

David Morris

It is presumptuous and premature for the staff to place this item on the agenda, and it is presumptuous and premature for the Housing Commission to be discussing this item at this time.

It is only on or after January 1, 2029, that the Council (whoever sits on it then) may decide whether to shut down the airport or not.

There has been a campaign of disinformation by the City Council and City staff to make the public believe that the closure of Santa Monica airport is already certain.

Such disinformation serves the interests of the developers that the current City Council members and City staff are beholden to.

In his recent Santa Monica Mirror article, Bob Taylor writes:

"The Myth of 2028

In 2014, Measure LC amended the city charter, via Section 640, giving the City Council the authority to regulate SMO as an operating airport, or to close the airport—but only after a council vote takes place. That means as few as four of the seven members, i.e., a simple council majority, will make that decision. No public vote. No town hall. No public presentations. Just four people may decide the future of the land. That's not a mandate to close, as they can just as easily decide to continue airport operations – that's discretion. And it matters. Because, with two more voting cycles, you will have an opportunity to say who will be on the council to support your choice.

The Fine Print No One Likes to Read

Following LC, in 2017, the city signed the Consent Decree with the FAA. This was a legally binding agreement, not a feel-good resolution. And it said plainly “...after December 31, 2028, the Parties agree that the City may, in its sole discretion at any time on or after January 1, 2029, cease to operate the Airport as an airport and may close the Airport...”. The City is obligated to operate the Airport through December 31, 2028, AFTER WHICH date the City MAY decide to close the Airport. Note the word “MAY.” Not “will,” not “shall, and certainly not “must.”

Following the 2017 Consent Decree, the then city council issued a ‘resolution’ stating it was their desire to close SMO. A resolution is not a binding law, but rather a wish list by the then city council members, none of whom are still on the council.

Nonetheless, in January 2025, eight years later, the city attorney’s office issued a ‘memo’ that stated the council resolution of 2017, in their interpretation, was the only vote necessary to seal the closure date of midnight Dec 31, 2028.

Source:

<https://smmirror.com/2025/05/sm-a-r-t-column-smo-so-many-options-part-3-pie-in-the-sky/>

It would be wise of the Housing Commissioners to familiarize themselves with the entire article and act accordingly, in the interests of the Santa Monica community rather than the corrupt City Council and staff.

Sincerely,

David Morris

EXTERNAL

RE: June 5, 2025 Housing Commission Meeting - Item 3.a.

Dear Housing Commissioners -

In response to the City's call earlier this year for Letters of Interest (LOIs) for SMAC Project amenities, many community stakeholders submitted LOIs regarding public recreational amenities in the future Great Park.

A copy of an LOI I prepared for a new skate park is attached. **I'm submitting it to you to help underscore how many individuals across our City and region seek more open and recreational space and are willing to work as a partner with the City to find \$\$ to build desired facilities and work as a team to create something great that stands the test of time.**

Skateboarding came to life in Santa Monica and Venice and if you attended the Street League skating event by the Pier a few weeks ago you would have seen how VAST, incredibly diverse, inclusive, and creative the skating community is, including those with disabilities.

Santa Monica is fortunate to have The Cove Skatepark, which anyone who knows (or parents) a skater is so grateful for. But to add a somewhat larger accessible skatepark in the SE corner of the City would be transformational for the entire SoCal skate community because skaters travel around the region skating different parks in search of new challenges. A new skate park would be a relatively low-cost amenity and would not require amendment of Measure LC.

The Santa Monica community understands that our City will continue to densify and add significant housing over the decades to come. There are many opportunities to add housing in other locations throughout our City but there is only one location EVER to build a 192-acre park to serve the needs of both residents now and for many, many generations to come.

Please support an all-public Great Park that can be built over time as funds become available and that will not require a ballot measure to amend the LC City Charter Amendment.🙏

Thank you -

Sincerely,

Ann Bowman

Resident, 28+ years

**Not a skater, but certainly an aficionado**

Dear Chair Gordon and Esteemed Commissioners -

A few thoughts to keep in mind as you receive the SMAC Project presentation tomorrow night -

### THE NEED -

- Santa Monica is a dramatically park-poor City at our **current** population (1.4 acres/1000 residents) in a park-poor region - Mar Vista only has .5 acres/1000; Venice has .9 acres/1000. The recommended minimum is 5 acres/1000 residents.
- Our park acres-to-residents ratio puts us near the very bottom among all California cities.
- Even compared to peer beach cities with large beaches like ours, our park acreage is extremely low.
- Almost **80% of the residents in our City live in multi-family housing** with no on-site yards or green space.
- In its 2022 Park Needs Assessment update, Los Angeles County identified the Southeast corner of Santa Monica as an area of priority for a **large regional park** - see pp. A-187 and A-188 of [https://lacountyparkneeds.org/wp-content/uploads/2023/03/AppA\\_RegionalProfiles\\_Westside\\_Dec2022.pdf](https://lacountyparkneeds.org/wp-content/uploads/2023/03/AppA_RegionalProfiles_Westside_Dec2022.pdf)
- The Great Park project is a 30X30 project - conserving 30% of the land in each of the 50 United States by 2030 - President Biden initiated 30X30; Gov. Newsom endorsed it. The State of Maryland met its 30x30 goal this year and is now working on 40X40- <https://www.nytimes.com/2025/04/21/climate/maryland-30x30-conservation-land.html?searchResultPosition=1>

### THE HOUSING -

- Housing generally and affordable housing particularly is and will continue to be added throughout our City - see 6th Cycle Housing Element and the LUCE.
- As our City densifies and adds population, it's critical to commensurately increase open and recreation space, which we have largely failed to do, despite adding Virginia Avenue, Tongva, and Historic Belmar parks over the last 30 years.
- There is only one location - **ever** - where our town can come together to build a 192-acre, large public park, which once realized will only up our park acres-to-residents ratio (**at current population**) to about 3.5 acres/1000. That ratio would make Santa Monica only a "moderately-parked" City, not even a "well-parked" one by all local, state and national measures.

- The park will bring significant new green and open spaces, increase sports & recreational opportunities, enhance the existing arts and cultural opportunities, honor the history of the site, support sustainability practices including water recapture and recharge, restore habitat, and enhance regional biodiversity.
- The Trust for Public Land recently stated: "Over the past 5 years, the Los Angeles [area has fallen]...to the bottom [in a national ranking of park systems in the 100 most populous cities]. ***The precipitous decline can be traced back to a century of leadership that failed to prioritize adequate or equitable park investments.***"

#### THE REVENUE -

- Parks bring significant economic benefits and "park effect" revenue, including increased property tax revenues and park-adjacent new businesses and new housing.
- The estimated total for the "wealth-increasing" annual effects of San Francisco's parks system is \$500,000,000 per the Center for City Park Excellence, The Trust for Public Land, April 2014
- The High Line Park "has brought in an additional **900 million dollars in tax revenue** for the city of New York and generated roughly **2 billion dollars in new economic activity** throughout the "High Line district" of the city."  
<https://rhetorikos.blog.fordham.edu/?p=1313>
- Central Park is estimated to bring in \$1 BILLION annually to NYC in economic activity, increased market value of nearby properties, and revenue. This includes revenue from tourism, real estate, and other tax sources. The "Central Park Effect" likely leads to more than 11,000 jobs, including 4,000 from economic activity and 7,200 from real estate. [https://assets.centralparknyc.org/pdfs/about/The\\_Central\\_Park\\_Effect.pdf](https://assets.centralparknyc.org/pdfs/about/The_Central_Park_Effect.pdf)

#### THE REALITY -

- Santa Monica (like other CA coastal cities) now finds itself in the same position as New York City was 170 years ago when City leaders built Central Park - effectively an island (just like Manhattan is) where people clamor to live because of growing unfavorable conditions elsewhere in California - higher average temperatures, extreme weather, elevated fire risk, and water scarcity.
- The densification here will continue for generations making it critical to plan NOW for sufficient open and park space while we have a ***once-ever chance to do it***. We need to build Santa Monica's Great Park and then our city will grow up around it for the next 100, 200+ years just like Manhattan did around Central Park over many generations.
- Central Park opened in 1858. Manhattan was low-rise back then just like Santa Monica

is now. The Empire State Building did not even open until 1931. **Here's a video documenting Manhattan's densification from the 1850s until present day. This is looking southeast from Central Park - <https://www.youtube.com/watch?v=NULrNgCVbT8>**

**Let's build this 192-acre Great Park**

Thank you - Ann Bowman

Recreation and Parks Commissioner

We can be **this** in 100 years (no large park or green space) -



Or we can be **this** -





**From:** [Gail Gordon](#)  
**To:** [Rene Ortega](#)  
**Subject:** Fw: June 5, 2025 Housing Commission Meeting - Item 3.a.  
**Date:** Thursday, June 5, 2025 9:46:41 AM

---

Maybe this one too?

Thanks

Gail

---

**From:** Cathy Larson <fospairport@rocketmail.com>  
**Sent:** Thursday, June 5, 2025 9:34:53 AM  
**To:** Dominic Gomez <Dominic.Gomez@santamonica.gov>; Deborah Lynch <Deborah.Lynch@santamonica.gov>; Theresa Marasco <Theresa.Marasco@santamonica.gov>; Michelle Gray <Michelle.Gray@santamonica.gov>; peter.borresen@santamonica.gov <peter.borresen@santamonica.gov>; Gail Gordon <Gail.Gordon@santamonica.gov>; Analise Wells <Analise.Wells@santamonica.gov>; SmHousing Mailbox <SmHousing.Mailbox@santamonica.gov>  
**Subject:** June 5, 2025 Housing Commission Meeting - Item 3.a.

EXTERNAL

Commissioners,

Residents in Santa Monica are well aware of the need for affordable housing in our City.

The challenge before us as we face decisions on the future of the Airport property is finding a balance between housing needs and park, recreation, and open space needs.

Our City is at the bottom of the barrel in park space per 1000 residents (1.4 acres of parkland per 1000 residents.)

[https://greatparkcoalition.org/wp-content/uploads/2025/03/LA-County-Park-Needs-StudyArea\\_182.pdf](https://greatparkcoalition.org/wp-content/uploads/2025/03/LA-County-Park-Needs-StudyArea_182.pdf)

As our City densifies, the need for parkland to service the physical and mental well-being of our community will only increase.

Although there are many locations in the City that housing can be built, especially along existing transit corridors, there is only ONE parcel large enough to create a GREAT PARK with amenities only a Great Park can service: playing fields, walking/biking trails, wildlife refuge, etc.

Please support LC compliant uses for our future Great Park and continue to be a strong voice in advocating for housing in-fill in transit preferred locations.



Cathy Larson

Airport 2 Park Board

FOSP Board

Great Park Coalition Advisory Committee

**From:** [nancy hall](#)  
**To:** [Housing and Human Services Department](#)  
**Subject:** Housing Commission item 4A – airport  
**Date:** Thursday, June 5, 2025 3:01:53 AM

EXTERNAL

#### Housing Commission item 4A – airport

Why is staff placing an item regarding the Airport Conversion Project on the Housing Commission's agenda if the decision whether to shut down the airport or not may not be legally made before January 1, 2029, by whoever will be sitting on the Santa Monica City Council then?

Why is the Housing Commission's time wasted on discussing potential outcomes of a matter that has not been decided on yet?

Below is an excerpt from a recent Santa Monica Mirror op-ed:

"The Myth of 2028

In 2014, Measure LC amended the city charter, via Section 640, giving the City Council the authority to regulate SMO as an operating airport, or to close the airport—but only after a council vote takes place. That means as few as four of the seven members, i.e., a simple council majority, will make that decision. No public vote. No town hall. No public presentations. Just four people may decide the future of the land. That's not a mandate to close, as they can just as easily decide to continue airport operations – that's discretion. And it matters. Because, with two more voting cycles, you will have an opportunity to say who will be on the council to support your choice.

The Fine Print No One Likes to Read

Following LC, in 2017, the city signed the Consent Decree with the FAA. This was a legally binding agreement, not a feel-good resolution. And it said plainly "...after December 31, 2028, the Parties agree that the City may, in its sole discretion at any time on or after January 1, 2029, cease to operate the Airport as an airport and may close the Airport...". The City is obligated to operate the Airport through December 31, 2028, AFTER WHICH date the City MAY decide to close the Airport. Note the word "MAY." Not "will," not "shall, and certainly not "must."

Following the 2017 Consent Decree, the then city council issued a 'resolution' stating it was their desire to close SMO. A resolution is not a binding law, but rather a wish list by the then city council members, none of whom are still on the council.

Nonetheless, in January 2025, eight years later, the city attorney's office issued a 'memo' that stated the council resolution of 2017, in their interpretation, was the only vote necessary to seal the closure date of midnight Dec 31, 2028.

Full article: [https://smmirror.com/2025/05/sm-a-r-t-column-smo-so-many-options-part-3-pie-in-the-sky/?fbclid=IwY2xjawKtfttleHRuA2FibQlxMAABHvEjhg9\\_GyhHWzY3Jdq5qTcJhhx6pWibxFXmn56nV26lZUiEt4KpwQCWLosJ\\_aem\\_NHiidT1QW35-hNvo6TIKsq](https://smmirror.com/2025/05/sm-a-r-t-column-smo-so-many-options-part-3-pie-in-the-sky/?fbclid=IwY2xjawKtfttleHRuA2FibQlxMAABHvEjhg9_GyhHWzY3Jdq5qTcJhhx6pWibxFXmn56nV26lZUiEt4KpwQCWLosJ_aem_NHiidT1QW35-hNvo6TIKsq)

**From:** [Cris Gutierrez](#)  
**To:** [Gail Gordon](#); [Dominic Gomez](#); [Deborah Lynch](#); [Theresa Marasco](#); [Michelle Gray](#); [Peter Borresen](#); [Analise Wells](#); Housing and Human Services Department  
**Subject:** Housing Commission 6/5/25 Meeting: Agenda Item 3-A, SMAC Scenarios Study Session  
**Date:** Thursday, June 5, 2025 11:08:33 AM

EXTERNAL

Dear Chair Gordon and Housing Commissioners:

As a native Santa Monican, who has for decades helped organize the community to understand and support the City of Santa Monica in exercising its sustainability leadership, I serve with Dean Kubani, former Santa Monica Chief Sustainability Officer, as the co-chair of the Great Park Coalition's Regenerative Sustainability Working Group. As Commissioners your advice for the next 150 - 200 years of planning Santa Monica's housing requires a meaningful balance of land use for edifices *and ecosystems*.

As you listen to the SMAC presentation this evening, you will be considering what will unfold on the **last, large natural ecosystem that is our public land** in Santa Monica. Any potential public land use impacts us and the Westside of Los Angeles and the region. We need to have a positive impact. We have but **one chance** to have a large, regenerative great park for current and future generations to enjoy ecological restoration, recreation, arts and culture, and vibrant relationships with Nature and neighbors. A large, regenerative great park can maximize benefits for habitat and human health and wellbeing, while stimulating the economy.

The truth is that housing, both affordable and general, is inevitably going to be built throughout the city. The great park is as essential to achieving a healthy, livable, inclusive, equitable, desirable city as is building housing itself. Providing green, regenerative spaces for all people is critical to environmental justice. Large parks provide equitable access and greater opportunities for recreation and increased social services, education and economic benefits. Our quality of life in Santa Monica requires a large, regenerative great park to complement the growing density of housing.

In fact, the potential "park effect" revenue for Santa Monica, based on demonstrable economic growth that large parks offer other cities in the nation, is key and needs to be factored into your examination of the three frameworks offered tonight. Elements of each framework are expected to be weighed and selected and reframed in a scenario that genuinely reflects the community input contributed over the last year. Over and over again, the community has preferred a great park over housing.

Data from the latest survey indicate a plurality or majority of people stressing, "no housing" at the great park. (See attached slide.)

- Question 32 regarding preference: 47% of respondents ask to "include no housing on site."
- Question 33 regarding housing types: 53% of respondents state, "I do not support housing on the site."
- Question 34 regarding housing products: 53% of respondents say they "do not support housing on the site."
- Question 35 regarding a Housing Element option: 51% of respondents state, "None of these because I do not support housing on the site in the future."

When it comes to revenue generation, housing or traditional businesses are not the sole means. The open space ecology and amenities of a great park itself can definitely generate revenue. The "park effect" includes increased property tax revenues and park-adjacent new businesses and new housing. Nature also saves us money with its innumerable services, including water reclamation and biomimicry features. A few examples of typical "park effect" revenues that bear repeating include:

- The estimated total for the "wealth-increasing" annual effects of San Francisco's parks system is \$500,000,000 per the Center for City Park Excellence, The Trust for Public Land, April 2014.
- New York City's High Line Park "has brought in an additional **900 million dollars in tax revenue** for the city of New York and generated roughly **2 billion dollars in new economic activity** throughout the "High Line district" of the city." <https://rhetorikos.blog.fordham.edu/?p=1313>
- Central Park is estimated to bring in \$1 BILLION annually to NYC in economic activity, increased market value of nearby properties, and revenue. This includes revenue from tourism, real estate, and other tax sources. The "Central Park Effect" likely leads to more than 11,000 jobs, including 4,000 from economic activity and 7,200 from real estate. [https://assets.centralparknyc.org/pdfs/about/The\\_Central\\_Park\\_Effect.pdf](https://assets.centralparknyc.org/pdfs/about/The_Central_Park_Effect.pdf)

Why should Santa Monica anticipate less? ***We cannot afford to foreclose on our future.***

According to the Trust for Public Land's most recent annual assessment, "Over the past 5 years, the Los Angeles [area has fallen]...to the bottom [in a national ranking of park systems in the 100 most populous cities]. ***The precipitous decline can be traced back to a century of leadership that failed to prioritize adequate or equitable park investments.***" Our great park can enrich Santa Monica's vitality. What is more is that Santa Monica's great park may add to the open space commonwealth promised with California's 30 x 30 initiative.

Santa Monica has long been recognized for its Rights of Nature/Sustainability Rights Ordinance (SRO). It is a fundamental law and core to our city's identity and existence, codified in Article 12 of our Municipal Code. Following the SRO and guided by the Precautionary Principle, Santa Monica has enacted strong, bold and urgent measures to confront the climate crisis. To progress and reach our Climate Action and Adaptation Plan's ambitious goals, we need to remain steadily on our path. We cannot afford any kind of denial. As climate conditions worsen, people throughout Los Angeles will seek respite in cooler places including Santa Monica, which a large, regenerative great park can enhance.

Our working group understands that "Large, contiguous great parks will offer greater benefits for biodiversity, heat island reduction, ecosystem function, and human well-being. Large Great Parks provide larger, uninterrupted habitats that support more species, allow for natural processes like seed dispersal and wildlife movement, and provide ecosystem services, including carbon sequestration and water harvesting/reclamation, as well as cleaning the air and water and mitigating and reducing the impact of climate change. (Those services also save money and could be the basis of creative revenue streams in a circular economy.) By contrast, small, fragmented parks can lead to increased edge effects offsetting benefits, reducing connectivity, and increasing potential loss of biodiversity."

Now is the time to secure our future. Imagine how together in Santa Monica, with a plethora of local, regional and state partners, we could create a Great Park Land Trust. Here's a radical thought: Let's consider a bond for parks **and** affordable housing but not on our public land at the airport site. I want our workers to be close to their jobs in Santa Monica. Housing would privatize our public land all over again. How unjust, ironically, that would be. Let us reclaim our public land and bring it alive as a full regenerative great park and provide affordable housing elsewhere throughout the city.

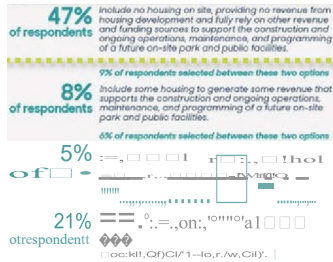
Time is our asset; we can unfold the great park in stages. The first 0 - 5 years, where we are now, involve us in closing the airport and laying the groundwork for planning, for exploring and cultivating potential funding, and for getting ready to open a basic, wide-open space and then do so on January 1, 2029 for all to enjoy.

