

The public process provides important opportunities to advance community-driven priorities for equitable development.

The community plan update process includes many opportunities for low-income residents and CBOs to provide input. The Department of City Planning (the Department) will first review the existing plans and discuss them with stakeholders, then it will prepare recommendations for how the plans should be updated, and finally, appointed and elected decision makers will consider the Department's recommendations, make amendments, and ultimately adopt a community plan update. Each of these phases is described in greater detail below, with recommendations on how to best engage.



The Department’s website summarizes* the public participation process for community plan updates, including the following steps:



Department staff will review the existing community plan and present findings to the neighborhood councils.



Department staff may request small group meetings to discuss its review of the existing community plan.



Department staff will summarize and analyze feedback from initial meetings with neighborhood councils and small groups and present this information to the neighborhood councils.



During this phase, CBOs and residents can participate in advisory groups, attend and provide comments to neighborhood council meetings, and submit written comments to the Department outlining policy recommendations and issues to consider. The specific process followed by the Department may vary from what is described above. Typically, the Department will create a website with information about your specific community plan update. Consult this website to identify opportunities to gather information and provide feedback.

*** Visit these sites to learn more information on public participation in community plan updates**

<https://planning.lacity.org/PublicPartGraphic.html>

<https://planning.lacity.org/Processes/CommunityPlan.pdf>

Next, the Department will draft a new community plan and revise it through community input. The Department’s website describes this process as follows:

- Department will hold a public workshop to present the draft community plan update.
- Department will review changes with the neighborhood councils.
- Department will hold open house events.
- Department will hold a public hearing before a hearing officer to issue official recommendations.



During this phase, CBOs may wish to devote significant time and resources to studying the impacts of the proposed draft plan by comparing the City’s proposals to community-identified priorities, hosting community workshops to educate residents on the draft, and developing community-driven recommendations for changes to the draft plan. CBOs should consider preparing and submitting significant written comments, attending each public meeting, and seeking individual meetings with the lead planners to share feedback, concerns and recommendations. As with the previous phase, CBOs should consult the website for your community plan update to identify opportunities to gather information and provide feedback.



After the Department issues its recommendation, appointed commission members and elected officials will review, amend, and ultimately adopt the community plan update. These final phases typically occur in conjunction with the final phases of CEQA review, discussed below. The Department's recommendation is reviewed by the following bodies:

Area Planning Commission

The Area Planning Commission is a body of five commissioners, appointed by the Mayor, that oversee planning decisions in an area of the city. There are seven different Area Planning Commissions, each responsible for a section of the city. The Area Planning Commission will hold a public meeting where it will hear testimony from staff members and the public before reviewing the Department's recommendations.

City Planning Commission

Next, the City Planning Commission will hold a similar public meeting before making an official recommendation concerning the Department's proposed community plan update. The City Planning Commission is a city-wide body comprised of nine members, each appointed by the Mayor. Community groups may submit written comments before the meeting, or provide oral comments during the meeting. Oral comments are typically limited to one or two minutes per person.

Planning and Land Use Management (PLUM) Committee

After the City Planning Commission issues recommendations, the PLUM committee of the City Council will hold a public hearing, consider testimony, and issue an official recommendation. The PLUM hearing is another opportunity for community groups to submit written comments or provide oral comments during the hearing. The City Clerk will create a council file on the City's website where the Department's and City Planning Commission's recommendations, staff reports, and written public comments are stored.

City Council

After PLUM reviews the City Planning Commission's recommendations and issues its own recommendation, the matter will be heard by the full City Council, which is ultimately responsible for deciding whether to adopt the community plan update, or to request further revisions. Further written comments can be submitted to the City Council. If the PLUM committee allowed for oral comments during the PLUM hearing, the City Council may not be required to hear further oral testimony during its meeting.

During the plan adoption phase, CBOs may wish to meet frequently with Department officials and Council office staff to discuss community concerns, priorities and recommendations. CBOs and residents should prepare to mobilize strong attendance at each hearing and present written and oral comments with core recommendations. These comments should include comments on the plan's EIR, if applicable (see below for more on CEQA requirements and process).

CEQA review creates important opportunities to advance sustainable, healthy, environmentally sound development policies in the community plans.

The California Environmental Quality Act (CEQA) is a state law that requires lawmakers to consider the environmental impacts of projects that require discretionary approval. A community plan update is considered a “project” under CEQA and, because a community plan update is a large undertaking, the City will likely assume it may have significant effects on the environment and will prepare a full Environmental Impact Report (EIR). The EIR will consider the significant environmental effects of a project, identify alternatives to the project, and indicate how significant environmental effects can be mitigated or avoided.

CBOs and residents should participate early in the CEQA process to ensure that the EIR considers environmental justice outcomes, properly assesses impacts on low-income communities, and includes adequate mitigation measures. CBOs should contact the Planning Department and request to be included on the list of interested parties to receive notices of public meetings regarding your community plan update.



The CEQA review process is governed by the statute, guidelines, and court decisions. A compilation of these sources is available on the California Natural Resources Agency website. The major stages of the environmental review process are as follows:

1 Notice of Preparation

The EIR process for a community plan update begins with the City issuing a Notice of Preparation (NOP). The NOP will describe, in high-level terms, the proposed changes to the community plan and the environmental issues that the City plans to analyze. This notice begins a 30-day comment period where members of the public can submit written feedback identifying issues that the City should analyze in the EIR process. CBOs should consider submitting feedback that highlights their core issues that have an effect on the environment. For example, CBOs could request that the EIR analyze the environmental impact of displacing low-income residents from transit rich areas.

