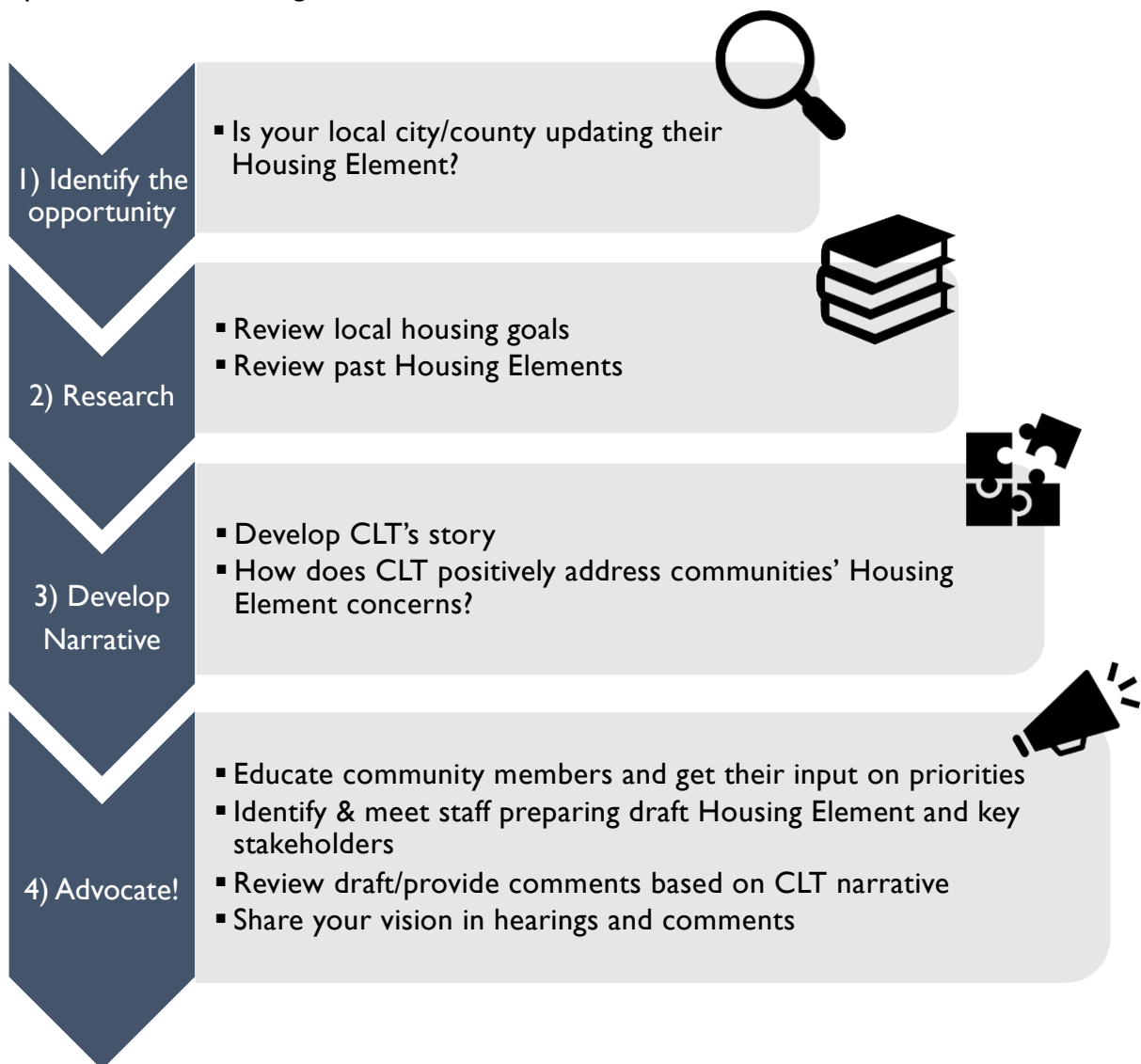


# Housing Element Advocacy

## How to Advocate for CLT's, Community Ownership, and Permanent Affordability



Every city and county in CA is required to update a “Housing Element” every 8 years. The Housing Element identifies the city/county’s housing conditions and needs and establishes the goals, policies, and programs to create housing across the income spectrum. Housing Element updates provide CLTs and their allies with an opportunity to engrain permanent affordability and community ownership in the core guiding document for housing production in their region.