Thank you.

With respect,  
Cris Gutierrez  
Great Park Coalition - Regenerative Sustainability Working Group, Co-Chair

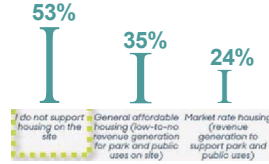
**Question 32** (1760 out of 4984 answered)

Using the spectrum below, please indicate your preference for including housing on the future site, assuming any future plan for the site is centered on a great park.



**Question 33** (1974 out of 4984 answered)

Which of the following housing types do you support for inclusion on the site?



**Question 34** (1981 out of 4984 answered)

Which of the following housing products do you support for inclusion on the site?



**Question 35** (1969 out of 4984 answered)

If there was housing on-site, which of the following housing types identified in the City's Housing Element do you support, assuming inclusion of these no-to-low revenue generating housing models are balanced with revenue generating housing types on site?

51% of respondents support

24% of respondents support a moderately-sized land area dedicated to housing with a mix of building heights, ranging from mid-rise multifamily buildings to high-rise multifamily buildings.

21% of respondents support smaller land area dedicated to housing with taller buildings (e.g. high-rise multifamily buildings)

21% of respondents support a significant land area dedicated to housing (but less than half the site area) with a mix of building heights, ranging from low-rise townhouses to mid-scale multifamily buildings.

**From:** Alyssa G  
**To:** Housing and Human Services Department  
**Subject:** Housing commission Item 4A - Airport - DO NOT CLOSE  
**Date:** Thursday, June 5, 2025 11:05:16 AM

EXTERNAL

Why is staff placing an item regarding the Airport Conversion Project on the Housing Commission's agenda if the decision whether to shut down the airport or not may not be legally made before January 1, 2029, by whoever will be sitting on the Santa Monica City Council then?

Why is the Housing Commission's time wasted on discussing potential outcomes of a matter that has not been decided on yet?

Below is an excerpt from a recent Santa Monica Mirror op-ed:

"The Myth of 2028

In 2014, Measure LC amended the city charter, via Section 640, giving the City Council the authority to regulate SMO as an operating airport, or to close the airport—but only after a council vote takes place. That means as few as four of the seven members, i.e., a simple council majority, will make that decision. No public vote. No town hall. No public presentations. Just four people may decide the future of the land. That's not a mandate to close, as they can just as easily decide to continue airport operations – that's discretion. And it matters. Because, with two more voting cycles, you will have an opportunity to say who will be on the council to support your choice.

The Fine Print No One Likes to Read

Following LC, in 2017, the city signed the Consent Decree with the FAA. This was a legally binding agreement, not a feel-good resolution. And it said plainly "...after December 31, 2028, the Parties agree that the City may, in its sole discretion at any time on or after January 1, 2029, cease to operate the Airport as an airport and may close the Airport...". The City is obligated to operate the Airport through December 31, 2028, AFTER WHICH date the City MAY decide to close the Airport. Note the word "MAY." Not "will," not "shall, and certainly not "must."

Following the 2017 Consent Decree, the then city council issued a 'resolution' stating it was their desire to close SMO. A resolution is not a binding law, but rather a wish list by the then city council members, none of whom are still on the council.

Nonetheless, in January 2025, eight years later, the city attorney's office issued a 'memo' that stated the council resolution of 2017, in their interpretation, was the only vote necessary to seal the closure date of midnight Dec 31, 2028.

Full article: [https://smmirror.com/2025/05/sm-a-r-t-column-smo-so-many-options-part-3-pie-in-the-sky/?fbclid=IwY2xjawKftlleHRuA2FibQIxMAABHvEjhg9\\_GyhHWzY3Jdq5qTcJhhx6pWibxFXmn56nV26lZUIEt4KpwQCWLosJ\\_aem\\_NHlidT1QW35-hNvo6TIKsg](https://smmirror.com/2025/05/sm-a-r-t-column-smo-so-many-options-part-3-pie-in-the-sky/?fbclid=IwY2xjawKftlleHRuA2FibQIxMAABHvEjhg9_GyhHWzY3Jdq5qTcJhhx6pWibxFXmn56nV26lZUIEt4KpwQCWLosJ_aem_NHlidT1QW35-hNvo6TIKsg)

**From:** [Elaine Golden-Gealer](#)  
**To:** [Housing and Human Services Department](#)  
**Cc:** [Elaine Golden-Gealer](#)  
**Subject:** Housing Commission item 4A – airport  
**Date:** Thursday, June 5, 2025 11:20:37 AM  
**Importance:** High

---

EXTERNAL

Just four people may decide the future of the land. That's not a mandate to close, as they can just as easily decide to continue airport operations – that's discretion. And it matters. Because, with two more voting cycles, you will have an opportunity to say who will be on the council to support your choice.

KEEP THE AIRPORT OPEN

**From:** [Houman Hemmati](#)  
**To:** [Housing and Human Services Department](#)  
**Cc:** [Elaine Polachek](#); [Lana Negrete](#); [Jesse Zwick](#); [Caroline Torosis](#)  
**Subject:** Housing Commission Item 4A - Airport  
**Date:** Thursday, June 5, 2025 12:02:58 PM

---

EXTERNAL

Santa Monica Housing Commission,

You've got some nerve. Slipping an "Airport Conversion Project" onto your agenda as if the fate of Santa Monica Municipal Airport (SMO) is already sealed for 2028? This isn't just a boneheaded mistake—it's a reckless, potentially illegal power grab that spits in the face of every Santa Monican who values our city's assets and our right to a fair process. You're not fooling anyone, and you're about to learn just how badly you've miscalculated.

Let's get the facts straight, because clearly you haven't. Measure LC, passed in 2014, gives the City Council—not you, not staff, not some unelected bureaucrat—the sole authority to decide SMO's future. That decision requires a vote by four council members, and guess what? It hasn't happened. The 2017 Consent Decree with the FAA is crystal clear: the City must operate SMO through December 31, 2028, and only after January 1, 2029, may it even consider closure. The word is "may," not "will," not "must." So why are you wasting taxpayer time and money debating a done deal that doesn't exist? Are you deliberately trying to undermine the law, or are you just that clueless?

That 2017 council resolution you're hiding behind? It's a worthless piece of paper—a wish list from a long-gone council with zero binding power. And don't get me started on the city attorney's 2025 memo claiming that resolution locks in closure. It's a legal fairy tale, and you know it. Or you should. By pushing this agenda item, you're not just jumping the gun—you're stomping on the democratic process and the will of this community. You're acting like the City Council's discretion, the law, and two upcoming election cycles don't matter. That's not just arrogant; it's dangerous.

Here's the deal: SMO isn't your personal playground. It's a vital piece of Santa Monica's identity, economy, and safety net, and we're watching you like hawks. That would include newly appointed U.S. Attorney for Southern California, Bill Essayli, who has assembled a public corruption task force alongside members of HUD and FBI. I know this for FACT.

Residents, pilots, business owners, and taxpayers are done with your bureaucratic games. You push this illegal charade forward, and you'll face a firestorm—public outrage, legal challenges that will bankrupt the city further and delay any work on the airport for decades, and a community that won't forget your betrayal. You're not the City Council. You don't get to decide SMO's fate. So why are you acting like you do?

Pull this item off your agenda. Now. Respect the law, the process, and the people of Santa Monica. Anything less, and you're begging for a reckoning that'll hit harder than you can imagine. We're not asking—we're demanding. And we're not going away.

Yours truly,  
Houman David Hemmati, MD, PhD



Santa Monica Resident, Physician, and Advocate

**From:** [Mathew Millen](#)  
**To:** [Housing and Human Services Department](#)  
**Subject:** June 5th item 13b.  
**Date:** Tuesday, June 3, 2025 4:17:04 PM  
**Attachments:** [METRO5.pdf](#)  
[3MJune14.pdf](#)  
[5G.pdf](#)

---

EXTERNAL

In 1988 the Santa Monica Unified Schools determined the schools serving the Pico Neighborhood were segregated.. The District report states: "Historic housing patterns probably preclude any immediate solutions, for desegregating the District." the reference to Historic Housing Patterns refers to the fact the lots south of Pico Blvd and North of Santa Monica Blvd had "restrictive covenant" Whites only. Because of the restrictive covenants the minorities were segregated in the Pico Neighborhood. Once SMRR took control of the City their Council members dumped low income housing in the Pico Neighborhood which as the State Housing Department found "perpetuated segregation" LA METRO at 17<sup>th</sup> and Colorado and Bergamot are BOTH in the Pico Neighborhood. Building low income housing in the red lined historically segregated Pico Neighborhood violates Federal Fair Housing laws.

The schools serving the Pico Neighborhood are still segregated and the 2 Montana Ave elementary schools are still predominately white....

it is time to end SMRR's policy of housing segregation. The Housing Commission should pass a resolution condemning these two projects and calling on METRO and the City to cancel them. IF said resolution is passed please send a copy to LA METRO

The City could sell Bergamot and buy the Gelson's property and build low income housing there. METRO will hopefully acknowledge building low income housing in an industrial zone adjacent to a cement plant is environmental racism and cancel their project.

METRO could sell their lots and let a developer build condos. ... but who would buy a condo in an industrial zone and live next to a cement plant?

PLEASE INCLUDE THE ATTACHMENTS AS PART OF THE RECORD FOR THIS COMMISSION HEARING

Mathew Millen,  
Pico Neighborhood Resident



Mathew L. Millen, The attached is :

Public Comment for Item Not on the Agenda, 5 December 2024

## **STOP ENVIRONMENTAL RACISM STOP SEGREGATED HOUSING IN THE Red Lined PICO NEIGHBORHOOD**

**THIS PHOTOGRAPH WAS TAKEN STANDING IN THE EMPTY LOT  
WHERE METRO WANTS TO BUILD 375 UNITS OF LOW INCOME  
HOUSING AT 17TH AND COLORADO IN SANTA MONICA  
THE PROJECT IS ADJACENT TO THIS CEMENT PLANT**

**THIS WILL BE THE VIEW FROM THE TENANTS  
LIVING ROOM**

**BUILDING LOW INCOME HOUSING IN THE Red Lined  
HISTORICALLY SEGREGATED PICO NEIGHBORHOOD VIOLATES  
FAIR HOUSING LAWS, & Gov.Code§8899.50 Affirmatively  
Furthering Fair Housing *AND IS A SIGNIFICANT HEALTH  
HAZARD TO THE TENANTS***

# t GOALO

A community that provides equitable housing access to all neighborhoods.

The City of Santa Monica is generally more homogenous than the County as a whole. The majority of the City's residential population is White, followed by Hispanics and Asians, respectively. Blacks represent 4% of the population. One of the likely barriers to living in the City for non-Whites is the high cost of housing. Hispanics and Black households have the lowest median income in the City and County as a whole, and as a result, are often priced out of housing opportunities in the City.

For those households of color that can afford to live in Santa Monica, many of them are concentrated in neighborhood pockets of the City along the 1-10 Freeway, and within the Pico, Downtown and Mid-City neighborhoods.

These patterns of segregation are largely the result of decades of structural racism deeply rooted in Federal, State, and local housing policies. This includes the adoption of exclusionary zoning, which was used primarily as a way to economically separate the wealthier Whites from Blacks/African Americans and other people of color. Since many Blacks/African Americans could not afford or were unable to receive mortgages to purchase homes, they were effectively driven out of single-family zoned neighborhoods. The federal policy of "redlining" that arose during the New Deal era (1930s) also have contributed to the patterns of segregated neighborhoods. This discriminatory practice of determining who could qualify for home mortgages based on skin color led to widespread segregated communities across the country and prevented Blacks/African Americans from buying homes. In Santa Monica, areas that were redlined included the Pico Neighborhood, portions of the Mid-City neighborhood south of Santa Monica Boulevard, and Ocean Park. The pattern of redlined areas directly correlate with the areas where the non-White population and lower income households and renter households are concentrated.

## Redlining

The term "redlining" refers to the discriminatory policy instituted by the federal government to create color-coded maps of every metropolitan area in the country to indicate where it was safe to insure mortgage. These maps were based on racial composition, quality of housing stock, access to amenities, etc. and were color coded to identify best (green "A" grade), still desirable (blue "B" grade), definitely declining (yellow "C" grade), and hazardous (red "D" grade) neighborhoods. Areas of the City that were predominantly commercial/industrial were not color coded.





Home <<https://epa.gov/>> / Enforcement <<https://epa.gov/enforcement>>

# Health and Environmental Effects of Cement Plant Emissions

Cement plants are a significant source of sulfur dioxide, nitrogen oxide and carbon monoxide, which are associated with the following health and environmental impacts:

---

- Nitrogen oxide (NO<sub>x</sub>) can cause or contribute to a variety of health problems and adverse environmental impacts, such as ground-level ozone, acid rain, global warming, water quality deterioration, and visual impairment. Affected populations include children, people with lung diseases such as asthma, and exposure to these conditions can cause damage to lung tissue for people who work or exercise outside.
- Sulfur dioxide (SO<sub>2</sub>) in high concentrations can affect breathing and may aggravate existing respiratory and cardiovascular disease. Sensitive populations include asthmatics, individuals with bronchitis or emphysema, children, and the elderly. SO<sub>2</sub> is also a primary contributor to acid deposition, or acid rain.
- Carbon monoxide (CO) can cause harmful health effects by reducing oxygen delivery to the body's organs and tissues, as well as adverse effects on the cardiovascular and central nervous systems. CO also contributes to the formation of smog (ground-level ozone), which can cause respiratory problems.

**Mathew L. Millen**  
**Attorney at Law**  
**10880 Wilshire Blvd. Suite 1050**  
**Los Angeles, CA 90024**  
**(310)470-8071**

December 2, 2024

## **5 December Board Meeting**

### **PUBLIC COMMENTS FOR ITEM NOT ON THE AGENDA**

Sent via email to: BoardClerk@Metro.net

SAY NO TO THE FOLLOWERS OF GEORGE WALLACE: REJECT THE STAFF PROPOSAL TO BUILD 375 UNITS OF LOW INCOME HOUSING AT 17TH AND COLORADO IN SANTA MONICA.

STOP ENVIRONMENTAL RACISM BUILDING HOUSING ADJACENT TO A CEMENT PLANT WILL BE UNSAFE FOR THE RESIDENTS

"We know that it's not by coincidence that poor people are relegated to the Pico neighborhood" de laTorre said. "We know that it was by design<sup>1</sup>. *Segregation is a root cause of the dilemma we face today"* [FORMER]School Board Member Oscar De La Torre quoted in [www.Surfsantamonica.com](http://www.Surfsantamonica.com) December 2004

DUMPING MORE LOW INCOME HOUSING IN RED LINED PICO NEIGHBORHOOD VIOLATES FAIR HOUSING LAWS

**THE CITY OF SANTA MONICA HAS BEEN ENGAGED IN A "GEORGE WALLACE" POLICY OF HOUSING SEGREGATION**

---

<sup>1</sup> The "design" Mr. De La Torre is referring to is the saturation of the Pico Neighborhood with city developed low income housing projects after the restrictive covenants were declared unconstitutional by the US Sup. Court



THE CONTINUED DEVELOPMENT OF MORE LOW INCOME RENTAL HOUSING IN THE PICO NEIGHBORHOOD VIOLATES *BROWN vs. THE BOARD OF EDUCATION OF TOPEKA KANSAS* 347 U.S. 483 (1954)

## **Santa Monica's History of Segregation**

During the 1920's to the late 1940's the house lots North of Santa Monica Blvd and South of Pico Blvd had "restrictive covenants" that prohibited Blacks, Latinos and Asians from living in those neighborhoods. The minorities were restricted to living in what is called The Pico Neighborhood.<sup>2</sup> The US Supreme Court declared the restrictive covenants unconstitutional.<sup>3</sup> However, according to a 1988 SMMUSD study more than 30 years after *Brown v The Bd of Education of Topeka Kansas* the schools serving the Pico Neighborhood were segregated. The study noted "**Historic housing patterns**"<sup>4</sup> probably preclude any immediate solutions for desegregating the District." Over 50 years after *Brown v. The Board of Education of Topeka Kansas* ruled segregated schools unconstitutional the children residing in the Pico Neighborhood still attend segregated elementary and middle schools due to City site selection of low income housing projects.

The City of Santa Monica intentionally segregates the minority residents primarily in the historically segregated neighborhood with segregated schools via their site selection of low income housing development concentrated in the historically segregated Pico Neighborhood (zip code 90404).

## **THE CITY OF SANTA MONICA ADOPTED A "GEORGE WALLACE" POLICY OF HOUSING SEGREGATION THROUGH THE SITE SELCTION PROCESS WHEN DEVELOPING LOW INCOME HOUSING PROJECTS**

Specifically the City of SM has a history of restricting funding for low income housing projects in the minority Pico Neighborhood. This was accomplished through development agreements with commercial developers<sup>5</sup> that

---

<sup>2</sup> East of Lincoln Blvd between Pico on the South and Santa Monica Blvd on the North.

<sup>3</sup> *Shelley v. Kraemer*, 334 U.S. 1 (**1948**), is a landmark United States Supreme Court case that struck down racially restrictive housing covenants.

<sup>4</sup> The "historic housing patterns" refers to the segregated housing as a consequence of the "restrictive covenants" South of Pico Blvd and North of Santa Monica Blvd. that limited residence in those neighborhoods to "whites only", the minorities were allowed to reside in the Pico Neighborhood.

<sup>5</sup> The developers of Colorado Place were required to develop low income housing in the Pico Neighborhood.



required the development of low income housing in the minority Pico Neighborhood, rather than in the white areas of town.

The City also created the Pico Neighborhood Housing Trust Fund. [PNHTF] The terms of the fund limited the development of low income housing with money from the fund geographically to the Pico Neighborhood. The City Council members, none of whom lived in the Pico Neighborhood then through the budget process allocated money to the PNHTF. This of course prevented the development of low income housing in their white neighborhoods. Trust funds were not established to develop low income housing in the white neighborhoods.

**The neighborhood with the greatest number of multifamily low income units is the historically segregated Pico Neighborhood.**

In *Pico Neighborhood Assn. v City of LA*, Case no BC 616804 a civil rights voting lawsuit by Pico Neighborhood residents, the plaintiffs discovered a tape of [former] Councilmember Zane, at a **July 1992** City Council hearing where he stated that "**the Pico Neighborhood has a DISPROPORTIONATE share of affordable housing.**" The council voted against district elections. The City continued *dumping* [the "term" used by the Judge] low income housing in the historically segregated Pico Neighborhood to perpetuate the segregation of minorities, and deny them an opportunity to live in the North of Wilshire/San Vicente neighborhood with the now unenforceable restrictive covenants.

The report from the **SMMUSD** from July 1988 stated "Historic Housing Patterns probably preclude any immediate solutions for desegregating the District." More than 36 years later due to SMMUSD council members dumping a disproportionate number of low income housing units in the Pico Neighborhood the schools are still segregated.<sup>6</sup>

### **The City and METRO must now comply with Supreme Court Cases**

On June 25, 2015, in *Texas Dep't of Housing and Community Affairs v. Inclusive Communities Project*, the *U.S. Supreme Court* held that a plaintiff may establish a *prima facie* case for discrimination under the *Fair Housing Act* (FHA) on the basis of statistical evidence that a governmental policy causes a disparate impact, without proof that the discrimination was intentional. The case, involved the allocation of low-income housing tax credits. But Justice Kennedy's opinion for the 5-4 majority (Chief Justice Roberts and Justices

---

<sup>6</sup> Over the past 18 months the City has funded the development of over 250 units of low income housing in the historically segregated Pico Neighborhood, in clear violation of State and Federal Fair Housing laws. See citations herein.

Scalia, Thomas and Alito dissented), made it clear that the Court's analysis extended to any claim under FHA, including claims based on local land use regulation. In fact, Justice Kennedy pointed directly at "zoning laws and other housing restrictions that function unfairly to exclude minorities from certain neighborhoods without any sufficient justification," commenting that suits "targeting such practices reside at the heartland of disparate-impact liability."