2 Scoping Meeting

The NOP will typically announce the time and location of a scoping meeting. At least one public scoping meeting will be held within 30 days of the release of the NOP. At this meeting, the Department will ask for feedback from the public and other public agencies on the scope and content of the environmental review, including identifying significant environmental issues, reasonable alternatives, and mitigation measures. CBOs and low-income residents should attend this meeting and request that issues important to them are taken into consideration.

3 Draft EIR Preparation

After the NOP is issued, the City may begin preparing the draft EIR (DEIR), or hire an outside consulting firm to prepare the DEIR. Anyone may submit information or comments to assist in the preparation of the DEIR. The Department is required to consider all information it receives and information submitted may be included in the DEIR. The DEIR will not be released until at least 30 days after the NOP is issued.

4 Public Review of Draft EIR

When the DEIR is completed, the City will issue a Notice of Completion, beginning the DEIR review period. The public review period will be between 30 and 60 days. CBOs and other stakeholders will have an opportunity to submit written comments during this review period. The City is required to evaluate and respond in writing to all comments it receives during this period. This is an important opportunity to put your concerns on the record and, when the City responds, to understand how the City views your concerns. These documents are complex and require time for adequate review and meaningful input, so CBOs and community stakeholders should consider requesting additional time for DEIR review, and may request that the City translate certain parts of the EIR.

5 Possible Recirculation of Draft EIR

If significant changes are made to the DEIR, the City will recirculate for further public review. During this time, CBOs will have another opportunity to comment on the new DEIR.

6 Final EIR Released

After the City has considered and responded to all comments it will release a final EIR for the City's elected and appointed officials to review and ultimately certify.

7 Review, Amendment, and Adoption by Appointed and Elected Officials

After the City produces a final EIR, the document will be reviewed by the relevant Area Planning Commission, the City Planning Commission, the PLUM committee, and the full City Council. This process usually occurs concurrently with review of the Department's recommended community plan update as described in the previous section. Ultimately, the City Council is responsible for certifying the final EIR.

8 Judicial challenges to certification of the EIR

If the City improperly certifies an EIR, the certification can be challenged in court. Community plan updates have been challenged in court on CEQA grounds. For example, a neighborhood association challenged the Hollywood community plan update in 2012. The court sided with

the neighborhood association and prevented the update from going into effect pending preparation of a new EIR. Note: A judicial challenge on CEQA grounds may be limited to issues that were raised *before* the city certified the EIR. Plaintiffs may be barred from raising issues for the first time in court.



Community Plan updates will apply re:code LA, the City’s new zoning code.

In 2013, the City launched re:code LA, a comprehensive update of its zoning code. The stated goal of re:code LA is to create new zones that are simpler and better adapted to modern development. While re:code LA will not itself change the zoning on any particular parcel of land, community plan updates will be the vehicle to rezone parcels with the new zoning designations created by re:code. In other words, new community plans may change the underlying zoning designation on every single property within the CPA boundaries. The Central City and Central City North community plan updates will be the first to apply this new code.

At the time of publication, the re:code LA process is not yet complete. However, it has been proposed that sites will be given a zone string with four unique designations:



The Form designation will identify allowable development envelopes for buildings, including lot area, building placement and allowable height and floor area ratio. The Department has suggested that the Form designation may be structured with a two-tier system that allocates: (i) a base floor area ratio, and (ii) a higher “bonus” floor area ratio for projects that provide affordable housing and/or other community benefits. The Frontage designation will set requirements for how the site and building is oriented to the street, including orientations such as “shopfront,” “live/work,” “active alley,” or “neighborhood.” The Use designation will establish the site’s Use District (e.g. Residential, Mixed Use, Industrial), which then corresponds to specific uses that are either permitted, limited, require a Conditional Use Permit, or not permitted on the site. Finally, the Density designation applies a unit-per-lot-area allowance for the site.

The creation and application of a new zoning code offers both opportunities and risks. As these new zoning designations are being developed, CBOs should engage the process and

advocate for equitable development principles to be included. For example, CBOs should closely monitor and actively engage in the creation of a public benefit program within the Form designation. Incorporating equitable development policies, such as affordable housing and value sharing, into the zoning code itself could lead to more consistent and widespread use of such policies. There is a risk, however, that new zones will undermine existing equitable development policies by increasing the building envelope⁴ without any affordability, or in exchange for less affordable housing than is required by current policies such as density bonus law. CBOs should engage actively in the re:code process and closely scrutinize any proposed public benefits program within the new zoning definitions to ensure that all increases to the building envelope are appropriately aligned with affordable housing and other public benefit.

CBOs will also need to closely scrutinize the application of the new zones within the community plan. In each community plan update, there is a risk that new zone designations may be applied in a way that does not properly align increases to the building envelope with a corresponding public benefit program. Because the new zoning code will use new concepts and terminology to describe the permitted land uses, it may be difficult to compare the new zones with the prior existing zones. CBOs should expressly request that Department staff describe exactly how any new zones will affect the permitted land uses and building envelope, and closely scrutinize these changes. (For example, specifically ask staff to explain exactly which parcels are being rezoned, and what the impact of that rezone is in terms of allowable density.)

re:code LA Zones



Form

- Identify allowable development envelopes for buildings (lot area, building placement and allowable height and floor area ratio).
- Two-tier system that allocates:
 - a base floor area ratio
 - a higher “bonus” floor area ratio for projects that provide affordable housing and/or other community benefits.



