

June 16, 2017

Rose Cade
San Mateo County Department of Housing
264 Harbor Blvd., Bldg. A
Belmont, CA 94002

Re: Initial Input for Draft Assessment of Fair Housing

Dear Ms. Cade:

The ongoing Assessment of Fair Housing (“AFH”) finds San Mateo County at an important crossroads in terms of civil rights and equal opportunity. While the local powerhouse economy has generated stunning job growth in recent years, including a large proportion of working class jobs, the pressures of a long-running housing crisis pose a serious threat to the ability of families with children, seniors, persons with disabilities, and Latino, Asian immigrant, and African American residents to remain in the community and benefit from the rising prosperity. In addition to pressures pushing residents out of the area, disparities in access to opportunity and housing needs persist across neighborhoods and communities within the county, carving an uneven playing field that fails to live up to our shared ideals.

As you know, the duty to affirmatively further fair housing, imposed by federal law as a condition of receiving funding from HUD, requires San Mateo County and other local governments and agencies to take meaningful actions to address these serious fair housing problems.¹ We have already lost much of the African American population. The AFH is an essential step towards compliance with that duty.

In order to ensure that the AFH adequately addresses the pressing fair housing issues affecting residents of color, immigrants, families with children, seniors, and persons with

¹ 24 C.F.R. § 5.166 (requiring recipients of HUD funding to certify compliance with the duty to affirmatively further fair housing). San Mateo County, South San Francisco, Daly City, Redwood City, San Mateo City, the Housing Authority of San Mateo County, and the Housing Authority of South San Francisco are all subject to the duty to affirmatively further fair housing.

disabilities in San Mateo County, we write to offer initial recommendations regarding topics which should receive robust attention in the AFH, including:

- Displacement pressures in the rental market affecting members of protected classes, including those resulting from the absence of protections against rent increases and no-cause evictions;
- Local and regional patterns of segregation and disparities in access to opportunity, including a consideration of the location of affordable housing;
- Barriers or limitations experienced by protected classes with regard to access to jobs, high quality education, adequate transit services, a healthy environment, and high quality health care;
- The particular housing challenges facing Section 8 voucher holders and residents of mobilehome parks in San Mateo County.

We also offer some key principles that should guide the assessment’s analytical approach to discussing fair housing issues, prioritizing contributing factors, and setting fair housing goals and corresponding metrics and milestones.

Our organizations welcome the important discussions regarding equal housing opportunity that the AFH process has helped to promote in San Mateo County, and we are confident that our continued dialogue will facilitate a meaningful assessment. We hope that the AFH, as intended by federal law, will lay a strong foundation for expanding fair housing choice and access for San Mateo County workers and residents—including communities of color, immigrant populations, families with children, and persons with disabilities—in the years to come.

1. Essential Topics to Include in the AFH

The undersigned organizations are actively involved in representing, organizing, and/or supporting members of protected classes in San Mateo County as they navigate challenges related to housing and access to opportunity. Based on this experience, we believe that each of the following fair housing issues² must receive careful and prominent attention in the AFH.

First, the AFH must analyze displacement pressures and other challenges facing renters in San Mateo County’s brutal rental housing market as urgent and high priority fair housing issues. It is well documented that working class tenants, including many tenants of color and families with children, have been pushed out of their homes through mass evictions, harassment, and staggering rent increases in recent years.³ This displacement represents a direct loss of

² The AFFH rule defines a “fair housing issue” as “a condition in a program participant’s geographic area of analysis that restricts fair housing choice or access to opportunity, and includes such conditions as ongoing local or regional segregation or lack of integration, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing.” 24 C.F.R. § 5.152 (definition of “fair housing issue”).