### **The Court's Analysis**

The effect of this is that bringing an FHA claim reverses the usual burden of proof in challenging the substance of a land use regulation. The FHA makes it unlawful to "make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status, or national origin." 42 U.S.C. § 3604(a). Basically, applying the employment discrimination analogy, if the plaintiff adequately pleads statistical evidence that a local government policy has caused a disparity in housing patterns along lines protected by the statute, the burden shifts to the defendant to justify the regulation.

In the context of land use regulation, this analysis reverses the burden of proof in challenging the substance of a land use regulation. In a traditional substantive due process challenge, there is a heavy burden on the plaintiff to overcome the presumption of constitutionality and establish that the regulation is irrational. Now, in an FHA case, where the plaintiff can establish that there is disparate impact, the local government has to prove that the regulation is rational.

## **I HAVE DONE THE RESEARCH FOR METRO COUNSEL**

Of course in Santa Monica limiting the funding for low income housing projects ONLY in the Pico Neighborhood establishes the action by the City was an intentional violation of Fair Housing laws. Based on *Gautreaux v. Chicago Housing Authority*, 304 F. Supp. 736 (N.D. Ill 1969) enforcing 296 F. Supp. 907 (N.D. Ill. 1969) and *Gautreaux v. Landrileu*, 523 F. Sup. 665, 674, (N.D.Ill. 1981); 425 U.S. 284; *Otero v. NY Housing Authority*, 484 F.2d. 1122 (2<sup>nd</sup> Cir. 1973), *United States v. Yonkers Board of Education*, 624 F.Supp. 1276 (S.D.N.Y.1985). *NAACP v. HUD*, 801 F.2d 593(1<sup>st</sup> Cir. 1986), 817 F.2d 149 (1<sup>st</sup> Cir. 1987), *Thompson v. HUD* 348 F. Supp. 2d 398 (Md. 2005), *Texas Dept. of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, 576 U.S. 519 (2015), 42 U.S.C. Section 3608(e)(5) and 24 C.F.R. 1.4(b)(1)(iii)(&(iv) and of course *Brown v The Board of Education of Topeka Kansas*. The METRO proposal to build low income housing at 1ih and Colorado in the historically segregated Pico Neighborhood violates Fair Housing laws. With over 1000 units of government deed restricted low income housing in the Pico Neighborhood this proposal also violates Government Code §8899.50 AFFH and must be rejected.

In the *Yonkers* court case the Court held, "While placing low cost housing in low income neighborhoods might have made perfect sense to an earlier generation of public housing officials, **[Judge] Sand found it unjustifiable.**"

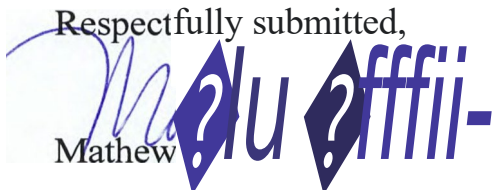
The initial City of SM Housing Element was rejected because the State determined there was a "pattern of segregation" of the Pico Neighborhood and dumping more low income housing in the Pico Neighborhood "perpetuated segregation".

The schools in the Pico Neighborhood are segregated due to the historic segregated housing patterns.

To quote Bob Dylan: "Liberty is Equality in School" There will be no equality in school if government keeps dumping low income housing in the historically segregated Pico Neighborhood

The staff comment that 45% of the residents within 1 mile of the project are "rent burdened" is false. No source of the information was provided. The methodology is flawed. There are over 1000 units of deed restricted low income housing in the Pico Neighborhood. By definition they only pay 1/3 of their income in rent. Assuming arguendo this is correct, will those rent burdened tenants be assigned a unit? We know the answer is NO, because no government agency knows who these people are.

Respectfully submitted,

 Mathew

#### THE PICO NEIGHBORHOOD HAS THE FOLLOWING REGIONAL SOCIAL SERVICE PROJECTS

1. Salvation Army Residential Rehab at 11<sup>th</sup> and Olympic
2. CLARE Fde. Residential Rehab on Pico at 9<sup>th</sup> St. and 11<sup>th</sup> St. and on 9<sup>th</sup> St.
3. Two Ocean Park Community Center 55 bed homeless shelters
4. 55 unit Permanent Supportive Housing built by Marin County Developers at 1413 Michigan Ave.
5. The Manor residential housing for the mentally ill at 19<sup>th</sup> and Pico
6. The Manor residential housing for the mentally ill at 21<sup>st</sup> and Pico
7. Proposed 7 story low income homeless housing at 1634 20<sup>th</sup> St.

Attachments included with this letter

As noted in Findings A5 and A6, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints. In addition:

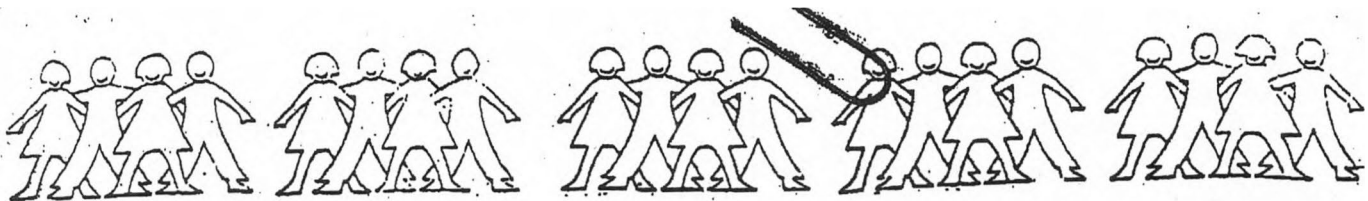
- *Program 1B (Streamline the Architectural Review):* While the program commits to adopt new streamlining procedures, it should include specific commitments to address identified constraints such as approval findings as noted in Finding A5.
- *Program 1D (Explore Reducing or Eliminating Parking Requirements):* In addition to exploring changes to parking requirements, the program should commit to actual modifications of parking requirements.

4. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding A1, the element requires a complete analysis of AFFH. Depending upon the results of that analysis, the City may need to revise or add programs to affirmatively further fair housing. In addition, Program 4D (Rezoning Selected Portions of R1 Zone Neighborhoods) notes historical practices have perpetuated segregation and hinder fair access to housing. As a result, the program should go well beyond exploring options and must commit to meaningful and sufficient actions to overcome patterns of segregation and foster inclusive communities. These actions should not be limited by the regional housing needs allocation and must include metrics and milestones as noted under Finding A1.

5. *The housing program shall preserve for low-income household the assisted housing developments identified pursuant to paragraph (9) of subdivision (a). The program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs identified in paragraph (9) of subdivision (a), except where a community has other urgent needs for which alternative funding sources are not available. The program may include strategies that involve local regulation and technical assistance. (Gov. Code, § 65583, subd. (c)(6).)*

Program 3C: Facilitate the Conservation of Restricted and Non-Restricted At-Risk Housing: This program commits the City to annual monitoring of its affordable housing stock at-risk of conversion to market rate. The program should be revised to commit the City to noticing residents and owners of potential conversion dates, coordinating with qualified entities for potential purchase, and to seek funding assistance specifically for these type projects.



**D'ESE.-:GR-EGII.TION**

**&**



**/NTtf/R.1TION**



**STUDY COMM-/TTE:E**



**..REPORT**



**... TO .**



**BOAR-D fJF EDIJCII.TION**



**JULY 1-9aa**



TO: **Desegregation and Integration Study Committee**

FROM: Jon O. Campbell  
Superintendent  
Instructional Staff

DATE: February 1988

Based on the F&I 1987 racial/ethnic survey, the following chart depicts the status of the district regarding **segregated** schools, **"in danger"** of becoming **segregated** schools, and racially isolated schools.

BASED UPON AN ELEMENTARY MINORITY ENROLLMENT OF 11.3%				
School	Minority Percentage	Segregated (+20%)	In Danger (+15-20%)	Racially Isolated (+20%)
Webster	15.1			RI
Malibu Park	18.1			RI
Alternative	26.0			RI
Franklin	28.0			
Roosevelt	33.9			
Grant	47.1			
Muir	63.1		id	
Rogers	69.3	Seg		
McKinley	70.3	Seg		
Edison	91.1	Seg		
Elementary				
Segregated		67.3% - 100% minority enrollment		
In Danger		62.1% - 67.3% minority enrollment		
Racially Isolated		0 - 27.3% minority enrollment		

BASED UPON THE JUNIOR HIGH MINORITY ENROLLMENT OF 44.9%				
Malibu Park	18.1			RI
Lincoln	42.6			
John Adams	52.2			
Junior High				
Segregated		64.9% - 100% minority enrollment		
In Danger		59.9% - 64.9% minority enrollment		
Racially Isolated		0 - 24.9% minority enrollment		
Olympic	43.2			
Samuel	56.3			

TOTAL DISTRICT MINORITY PERCENTAGE 43.0

#### BOARD OF EDUCATION ACTION 6/23/84

ANY SCHOOL WHICH HAS A MINORITY STUDENT POPULATION OF 7.11 PERCENTAGE POINTS OR MORE ABOVE THE DISTRICT AVERAGE IN ITS RESPECTIVE CATEGORY (ELEMENTARY, JUNIOR-HIGH SCHOOLS) MAY BE CONSIDERED SEgregated.

ANY ELEMENTARY OR SECONDARY SCHOOL THAT 15.15 - 20 PERCENTAGE POINTS ABOVE THE ELEMENTARY OR SECONDARY MINORITY ENROLLMENT AVERAGE MAY BE DEFINED AS "IN DANGER" OF BECOMING SEgregated.



CONCLUSIONS Ali RECOMMENDATIONS

1. According to the current definition of segregated schools, the District has some segregated schools **despite** its voluntary desegregation plan. Three elementary schools **are** segregated; one elementary school is in danger of being **segregated**; three schools **elementary** schools are racially isolated.
2. The District's performance on CAP is directly related to the Social Economic Status (SES) levels and ethnicity **percentages**. Both **variables appear** to affect achievement performance on the **AP test**.
3. Stricter enforcement of District guidelines on transfers and out-of-district enrollment offer the **greatest** opportunity for bringing the District into **greater compliance**. McKinlay and Rogers could become desegregated schools if voluntary transfers are carefully **monitored**. Historic housing pattern probably preclude any immediate solutions, or desegregating the District. The Spanish Immersion Program is an attempt by the district, **as is** the lowering of **class** size, to **rectify** the **segregated** status of Edison.
4. The desegregation plan should be implemented, understood and fully budgeted.
5. De-aggregation issues and concerns should be given a high priority in all decisions relating to transfer of students, educational programs, staffing and budgets.
6. A major desegregation task force **should** be formed in order to study in **depth** the findings and recommendations this committee has reported. Subcommittees should be formed to study the specific areas as mentioned in this report and **seek** solutions.



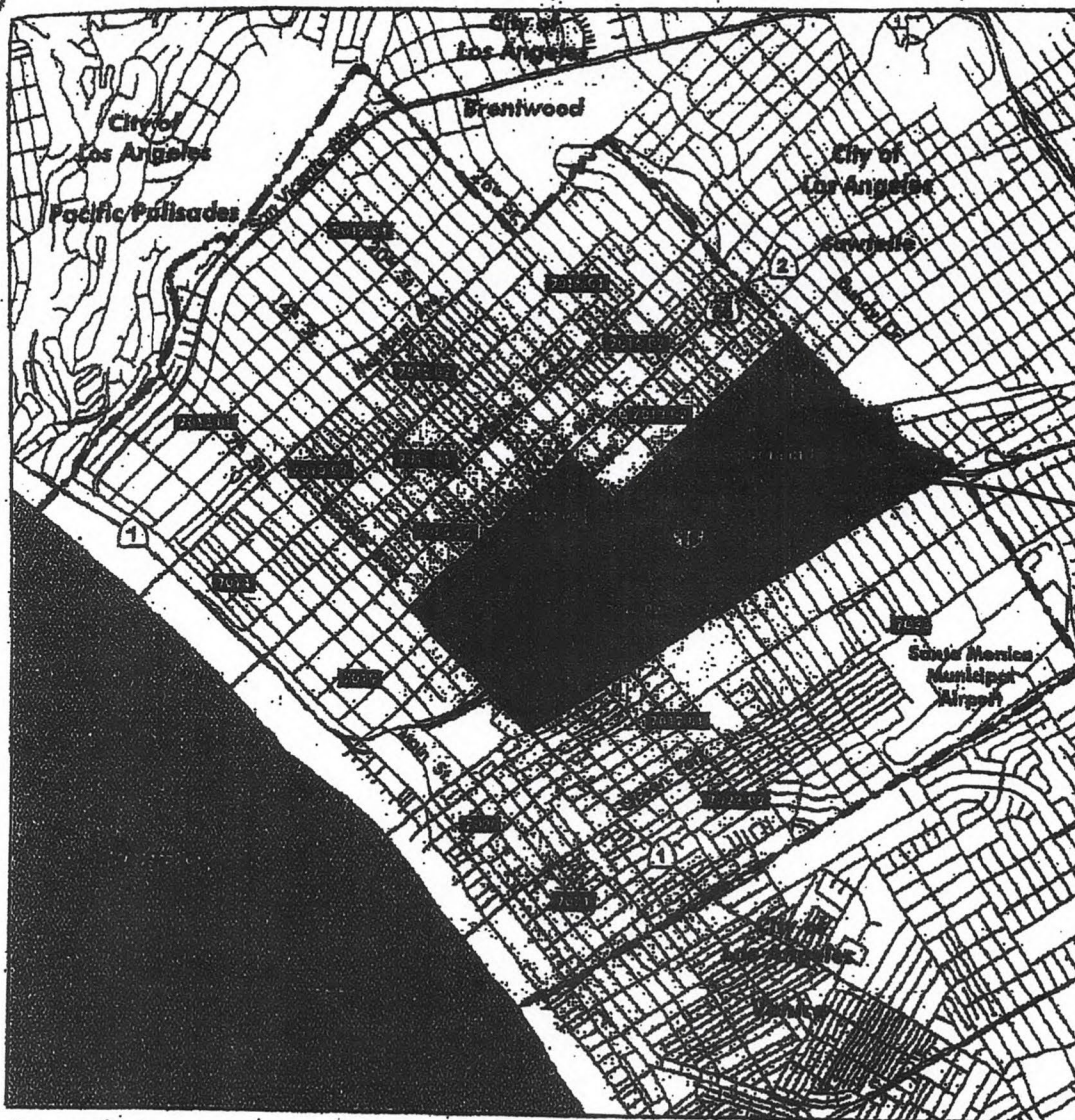
SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

Human Resources Department

Racial & Ethnic Distribution

October, 2010

SCHOOL	MINORITY										WHITE		TOTAL	MINORITY	
	AMERICAN INDIAN ALASKAN NATIVE	ASIAN		PACIFIC ISLANDER	FILIPINO	HISPANIC		BLACK not of Hispanic Origin	Multiple orno Response	not of Hispanic Origin	Enrollment				
	N %	N %		N %	N %	N %		N %	N %	TOTAL %				TOTAL	%
Cabrillo	0 0.00%	4 1.57%		0 0.00%	3 1.18%	47 18.50%		10 3.94%	1 0.39%	189 74.41%		254		64	25.200%
Edison	1 0.22%	13 2.90%		1 0.22%	0 0.00%	279 62.14%		20 4.45%	11 2.45%	124 27.62%		449		314	69.93%
Franklin	0 0.00%	77 9.97%		4 0.52%	2 0.26%	34 4.40%		11 1.42%	13 1.68%	631 81.74%		772		128	16.58%
Grant	4 0.63%	40 6.34%		2 0.32%	4 0.63%	172 27.26%		56 8.87%	7 1.11%	346 54.83%		631		278	44.06%
McKinley	4 0.91%	59 13.41%		1 0.23%	6 1.36%	151 34.32%		56 12.73%	7 1.59%	156 35.45%		440		277	62.95%
Muir	3 0.95%	19 6.01%		1 0.32%	3 0.95%	109 34.49%		47 14.87%	8 2.53%	126 39.87%		316		182	57.59%
Pt. Dume	3 1.10%	12 4.40%		2 0.73%	0 0.00%	14 5.13%		11 4.03%	1 0.37%	230 84.25%		273		42	15.38%
Rogers	1 0.20%	17 3.42%		1 0.20%	4 0.80%	245 49.30%		74 14.89%	35 7.04%	120 24.14%		497		342	68.81%
Roosevelt	5 0.64%	84 10.76%		5 0.64%	18 2.30%	94 12.04%		35 4.48%	34 4.35%	506 64.79%		781		241	30.86%
Webster	0 0.00%	21 5.57%		6 1.59%	1 0.27%	31 8.22%		8 2.12%	2 0.53%	308 81.70%		377		67	17.77%
SMASH K-5	1 0.67%	26 17.45%		0 0.00%	3 2.01%	2 1.34%		9 6.04%	0 0.00%	108 72.48%		149		41	27.52%
SMASH6-8	0 0.00%	6 8.11%		0 0.00%	3 4.05%	6 8.11%		9 12.16%	0 0.00%	50 67.57%		74		24	32.43%
Adams	1 0.10%	39 3.74%		6 0.58%	9 0.86%	525 50.38%		121 11.61%	13 1.25%	328 31.48%		1,042		701	67.27%
Lincoln	9 0.80%	121 10.72%		10 0.89%	12 1.06%	191 16.92%		70 6.20%	7 0.62%	709 62.80%		1,129		413	36.58%
Malibu 6-8	1 0.22%	17 3.73%		3 0.66%	4 0.88%	47 10.31%		15 3.29%	0 0.00%	369 80.92%		456		87	19.08%
Malibu 9-12	1 0.14%	13 1.85%		5 0.71%	2 0.28%	63 8.95%		13 1.85%	0 0.00%	607 86.22%		704		97	13.78%
Olympic	0 0.00%	4 3.57%		1 0.89%	0 0.00%	58 51.79%		11 9.82%	0 0.00%	38 33.93%		112		74	66.07%
Santa Monica	9 0.29%	212 6.83%		25 0.81%	21 0.68%	1,067 34.39%		335 10.80%	19 0.61%	1,415 45.60%		3,103		1,669	53.79%
<b>TOTALS:</b>	<b>43 0.37%</b>	<b>784 6.78%</b>		<b>73 0.63%</b>	<b>95 0.82%</b>	<b>3,135 27.12%</b>		<b>911 7.88%</b>	<b>158 1.37%</b>	<b>6,360 55.02%</b>		<b>11,559</b>		<b>3,041</b>	<b>43.61%</b>
Elementary Schools Grades K-5	22 0.45%	372 7.53%		23 0.47%	44 0.89%	1,178 23.85%		337 6.82%	119 2.41%	2,844 57.58%		4,939		1,976	40.01%
Middle Schools Grades 6-8	11 0.41%	183 6.78%		19 0.70%	28 1.04%	769 28.47%		215 7.96%	20 0.74%	1,456 53.91%		2,701		1,225	45.35%
Secondary Schools Grades 9-12	10 0.26%	229 5.84%		31 0.79%	23 0.59%	1,188 30.31%		359 9.16%	19 0.48%	2,060 52.56%		3,919		1,840	46.95%



# Legend

- · - City Boundary
- ◆ - Census Tract Boundary
- [Black Box] - Census Tract Number
- ...A... Census Tracts with more than 30% minority population
- [Black Box] - Minority Population