Frontage

- Set requirements for how the site/building is oriented to the street.
- Orientations included:
 - “shopfront”
 - “live/work”
 - “active alley”
 - “neighborhood”



Use

- Establishes the site’s Use District (e.g. Residential, Mixed Use, Industrial).
- Corresponds to specific uses that are either permitted, limited, require a Conditional Use Permit, or not permitted on the site.



Density

- Applies a unit-per-lot-area allowance for the site.

⁴ An increased building envelope, as used here, includes reductions in parking, increased floor area ratio, increased dwelling units per [space] acre, reduced set, increased height, or new permitted uses.

The United Neighbors In Defense Against Displacement (UNIDAD) coalition is a network of CBOs and community leaders working to advance equitable development in South Central Los Angeles. Facing growing gentrification and displacement threats resulting from new transit investment, encroaching “downtown” development, continued expansion of the University of Southern California (USC), the proliferation of corporate landlords and a myriad of other pressures, the UNIDAD coalition recognized the crucial importance of the South and Southeast LA Community Plan updates in establishing a more inclusive framework for growth.

Over the course of nearly a decade, the UNIDAD coalition worked with low-income residents and community leaders to develop their own vision for healthy, equitable growth. This process culminated in the People’s Plan—a comprehensive policy platform and a robust community-driven campaign to embed these policies in the new community plans.

The People’s Plan campaign was multifaceted. Arising out of robust community education and engagement, UNIDAD produced a set of core policy recommendations in three broad categories:

- 1 displacement prevention and a net gain of affordable housing opportunities;
- 2 inclusive economic development; and
- 3 environmental justice and community health.



Photo by Nolwen Cifuentes

The engagement process strengthened community leadership and helped build a strong base of local stakeholders to share their stories with city decision-makers. Legal and policy support from attorneys and technical experts enabled the coalition to submit detailed and comprehensive comment letters and advocacy materials at many different stages of the plan development – from individual meetings with the Planning Department and other city officials, to comprehensive EIR comments and land use letters, to testimony and correspondence at public hearings. The UNIDAD coalition provided City officials with very specific policy language, in the form of redlines and inserts, to embed the People’s Plan principles into the City’s draft plans.

Many of the People’s Plan recommendations were incorporated directly into the plans, including strong affordable housing production measures, affordable housing replacement requirements, innovative anti-displacement measures, employment opportunities for local residents facing barriers to opportunity, supports for community serving small businesses, and stronger protections for environmental sustainability and community health. As a result of the People’s Plan campaign, policies that were imagined, developed and refined by the affected low-income communities of South Central are now part of the legal framework for growth and development in that community.

Part Two



Photo by Nolwen Cifuentes

A Toolkit for Equitable Development

Part II provides a series of policy tools that CBOs and community stakeholders may consider in a campaign to advance equitable development in the community plan updates. These tools draw on best practices, lessons from previous efforts, and the experiential knowledge of ACT-LA organizations and resident leaders.

This guide is a starting point. Some of these tools may be appropriate for the community plan policy documents, while others are targeted to the zoning ordinances. Those tools listed below provide a general description of potential policy outcomes, but do not provide specific policy language. And as noted above, this is not intended to be an exhaustive list. Engaged CBOs and community leaders will need to select the tools most appropriate for a unique community, craft and refine these tools to match community needs and priorities, write policy language, and develop additional tools as necessary. ACT-LA may be able to provide model policy language for certain tools upon request.

The tools are presented below according to five core principles of equitable development:

- 1 growth and preservation of affordable housing;
- 2 inclusive economic development that supports workers and businesses;
- 3 community health and environmental justice;
- 4 livable, publicly accessible, walkable and bikeable public areas; and
- 5 community leadership and authentic engagement.



Image by Mike Dennis

GROWTH AND PRESERVATION OF AFFORDABLE HOUSING



Affordable up-zoning.

The community plan update process presents an opportunity to direct new growth and density where appropriate, including along major transit corridors. But increases in allowable residential density (aka “up-zoning”) must be aligned with the provision of significant on-site affordable housing. To achieve this objective, create an affordable housing incentive program that applies to every parcel designated for increased density in the CPA. This incentive program should be structured to provide a “base” density and a “bonus” density. The base density should be either the same as the previous allowable density for the site, or set at 1.5 FAR if the site was previously zoned industrial. Then, the program should grant a higher “bonus” density for projects that provide a certain level of on-site affordable housing. This required affordable housing set-aside should be determined according to community need, but must meet or exceed the standards set forth in the City’s TOC Affordable Housing Incentive Program.

Require mixed income development.

Requiring that new development projects of a certain size include a percentage of affordable units could increase affordable housing opportunities and promote and sustain mixed-income communities.

Include affordable housing replacement requirements and tenant protection standards on new development.

Require that in order to be eligible for any incentive or development benefit (including any affordable housing incentive program), a project must meet the replacement housing requirements contained in state density bonus law (AB 2222), which requires replacement of all affordable and rent stabilized units—going back five years. To strengthen this commitment, advocate for a first right of refusal for former tenants of any units that are vacated or demolished in the development of any project seeking incentives.

Assess and respond to changes in the affordable housing stock in real time.