# CACLTN Housing Element Advocacy Guide

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### ***Key terms***

**Regional Housing Needs Allocation (RHNA)**: RHNA is the state’s process for assessing the housing needs of CA cities and counties for 8 year periods. The state provides each region with a RHNA allocation (how much housing they need to build at various income levels) and then the regions allocate those housing needs to their various cities and counties in the RHNA Plan.

**Housing Element**: A plan for meeting RHNA allocations of housing growth that each CA city and county is mandated by law to develop. Housing Elements must be updated every 8 years, by different cities and counties are on different schedules.

- Resources: [Primer on background and the process](#); [“Building Blocks”](#) is a comprehensive guide from the state.



## Guide to Engaging With Your Local Housing Element

### 1) Identify the Opportunity

- Check the deadline for when your city or county must update its Housing element by looking at the “Sixth Housing Element (HE) Revision Due Date” column [here](#) or using the interactive [chart here](#).
  - A typical housing element timeline will look like this
- Find out what opportunities you have to provide guidance or feedback to your county/city’s Housing Element Update by searching the internet for “\_\_\_\_\_ county housing element update”. Typically the local city planning agency will have a page with information about hearings or ways to submit comments. At a minimum they should have an email address for inquiries and an email list for receiving updates.

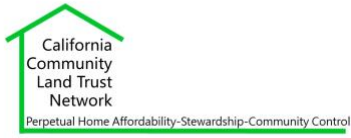
### 2) Research

*Background research will help you advocate effectively*

- Review HCD Regional Housing Needs Allocation (RHNA) goals for your city/county; *Are these the right goals? Have they been met in the past? Have community ownership and permanent affordability been a priority in the past?* Resources:
  - HCD’s [RHNA website and HCD’s Annual Progress Report Site](#)
  - [Report card from Southern CA News Group](#) grading cities and counties on whether they’ve permitted their share of affordable housing
  - [Report card from the Campaign for Fair Housing Elements](#)

### 3) Develop a Narrative

- Develop a narrative identifying the value your CLT brings to the city/county and how the CLT’s work is critical to a) achieving the city/county’s RHNA goals (ie building more affordable housing) and b) creating a more inclusive, racially just area.



#### 4) **Advocate!**

- Educate your membership on the process and get their input on priorities
- Review Housing Element drafts and develop comments and recommendations for areas of particular concern for your org - see “What Parts of the Housing Element Should My CLT Focus On?” below
  - See “Examples of CLT Comments on Local Housing Elements” section below
- Identify & meet staff preparing draft Housing Element and key stakeholders; Let the Housing Element coordinator know that you will be involved in the housing element early on!
- Provide comments in hearings and by writing based on CLT narrative and local priorities



## What Parts of the Housing Element Should My CLT Focus On?

The [general table of contents for Housing Elements](#) has a lot of technical sections to it, some of which may be of interest to your organization and community and some less so. Here are a few sections that every CLT might consider providing comments and recommendations on:

- 1) The **Programs**<sup>1</sup> section is a great place for CLT's to advocate for community ownership and permanent affordability.
  - a) The **Assist in Development of Housing** subsection would be a good spot for a CLT to propose ways in which their local government could support CLT growth, tenant acquisitions of their buildings, preference for permanent affordability, etc.
  - b) In the **Improve and Conserve the Existing Housing Stock** subsection, there is an opportunity to highlight ways in which CLTs can preserve affordable housing and how local gov can channel resources towards community ownership and CLTs: eg. supporting local TOPA initiatives or providing CLTs with acquisition and operating support to acquire market-rate housing
- 2) The **Site Inventory and Analysis** section
  - a) The **Sites Inventory** section asks for specific sites to target for affordable housing construction. Where CLTs are organizing around a specific property/properties, this would be a good place to make sure that property is included in the Housing Element.
  - b) Part 2 of the **Affirmatively Furthering Fair Housing Sites Requirement** asks local gov's to document "place-based strategies that create opportunity in areas of disinvestment" - this is a great spot to talk about the stability and asset building that shared equity homeownership on a CLT provides as well as how CLT rental housing mitigates displacement pressures by shielding housing from market forces.