Scale: 0 1/2 miles

City of Santa Monica

Source: 2000 Census

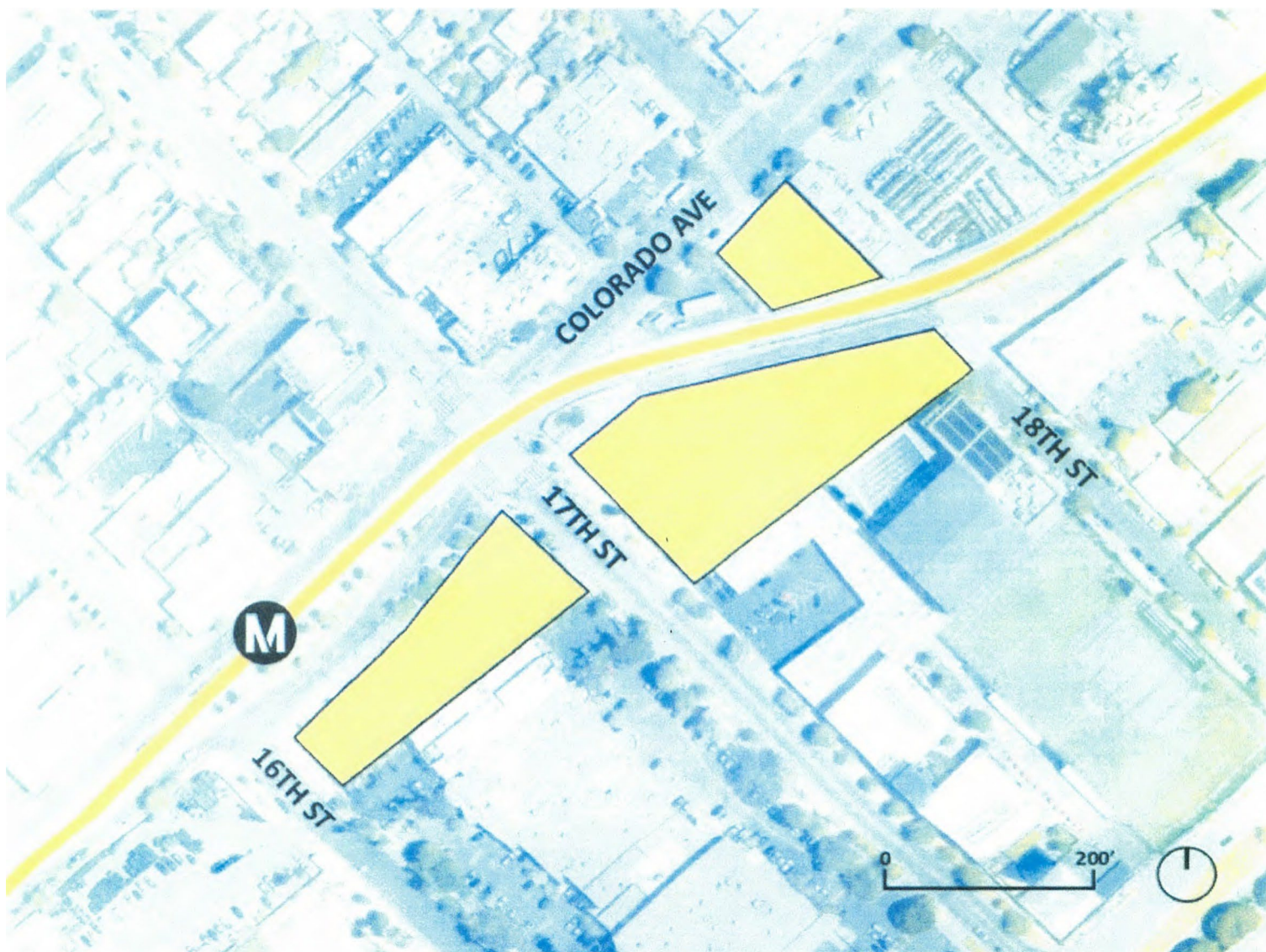
Figure 1  
Minority Population  
by Census Tract



## News

# Metro shares vision for 17th/SMC affordable housing site

by Thomas Leffler  
October 15, 2024



A new affordable housing development could be constructed around the 17th St/Santa Monica College Expo Line station in 2024. Credit: Courtesy of the City of Santa Monica.

Metro Los Angeles laid out its preliminary plans for an income-restricted housing development adjacent to the 17th Street/Santa Monica College Expo Line station this week.

Wednesday evening, Metro officials shared its housing vision via a virtual community meeting, planning to take underutilized Metro-owned properties and through collaboration with communities and private developers, build "transit-oriented development" aimed at a range of income levels. A Request for Proposals (RFP) to developers will be released this coming Winter season, with negotiations between Metro and a selected developer set for early 2025.

Having worked through its Joint Development program to develop a bevy of sites already, the 17th/SMC project is part of Metro's 10,000 Home Commitment, a plan to have 10,000 units (5,000 affordable) by 2031. So far, 2,362 units have been completed, 930 of those affordable.

"As part of our effort to bring more complete, equitable, transit-oriented communities to Los Angeles, we also build housing on our vacant and underutilized Metro property, and we've been doing it for some time, but in the last several years, we really have honed our focus on housing, and we've adopted our informal tagline and mission to build as much housing as possible, as quickly as possible, for those who need it most," Metro Joint Development Deputy Executive Officer Wells Lawson said.

The development, which according to the Metro website is slated for a unit range of 275-380, is planned to be built over four parcels of land just south of Colorado Ave. between 16th and 18th Street Metro Joint Development Principal Transportation Planner Mica O'Brien presented the outline for development space, with no building details to be shared until a developer is chosen.

O'Brien stated that the easternmost parcel on the corner of Colorado and 18th is an underutilized Metro Park and Ride lot with 65 parking stalls, which she added was underutilized due to roughly 90% of transit riders arriving at the station by means other than a car.

The largest parcel is currently leased to Crossroads Elementary School for bus and car parking, as well as carpool pickup and drop-off. The remaining parcels between 16th and 17th Street, O'Brien noted, were "vacant in terms of transit."

Out of the over 400 responses received by Metro thus far, the potential need to keep parking available for local destinations like Crossroads and SMC was one of the top concerns. Wells stated that there is consideration to include that any RFP should include "at least 100" of "community spaces" that can supplement any parking space loss from development.

He added that the plan is to require RFPs to "prepare a plan" that would continue to provide for safe access to the schools and other local spots.

"We're going to make sure that the developers come forward with a plan that includes those pickup and drop-off facilities for the cars and buses, and the walk, bike and roll kind of means to getting to areas ... we will be selecting a developer that has the chops to manage that," Wells said.

For questions related to the would-be residents of such a development, Wells said he is not sure about the percentage of affordable units yet or the background of any future unit occupiers, but that Metro policy prioritizes income-restricted housing. Demographic data taken by the organization found that within a mile of the 17th/SMC station, 45% of the population is rent-burdened, meaning spending more than 30% of monthly income on rent.

The data also showed that 95% of housing in the area is occupied, with O'Brien adding that they know "low residential vacancy: drives up rent," adding to the goal of creating housing "for those who need it most."

"Given the incomes and housing cost burdens in the area, we see this site as having the potential to address some of the challenges that area residents are facing," O'Brien said.

After a developer is chosen for the site, the developer-led public engagement period will begin in Spring 2025, followed by Metro Board considering a recommendation of the project in early 2026. If all financing for the project is secured, construction would be slated to begin in early 2027.

For those that missed the community meeting, a community input survey is currently available [here](#).

*thomas@smdp.com*

***Mathew L. Millen***  
***Attorney at Law***  
***10880 Wilshire Blvd. Suite 1050***  
***Los Angeles, CA 90024***  
***(310)470-8071***

May 7, 2023

Santa Monica City Council  
Comments May 9<sup>th</sup> meeting  
Item: 5 G  
Sent via email

**THE GRANT FUNDS SHOULD BE LIMITED TO DEVELOPING LOW INCOME HOUSING  
IN SUNSET PARK**

The State of California determined the City dumping low income housing in the Pico  
Neighborhood "perpetuated segregation" see attached.

We need the 2 new Sunset Park Council members to join together and make a motion to amend  
the application to provide the \$5,000,000 will be RESTRICTED TO DEVELOPING LOW  
INCOME HOUSING IN SUNSET PARK.<sup>1</sup>

So, hopefully Council member C. Torosis will move to restrict the funds to Sunset Park, and  
Council member J.Zwick will second the motion. This will implement the Affirmatively  
Furthering Fair Housing Statute, Government Code§ 8899.50.

It is clear the staff is trying to perpetuate segregation. The property at 1654 19<sup>th</sup> St.(in the Pico  
Neighborhood) was designated as surplus in April. Now the Staff is recommending the City  
apply for grant money to build another low income housing project in the red lined Pico  
Neighborhood. For the 2 parcels at the Expo line stop, my guess, the Staff will recommend the  
City develop in conjunction with Metro another Regional Social Services homeless shelter on  
those 2 parcels. This will allow the homeless from all over Los Angeles County to ride the last  
train to Santa Monica and sleep at the beach.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mathew Millen', is written over a horizontal line. The signature is fluid and cursive.

Mathew Millen  
40 year resident of the Pico Neighborhood

---

<sup>1</sup> Previously the Pico Neighborhood Housing Trust Fund restricted the development of low income housing to the  
red lined, historically segregated Pico Neighborhood, so the precedent is set

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

@  
it  
CO

**FLED**  
Superior Court of California  
County of Los Angeles  
**;FEB13201**

Sherril R. Carter, Executive Officer/Clerk  
By [Signature] Deputy  
Neh M. Raya

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

PICO NEIGHBORHOOD ASSOCIATION, ) Case No.: a<:616804  
et al. )  
Plaintiffs, ) **STATEMENT OF DECISION**  
VS. )  
CITY OF SANTA MONICA, )  
Defendant. )

----->

Pursuant to CCP §632, the Court issues the following  
Statement of Decision in support of its Judgment after court  
trial:

Id&Qi)(C'RJ:01'

1. Plaintiff Pico Neighborhood Association ("PNA"), Maria  
Loya ("Loya"), filed a First Amended-Complaint alleging two  
causes of action: 1) Violation of the California Voting Rights



1 Elections (CURE) specifically noted the Watsonville case in  
2 urging the Santa Monica City council to place the issue of  
3 substituting district for at-large elections on the ballot,  
4 allowing Santa Monica voters to decide the question. With the  
5 issue of at-large-elections diluting minority vote receiving  
6 increased attention in Santa Monica and throughout California,  
7 Defendant appointed a 15-member Charter Review Commission to  
8 study the matter and make recommendations to the City Council.

9  
10 76.. As part of their investigation, the Charter Review  
11 Commission sought the analysis of Plaintiff's expert, Dr.  
12 Kousser, who had just completed his work in Garza regarding  
13 discriminatory intent in the way Los Angeles County's  
14 supervisorial districts had been drawn. Dr. Kousser was asked  
15 whether Santa Monica's at-large election system was adopted or  
16 maintained for a discriminatory purpose, and Dr. Kousser  
17 concluded that it was, for all of the reasons discussed above.  
18 Based on their extensive study and investigation, the near-  
19 unanimous Charter Review Commission recommended that Defendant's  
20 at-large election system be eliminated. The principal reason  
21 for that recommendation was that the at-large system prevents  
22 minorities and the minority-concentrated Pico Neighborhood from  
23 having a seat at the table.

24 77. That recommendation went to the City Council in July 1992,  
25 and was the subject of a public city council meeting. Excerpts

02/14/19

1 from the video of that hours-long meeting were played at trial,  
2 and provide direct evidence of the intent of the then-members of  
3 Defendant's City Council. One speaker after another - members  
4 of the Charter Review Commission; the public, an attorney from  
5 the Mexican American Legal Defense and Education Fund, and even  
6 a former councilmember - urged Defendant's City Council to  
7 change its at-large election system. Many of the speakers  
8 specifically stressed that the at-large system discriminated  
9 against Latino voters and/or that courts might rule "that they  
10 did in an appropriate case. Although the City Council understood  
11 well that the at-large system prevented racial minorities from  
12 achieving representation - that point was made by the Charter  
13 Review Commission's report and several speakers and was never  
14 challenged - the members refused by a 4-3 vote to allow the  
15 voters to change the system that had elected them.  
16 78. Councilmember Dennis Zane explained his professional  
17 reasoning: in a district system, Santa Monica would no longer  
18 be able to place a disproportionate share of affordable housing  
19 into the minority-concentrated Pico Neighborhood, where,  
20 according to the unrefuted remarks at the July 1992 council  
21 meeting, the majority of the city's affordable housing was  
22 already located, because the Pico Neighborhood doesn't  
23 representative would oppose it. Mr. Zane's comments were evasive and  
24 revealing. He specifically phrased the issue as one of

1 Latino representa~~on~~ versus affordable housing: '... you gain  
2 the representation but you lose the housing."<sup>12</sup> While this  
3 profes~~ed~~ rationaie could be c~~h~~acterized as not demonstrating  
4 that Mr. Zane or his colleagues uharbored any ethnic or racial  
5 animus toward the ... Hispanic community," it nonethele•s  
6 reflects intentional discrimination-Mr. **Zane** understood that his  
7 action would harm Latinos; voting power, and he took that action  
8 to maintain the power of his political group to continue dumping  
9 affordable housing in the Latino-concentrated neighb~~6~~ood  
10 despite their opposition. Garza, supra, 918 F.2d a~~7~~78 (J.  
11 Kozinski, concurring}\_ (finding that incumbents.preserving their  
12 power by drawing.district lines that avoided a higher proportion  
13 of Latinos in one district .**was intentionally discrimina•tory**  
14 **despite the lack of any racial animus**), cert. denied •{1991) 111  
15 S.Ct. 681.

17 79. In addition to Mr.. Zane's contemporaneous explanation of  
18 his own decisive vote, the Court also considers the  
19 circumstantial evidence of intent revealed by the Arlington  
20 Heights fact-ors. While those non-exhaustive factors do not each

22 <sup>12</sup> **Mr. Zane's insistence-on a tradaoff between Latino representation and**  
23 policy goals that he.believed would be more.likely to be acc~~h~~ished by an  
24 at-large council echoed comments of the *Santa .Mon.tea Buen.in.tr Out:look*. the  
25 ch~~ief~~ aponaor of and spokesman for the charter Cb.ange to an at-laxge c~~o~~y  
council. .in 1946. "CG)roups such as organized labor and the colored **people**."  
the newspaper announced, should realize that ftThe interest of minorities is  
always best protected by a syst- which favoz-s the e.lectJ.on of .l.iberall.-mi.nded  
persons who are not compelled to pl.ay peanut politics. Such liberal-minded  
persons, of high caliber, will .run for office and be elected if elections are  
held at large."

02/14/19

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833  
(916) 263-2911 / FAX (916) 263-7453  
[www.hcd.ca.gov](http://www.hcd.ca.gov)



February 8, 2022

David White, City Manager  
City of Santa Monica  
1685 Main Street  
Santa Monica, CA 90401

Dear David White:

**RE: City of Santa Monica's 6<sup>th</sup> Cycle (2021-2029) Adopted Housing Element**

Thank you for submitting the City of Santa Monica's (City) housing element adopted on October 12, 2021 and received for review on November 10, 2021. Pursuant to Government Code section 65585, subdivision (h), the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from Kenneth Kutcher, Abundant Housing LA, Santa Monica Housing Council, Jason Mastbaum, Tieira Ryder, YIMBY Law, Matthew Millen and the League of Women Voters of Santa Monica, pursuant to Government Code section 65585, subdivision (c).

The adopted element addresses many statutory requirements described in HCD's August 30, 2021 review; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households and commenters on this review, by making information regularly available and considering and incorporating comments where appropriate.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the

As noted in Findings A3, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

In addition, while the element includes Program 2.1 to amend zoning for a variety of housing types, the Program should include specific commitment to amend zoning for identified constraints related to the definition of households, residential care facilities for seven or more persons, parking for emergency shelters, permanent supportive housing and employee housing.

3. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

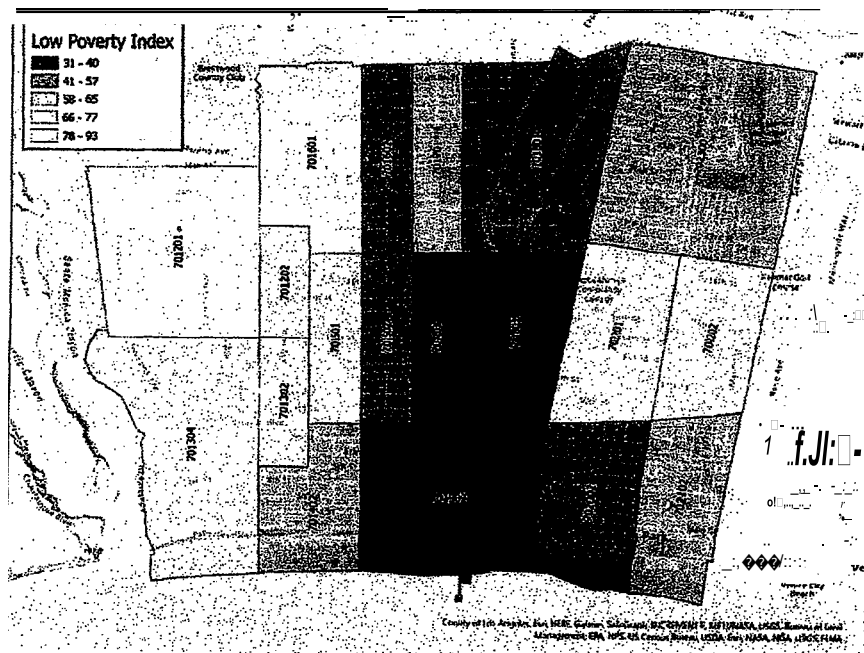
As noted in Finding A1, the element requires a complete analysis of AFFH. Depending upon the results of that analysis, the City may need to revise or add programs to affirmatively further fair housing. In addition, HCD's prior review found the City should revise Program 4.D (Rezoning R1 Neighborhoods) with meaningful and sufficient actions to overcome patterns of segregation and foster inclusive communities. In response, the element now appears to only promote accessory dwelling units; an insufficient action given the perpetuated segregation noted in the element. Please see HCD's prior review.



#### 4.A Access to Low Poverty Neighborhoods

In the City of Santa Monica, access to low poverty neighborhoods is closely linked to residential patterns of racial and ethnic concentration. Map 2-18 shows the low poverty indices for the City. The areas with the lowest Low Poverty Indices and thus the highest concentrations of poverty are in the Pico neighborhood and the immediate vicinity of Downtown Santa Monica. These areas have the concentrations of Black and Hispanic households than the city as a whole. By contrast, the North of Wilshire and North of Montana neighborhoods, with higher White populations, both have higher Low Poverty Indices and thus lower concentrations of poverty. In the City of Santa Monica, Black and Hispanic households have lower access to low poverty neighborhoods than do White and Asian American or Pacific Islander households. The disparities are significant but not extreme.

Map 2-18: Low Poverty Index



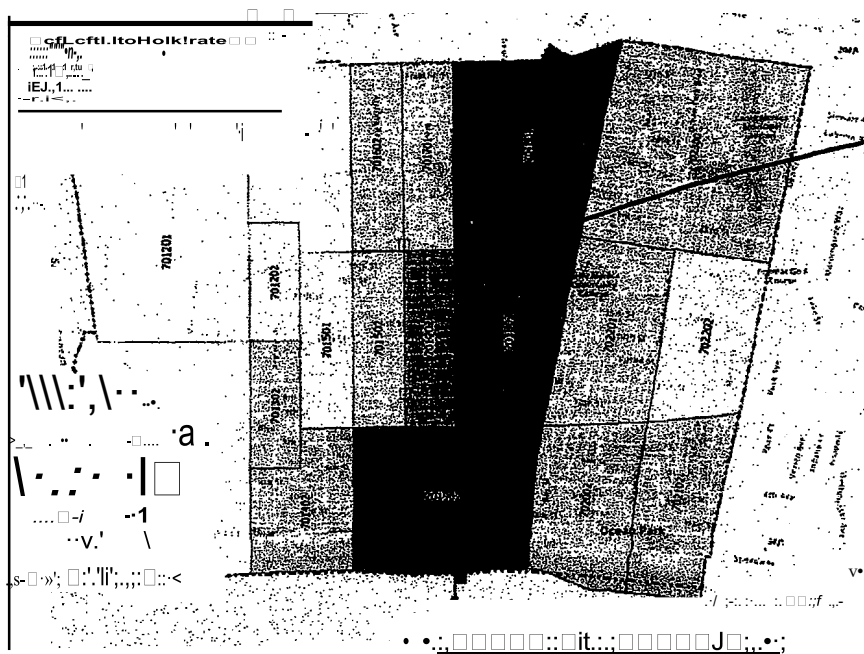
#### 5. Access to Environmentally Healthy Neighborhoods

Map 2-19 which shows the Environmental Health Hazard indices across the City and substantiates the view that there are significant differences in environmental health between neighborhoods and that these disparities are correlated with neighborhood demographics. The eastern area of NOMA and Northeast neighborhood of the City are the most environmentally healthy than other areas in the City, and have the highest environmental health indices. The Pico neighborhood, current and former industrial areas of the Industrial Conservation zones and Downtown Santa Monica are more heavily affected by their proximity to the 1-10 freeway than are more heavily White neighborhoods.