Measure JJJ requires new community plans to create an inventory of units within the CPA that are subject to a recorded covenant, ordinance or law that restricts rents to levels

affordable to persons and families of Lower or Low-Income; subject to the City Rent Stabilization Ordinance; and/or occupied by Lower or Very Low-Income households. Strengthen this program by also requiring an annual report on Ellis Act evictions, condo conversions and residential demolitions within the community plan area, and a set of strategies and policies to respond to a loss in affordable units, if recorded. Direct the City to implement this monitoring program immediately.

Encourage 100% affordable housing development.

Include a Transfer of Floor Area Ratio (TFAR) program to support 100% affordable housing projects. As part of an affordable housing incentive program, grant an even higher floor area bonus to 100% affordable housing projects, and then allow participating projects to transfer the rights to unused floor area to receiver sites for a fee, thereby generating additional revenue to support the development of 100% affordable housing. See the Cornfield Arroyo Seco Specific Plan (CASP) for an example of this type of program.

Promote and preserve affordable homeownership opportunities.

Affordable homeownership helps stabilize households and communities, creating an opportunity to build and sustain assets across generations. Include policy language to prioritize the creation of affordable homeownership opportunities and consider additional programs to:

- 1 require for-sale housing developments and condominium conversions to include a percentage of units affordable to Low and Moderate-income households;
- 2 incorporate energy efficiency and renewable technology into low income mortgages to decrease long-term costs of the property for the homeowners; and
- 3 direct foreclosure registry revenues from the community plan area to rehabilitation of homes, including assisting low-income homeowners to fix code violations that they otherwise cannot afford to rectify.

***Visit this page for more information on Cornfield Arroyo Seco Specific Plan**

https://planning.lacity.org/EIR/CornfieldArroyo/CASP_AdoptedOrd.htm



Photo by Masbebet Christianito (via Pixabay)

Minimize the harmful displacement impacts of condominium conversions.

Include policies and programs to limit the number of condo conversions that will take rent stabilized and/or affordable rental units off the market. In addition to policy language to discourage the loss of RSO housing stock, consider policies to:

- A** deny any condo conversion application unless applicant can show that the vacancy rate of the CPA is above five percent; and
- B** place a limit on the total number of conversions that may be approved in any one-year period. Many California cities have implemented annual allowances on condo conversions and, in Los Angeles, the CPA is an appropriate geography in which to implement such a regulation.

Minimize the harmful displacement impacts of residential demolitions.

Given the significant negative impacts of residential demolitions:

- A** place demolition applications on a wait list if vacancy rate in the CPA is five percent or less;
- B** limit the number of demolitions granted in any one-year period; and/or
- C** require new building permits prior to granting any demolition permit to minimize the harmful impacts of vacant lots.

Enhance opportunities for affordable and/or supportive 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 true for affordable transit-oriented development as land speculation increases in areas near planned or existing transit. To address these challenges, include policies and programs that support opportunities and resources for affordable housing acquisition, including but not limited to:

- A** proper implementation and utilization of the state Surplus Land Act;
- B** joint development on publicly-owned land;
- C** a proactive plan to advance land acquisition goals for community land trusts (CLTs) and affordable housing developers, and
- D** the creation of a centralized, accessible database of land transactions.

Streamline affordable housing projects.

Include policy language that will streamline the review and entitlement process for Permanent Supportive Housing and/or projects that dedicate at least 80% of the units as affordable.

Proactive coordination between city departments and tenant rights organizations.

Tenant rights and community-based organizations foster relationships with local renters and are best positioned to support the implementation and enforcement of tenant protections. Include policies and/or programs 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.

Preserve rent-stabilized units.

Include policies to preserve and maintain rental units that are protected by the Rent Stabilization Ordinance and achieve no net-loss of affordable units in the CPA. In addition to including policy language about preservation of RSO units, also prioritize adequate enforcement of RSO protections including a regularly updated registry. 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 CPA.

Create a low-income renters advisory committee.

The Community Plan can create a low-income renters advisory committee (LIRAC) to formalize meaningful community engagement and elevate local community leadership. Charged with monitoring the implementation of community plan policies, a LIRAC should be comprised of low-income resident renters and staffed by the Department. In establishing the LIRAC, the Department should partner with community-based organizations to conduct outreach targeting low-income renters and create education curriculum to increase the capacity of residents to participate in the LIRAC.



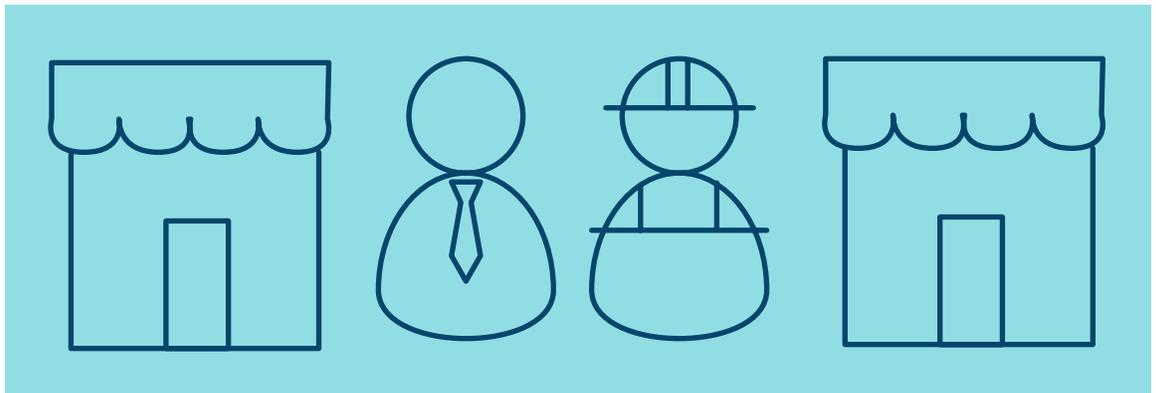
Promote a range of housing options.