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<sup>1</sup> Not every city/county uses these exact section titles or organizes their Housing Element according to HCD's template. In those cases, you'll have to decide on what section is most relevant to your input.



- 3) The **Constraints** section would be a good place for CLTs to note the obstacles they face to serving their communities
- 4) The **Housing Need** section, you can make sure that your city/county is painting an accurate picture of the needs of low-income and socially marginalized people in your area.

## Examples of CLT Comments on Local Housing Elements

### **Process: Los Angeles City 2021 Housing Element Update**

Group: ACT LA

ACT LA recommended several types of support for CLTs in their recommendations for the City of LA Housing Element including direct investments, prioritized land dispositions, and support for opportunity to purchase legislation.

Sample text: “Develop strategies to assist community land trusts and affordable housing developers with property acquisition. Coordinate with non-profit developers and community land trusts to take advantage of off-site acquisition options provided under Measure JJJ.”

<http://allianceforcommunitytransit.org/wp-content/uploads/2020/10/ACT-LA-Housing-Element-Letter-10.20.20.pdf>

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### **Process: San Francisco 2022 Housing Element Update**

Group: The Race & Equity in all Planning Coalition

The Race & Equity in all Planning Coalition advocated for the inclusion of housing cooperatives in various strategies to preserve affordable housing.

Sample text: “*Enable tenants, not just non-profits, to be able to purchase these buildings through a limited equity, nonprofit, cooperative model.*”

<https://drive.google.com/file/d/11ZxvjqGVzkzVM9p5ZjUwgPKtGuMX0ze9/view?usp=sharing>

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## **Process: El Dorado County 2021 Housing Element Update**

Group: Saint Joseph Community Land Trust

Saint Joseph Community Land Trust successfully advocated for the inclusion of permanently affordable housing and CLTs.

Sample text: *“The policy or policies shall also consider partnerships with nonprofit housing organizations whose mission it is to expand and preserve permanently affordable rental and ownership housing for low and moderate-income housing such as community land trusts.”*

<https://docs.google.com/document/d/1nXd-4ieUV8AU78zd7Qqs5pv5u0dHIXbOxi68BZ-vNkU/edit?usp=sharing>

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## **Process: Los Angeles City 2021 Housing Element Update**

**Group: LA CLT Coalition**

The LA CLT Coalition advocated for the inclusion of CLTs in the LA Housing Element Update, resulting in the following language in the draft update.

Sample text: *“Explore barriers and consider providing assistance and incentivizing the development of shared-equity ownership models such as Limited Equity Housing Cooperatives (LEHCs), Community Apartments and housing owned by Community Land Trusts (CLTs) or Tenancy in Common (TICs) in the Zoning Code and housing funding processes. Consider policies to require that on-site affordable for-sale units in mixed-income projects be sold to a qualified nonprofit, and/or CLTs or LEHCs. Promote the State property tax exemption for property that is owned by a CLT and that is being—or will be—developed or rehabilitated as rental housing, LEHCs, or owner-occupied housing per Section 214.18 of the Revenue and Taxation Code. Explore securing tax-defaulted properties through Chapter 8 Agreement Sales for Community Land Trusts (CLTs) to create long-term affordable housing. Explore conveying public land / tax foreclosed / receivership properties to CLTs and prioritize CLTs in current acquisition and rehabilitation programs”*

[https://planning.lacity.org/odocument/050221c8-b5cb-48cf-ad61-00ef9c2fa96b/Chapter\\_6\\_-\\_Goals,\\_Policies\\_Objectives\\_and\\_Programs.pdf](https://planning.lacity.org/odocument/050221c8-b5cb-48cf-ad61-00ef9c2fa96b/Chapter_6_-_Goals,_Policies_Objectives_and_Programs.pdf)