While there are no R/ECAPs within the City of Santa Monica (Map 2-6), the legacy of past racist planning and housing policies have shaped land use patterns in the City that we see today. There are census tracts in the City that have higher concentrations of non-Whites as well as higher concentrations of low income and moderate income population. J.2-general, the patterns of non-White and lower income households continue to mirror the redline maps with more affluent Whites on the northern and southern ends of the City (Map 2-4) and non-Whites and lower income populations concentrated in the central city near the main transportation corridors (Map 2-7).

Map 2-7: Low to Moderate Income Population by Census Tract.



Pico Neighborhood (90404)

This pattern of segregation is also true for renters and owners. The 2010 AFH found that the location of renters and owners in Santa Monica very highly correlates with patterns of residential racial and ethnic segregation. The areas with the highest concentrations of homeownership, such as north of Montana, Ocean Park, and Sunset Park are also the areas that are predominantly White. The areas with the highest concentrations of renters, such as the Pico neighborhood and Downtown, are areas that contain high concentrations of minorities and/or those with Limited English Proficiency.

The AFH also found that a major contributor to continued racial and ethnic segregation is the economics of high housing and land costs created by zoning, which particularly limits the feasibility of developing affordable housing in certain areas of the City.

J'e,l( 1/t''oT

1,20--S  
yrdt#Jsfo,

problems with-Housing Element

Mathew Millen <matmillen@msn.com>

Mon 10/4/2021 2:09 PM

To: sue himmelrich <sue.himmelrich@smgov.net>; oscar.delatorre@smgov.net.<oscar.delatorre@smgov.net>;

council@smgov.net <council@smgov.net>

Bee matmillen@msn.com <matmillen@msn.com>

## THIS IS WHAT ABUNDANT HOUSING LA HAS TO SAY ABOUT SANTA MONICA'S PROPOSED HOUSING ELEMENT

**Fair Housing Act became the law of the land in 1968. Why do patterns of segregation persist to this day?**

The 1960s were an era of great struggles but also remarkable progress on civil rights, culminating in the year 1968. On February 29th of that year, the National Advisory Commission on Civil Disorders, after studying widespread civil unrest found that, all too often, America consisted of two separate and unequal societies, one for whites and one for Blacks; and such a societal structure was cemented and maintained by where Blacks can and cannot live. In the wake of Reverend Dr. • Martin Luther King Jr.'s assassination and nationwide protests, Congress passed the Fair Housing Act, which outlawed housing discrimination based on race, religion, national origin, sex, (and as amended) handicap and family status.

A brief period of reform followed. The new Department of Housing and Urban Development (HUD) and its secretary, George Romney, was tasked with "affirmatively furthering" fair housing (sound familiar?). The HUD sought to integrate well-resourced, whites-only suburbs and demanded that these areas allow more affordable housing - an effort known as "Open Communities". Unsurprisingly, the Open Communities initiative was met with fierce -local• resistance. Romney tried to enforce integration by withholding federal funding from non complying municipalities, but Nixon, afraid of losing suburban white votes, quickly intervened to halt all such efforts.

Had the federal government actually enforced fair housing laws five decades ago, today's America would be very different. Today, Californians have the opportunity to decide whether or not to enforce our own fair housing law. AB 686 (2018) requires all state and local public agencies to "facilitate deliberate action to explicitly address, combat, and relieve disparities resulting from past patterns. of segregation to foster more inclusive communities". It is up to the Newsom administration and the Department of Housing and Community Development to enforce this .law and demand cities create fait housing elements that encourage strong housing growth at all levels of income. •

**Tell HCD:  
enforce housing element laws**

Under California's Regional Housing Needs Assessment, cities must update the housing element in a way that encourages historically high housing growth, while

affirmatively furthering fair housing opportunities and undoing patterns of discrimination in housing. This offers a once-in-a-generation opportunity to address the need for more housing in a way that furthers equity, environmental sustainability, and economic recovery.

Unfortunately, ma.n.v. Southern California cities are submitting housing elements that don't meet the state's requirements, and are effectively treating fair housing law as optional. For example, Santa Monica has proposed a housing element that promotes almost all housing growth in formerly redlined areas. South Pasadena and Beverly Hills are proposing housing on sites where it's very unlikely to be built, such as city halls, vacant parcels of railroad track, and historic theaters. These cities are using bad-faith tactics to superficially comply with the law, while avoiding rezoning exclusive areas to allow more housing.



The Pico Neighborhood in Santa Monica. Photo: Sam Catanzaro.

## Residents in Certain Santa Monica Neighborhoods Eligible for LA County Guaranteed Income Program

**Residents in Downtown and Pico neighborhoods eligible for \$1,000 a month program**

By Sam Catanzaro

Residents of two Santa Monica neighborhoods are eligible to apply for LA County's new \$1,000 a month guaranteed income program.

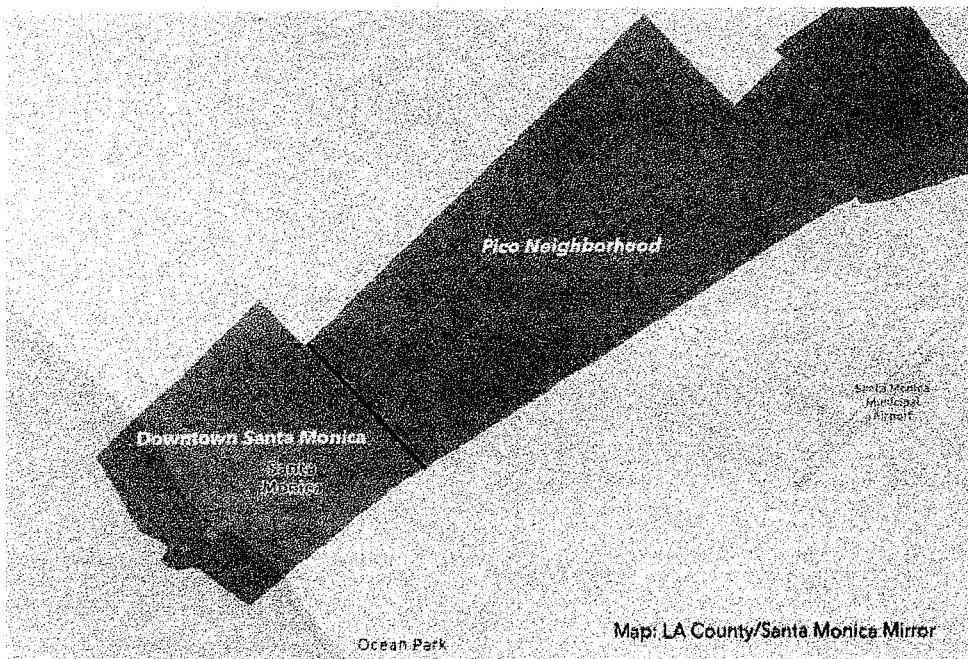
The program, called "Breathe", launched on March 31 and will award 1,000 randomly selected qualifying residents \$1,000 a month for three years.

"The course of this pandemic has revealed the large number of County residents who are living on the brink of financial crisis, with insufficient savings to weather a job loss, a medical emergency, or a major car repair. This guaranteed income program will help give residents the breathing room they need to better weather those crises," said program co-author Supervisor **Sheila Kuehl**.

The enrollment period opened on March 31 and the deadline for applications is April 13. Selection will not depend on the timing of entries. The program is being overseen by the County's Poverty Alleviation Initiative, launched last year to address poverty and income instability among LA County residents.

Applicants must be at least 18 years old and with a household income that falls at or below LA County's average median income (AMI) of \$56,000 for a single-person household or 120 percent of AMI at or below \$96,000 for a family of four, for example. They must also have been negatively impacted by the COVID-19 pandemic.

In addition, applicants are required to live within what LA County deems a low-income community. In Santa Monica, two neighborhoods fall under this category: Pico and Downtown. Pico's boundaries are Lincoln Boulevard to the west, Centinela Avenue to the east, Olympic Boulevard to the north and Pico Boulevard to the south. Downtown contains Wilshire Boulevard, Arizona Avenue, Santa Monica Boulevard, Broadway, and Colorado Avenue from Ocean Avenue to Lincoln Boulevard.



*City developed  
segregated  
low income  
housing in  
Pico Neighborhood*

A total of 1,000 participants who apply during the open enrollment period will be randomly selected by a research team from the University of Pennsylvania's Center for Guaranteed Income Research, which is partnering with the County to design and implement the program. Direct monthly payments will be distributed via a debit card to selected residents and will come without strings or conditions.

After participants are selected, another 1,200 applicants will be randomly chosen to participate in the research study only, as part of a control group. Control group participants will not receive the monthly payment. They will complete periodic surveys and interviews about their well-being so that information can be compared to the treatment group and help determine whether or not the program was effective.

To learn more about the program, visit [breathe.lacounty.gov](https://breathe.lacounty.gov)

By Sam Catanzaro April 8, 2022  
in NLU2§.

n

t

## RELATED POSTS



### USPS suspends service to Santa Monica Block Following Assaults on Mail carriers

April 11, 2022 Sam Catanzaro

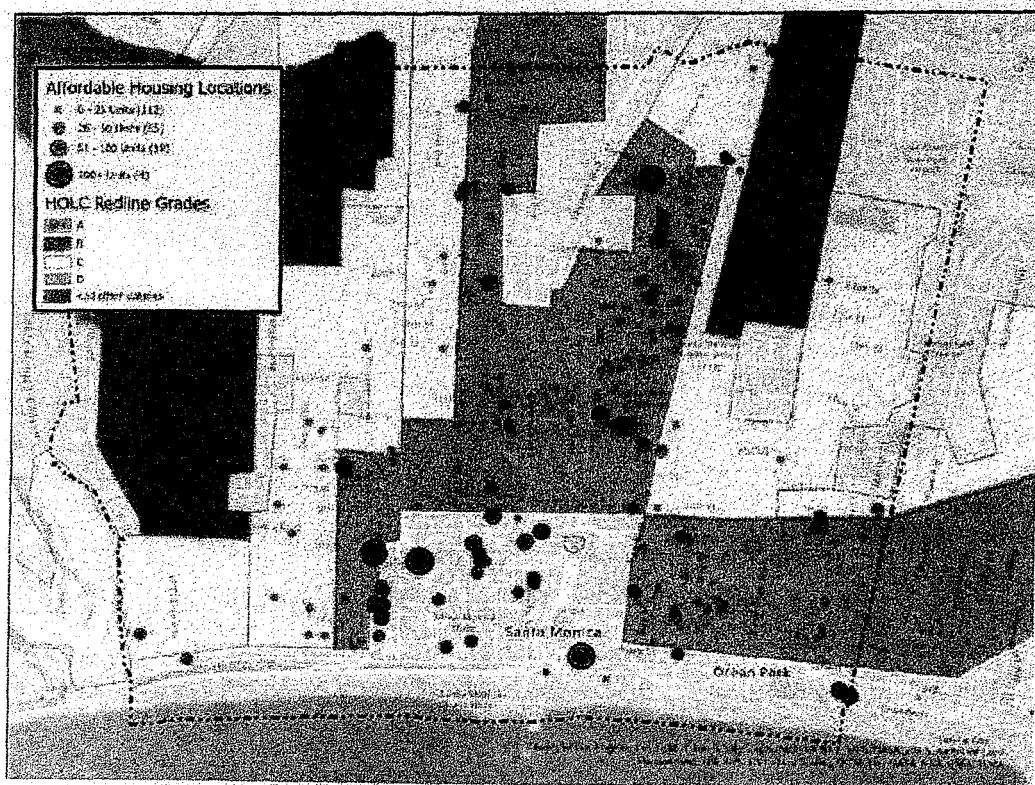
Residents on the 1300 block of 14th Street without delivery service following multiple assaults By Sam Catanzaro The United States...

the Belmar Triangle was home to many African American families and other families of color who migrated to Santa Monica.<sup>1</sup> Through eminent domain proceedings, the Belmar Triangle was razed to build the Santa Monica Civic Auditorium and part of the Los Angeles County Courthouse grounds. The City's annual reports claimed that the Belmar area was "blighted" and that only substandard and dilapidated structures and dwellings were burned down and removed for health and safety reasons.<sup>2</sup>

Over the years, the development of lower-cost affordable housing has largely followed historic patterns of segregation. Map 2-2 shows the redlining boundaries overlaid with affordable housing that has been constructed or acquired/rehabilitated over the years. Of the affordable units that have been constructed over the years, 49% are in the City's former redlined areas (which make up

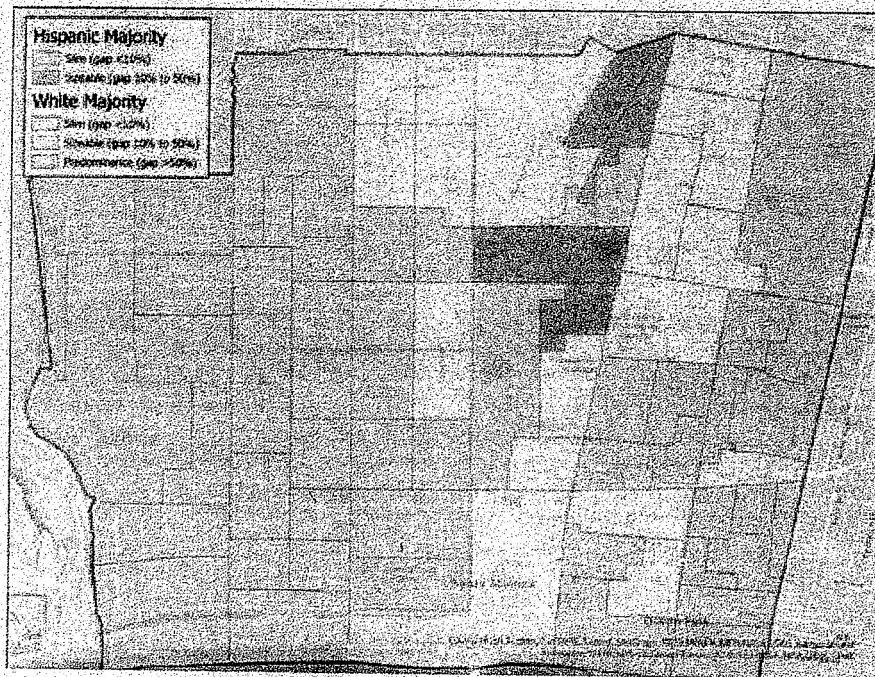
6,210

Map 2-2: Affordable Housing and Formerly "Redlined" Areas in the City of Santa Monica