Ensure adequate housing units for senior citizens are developed in neighborhoods that are accessible to public transit, commercial services and health facilities, and encourage new multi-family developments to provide amenities for residents such as on-site recreational facilities, community meeting spaces, as well as units with three or more bedrooms that are suitable for larger families.

Preserve public housing development.

Ensure the continued funding of public and subsidized housing projects. Include policies for preserving, improving and increasing both public and subsidized housing options.

**INCLUSIVE ECONOMIC DEVELOPMENT
THAT SUPPORTS LOCAL WORKERS AND
BUSINESSES**



Incentivize new projects to meet the construction employment standards in Measure JJJ.

Structure community plan zoning standards to harmonize the dual benefits of on-site affordable housing and quality employment standards. Specifically, include incentives for projects that meet the construction employment standards contained in Measure JJJ. One option is to allow projects that provide affordable housing and meet Measure JJJ employment standards to choose additional on-menu incentives and concessions under LAMC 12.22.A.25.

Prioritize opportunities for local residents with barriers to employment.

Establish goals and/or requirements for hiring local workers for both the construction and permanent jobs created within the CPA. Specifically prioritize job training and hiring for local residents and 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, emancipated from the foster care system, being a veteran, or being an apprentice with less than 15% of the apprenticeship hours required to graduate to journey level in a program. Consider community worker centers and community organizations that work with disadvantaged populations as partners for these programs.

Encourage living wage jobs.

Couple the local hiring policies with a policy and corresponding program to maintain and increase the availability of living wage jobs for community residents.

Encourage opportunities for small business development.

Include policies and programs aimed at increasing resources and opportunities for local small businesses and low-income entrepreneurs. This could include policies to encourage development of retail space of appropriate size for small businesses, policies to advance street vending opportunities, and innovative lending and financing programs.

Incentivize community-serving commercial uses.

Provide zoning incentives (e.g. allow density increases and parking reductions) to desired commercial uses, such as healthy food retail, federally qualified health centers, childcare, cultural and community centers.

Incentivize reduced rent retail space for community-serving small businesses.

Include a definition of “community-serving small business,” and then provide incentives (e.g. density increases and parking reductions) to development projects that set aside retail space available exclusively to such uses at reduced rent and/or with long-term leases.

Provide educational support.

Provide educational support to existing small business owners and incoming small businesses to understand their rights as commercial tenants and learn business operations in order to keep their businesses running strongly.



Photo by Michael Gaida (via Pixabay)

Leverage local procurement to support local small businesses.

Include programs to provide local community-serving small businesses and social enterprises with priority and/or first opportunity to secure procurement contracts from new development and investment in the CPA.

Preserve community and cultural resources in new commercial development.

Ensure that new development protects and enhances places and features identified within the community as cultural resources. Promote public/private partnerships to create new informational and educational programs, tours, and signage programs that highlight the community's history and architectural legacy, and support efforts to showcase important historic resources and events.

Minimize harmful effects of predatory and undesired businesses.

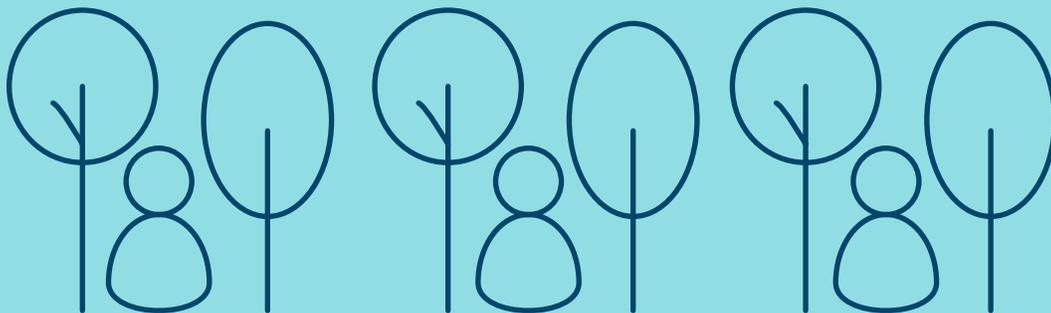
Discourage uses that are harmful or predatory to low-income communities, such as payday lenders and check cashing facilities, bail bonds and an overconcentration of liquor stores and fast food chains. In addition to policy statements discouraging such uses, community plan zoning standards could include prohibitions or siting restrictions.

Designate historic cultural businesses.

Historic Designation may help preserve certain culturally significant institutions and legacy small businesses. This often means that a sign, storefront, or an entire building can be protected from future demolition. Include policies to protect and support tenants who are not owners.



COMMUNITY HEALTH AND ENVIRONMENTAL JUSTICE



Identify and mitigate cumulative health risks to disadvantaged communities.

To address environmental justice, identify disadvantaged communities and those areas suffering from cumulative health impacts. This includes evaluating socioeconomic data, pollution exposure from current and legacy sources, and non-chemical stressors such as access to food and healthcare, for example, by using CalEnviroScreen. This analysis should include how changing conditions (climate or regional development) could exacerbate these conditions. Provide multi-lingual support for community members in assessing cumulative health impacts to ensure all community members are included. Then include policies to prioritize pollution reductions, and improvements and programs in areas facing compounded health risks, and include design standards throughout the community plan area to limit cumulative health impacts.