³ Institute of Governmental Studies, University of California, Berkeley, *Displacement in San Mateo County, California: Consequences for Housing, Neighborhoods, Quality of Life, and Health*, Research Brief (May 2017), available online at http://www.urbandisplacement.org/sites/default/files/images/impacts_of_displacement_in_san_mateo_county.pdf

housing choice, and contributes to deepening segregation and unequal access to opportunity as diverse families are forced to move to lower resourced and frequently segregated communities.⁴ Moreover, the same pressures in the rental market that drive displacement contribute to—and increase the severity of—overcrowding, rent burden, poor livings conditions, and harassment experienced by tenants in protected classes.⁵ These dynamics should receive robust analysis and discussion in the AFH.

We also ask that the AFH consider the presence or absence of tenant protections, including rent stabilization, just cause, and anti-harassment provisions, when analyzing contributing factors related to segregation, access to opportunity, and disproportionate housing need in connection with the rental market. Such laws would protect tenants’ access to secure and stable housing in communities of opportunity, and would also mitigate some of the circumstances contributing to overcrowding, poor conditions, and cost burden. Review of the current application and impact of laws that limit evictions and rent increases in East Palo Alto and in County mobilehome parks would be useful to this discussion.

Second, the AFH must analyze segregation and access to opportunity at both a local and a regional level, identifying barriers to affordable housing and comparing the location of affordable housing sites to opportunity indicators and patterns of racial or ethnic concentration. As then-Judge Breyer wrote in a case regarding the duty to affirmatively further fair housing, the affirmative duty “reflects the desire to have HUD use its grant programs to assist in ending discrimination and segregation, to the point where the supply of genuinely open housing increases.”⁶ Both a regional and a local lens are necessary to adequately analyze segregation in the AFH. There is significant variation in the concentration of members of protected classes, together with income and markers of opportunity, within and between cities and unincorporated communities throughout San Mateo County. The same analysis should be repeated at a regional level, comparing demographic and opportunity indicators for San Mateo County with neighboring counties as well as places that are recognized destinations for displaced households (e.g. Stanislaus County in the Central Valley). In order to explore these patterns of segregation and disparities in access to opportunity, we recommend that the AFH make full use of the “local data” sets and maps addressing opportunity and segregation in the region, including those set out at the margin.⁷

⁴ *Id.* at 8 (“Households who were displaced [from rental homes in San Mateo County] currently live in neighborhoods with more affordable housing but access to fewer jobs, scoring over 10 points lower on the HUD Job Access index (on a 100-point scale) than the neighborhoods of households who were not displaced.”); *see also id.* at 10-11 (discussing negative impacts on transportation access, job opportunities, safety, access to healthcare services, and environmental quality); Kathleen Maclay, *Many in San Mateo County priced, pushed out of affordable housing*, Berkeley News (May 16, 2017), available online at <http://news.berkeley.edu/2017/05/16/many-in-san-mateo-county-found-priced-pushed-out-of-affordable-housing/> (“Thirty-three percent of [displaced] households left San Mateo County, generally moving to the Central Valley or eastern communities in the East Bay.”).

⁵ *Id.* at 2, 4-7, 12. HUD AFFH Data and Mapping Tool, Table 9 (Demographics of Households with Disproportionate Housing Needs). Overcrowding, rent burden, poor living conditions, and housing-related harassment disproportionately affecting members of protected classes are elements of “disproportionate housing need” as that term is used in the AFFH rule. 24 C.F.R. § 1.152 (defining “disproportionate housing need”).

⁶ *NAACP v. Sec’y of Housing and Urban Development*, 817 F.2d 149, 155 (1st Cir. 1987) (Breyer, J.).

⁷ *See* 24 C.F.R. § 1.52 (defining the term “local data”) and 24 C.F.R. §§ 1.154(c), (d)(2) (requiring use of local data in the AFH analysis). Relevant sources of local data include, but are not limited to, U.C. Berkeley’s Urban Displacement project, available online at <http://www.urbandisplacement.org/map/sf>; U.C. Davis’ Regional