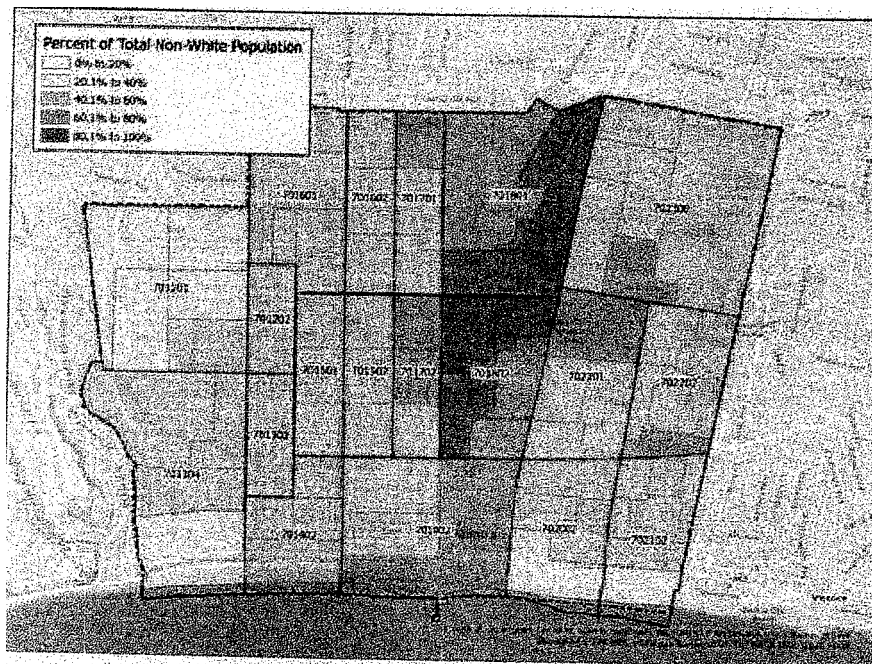


<sup>1</sup> Ibid. <sup>2</sup> Ibid. <sup>3</sup> Ibid. <sup>4</sup> Ibid. <sup>5</sup> Ibid. <sup>6</sup> Ibid. <sup>7</sup> Ibid. <sup>8</sup> Ibid. <sup>9</sup> Ibid. <sup>10</sup> Ibid. <sup>11</sup> Ibid. <sup>12</sup> Ibid. <sup>13</sup> Ibid. <sup>14</sup> Ibid. <sup>15</sup> Ibid. <sup>16</sup> Ibid. <sup>17</sup> Ibid. <sup>18</sup> Ibid. <sup>19</sup> Ibid. <sup>20</sup> Ibid. <sup>21</sup> Ibid. <sup>22</sup> Ibid. <sup>23</sup> Ibid. <sup>24</sup> Ibid. <sup>25</sup> Ibid. <sup>26</sup> Ibid. <sup>27</sup> Ibid. <sup>28</sup> Ibid. <sup>29</sup> Ibid. <sup>30</sup> Ibid. <sup>31</sup> Ibid. <sup>32</sup> Ibid. <sup>33</sup> Ibid. <sup>34</sup> Ibid. <sup>35</sup> Ibid. <sup>36</sup> Ibid. <sup>37</sup> Ibid. <sup>38</sup> Ibid. <sup>39</sup> Ibid. <sup>40</sup> Ibid. <sup>41</sup> Ibid. <sup>42</sup> Ibid. <sup>43</sup> Ibid. <sup>44</sup> Ibid. <sup>45</sup> Ibid. <sup>46</sup> Ibid. <sup>47</sup> Ibid. <sup>48</sup> Ibid. <sup>49</sup> Ibid. <sup>50</sup> Ibid. <sup>51</sup> Ibid. <sup>52</sup> Ibid. <sup>53</sup> Ibid. <sup>54</sup> Ibid. <sup>55</sup> Ibid. <sup>56</sup> Ibid. <sup>57</sup> Ibid. <sup>58</sup> Ibid. <sup>59</sup> Ibid. <sup>60</sup> Ibid. <sup>61</sup> Ibid. <sup>62</sup> Ibid. <sup>63</sup> Ibid. <sup>64</sup> Ibid. <sup>65</sup> Ibid. <sup>66</sup> Ibid. <sup>67</sup> Ibid. <sup>68</sup> Ibid. <sup>69</sup> Ibid. <sup>70</sup> Ibid. <sup>71</sup> Ibid. <sup>72</sup> Ibid. <sup>73</sup> Ibid. <sup>74</sup> Ibid. <sup>75</sup> Ibid. <sup>76</sup> Ibid. <sup>77</sup> Ibid. <sup>78</sup> Ibid. <sup>79</sup> Ibid. <sup>80</sup> Ibid. <sup>81</sup> Ibid. <sup>82</sup> Ibid. <sup>83</sup> Ibid. <sup>84</sup> Ibid. <sup>85</sup> Ibid. <sup>86</sup> Ibid. <sup>87</sup> Ibid. <sup>88</sup> Ibid. <sup>89</sup> Ibid. <sup>90</sup> Ibid. <sup>91</sup> Ibid. <sup>92</sup> Ibid. <sup>93</sup> Ibid. <sup>94</sup> Ibid. <sup>95</sup> Ibid. <sup>96</sup> Ibid. <sup>97</sup> Ibid. <sup>98</sup> Ibid. <sup>99</sup> Ibid. <sup>100</sup> Ibid. <sup>101</sup> Ibid. <sup>102</sup> Ibid. <sup>103</sup> Ibid. <sup>104</sup> Ibid. <sup>105</sup> Ibid. <sup>106</sup> Ibid. <sup>107</sup> Ibid. <sup>108</sup> Ibid. <sup>109</sup> Ibid. <sup>110</sup> Ibid. <sup>111</sup> Ibid. <sup>112</sup> Ibid. <sup>113</sup> Ibid. <sup>114</sup> Ibid. <sup>115</sup> Ibid. <sup>116</sup> Ibid. <sup>117</sup> Ibid. <sup>118</sup> Ibid. <sup>119</sup> Ibid. <sup>120</sup> Ibid. <sup>121</sup> Ibid. <sup>122</sup> Ibid. <sup>123</sup> Ibid. <sup>124</sup> Ibid. <sup>125</sup> Ibid. <sup>126</sup> Ibid. <sup>127</sup> Ibid. <sup>128</sup> Ibid. <sup>129</sup> Ibid. <sup>130</sup> Ibid. <sup>131</sup> Ibid. <sup>132</sup> Ibid. <sup>133</sup> Ibid. <sup>134</sup> Ibid. <sup>135</sup> Ibid. <sup>136</sup> Ibid. <sup>137</sup> Ibid. <sup>138</sup> Ibid. <sup>139</sup> Ibid. <sup>140</sup> Ibid. <sup>141</sup> Ibid. <sup>142</sup> Ibid. <sup>143</sup> Ibid. <sup>144</sup> Ibid. <sup>145</sup> Ibid. <sup>146</sup> Ibid. <sup>147</sup> Ibid. <sup>148</sup> Ibid. <sup>149</sup> Ibid. <sup>150</sup> Ibid. <sup>151</sup> Ibid. <sup>152</sup> Ibid. <sup>153</sup> Ibid. <sup>154</sup> Ibid. <sup>155</sup> Ibid. <sup>156</sup> Ibid. <sup>157</sup> Ibid. <sup>158</sup> Ibid. <sup>159</sup> Ibid. <sup>160</sup> Ibid. <sup>161</sup> Ibid. <sup>162</sup> Ibid. <sup>163</sup> Ibid. <sup>164</sup> Ibid. <sup>165</sup> Ibid. <sup>166</sup> Ibid. <sup>167</sup> Ibid. <sup>168</sup> Ibid. <sup>169</sup> Ibid. <sup>170</sup> Ibid. <sup>171</sup> Ibid. <sup>172</sup> Ibid. <sup>173</sup> Ibid. <sup>174</sup> Ibid. <sup>175</sup> Ibid. <sup>176</sup> Ibid. <sup>177</sup> Ibid. <sup>178</sup> Ibid. <sup>179</sup> Ibid. <sup>180</sup> Ibid. <sup>181</sup> Ibid. <sup>182</sup> Ibid. <sup>183</sup> Ibid. <sup>184</sup> Ibid. <sup>185</sup> Ibid. <sup>186</sup> Ibid. <sup>187</sup> Ibid. <sup>188</sup> Ibid. <sup>189</sup> Ibid. <sup>190</sup> Ibid. <sup>191</sup> Ibid. <sup>192</sup> Ibid. <sup>193</sup> Ibid. <sup>194</sup> Ibid. <sup>195</sup> Ibid. <sup>196</sup> Ibid. <sup>197</sup> Ibid. <sup>198</sup> Ibid. <sup>199</sup> Ibid. <sup>200</sup> Ibid. <sup>201</sup> Ibid. <sup>202</sup> Ibid. <sup>203</sup> Ibid. <sup>204</sup> Ibid. <sup>205</sup> Ibid. <sup>206</sup> Ibid. <sup>207</sup> Ibid. <sup>208</sup> Ibid. <sup>209</sup> Ibid. <sup>210</sup> Ibid. <sup>211</sup> Ibid. <sup>212</sup> Ibid. <sup>213</sup> Ibid. <sup>214</sup> Ibid. <sup>215</sup> Ibid. <sup>216</sup> Ibid. <sup>217</sup> Ibid. <sup>218</sup> Ibid. <sup>219</sup> Ibid. <sup>220</sup> Ibid. <sup>221</sup> Ibid. <sup>222</sup> Ibid. <sup>223</sup> Ibid. <sup>224</sup> Ibid. <sup>225</sup> Ibid. <sup>226</sup> Ibid. <sup>227</sup> Ibid. <sup>228</sup> Ibid. <sup>229</sup> Ibid. <sup>230</sup> Ibid. <sup>231</sup> Ibid. <sup>232</sup> Ibid. <sup>233</sup> Ibid. <sup>234</sup> Ibid. <sup>235</sup> Ibid. <sup>236</sup> Ibid. <sup>237</sup> Ibid. <sup>238</sup> Ibid. <sup>239</sup> Ibid. <sup>240</sup> Ibid. <sup>241</sup> Ibid. <sup>242</sup> Ibid. <sup>243</sup> Ibid. <sup>244</sup> Ibid. <sup>245</sup> Ibid. <sup>246</sup> Ibid. <sup>247</sup> Ibid. <sup>248</sup> Ibid. <sup>249</sup> Ibid. <sup>250</sup> Ibid. <sup>251</sup> Ibid. <sup>252</sup> Ibid. <sup>253</sup> Ibid. <sup>254</sup> Ibid. <sup>255</sup> Ibid. <sup>256</sup> Ibid. <sup>257</sup> Ibid. <sup>258</sup> Ibid. <sup>259</sup> Ibid. <sup>260</sup> Ibid. <sup>261</sup> Ibid. <sup>262</sup> Ibid. <sup>263</sup> Ibid. <sup>264</sup> Ibid. <sup>265</sup> Ibid. <sup>266</sup> Ibid. <sup>267</sup> Ibid. <sup>268</sup> Ibid. <sup>269</sup> Ibid. <sup>270</sup> Ibid. <sup>271</sup> Ibid. <sup>272</sup> Ibid. <sup>273</sup> Ibid. <sup>274</sup> Ibid. <sup>275</sup> Ibid. <sup>276</sup> Ibid. <sup>277</sup> Ibid. <sup>278</sup> Ibid. <sup>279</sup> Ibid. <sup>280</sup> Ibid. <sup>281</sup> Ibid. <sup>282</sup> Ibid. <sup>283</sup> Ibid. <sup>284</sup> Ibid. <sup>285</sup> Ibid. <sup>286</sup> Ibid. <sup>287</sup> Ibid. <sup>288</sup> Ibid. <sup>289</sup> Ibid. <sup>290</sup> Ibid. <sup>291</sup> Ibid. <sup>292</sup> Ibid. <sup>293</sup> Ibid. <sup>294</sup> Ibid. <sup>295</sup> Ibid. <sup>296</sup> Ibid. <sup>297</sup> Ibid. <sup>298</sup> Ibid. <sup>299</sup> Ibid. <sup>300</sup> Ibid. <sup>301</sup> Ibid. <sup>302</sup> Ibid. <sup>303</sup> Ibid. <sup>304</sup> Ibid. <sup>305</sup> Ibid. <sup>306</sup> Ibid. <sup>307</sup> Ibid. <sup>308</sup> Ibid. <sup>309</sup> Ibid. <sup>310</sup> Ibid. <sup>311</sup> Ibid. <sup>312</sup> Ibid. <sup>313</sup> Ibid. <sup>314</sup> Ibid. <sup>315</sup> Ibid. <sup>316</sup> Ibid. <sup>317</sup> Ibid. <sup>318</sup> Ibid. <sup>319</sup> Ibid. <sup>320</sup> Ibid. <sup>321</sup> Ibid. <sup>322</sup> Ibid. <sup>323</sup> Ibid. <sup>324</sup> Ibid. <sup>325</sup> Ibid. <sup>326</sup> Ibid. <sup>327</sup> Ibid. <sup>328</sup> Ibid. <sup>329</sup> Ibid. <sup>330</sup> Ibid. <sup>331</sup> Ibid. <sup>332</sup> Ibid. <sup>333</sup> Ibid. <sup>334</sup> Ibid. <sup>335</sup> Ibid. <sup>336</sup> Ibid. <sup>337</sup> Ibid. <sup>338</sup> Ibid. <sup>339</sup> Ibid. <sup>340</sup> Ibid. <sup>341</sup> Ibid. <sup>342</sup> Ibid. <sup>343</sup> Ibid. <sup>344</sup> Ibid. <sup>345</sup> Ibid. <sup>346</sup> Ibid. <sup>347</sup> Ibid. <sup>348</sup> Ibid. <sup>349</sup> Ibid. <sup>350</sup> Ibid. <sup>351</sup> Ibid. <sup>352</sup> Ibid. <sup>353</sup> Ibid. <sup>354</sup> Ibid. <sup>355</sup> Ibid. <sup>356</sup> Ibid. <sup>357</sup> Ibid. <sup>358</sup> Ibid. <sup>359</sup> Ibid. <sup>360</sup> Ibid. <sup>361</sup> Ibid. <sup>362</sup> Ibid. <sup>363</sup> Ibid. <sup>364</sup> Ibid. <sup>365</sup> Ibid. <sup>366</sup> Ibid. <sup>367</sup> Ibid. <sup>368</sup> Ibid. <sup>369</sup> Ibid. <sup>370</sup> Ibid. <sup>371</sup> Ibid. <sup>372</sup> Ibid. <sup>373</sup> Ibid. <sup>374</sup> Ibid. <sup>375</sup> Ibid. <sup>376</sup> Ibid. <sup>377</sup> Ibid. <sup>378</sup> Ibid. <sup>379</sup> Ibid. <sup>380</sup> Ibid. <sup>381</sup> Ibid. <sup>382</sup> Ibid. <sup>383</sup> Ibid. <sup>384</sup> Ibid. <sup>385</sup> Ibid. <sup>386</sup> Ibid. <sup>387</sup> Ibid. <sup>388</sup> Ibid. <sup>389</sup> Ibid. <sup>390</sup> Ibid. <sup>391</sup> Ibid. <sup>392</sup> Ibid. <sup>393</sup> Ibid. <sup>394</sup> Ibid. <sup>395</sup> Ibid. <sup>396</sup> Ibid. <sup>397</sup> Ibid. <sup>398</sup> Ibid. <sup>399</sup> Ibid. <sup>400</sup> Ibid. <sup>401</sup> Ibid. <sup>402</sup> Ibid. <sup>403</sup> Ibid. <sup>404</sup> Ibid. <sup>405</sup> Ibid. <sup>406</sup> Ibid. <sup>407</sup> Ibid. <sup>408</sup> Ibid. <sup>409</sup> Ibid. <sup>410</sup> Ibid. <sup>411</sup> Ibid. <sup>412</sup> Ibid. <sup>413</sup> Ibid. <sup>414</sup> Ibid. <sup>415</sup> Ibid. <sup>416</sup> Ibid. <sup>417</sup> Ibid. <sup>418</sup> Ibid. <sup>419</sup> Ibid. <sup>420</sup> Ibid. <sup>421</sup> Ibid. <sup>422</sup> Ibid. <sup>423</sup> Ibid. <sup>424</sup> Ibid. <sup>425</sup> Ibid. <sup>426</sup> Ibid. <sup>427</sup> Ibid. <sup>428</sup> Ibid. <sup>429</sup> Ibid. <sup>430</sup> Ibid. <sup>431</sup> Ibid. <sup>432</sup> Ibid. <sup>433</sup> Ibid. <sup>434</sup> Ibid. <sup>435</sup> Ibid. <sup>436</sup> Ibid. <sup>437</sup> Ibid. <sup>438</sup> Ibid. <sup>439</sup> Ibid. <sup>440</sup> Ibid. <sup>441</sup> Ibid. <sup>442</sup> Ibid. <sup>443</sup> Ibid. <sup>444</sup> Ibid. <sup>445</sup> Ibid. <sup>446</sup> Ibid. <sup>447</sup> Ibid. <sup>448</sup> Ibid. <sup>449</sup> Ibid. <sup>450</sup> Ibid. <sup>451</sup> Ibid. <sup>452</sup> Ibid. <sup>453</sup> Ibid. <sup>454</sup> Ibid. <sup>455</sup> Ibid. <sup>456</sup> Ibid. <sup>457</sup> Ibid. <sup>458</sup> Ibid. <sup>459</sup> Ibid. <sup>460</sup> Ibid. <sup>461</sup> Ibid. <sup>462</sup> Ibid. <sup>463</sup> Ibid. <sup>464</sup> Ibid. <sup>465</sup> Ibid. <sup>466</sup> Ibid. <sup>467</sup> Ibid. <sup>468</sup> Ibid. <sup>469</sup> Ibid. <sup>470</sup> Ibid. <sup>471</sup> Ibid. <sup>472</sup> Ibid. <sup>473</sup> Ibid. <sup>474</sup> Ibid. <sup>475</sup> Ibid. <sup>476</sup> Ibid. <sup>477</sup> Ibid. <sup>478</sup> Ibid. <sup>479</sup> Ibid. <sup>480</sup> Ibid. <sup>481</sup> Ibid. <sup>482</sup> Ibid. <sup>483</sup> Ibid. <sup>484</sup> Ibid. <sup>485</sup> Ibid. <sup>486</sup> Ibid. <sup>487</sup> Ibid. <sup>488</sup> Ibid. <sup>489</sup> Ibid. <sup>490</sup> Ibid. <sup>491</sup> Ibid. <sup>492</sup> Ibid. <sup>493</sup> Ibid. <sup>494</sup> Ibid. <sup>495</sup> Ibid. <sup>496</sup> Ibid. <sup>497</sup> Ibid. <sup>498</sup> Ibid. <sup>499</sup> Ibid. <sup>500</sup> Ibid. <sup>501</sup> Ibid. <sup>502</sup> Ibid. <sup>503</sup> Ibid. <sup>504</sup> Ibid. <sup>505</sup> Ibid. <sup>506</sup> Ibid. <sup>507</sup> Ibid. <sup>508</sup> Ibid. <sup>509</sup> Ibid. <sup>510</sup> Ibid. <sup>511</sup> Ibid. <sup>512</sup> Ibid. <sup>513</sup> Ibid. <sup>514</sup> Ibid. <sup>515</sup> Ibid. <sup>516</sup> Ibid. <sup>517</sup> Ibid. <sup>518</sup> Ibid. <sup>519</sup> Ibid. <sup>520</sup> Ibid. <sup>521</sup> Ibid. <sup>522</sup> Ibid. <sup>523</sup> Ibid. <sup>524</sup> Ibid. <sup>525</sup> Ibid. <sup>526</sup> Ibid. <sup>527</sup> Ibid. <sup>528</sup> Ibid. <sup>529</sup> Ibid. <sup>530</sup> Ibid. <sup>531</sup> Ibid. <sup>532</sup> Ibid. <sup>533</sup> Ibid. <sup>534</sup> Ibid. <sup>535</sup> Ibid. <sup>536</sup> Ibid. <sup>537</sup> Ibid. <sup>538</sup> Ibid. <sup>539</sup> Ibid. <sup>540</sup> Ibid. <sup>541</sup> Ibid. <sup>542</sup> Ibid. <sup>543</sup> Ibid. <sup>544</sup> Ibid. <sup>545</sup> Ibid. <sup>546</sup> Ibid. <sup>547</sup> Ibid. <sup>548</sup> Ibid. <sup>549</sup> Ibid. <sup>550</sup> Ibid. <sup>551</sup> Ibid. <sup>552</sup> Ibid. <sup>553</sup> Ibid. <sup>554</sup> Ibid. <sup>555</sup> Ibid. <sup>556</sup> Ibid. <sup>557</sup> Ibid. <sup>558</sup> Ibid. <sup>559</sup> Ibid. <sup>560</sup> Ibid. <sup>561</sup> Ibid. <sup>562</sup> Ibid. <sup>563</sup> Ibid. <sup>564</sup> Ibid. <sup>565</sup> Ibid. <sup>566</sup> Ibid. <sup>567</sup> Ibid. <sup>568</sup> Ibid. <sup>569</sup> Ibid. <sup>570</sup> Ibid. <sup>571</sup> Ibid. <sup>572</sup> Ibid. <sup>573</sup> Ibid. <sup>574</sup> Ibid. <sup>575</sup> Ibid. <sup>576</sup> Ibid. <sup>577</sup> Ibid. <sup>578</sup> Ibid. <sup>579</sup> Ibid. <sup>580</sup> Ibid. <sup>581</sup> Ibid. <sup>582</sup> Ibid. <sup>583</sup> Ibid. <sup>584</sup> Ibid. <sup>585</sup> Ibid. <sup>586</sup> Ibid. <sup>587</sup> Ibid. <sup>588</sup> Ibid. <sup>589</sup> Ibid. <sup>590</sup> Ibid. <sup>591</sup> Ibid. <sup>592</sup> Ibid. <sup>593</sup> Ibid. <sup>594</sup> Ibid. <sup>595</sup> Ibid. <sup>596</sup> Ibid. <sup>597</sup> Ibid. <sup>598</sup> Ibid. <sup>599</sup> Ibid. <sup>600</sup> Ibid. <sup>601</sup> Ibid. <sup>602</sup> Ibid. <sup>603</sup> Ibid. <sup>604</sup> Ibid. <sup>605</sup> Ibid. <sup>606</sup> Ibid. <sup>607</sup> Ibid. <sup>608</sup> Ibid. <sup>609</sup> Ibid. <sup>610</sup> Ibid. <sup>611</sup> Ibid. <sup>612</sup> Ibid. <sup>613</sup> Ibid. <sup>614</sup> Ibid. <sup>615</sup> Ibid. <sup>616</sup> Ibid. <sup>617</sup> Ibid. <sup>618</sup> Ibid. <sup>619</sup> Ibid. <sup>620</sup> Ibid. <sup>621</sup> Ibid. <sup>622</sup> Ibid. <sup>623</sup> Ibid. <sup>624</sup> Ibid. <sup>625</sup> Ibid. <sup>626</sup> Ibid. <sup>627</sup> Ibid. <sup>628</sup> Ibid. <sup>629</sup> Ibid. <sup>630</sup> Ibid. <sup>631</sup> Ibid. <sup>632</sup> Ibid. <sup>633</sup> Ibid. <sup>634</sup> Ibid. <sup>635</sup> Ibid. <sup>636</sup> Ibid. <sup>637</sup> Ibid. <sup>638</sup> Ibid. <sup>639</sup> Ibid. <sup>640</sup> Ibid. <sup>641</sup> Ibid. <sup>642</sup> Ibid. <sup>643</sup> Ibid. <sup>644</sup> Ibid. <sup>645</sup> Ibid. <sup>646</sup> Ibid. <sup>647</sup> Ibid. <sup>648</sup> Ibid. <sup>649</sup> Ibid. <sup>650</sup> Ibid. <sup>651</sup> Ibid. <sup>652</sup> Ibid. <sup>653</sup> Ibid. <sup>654</sup> Ibid. <sup>655</sup> Ibid. <sup>656</sup> Ibid. <sup>657</sup> Ibid. <sup>658</sup> Ibid. <sup>659</sup> Ibid. <sup>660</sup> Ibid. <sup>661</sup> Ibid. <sup>662</sup> Ibid. <sup>663</sup> Ibid. <sup>664</sup> Ibid. <sup>665</sup> Ibid. <sup>666</sup> Ibid. <sup>667</sup> Ibid. <sup>668</sup> Ibid. <sup>669</sup> Ibid. <sup>670</sup> Ibid. <sup>671</sup> Ibid. <sup>672</sup> Ibid. <sup>673</sup> Ibid. <sup>674</sup> Ibid. <sup>675</sup> Ibid. <sup>676</sup> Ibid. <sup>677</sup> Ibid. <sup>678</sup> Ibid. <sup>679</sup> Ibid. <sup>680</sup> Ibid. <sup>681</sup> Ibid. <sup>682</sup> Ibid. <sup>683</sup> Ibid. <sup>684</sup> Ibid. <sup>685</sup> Ibid. <sup>686</sup> Ibid. <sup>687</sup> Ibid. <sup>688</sup> Ibid. <sup>689</sup> Ibid. <sup>690</sup> Ibid. <sup>691</sup> Ibid. <sup>692</sup> Ibid. <sup>693</sup> Ibid. <sup>694</sup> Ibid. <sup>695</sup> Ibid. <sup>696</sup> Ibid. <sup>697</sup> Ibid. <sup>698</sup> Ibid. <sup>699</sup> Ibid. <sup>700</sup> Ibid. <sup>701</sup> Ibid. <sup>702</sup> Ibid. <sup>703</sup> Ibid. <sup>704</sup> Ibid. <sup>705</sup> Ibid. <sup>706</sup> Ibid. <sup>707</sup> Ibid. <sup>708</sup> Ibid. <sup>709</sup> Ibid. <sup>710</sup> Ibid. <sup>711</sup> Ibid. <sup>712</sup> Ibid. <sup>713</sup> Ibid. <sup>714</sup> Ibid. <sup>715</sup> Ibid. <sup>716</sup> Ibid. <sup>717</sup> Ibid. <sup>718</sup> Ibid. <sup>719</sup> Ibid. <sup>720</sup> Ibid. <sup>721</sup> Ibid. <sup>722</sup> Ibid. <sup>723</sup> Ibid. <sup>724</sup> Ibid. <sup>725</sup> Ibid. <sup>726</sup> Ibid. <sup>727</sup> Ibid. <sup>728</sup> Ibid. <sup>729</sup> Ibid. <sup>730</sup> Ibid. <sup>731</sup> Ibid. <sup>732</sup> Ibid. <sup>733</sup> Ibid. <sup>734</sup> Ibid. <sup>735</sup> Ibid. <sup>736</sup> Ibid. <sup>737</sup> Ibid. <sup>738</sup> Ibid. <sup>739</sup> Ibid. <sup>740</sup> Ibid. <sup>741</sup> Ibid. <sup>742</sup> Ibid. <sup>743</sup> Ibid. <sup>744</sup> Ibid. <sup>745</sup> Ibid. <sup>746</sup> Ibid. <sup>747</sup> Ibid. <sup>748</sup> Ibid. <sup>749</sup> Ibid. <sup>750</sup> Ibid. <sup>751</sup> Ibid. <sup>752</sup> Ibid. <sup>753</sup> Ibid. <sup>754</sup> Ibid. <sup>755</sup> Ibid. <sup>756</sup> Ibid. <sup>757</sup> Ibid. <sup>758</sup> Ibid. <sup>759</sup> Ibid. <sup>760</sup> Ibid. <sup>761</sup> Ibid. <sup>762</sup> Ibid. <sup>763</sup> Ibid. <sup>764</sup> Ibid. <sup>765</sup> Ibid. <sup>766</sup> Ibid. <sup>767</sup> Ibid. <sup>768</sup> Ibid. <sup>769</sup> Ibid. <sup>770</sup> Ibid. <sup>771</sup> Ibid. <sup>772</sup> Ibid. <sup>773</sup> Ibid. <sup>774</sup> Ibid. <sup>775</sup> Ibid. <sup>776</sup> Ibid. <sup>777</sup> Ibid. <sup>778</sup> Ibid. <sup>779</sup> Ibid. <sup>780</sup> Ibid. <sup>781</sup> Ibid. <sup>782</sup> Ibid. <sup>783</sup> Ibid. <sup>784</sup> Ibid. <sup>785</sup> Ibid. <sup>786</sup> Ibid. <sup>787</sup> Ibid. <sup>788</sup> Ibid. <sup>789</sup> Ibid. <sup>790</sup> Ibid. <sup>791</sup> Ibid. <sup>792</sup> Ibid. <sup>793</sup> Ibid. <sup>794</sup> Ibid. <sup>795</sup> Ibid. <sup>796</sup> Ibid. <sup>797</sup> Ibid. <sup>798</sup> Ibid. <sup>799</sup> Ibid. <sup>800</sup> Ibid. <sup>801</sup> Ibid. <sup>802</sup> Ibid. <sup>803</sup> Ibid. <sup>804</sup> Ibid. <sup>805</sup> Ibid. <sup>806</sup> Ibid. <sup>807</sup> Ibid. <sup>808</sup> Ibid. <sup>809</sup> Ibid. <sup>810</sup> Ibid. <sup>811</sup> Ibid. <sup>812</sup> Ibid. <sup>813</sup> Ibid. <sup>814</sup> Ibid. <sup>815</sup> Ibid. <sup>816</sup> Ibid. <sup>817</sup> Ibid. <sup>818</sup> Ibid. <sup>819</sup> Ibid. <sup>820</sup> Ibid. <sup>821</sup> Ibid. <sup>822</sup> Ibid. <sup>823</sup> Ibid. <sup>824</sup> Ibid. <sup>825</sup> Ibid. <sup>826</sup> Ibid. <sup>827</sup> Ibid. <sup>828</sup> Ibid. <sup>829</sup> Ibid. <sup>830</sup> Ibid. <sup>831</sup> Ibid. <sup>832</sup> Ibid. <sup>833</sup> Ibid. <sup>834</sup> Ibid. <sup>835</sup> Ibid. <sup>836</sup> Ibid. <sup>837</sup> Ibid. <sup>838</sup> Ibid. <sup>839</sup> Ibid. <sup>840</sup> Ibid. <sup>841</sup> Ibid. <sup>842</sup> Ibid. <sup>843</sup> Ibid. <sup>844</sup> Ibid. <sup>845</sup> Ibid. <sup>846</sup> Ibid. <sup>847</sup> Ibid. <sup>848</sup> Ibid. <sup>849</sup> Ibid. <sup>850</sup> Ibid. <sup>851</sup> Ibid. <sup>852</sup> Ibid. <sup>853</sup> Ibid. <sup>854</sup> Ibid. <sup>855</sup> Ibid. <sup>856</sup> Ibid. <sup>857</sup> Ibid. <sup>858</sup> Ibid. <sup>859</sup> Ibid. <sup>860</sup> Ibid. <sup>861</sup> Ibid. <sup>862</sup> Ibid. <sup>863</sup> Ibid. <sup>864</sup> Ibid. <sup>865</sup> Ibid. <sup>866</sup> Ibid. <sup>867</sup> Ibid. <sup>868</sup> Ibid. <sup>869</sup> Ibid. <sup>870</sup> Ibid. <sup>871</sup> Ibid. <sup>872</sup> Ibid. <sup>873</sup> Ibid. <sup>874</sup> Ibid. <sup>875</sup> Ibid. <sup>876</sup> Ibid. <sup>877</sup> Ibid. <sup>878</sup> Ibid. <sup>879</sup> Ibid. <sup>880</sup> Ibid. <sup>881</sup> Ibid. <sup>882</sup> Ibid. <sup>883</sup> Ibid. <sup>884</sup> Ibid. <sup>885</sup> Ibid. <sup>886</sup> Ibid. <sup>887</sup> Ibid. <sup>888</sup> Ibid. <sup>889</sup> Ibid. <sup>890</sup> Ibid. <sup>891</sup> Ibid. <sup>892</sup> Ibid. <sup>893</sup> Ibid. <sup>894</sup> Ibid. <sup>895</sup> Ibid. <sup>896</sup> Ibid. <sup>897</sup> Ibid. <sup>898</sup> Ibid. <sup>899</sup> Ibid. <sup>900</sup> Ibid. <sup>901</sup> Ibid. <sup>902</sup> Ibid. <sup>903</sup> Ibid. <sup>904</sup> Ibid. <sup>905</sup> Ibid. <sup>906</sup> Ibid. <sup>907</sup> Ibid. <sup>908</sup> Ibid. <sup>909</sup> Ibid. <sup>910</sup> Ibid. <sup>911</sup> Ibid. <sup>912</sup> Ibid. <sup>913</sup> Ibid. <sup>914</sup> Ibid. <sup>915</sup> Ibid. <sup>916</sup> Ibid. <sup>917</sup> Ibid. <sup>918</sup> Ibid. <sup>919</sup> Ibid. <sup>920</sup> Ibid. <sup>921</sup> Ibid. <sup>922</sup> Ibid. <sup>923</sup> Ibid. <sup>924</sup> Ibid. <sup>925</sup> Ibid. <sup>926</sup> Ibid. <sup>927</sup> Ibid. <sup>928</sup> Ibid. <sup>929</sup> Ibid. <sup>930</sup> Ibid. <sup>931</sup> Ibid. <sup>932</sup> Ibid. <sup>933</sup> Ibid. <sup>934</sup> Ibid. <sup>935</sup> Ibid. <sup>936</sup> Ibid. <sup>937</sup> Ibid. <sup>938</sup> Ibid. <sup>939</sup> Ibid. <sup>940</sup> Ibid. <sup>941</sup> Ibid. <sup>942</sup> Ibid. <sup>943</sup> Ibid. <sup>944</sup> Ibid. <sup>945</sup> Ibid. <sup>946</sup> Ibid. <sup>947</sup> Ibid. <sup>948</sup> Ibid. <sup>949</sup> Ibid. <sup>950</sup> Ibid. <sup>951</sup> Ibid. <sup>952</sup> Ibid. <sup>953</sup> Ibid. <sup>954</sup> Ibid. <sup>955</sup> Ibid. <sup>956</sup> Ibid. <sup>957</sup> Ibid. <sup>958</sup> Ibid. <sup>959</sup> Ibid. <sup>960</sup> Ibid. <sup>961</sup> Ibid. <sup>962</sup> Ibid. <sup>963</sup> Ibid. <sup>964</sup> Ibid. <sup>965</sup> Ibid. <sup>966</sup> Ibid. <sup>967</sup> Ibid. <sup>968</sup> Ibid. <sup>969</sup> Ibid. <sup>970</sup> Ibid. <sup>971</sup> Ibid. <sup>972</sup> Ibid. <sup>973</sup> Ibid. <sup>974</sup> Ibid. <sup>975</sup> Ibid. <sup>976</sup> Ibid. <sup>977</sup> Ibid. <sup>978</sup> Ibid. <sup>979</sup> Ibid. <sup>980</sup> Ibid. <sup>981</sup> Ibid. <sup>982</sup> Ibid. <sup>983</sup> Ibid. <sup>984</sup> Ibid. <sup>985</sup> Ibid. <sup>986</sup> Ibid. <sup>987</sup> Ibid. <sup>988</sup> Ibid. <sup>989</sup> Ibid. <sup>990</sup> Ibid. <sup>991</sup> Ibid. <sup>992</sup> Ibid. <sup>993</sup> Ibid. <sup>994</sup> Ibid. <sup>995</sup> Ibid. <sup>996</sup> Ibid. <sup>997</sup> Ibid. <sup>998</sup> Ibid. <sup>999</sup> Ibid. <sup>1000</sup> Ibid. <sup>1001</sup> Ibid. <sup>1002</sup> Ibid. <sup>1003</sup> Ibid. <sup>1004</sup> Ibid. <sup>1005</sup> Ibid. <sup>1006</sup> Ibid. <sup>1007</sup> Ibid. <sup>1008</sup> Ibid. <sup>1009</sup> Ibid. <sup>1010</sup> Ibid. <sup>1011</sup> Ibid. <sup>1012</sup> Ibid. <sup>1013</sup> Ibid. <sup>1014</sup> Ibid. <sup>1015</sup> Ibid. <sup>1016</sup> Ibid. <sup>1017</sup> Ibid. <sup>1018</sup> Ibid. <sup>1019</sup> Ibid. <sup>1020</sup> Ibid. <sup>1021</sup> Ibid. <sup>1022</sup> Ibid. <sup>1023</sup> Ibid. <sup>1024</sup> Ibid. <sup>1025</sup> Ibid. <sup>1026</sup> Ibid. <sup>1027</sup> Ibid. <sup>1028</sup> Ibid. <sup>1029</sup> Ibid. <sup>1030</sup> Ibid. <sup>1031</sup> Ibid. <sup>1032</sup> Ibid. <sup>1033</sup> Ibid. <sup>1034</sup> Ibid. <sup>1035</sup> Ibid. <sup>1036</sup> Ibid. <sup>1037</sup> Ibid. <sup>1038</sup> Ibid. <sup>1039</sup> Ibid. <sup>1040</sup> Ibid. <sup>1041</sup> Ibid. <sup>1042</sup> Ibid. <sup>1043</sup> Ibid. <sup>1044</sup> Ibid. <sup>1045</sup> Ibid. <sup>1046</sup> Ibid. <sup>1047</sup> Ibid. <sup>1048</sup> Ibid. <sup>1049</sup> Ibid. <sup>1050</sup> Ibid. <sup>1051</sup> Ibid. <sup>1052</sup> Ibid. <sup>1053</sup> Ibid. <sup>1054</sup> Ibid. <sup>1055</sup> Ibid. <sup>1056</sup> Ibid. <sup>1057</sup> Ibid. <sup>1058</sup> Ibid. <sup>1059</sup> Ibid. <sup>1060</sup> Ibid. <sup>1061</sup> Ibid. <sup>1062</sup> Ibid. <sup>1063</sup> Ibid. <sup>1064</sup> Ibid. <sup>1065</sup> Ibid. <sup>1066</sup> Ibid. <sup>1067</sup> Ibid. <sup>1068</sup> Ibid. <sup>1069</sup> Ibid. <sup>1070</sup> Ibid. <sup>1071</sup> Ibid. <sup>1072</sup> Ibid. <sup>1073</sup> Ibid. <sup>1074</sup> Ibid. <sup>1075</sup> Ibid. <sup>1076</sup> Ibid. <sup>1077</sup> Ibid. <sup>1078</sup>