Include an environmental justice analysis.

Include an environmental justice analysis as part of the community plan environmental review process in order to identify hot spots of pollution and non-chemical stressors within the community plan area. Target abatement efforts to those most impacted areas first.

Plan for climate resiliency of community.

New state policy guidance requires inclusion of climate change in General Plan updates. Emissions reduction strategies adopted via community planning can reduce climate change. Furthermore, community planning and assessments of the community plan should evaluate the projected impact of climate change on the plan area in relation to air quality, water quality, stability of developments, etc. Recommended mitigation measures can be included in the plan to reduce pollution sources and climate change impacts such as increased tree canopy, production and preservation of affordable housing near transit, reduction of heat absorbing surfaces, and reduction of non-permeable ground cover. Assessments of environmental conditions should reflect projections (e.g. increased temperature can increase smog generation) over the lifetime of the plan to ensure projected risks to the community are identified and mitigation plans are in place.

Develop zoning standards to address identified health risks.

Establish overlay districts, such as the Clean Up Green Up district, to supplement conventional zoning districts and establish targeted guidelines for areas where cumulative health impacts are more significant, such as industrial areas or heavily trafficked transportation corridors.

Include an assessment of health impacts in the drafting and approval of new community plans.

Incorporate a Health Impact Assessment (HIA) in the community plan update process in order to understand the impacts of the proposed changes to the community plans and to identify approaches to address community vulnerabilities. HIAs can be resource-intensive, so limit use of HIAs to instances where they will reveal new information that will guide policy. HIAs should lay out specific and actionable steps, but provide flexibility to adapt to local needs. HIAs need not be limited to academic input only but, rather, they can be an important tool to engage community members.

Reduce residential-industrial conflicts.

Include policies that avoid and reduce residential-industrial land use conflicts, while also providing incentives to businesses on industrial parcels to reduce harmful pollution and mitigate the pollution burden on surrounding communities. Impose the use of setbacks, buffers, ventilation systems, and other design standards on industrial parcels that abut residentially zoned land or land on which publicly habitable space exists to minimize pollution burdens on the surrounding community. Include similar measures to minimize pollution in new residential and sensitive land uses near a highway. Create green buffers on publicly owned freeway right-of-ways to reduce the amount of particulate matter in residential areas. Facilitate the introduction of species that will thrive under current and future conditions.

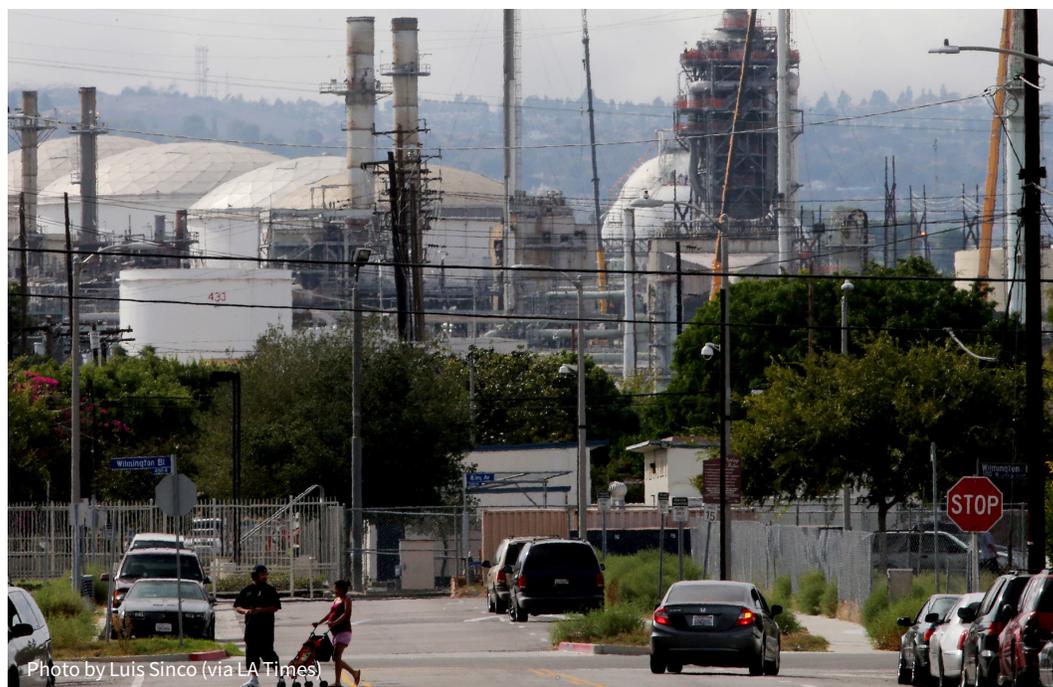


Photo by Luis Sinco (via LA Times)

Promote healthy food retail.

Implement a suite of policies to encourage and/or require healthy food retail, including the following options:

- 1** provide incentives (e.g. increased floor area or parking reductions) for healthy food retail in new commercial developments;
- 2** establish incentives and/or requirements for convenience stores to carry healthy food retail and to accept CalFresh as a form of payment to make food accessible to all;
- 3** provide loan assistance to businesses who wish to offer healthy options but need support doing so;
- 4** provide store re-designs in order to attract more business in community that have new investments coming in—in order to make businesses competitive.

Prohibit certain harmful and unhealthy land uses, as appropriate.