As you work to identify the contributing factors to segregation and disparities in access to opportunity on both a local and regional level, we ask that you analyze zoning and planning barriers to affordable housing, multifamily housing, and accessible housing in each of the twenty one jurisdictions and include that analysis in the AFH. Examining current and proposed policies on preservation of mobilehome parks as a source of affordable housing is also an appropriate component of the AFH. Furthermore, we ask that you assess the impact that public opposition has on the development of affordable housing in individual communities throughout the County. Additionally, as one important gauge on the scale of exclusion resulting from San Mateo County's housing crisis, we also recommend that you refer to recent analyses of the "jobs-housing fit" between working class jobs in the county and housing affordable to working class individuals.⁸

To understand how low-income members of protected classes who do live within the county are affected by this geography, the AFH should compare the location of existing affordable housing⁹ to the demographic profile and opportunity indicators of the neighborhoods and cities where the housing is located. Additionally, the AFH should review the Housing Elements completed by each of the twenty-one jurisdictions in San Mateo County and compare the location of housing opportunity sites to patterns of racial or other concentration as well as markers of opportunity like transit access, the quality of educational opportunity, environmental quality, and other important opportunities.¹⁰

*Third, the AFH must identify disparities experienced by protected class members in access to high quality transit, access to high quality public education, access to high quality health care, and access to clean environmental conditions.*¹¹ To accomplish this analysis, we ask that you reach out to officials at state, regional, and local agencies charged with administering transit, education, health and environmental protection programs and initiate a collaboration with them to review relevant data and compile information on strategies for reducing disparities connected with their programs that are experienced by members of protected classes. In considering access to transit, for example, the AFH should examine the affordability of bus and train service in the county, the adequacy of transit routes to connect members of protected classes to important job centers like the San Francisco International Airport, and the frequency and quality of transit services that are used by members of protected classes.

Opportunity Index, available online at <http://interact.regionalchange.ucdavis.edu/roi/about.html> ; and the CalEnviroScreen, available online at <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>.

⁸ Chris Benner & Alex Karner, *Low-wage jobs-housing fit: identifying locations of affordable housing shortages*, Urban Geography, (2016) available online at <http://www.tandfonline.com/doi/full/10.1080/02723638.2015.1112565>; Alex Karner & Chris Benner, *Job growth, housing affordability, and commuting in the Bay Area, Prepared for the Bay Area Regional Prosperity Plan* (2015), available online at http://www.planbayarea.org/sites/default/files/pdf/prosperity/research/Jobs-Housing_Report.pdf.

⁹ Existing affordable housing may include units that have some kind of explicit affordability criteria (such as subsidized units, or deed-restricted units), or "naturally occurring" affordable housing in the private market that, although not protected or secured by an affordability requirement, is currently occupied by low-income residents.

¹⁰ The Housing Elements may be accessed via this website: <http://hcd.ca.gov/community-development/housing-element/index.shtml> .

¹¹ 24 C.F.R. § 5.154(d)(2)(iii).

Fourth, the AFH must adequately incorporate fair housing analyses from the two participating housing authorities – the Housing Authority of the County of San Mateo (HACSM) and the South San Francisco Housing Authority. As the public housing agency plan conforming amendments to the AFFH regulation state, “All admission and occupancy policies for public housing and Section 8 tenant-based housing programs must comply with Fair Housing Act requirements and other civil rights laws and regulations and with a PHA’s plans to affirmatively further fair housing.”¹² Accordingly, as part of the AFH process, we ask that the two PHAs involved evaluate their relevant planning documents, policies, and practices – including, as applicable, those that appear in their Admissions and Continued Occupancy Policy (public housing) and the Section 8 Administrative Plan (Section 8 Housing Choice Voucher program).

Regarding the HACSM, we recommend that the AFH examine the following policies, practices, and circumstances that may impact fair housing choice and access to opportunity for individuals and families served by the housing authority: (1) source of income discrimination by housing providers on the private rental market; (2) the effectiveness of any programs in place to increase landlord participation in the Housing Choice Voucher program; (3) the impact of time limitations on Section 8 voucher participants; (4) the impact on tenant rent burden of Housing Choice Voucher subsidy calculations based on the Tiered Subsidy Table; and (5) the geographic distribution of rental properties using Housing Choice Vouchers relative to high opportunity areas.