### Map 2-4: Racial and Ethnic Majority by Census Tract



Map 2-5: Population Distribution of Non-Whites





**Mathew L. Millen**  
**Attorney at Law**  
**10880 Wilshire Blvd. Suite 1050**  
**Los Angeles, CA 90024**  
**(310)470-8071**

June 1,, 2022

Comments Regarding Updating the Housing Element  
Agendd Item 3M Meeting June 14, 2022  
Sent via email to: [councilmtgitems@santamonica.gov](mailto:councilmtgitems@santamonica.gov)

The February 8, 2022 letter from the Dept of Housing and Community Development rejected the City Housing Element because the City proposal failed to "overcome patterns of segregation<sup>1</sup> and foster inclusive communities. In response, the element now appears to promote accessory dwelling units; an insufficient action given the **perpetuated segregation noted in the element.**"

**"We know that it's not by coincidence that poor people are relegated to the Pico neighborhood" de la Torre said. "We know that it was by design".**

**Segregation<sup>1</sup> is a root cause of the dilemma we face today" School Board Member Oscar De La Torre quoted in [www.Surfsantamonica.com](http://www.Surfsantamonica.com) December 2004**

**TO IMPLEMENT GOVERNMENT CODE 8899.50 et seq AFFH THE CITY HAS TO IMPOSE A MORATORIUM ON NEW LOW INCOME HOUSING PROJECTS IN THE PICO NEIGHBORHOOD INCLUDING BERGAMOT FOR THE NEXT 10 YEARS<sup>3</sup>**

**The geographic boundaries of the Pico Neighborhood are South: Pico Blvd; West Lincoln Blvd; North Santa Monica Blvd to 20<sup>th</sup> St. then South to Colorado then East to Centinela. This includes Bergamot!**

**SUGGESTION; TRADE/SWAP THE BERGAMOT SITE FOR THE GELSON'S SITE. THE CITY CAN BUILD THE LOW INCOME HOUSING AT THE GELSON'S SITE AND A.F.F.H.**

<sup>1</sup> This reference is the Pico Neighborhood. See my prior correspondence.

<sup>2</sup> The "design" Mr. De La Torre is referring to is the saturation of the Pico Neighborhood with city developed low income housing projects after the restrictive covenants were declared unconstitutional by the US Sup. Court

<sup>3</sup> I represent a native of Mexico, who is an honorably discharged, disabled veteran of the United States Army, and a naturalized United States Citizen. He wishes to remain anonymous due to fear of harassment by SMRR

The developer of the Gilson's site can then build various housing types, including ownership opportunities on the larger Bergamot site.

In addition, the homeowners on the City Council and Planning Commission should build Accessory Dwelling Units on their parcels and rent them to Section 8 VASH veterans as a show of good faith.

Resperfully submitted,

  
W L. Millen

**FILED**  
Superior Court of California  
County of Los Angeles

**FEB 13 2019**

Sherri R. Cartwright, Deputy Clerk  
Neelam. Raya, Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

**PICO NEIGHBORHOOD ASSOCIATION,** ) Case No.: BC616804  
**et al.** )  
 )  
PJ.aintiffs, ) STATEMENT OF DECISION  
 )  
 )  
CITY OF SANTA MONICA, )  
 )  
 )  
**Defendant.** )

Pursuant to CCP §632, the Court issues the following  
Statement of Decision in support of its Judgment after court  
trial:

**DISCUSSION**

1. PJ.aintiffs' Pico Neighborhood Association ("PNA"), Maria  
Loyali ("Loya"), filed a First Amended Complaint alleging two  
causes of action: 1) Violation of the California Voting Rights

1 Elec~~ti~~ons (CURE} specifically noted the Watsonville case in  
2 urging the Santa Monica City Council to place the issue of  
3 substituting distric~~t~~ for at-large elections on the ballot,  
4 allowing Santa Monica voters to decide the question. With the  
5 issue~~d~~ of at-large-elections diluting minority vote \*receiving  
6 increased attention in Santa Monica and throughout C~~al~~ifornia,  
7 Defendant appointed a 15-member Charter Review Com~~mi~~ssion to  
8 study the matter and make recommendations to the City council.  
9 76. [As part of their investigation, the Charter Review  
10 commission sought the analysis of Plaintiff's expert, Dr.  
11 Kousiser, who had just completed his work in Garza regarding  
12 discriminatory intent in the way Los Angeles County's  
13 supervisorial districts had been drawn. Dr. Kousser was asked  
14 whether Santa Monica's at-large election system was adopted or  
15 maintained for a discriminatory purpose, and Dr. Ko~~u~~~~s~~~~s~~~~e~~~~r~~  
16 concluded that it was, for all of the reasons disc~~us~~~~s~~~~e~~~~d~~ above.  
17 Based~~d~~ on their extensive study and investigations, the near-  
18 unanimous Charter Review Commission recommended that Defendant's  
19 at-large election system be eliminated. The principal reason  
20 for that recommendation was that the at-large system prevents  
21 minorities and the minority-concentrated Pico Neighb~~or~~hood from  
22 having a seat at the table.  
23 77.. That recommendation went to the City Council in July 1992,  
24 and ~~is~~ the subject of a public city council meeting~~d~~ - - - : Excerpts

from the video of that hours-long meeting were played at trial,  
and provide direct evidence of the intent of the then-members of  
Defendant's City Council. One speaker after another - members  
of the Charter Review Commission, the public, an attorney from  
the Mexican American Legal Defense and Education Fund, and even  
a former councilmember - urged Defendant's City Council to  
change its at-large election system. Many of the speakers  
specifically stressed that the at-large system discriminated  
against Latino voters and/or that courts might rule that they  
did in an appropriate case. Though the City Council understood  
well that the at-large system prevented racial minorities from  
achieving representation - that point was made by the Charter  
Review Commission's report and several speakers and was never  
challenged - the members refused by a 4-3 vote to allow the  
vote to change the system that had elected them.  
78. Councilmember Dennis Zane explained his perspective  
reasoning: in a district system, Santa Monica would no longer  
be able to place a disproportionate share of affordable housing  
into the minority-concentrated Pico Neighborhood, where,  
according to the unrefuted remarks at the July 1992 council  
meeting, the majority of the city's affordable housing was  
already located, because the Pico Neighborhood district's  
representative would oppose it. Mr. Zane's comments were candid  
and revealing. He specifically phrased the issue as one of

1 Latino representation versus affordable housing: "(Sp you gain  
2 the representation but you lose the housing."<sup>12</sup> While this  
3 professed rationale could be characterized as not demonstrating  
4 that Mr. Zane or his colleagues "harbored any ethnic or racial  
5 animus toward the... Hispanic community," it nonetheless  
6 reflects intentional discrimination-Mr. Zane understood that his  
7 action would harm Latinos' voting power, and he took that action  
8 to maintain the power of his political group to continue dumping  
9 affordable housing in the Latino-concentrated neighborhood  
10 despite their opposition. Garza, supra, 918 F.2d at 78 (J.  
11 Kozinski, concurring) (finding that incumbents preserving their  
12 power by drawing district lines that avoided a higher proportion  
13 of Latinos in one district was *intentionally discriminatory*  
14 *despite the lack of any racial animus*), cert. denied (1991) 111  
15 S.Ct. 681.