Prohibit certain industrial land uses that are incompatible with human health from being established or expanded near residential and sensitive populations. For example, a community plan could prohibit urban oil extraction uses and techniques, including but not limited to acidization, fracking, and urban oil drilling, as all these practices are harmful to public health.

Reduce and mitigate exposure to harmful air pollutants.

Include policies to limit truck routes to commercial corridors, away from sensitive receptors like schools and residences; restrict truck idling and parking on residential streets to limit toxic diesel emissions; and include strong environmental standards for new construction that limit pollution and require use of the cleanest technology for trucks and equipment.

Improve indoor air quality.

Include specific and enforceable policy language that considers indoor air quality, which is often tied directly to outdoor air quality and can be difficult to mitigate. Measures to mitigate indoor air quality should not be a single-step process; they should include procedures for continuous monitoring and replacement of air filters and include passive techniques that don't cost residents, such as increasing local filtering vegetation (ensuring species will be resilient under changing climate conditions) and improved design of interior air exchange. Filters should be able to address pollution under changing climate conditions such as extreme heat and changing humidity. Consider a program to provide assessments of indoor air quality in high-risk areas, accounting for cumulative health impacts. The program should include a public information campaign about indoor air quality risks and ways to improve indoor air quality. The program should also include a routine monitoring of buildings in high impact areas to ensure regular air filter replacement and continued compliance with other mitigation measures.

Build community leadership to advance healthy homes.

Include a program to develop and support a community-led workforce to inspect buildings identified as slum housing and/or having environmental hazards. [See Promotora Program for an example of a successful community program to advance healthy homes.]

Esperanza Community Housing's Promotora Program:

The Promotora Program, or Community Health Promoter Program, is an effort to build and maintain a comprehensive approach to training community residents as health leaders.

Promotores reach thousands of community residents each year and educate residents about varied health issues, including environmental health, lead poisoning prevention, allergies and asthma, prenatal care and early childhood development, and access to health services. Community health promoters also conduct community-based research, community education, and home visits.

Increase the amount and accessibility of public open/green spaces.

Include policies and programs to commit resources to improving and maintaining open space in the CPAs – consistent 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.

Incentivize the development of open space that is accessible to the public.

Structure zoning standards to provide incentives (e.g., density allowances, parking reductions) for private developments that provide a minimum set-aside of publicly accessible open space, which should include public plazas, pocket parks, passive and active recreation areas that are privately constructed and maintained, and that are accessible for use by the general public, are open at hours comparable to those of City parks and facilities, and have appropriate signage indicating that the space is open to the public. Where possible, work to develop greenways to promote safe, non-motorized transit routes through greenspace corridors.

Remediate contaminated sites for redevelopment and reuse.

Brownfield sites are found disproportionately in low-income communities of color, and their clean-up and development can improve a community’s environment and health and revitalize neighborhoods. Seek to maximize the development of these brownfield sites, following remediation requirements and best practices and full transparency of plans so CBOs and residents can provide oversight to the remediation process. Ensure that site remediation is to a standard that will garner protection of the community under future climate conditions such as changing precipitation patterns and extreme heat.



LIVABLE, PUBLICLY ACCESSIBLE, WALKABLE AND BIKEABLE PUBLIC AREAS



Plan for pedestrian access.

Encourage walking by orienting building entrances to face the streets and sidewalks when designing access to new developments and buildings. A community plan should advance a policy of preserving, enhancing, and expanding existing pedestrian orientation along commercial streets through design standards such as maintaining a uniform street frontage and locating parking areas at rear of lots.

Create pedestrian priority routes.

Selected streets within commercial, transit-oriented, mixed-use, and employment districts should have pedestrian priority, establishing pedestrian needs as paramount to vehicular circulation needs and encouraging investment in pedestrian improvements and programs for these segments.

Align with Vision Zero to eliminate traffic deaths.

Community plans should support and prioritize infrastructure that improves safety for all users and particularly for vulnerable users: children, older adults, and people walking and bicycling. The City of Los Angeles has adopted Vision Zero's goal of eliminating traffic deaths by 2025. Refer to Vision Zero Los Angeles resources, including the High Injury Network identified by the Department of Transportation, to identify key intersections and corridors in the CPA that demand safety enhancements in order to reduce severe and fatal traffic collisions.

Seek to accommodate daily needs within walking distances.

Encourage a variety of uses serving the daily needs of adjacent residential areas within neighborhood districts to encourage walkability of neighborhoods.

Provide pedestrian amenities.

Prioritize the maintenance of sidewalks, streets, and rights-of-way in good condition, free of obstructions, and with adequate lighting, trees and parkways for people of all abilities and ages. Streets should accommodate pedestrians comfortably through sidewalks that are wide enough for kiosks, benches, bus shelters, pedestrian signage, pedestrian-scale lighting, planters, and landscaping that provides shade without obstructing access to people using mobility devices.

****Visit Vision Zero
LA website for more
information:***

<http://visionzero.lacity.org>

Minimize pedestrian conflicts and enhance safety.

Minimize conflicts between buses, vehicles, and pedestrians by encouraging the design and construction of sidewalks and crosswalks that increase pedestrian safety according to national best practices in street design. Create frequent and well-marked crossings at intersections and select mid-block locations, especially within Transit-Oriented Areas and Districts.

Enhance livability in the public realm.

Encourage streetscapes that include street trees, street lighting, street furniture, and public art.

Create safe routes to schools.