16  
17 In addition to Mr. Zane's contemporaneous explanation of  
18 his own decisive vote, the Court also considers the  
19 circumstantial evidence of intent revealed by the Arlington  
20 Heights factors. While those non-exhaustive factors do not each

21  
22 Mr. Zane's insistence on a tradeoff between Latino representation and  
23 policy goals that he believed would be more likely to be accomplished by an  
24 at-large council echoed comments of the *Santa Monica Evening Outlook*, the  
25 chief sponsor of and spokesman for the charter change to an at-large city  
council in 1946. "[G]roups such as organized labor and the colored people,"  
the newspaper announced, should realize that "The interest of minorities is  
always best protected by a system which favors the election of liberal-minded  
persons who are not compelled to play peanut politics. Such liberal-minded  
persons, of high caliber, will run for office and be elected if elections are  
held at large."

1 reveal discrimination to the same extent, on balance, they also  
2 militate in favor of finding discriminatory intent - \*? this case.  
3 Title discriminatory impact of the at-large election system was felt  
4 immediately after its maintenance in 1992. The first and only;  
5 Latino elected to the Santa Monica City council lost his  
6 re-election bid in 1994 in an election marred by racial appeals  
7 - a notable anomaly in Santa Monica where election records  
8 establish that incumbents lose very rarely. Bolden v. City of  
9 Mobile (S.D. Ala. 1982) 542 F.Supp. 1050, 1076 (relying on the  
10 lack of success of Black candidates over several decades to show  
11 disparate impact, even without a showing that Black voters voted  
12 for each of the particular Black candidates going back to 1874.)  
13 Moreover, the impact on the minority-concentrated Pico  
14 Neighborhood over the past 72 years, discussed above, also  
15 demonstrates the discriminatory impact of the at-large election  
16 system in this case, and has continued well past 1992. Gingles,  
17 supra, 478 U.S. at 48, n. 14 (describing how at-large election  
18 systems tend to cause elected officials to "ignore [minority]  
19 interests without fear of political consequences.")  
20  
21 80. The historical background of the decision in 1992 also  
22 militate in favor of finding a discriminatory intent. At-large  
23 elections are well known to disadvantage minorities, and that  
24 was well understood in Santa Monica in 1992. In 1992, the non-  
25 White population was sufficiently compact (in the Pico



The Pico Neighborhood in Santa Monica. Photo: Sam Catanzaro.

## Residents in Certain Santa Monica Neighborhoods Eligible for LA County Guaranteed Income Program

Residents in downtown and Pico neighborhoods eligible for \$1,000 a month program

By Sam

Residents of certain Santa Monica neighborhoods are eligible to apply for LA County's new \$1,000 a month guaranteed income program.

The program, called "Breathe", launched on March 31 and will award 1,000 randomly selected qualifying residents \$1,000 a month for three years.

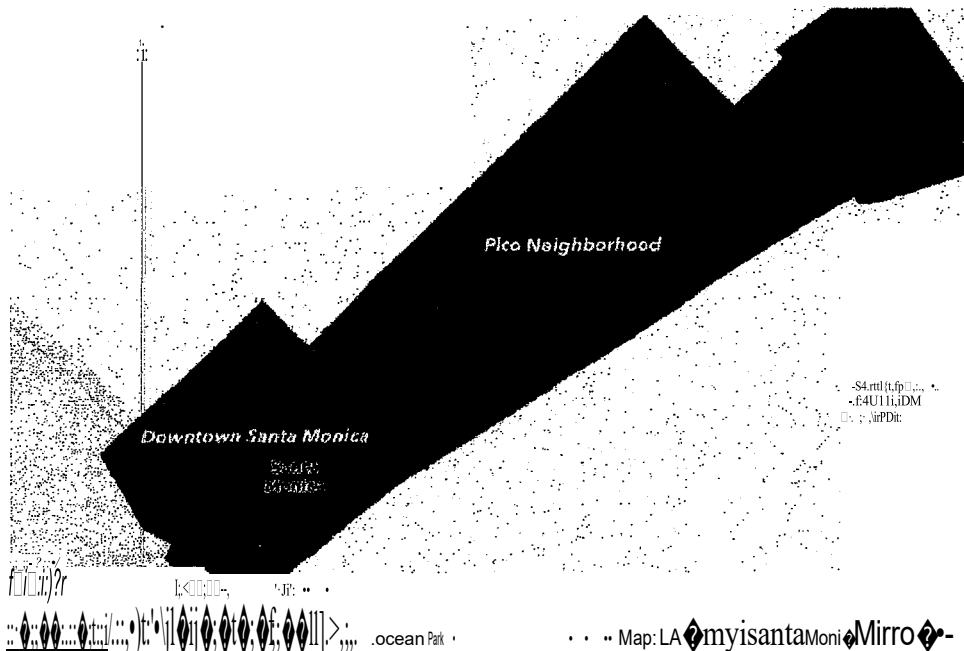
"The collapse of this pandemic has revealed the large number of County residents who are living on the brink of financial crisis, with insufficient ability to weather a job loss, a medical emergency, or a major car repair. This guaranteed income program will help give residents the breathing room they need to better weather those crises," said program co-author Supervisor Sheila Kuehl.

The enrollment period opened on March 31 and the deadline for applications is April 13. Selection will not depend on the timing of entries. The program is being overseen by the County's Poverty Alleviation Initiative, launched last year to address poverty and income instability among Los Angeles County residents.

Applicants must be at least 18 years old and with a household income that falls at or below LA County's average median income (AMI) of \$56,000 for a single-person household or 120 percent of AMI at or below \$96,000 for a family of four, for example. They must also have been negatively impacted by the COVID-19 pandemic.



In addition, Jucants are required to live within what LA County deems a low-income community. In Santa Monica, two neighborhoods fall under this category: Pico and Downtown. Pico's Boundaries are Lincoln Boulevard to the west, Centinela Avenue to the east, Olympic Boulevard to the north and Pico Boulevard to the south, Downtown contains Wilshire Boulevard, Arizona Avenue, Santa Monica Boulevard, Broadway, and Pico Avenue from Ocean Avenue to Lincoln Boulevard.

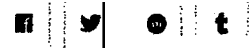


A total of 1,000 participants who apply during the open enrollment period will be randomly selected by a research team from the University of Pennsylvania's Center for Guaranteed Income Research, which is partnering with the County to design and implement the program. Direct monthly payments will be distributed via a debit card to selected residents and will come without strings or conditions.

After participants are selected, another 1,200 applicants will be randomly chosen to participate in the research study only, as part of a control group. Control group participants will not receive the monthly payment. They will complete periodic surveys and interviews about their well-being so that information can be compared to the treatment group and help determine whether or not the program was effective.

To learn more about the program, visit [breathe Jacountf.g21f](#)

BYA Wt-W 11/14 April 8, 2022  
tn.tLa



## RELATED POSTS



NEWS

### JJSPS Suspends Service to Santa Monica Block Following Assault on Mail Carrier

April 11, 2022 [Sam Catanzaro](#)

Residents on the 1300 block of 14th Street without delivery service following multiple assaults By Sam Catanzaro The United States...

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT**  
**DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500  
 Sacramento, CA 95833  
 (916) 263-2911 / Fax (916) 263-7453  
[www.hcd.ca.gov](http://www.hcd.ca.gov)



February 8, 2022

David White, City Manager  
 City of Santa Monica  
 1685 Main Street  
 Santa Monica, CA 90401

Dear David White:

**RE: City of Santa Monica's 6<sup>th</sup> Cycle (2021-2029) Adopted Housing Element**

Thank you for submitting the City of Santa Monica's (City) housing element adopted on October 12, 2021 and received for review on November 10, 2021. Pursuant to Government Code section 65585, subdivision (h), the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from Kenneth Kutcher, Abundant Housing LA, Santa Monica Housing Council, Jason Mastbaum, Tiera Ryder, YIMBY Law, Matthew Millen and the League of Women Voters of Santa Monica, pursuant to Government Code section 65585, subdivision (c).

The adopted element addresses many statutory requirements described in HCD's August 30, 2021 review; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households and commenters on this review, by making information regularly available and considering and incorporating comments where appropriate.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 6th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD for review housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the

EXHIBIT" : (...  
 221 27

statutory deadline (October 15, 2021), then any rezoning to accommodate the regional housing needs allocation, including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1118 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

We appreciate your hard work and the diligent effort and cooperation of the entire housing element update team. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact me at [paul.mcdougall@hcd.ca.gov](mailto:paul.mcdougall@hcd.ca.gov).

Attachment 7

Paul McDougall

Senior Program Manager

Enclosure

## APPENDIX CITY OF SANTA MONICA

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>. Among other resources, the housing element section contains HCD's latest technical assistance tool, Building Blocks for Effective Housing Elements (Building Blocks), available at <http://www.hcd.ca.gov/community-development/building-blocks/index.shtml> and includes the Government Code addressing State Housing Element Law and other resources.

### A. Housing Needs Resources and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

Sites Inventory : While the element includes some general discussion regarding the identification of sites and affirmatively furthering fair housing (AFFH). The element should still include analysis such as the number of units by income group and location, impact, or lack of conformity on existing patterns and isolation of the regional housing need allocation (RHNA) to evaluate whether fair housing conditions are improved or exacerbated.

Local Data and Knowledge and Other Relevant Factors: The element generally was not revised to address this requirement. Please see HCD's prior review.

Goals, Priorities, Metrics, and Milestones: The element must be revised to add or modify goals and actions based on the outcomes of a complete analysis. Actions must have metrics and milestones to target meaningful outcomes and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community revitalization and displacement protection.

2. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Realistic Capacity : The element now lists recent developments to support capacity assumptions, however, the analysis of realistic capacity should also account for recent development by affordability as noted in the prior review. This is particularly important since some development affordable to lower-income households may not be built at higher densities assumed in the inventory. In addition, as noted in the prior review, the calculation of residential capacity should account for the likelihood of 100 percent nonresidential uses.

The element describes some recent trends and concludes residential is very likely, but the information also indicates that 100 percent nonresidential uses does occur (p. F-7) and the element should account for this likelihood in the calculation of capacity.

Suitability of Nonvacant Sites: The element includes some additional discussion of the various categories of sites, market conditions and lists some recent redevelopment activities. However, the element should still include analysis of the extent existing uses impeded additional development. For example, the element describes various factors utilized to identify high potential sites but does not appear to reflect all of those factors in the inventory. Further, the element lists recent trends but should also utilize those trends to support the validity of factors used to determine potential. Please see HCD's prior review for additional information.

In addition, for your information, the element relies on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households, which triggers requirements to make findings based on substantial evidence that the existing use is not an impediment and will likely discontinue in the planning period. While the resolution of adoption includes the appropriate findings, any changes to the analysis should be reflected in future re-adoption of the element.

City-Owned Sites: The element now lists City-Owned sites and indicates sites can be available for development in the planning period. However, given the reliance on these sites and as noted in the prior review, the element should include some discussion on the potential schedule of availability for development in the planning period and revise programs as appropriate to facilitate development on these sites in the planning period.

Access to Dwelling Units ADU : The element now clarifies recent ADU trends to include permitted units and adjusts the number of ADUs assumed to be permitted in the planning period. However, as noted in the prior review, HCD records indicate far different ADU trends than what is indicated in the element. The City should reconcile these figures and adjust assumptions as appropriate. Please see HCD's prior review for additional information.

Small Sites: Sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size and affordability were successfully developed during the prior planning period; or unless the housing element describes other evidence these sites are adequate to accommodate lower income housing. The element lists some recent trends on small sites; however, these trends do not appear to align with assumptions in the inventory as noted in the prior review. For example, the element identifies many sites that accommodate less than 15 units for lower-income households, but trends indicate most developments that are 100 percent affordable for lower-income households are 15 or more units. Please see HCD's prior review for additional information.

Infrastructure: As noted in the prior review, the element must still describe sufficient existing and planned total infrastructure sewer capacity to accommodate the RHNA and include programs, if necessary.

Electronic Site Inventory : As noted in the prior review, pursuant to Government Code section: 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory and submit an electronic version of the site inventory. While the City has submitted an electronic version of the sites inventory, if changes occur, any future re-adopted versions of the element must also submit the electronic version of the sites inventory.

Zoning for a Variety of Housing Types:

- Emergency Shelters: The element discusses the number of parcels in various zones but should still discuss opportunities for redevelopment or reuse. In addition, the element indicates parking requirements are inconsistent with Section 139 (Chapter 335, Statutes of 2019) and Program should specifically commit to revise parking requirements.
  - Permanent Supportive Housing: The element describes permanent supportive housing uses are permitted uses but should clarify the uses are permitted without discretionary action. If necessary, programs should specifically commit to amending zoning to permit these uses without discretionary action.
  - Employee Housing: The element states the City does not regulate housing for six or fewer persons and therefore complies with the Employee Housing Act. However, zoning should explicitly comply with the provisions of the Employee Housing Act and programs should be revised to specifically amend zoning and procedures. Please see HCD's prior review.
3. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as follows: Identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65503.3, subd. (a)(5).)*

Land Use Controls: The element generally describes programs that were added to address constraints. However, those programs do not include specific commitment to review or modify standards and generally commit to only review and change land use controls if necessary. Instead, the element update should review or analyze those land use controls and programs should specifically commit to address constraints. Please see HCD's prior review for additional information.

Fees and Exaction: The element generally describes that typical development on identified sites will not require a conditional use permit and therefore no analysis of planning fees as potential constraints is necessary. However, the element should evaluate fees as constraints regardless of the RHNA or identified sites. Please see HCD's prior review.

Local Processing and Permit Procedures: While the element now includes Program 1.B to streamline architectural review, it must still evaluate approval findings for

impacts on housing and add or modify programs as appropriate. Please see HCD's prior review.

## **B. Housing Programs**

1. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in Finding A2, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

*Shortfall of Sites:* Program 1.A (By-right Approvals) mentions various zoning amendment, however, as noted in the prior review, the Program must specifically commit to acreage, allowable densities, anticipated units and meet all requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i).

*Program 1A (Streamlined Approvals for Housing Projects):* As noted in the prior review, this program should clarify the allowance of by-right developments for sites identified in previous cycles if the project includes at least 20 percent affordable housing pursuant to Government Code Section 65583.2.

*City-Owned Sites:* Program 2E (Affordable Housing on City-owned/Publicly-owned Land) was revised to issue at least one request for proposal in the planning period. But, given the reliance on City-Owned sites, the Program should have far greater commitment to facilitate development on City-owned sites and in stride with assumption for the planning period. Please see HCD's prior review for additional information, including rezoning pursuant to Government Code section 65583.2, subdivisions (h) and (i).

2. *Add, and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*



As noted in Findings A3, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and *remove* or mitigate any identified constraints.

In addition, while the element includes Program 4.1 to amend zoning for a variety of housing types, the Program should include specific commitment to amend zoning for identified constraints related to the definition of households, residential care facilities for *two or more persons*, parking for emergency shelters, permanent supportive housing and employee housing.

3. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

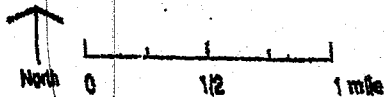
As noted in Finding A1, the element requires a complete analysis of AFFH. Depending upon the results of that analysis, the City may need to revise or add programs to affirmatively further fair housing. In addition, HCD's prior review found the City should revise Program 4.0 (Rezoning R1 Neighborhoods) with meaningful and sufficient actions to oversee the attempts of segregation and foster inclusive communities. In response, the element now appears to only promote accessory dwelling units; an insufficient action given the perpetuated segregation noted in the element. Please see HCD's prior review.

State identifies  
& confirms segregation  
in Pico Neighborhood



### Legend

- City Boundary
- Streets
- Census Tract Boundary
- Census Tract Number
- Census Tracts with more than 30% Minority Population



Source: 2000 Census

**Figure 1**  
**Minority Population**  
**by Census Tract**

Figure 1-J  
Minority Population  
by Census Tract

CITY OF  
SANTA MONICA  
HOUSING ELEMENT

- City Boundary
- Census Tract Boundary
- Census Tract Number
- Streets
- Census Tracts with more than 30% minority population

source: 1990 CEN

fr. 404  
fr. 6 neighborhood



problems with Housing Element

Mathew M llen <matmillen@msn.com>

Mon 10/4/2021 2:09 PM

To: sue.himmelrich <sue.himmelrich@smgov.net>; oscar.delatorre@smgov.net <oscar.delatorre@smgov.net>;

n

cou cil@s;tt,:;NDANT HOUSING LA HAS TO SAY ABOUT  
SANTA MONICA'S PROPOSED HOUSING ELEMENT

**Fair Housing Act became the law of the land in 1968. Why do patterns of segregation persist to this day?**

The 1960s were an era of great struggles but also remarkable progress on civil rights, culminating in the year 1968. On February 29th of that year, the National Advisory Commission on Civil Disorders, after studying widespread civil unrest found that, all too often, America consisted of two separate and unequal societies, one for whites and one for Blacks; and such a societal structure was cemented and maintained by where Blacks can and cannot live. In the wake of Reverend Dr. Martin Luther King Jr.'s assassination and nationwide protests, Congress passed the Fair Housing Act, which outlawed housing discrimination based on race, religion, national origin, sex, (and as amended) handicap and family status.

A brief period of reform followed. The new Department of Housing and Urban Development (HUD) and its secretary, George Romney, was tasked with "affirmatively furthering" fair housing (sound familiar?). The HUD sought to integrate well-resourced, whites-only suburbs and demanded that these areas allow more affordable housing - an effort known as "Open Communities". Unsurprisingly, the Open Communities initiative was met with fierce local resistance. Romney tried to enforce integration by withholding federal funding from non complying municipalities, but Nixon, afraid of losing suburban white votes, quickly intervened to halt all such efforts.

Had the federal government actually enforced fair housing laws five decades ago, today's America would be very different. Today, Californians have the opportunity to decide whether or not to enforce our own fair housing law. AB 686 (2018) requires all state and local public agencies to "facilitate deliberate action to explicitly address, combat, and relieve disparities resulting from past patterns of segregation to foster more inclusive communities". It is up to the Newsom administration and the Department of Housing and Community Development to enforce this law and demand cities create fair housing elements that encourage strong housing growth at all levels of income.

**Tell HCD:  
enforce housing element laws**

Under California's Regional Housing Needs Assessment, cities must update the housing element in a way that encourages historically high housing growth, while affirmatively furthering fair housing opportunities and undoing patterns of

discrimination in housing. This offers a once-in-a-generation opportunity to address the need for more housing in a way that furthers equity, environmental sustainability, and economic recovery.

Unfortunately, many Southern California cities are submitting housing elements that don't meet the state's requirements, and are effectively treating fair housing law as optional. For example, Santa Monica has proposed a housing element that promotes almost all housing growth in formerly redlined areas. South Pasadena and Beverly Hills are proposing housing on sites where it's very unlikely to be built, such as city halls, vacant parcels of railroad track, and historic theaters. These cities are using bad-faith tactics to superficially comply with the law, while avoiding rezoning exclusive areas to allow more housing.