Seek data for popular walking and biking routes for school children in the CPA. Prioritize safety improvements and walkability along these routes in particular. Reference the City of Los Angeles' Safe Routes to School Strategic Plan for more information and to ensure street improvements are aligned with safety priorities.

Accommodate transit users through design.

Encourage amenities on streets served by transit to create welcoming conditions for people that use transit, such as wayfinding, benches, trees, shelters, and bicycle lockers. Incorporate bicycle amenities such as parking, lockers, changing rooms, and showers in public facilities, parks, commercial and multi-family residential developments, employment and transit centers, as well as park-and-ride facilities.

Ensure transit services for people of all ages and abilities.

Support transportation programs and services aimed at enhancing the mobility of older adults, disabled persons, youth, mothers and their children and transit-dependent populations.

Create priority bikeways.

Advance a citywide bikeway network to establish bicycle circulation as paramount to vehicular circulation needs on key streets, and to encourage investment in bicycle improvements and programs on these streets. Refer to the City's Mobility Plan 2035 to ensure alignment with planned priority bicycle routes in the City.





Photo by Alexander M. (via Pixabay)

Plan for bikeway connections.

Provide for bicycle access for open space areas, commercial and mixed-use boulevards, transit-oriented community centers, and neighborhood districts in order to allow easy connections between residential neighborhoods and employment centers as well as important non-work destinations.

Ensure regional bikeway coordination.

Call on the City to coordinate with adjacent jurisdictions and communities to require that bicycle infrastructure be coordinated throughout the region.

Utilize reclaimed land for bikeways.

Ensure that bicycle facilities are incorporated into reuse of reclaimed land such as recreational use of remediated lands, reservoirs, public rights-of-way, and access roads.

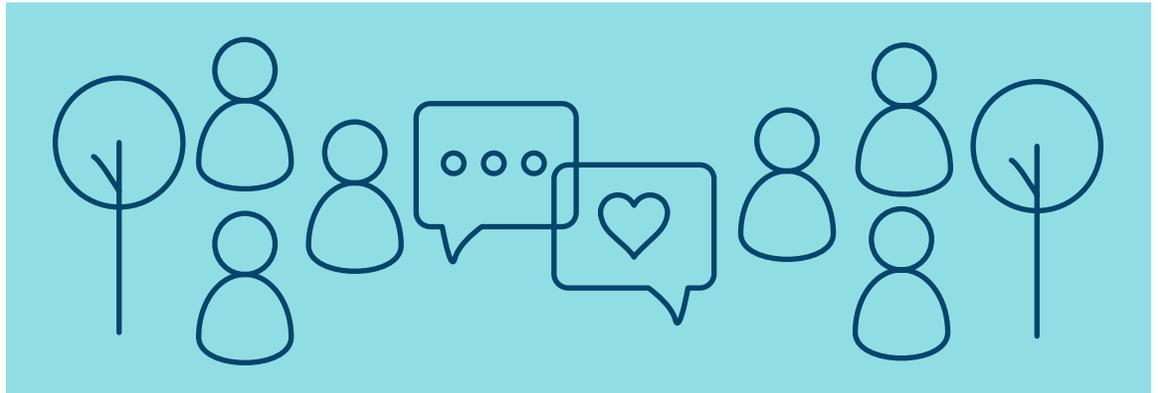
Limit auto-oriented uses.

Restrict certain uses and building forms that detract from an active, pedestrian friendly, walkable district.

Provide complete streets and other multimodal transportation plans.

A multimodal transportation system allows people to use a variety of transportation modes, including walking, biking and other mobility devices (e.g., wheelchairs), as well as transit where possible. Include policies and programs to advance complete streets in the CPA. Complete streets are streets that are designed and operated with all users in mind—including motorists, pedestrians, bicyclists and public transit riders (where applicable) of all ages and abilities—to support a multimodal transportation system. A complete street network is one that safely and conveniently accommodates all users and desired functions, though this does not mean that all modes or functions will be equally prioritized on any given street segment.

COMMUNITY LEADERSHIP AND AUTHENTIC ENGAGEMENT



Enhance language access of all planning documents.

The community planning process should prioritize language access for drafts, plans, outreach and CEQA-related documents. The City should commit to a new standard for full disclosure of its planning documents through the translation into the various languages spoken in the CPA.

Hold community planning meetings at night and/or on the weekends at locations in the community.

The distance between City Hall and some LA neighborhoods is significant. Also, many community leaders and residents hold day jobs that prevent them from attending public hearings during work hours. These issues represent two significant barriers for resident participation in the community plan process. To overcome these barriers, public hearings to consider community plans should 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 should regularly assess 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.

It is often said that Los Angeles is an unplanned city. However, LA's built environment is the result of a long history of city planning and decision-making led by and for wealthy Angelenos and special interests.

LA is transforming from a sprawling, car-centric city to a metropolis of dense, multi-family dwellings with an extensive public transit system. As these transformations take place, we must ensure that the built environment is planned by, and for, all Angelenos

We all want LA to remain an important cultural destination and a desirable place to plant roots, given its diverse cultures and languages, breathtaking landscapes, innovative industries, and talented workforce. Thank you for using this guide and doing the work necessary to ensure that workers and families can stay and thrive in Los Angeles, regardless of income, race or educational attainment, and that future generations will be able to enjoy a city that is replete with parks, community gardens, affordable housing, public transportation and access to quality jobs near their home.



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www.planningforequity.org

Photo by Koreatown Immigrant Workers Alliance