For both housing authorities, we urge the County to ensure that there is robust tenant participation by participant and applicant individuals and families served by these PHAs.

2. Qualitative Standards for the AFH Analysis

HUD’s regulation governing the AFH process recognizes that “[t]o develop a successful affirmatively furthering fair housing strategy, it is central to assess the elements and factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs.”¹³ The analysis prescribed for the AFH is designed to facilitate a thoughtful, principled report that addresses these issues in a way that can guide planning, policy and investment decisions.

To support this goal, we would like to make a few overarching comments about the approach the AFH should take, consistent with HUD regulations, to analyzing the important and sometimes politically thorny issues listed above.

First, the AFH should rely on grounded, factual analyses of fair housing issues and their contributing factors, avoiding the temptation to please key political stakeholders or seek a middle ground between conflicting positions. Several of the issues discussed in the first part of this letter are politically thorny topics that have previously generated conflict. In particular, we have noticed that opponents of rent stabilization and just cause protection for tenants have used arguments that at best distort basic information about these tenant protections, and at worst rely

¹² 24 C.F.R. § 903.15(d).

¹³ 24 C.F.R. § 5.154.

on racially coded language designed to incite opposition to policies that would protect a racially diverse tenant population. Of course, community opposition to policies that would increase housing opportunity for lower income households of color is nothing new—and it is decidedly not a valid basis for a local government averting its eyes from pressing fair housing issues in completing an AFH.¹⁴

Federal regulation imposes a responsibility on those drafting the AFH to examine issues like the ones discussed above in a factual, data-driven manner that is guided by a civil rights framework. The AFH must analyze, without fear or favor, the contributing factors of disproportionate housing needs, dynamics of segregation, restriction of fair housing choice, and disparities in access to opportunity. This clear-eyed, apolitical analysis must be targeted to informing policies and investments that will strengthen equal housing opportunity regardless of race, national origin, familial status, or disability status. In order to fulfill this function, it is extremely important that the AFH not provide a platform for fearmongering or factually baseless criticisms of policy options. With regard to tenant protections in particular, we encourage you to reach out to respected authorities who have an expertise in the legally permissible forms of rent stabilization and just cause limitations on eviction under California law.

Second, the AFH should assign high priority to pressures in the rental market and barriers to affordable housing as contributing factors that limit and/or deny fair housing choice. HUD regulations require that the AFH give highest priority to those contributing factors “that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.”¹⁵ Displacement resulting from unregulated rent increases and no cause evictions directly denies individuals the most natural housing choice, which is the choice to remain in their homes.¹⁶ Similarly, the inadequate supply of affordable housing throughout San Mateo County denies fair housing choice to many members of protected classes who cannot find housing they can afford within the County.

*Third, the AFH should set meaningful fair housing goals with clear “metrics and milestones” that can be used to judge progress.*¹⁷ The purpose of the AFH is to lay the groundwork for local governments and public housing authorities to take meaningful actions to achieve fair housing goals. HUD regulations define meaningful actions as “significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing.”¹⁸ Thus, the fair housing goals set out in the AFH should be selected so as to (1) reflect the scale of the problem they address, (2) target those who are most

¹⁴ To the contrary, HUD’s Guidebook Tool regarding the duty to affirmatively further fair housing and HUD’s Local Government Assessment Tool identify “community opposition” or “the opposition of community members to proposed or existing housing developments” as a potential contributing factor. Some of the undersigned organizations previously wrote to you to express the concern, among others, that political organized real estate interests were creating obstacles to fair housing goals by using unsavory tactics and racially coded appeals to oppose tenant protections like rent stabilization and just cause. See May 24, 2017 letter re: Special Interests and Civil Rights in Housing (attached).

¹⁵ 24 C.F.R. § 5.155(d)(4)(ii).

¹⁶ See 24 C.F.R. § 5.152 (defining fair housing choice to encompass, among other things “[a]ctual choice, which means the existence of realistic housing options”).

¹⁷ 24 C.F.R. § 5.155(d)(4)(iii)

¹⁸ 24 C.F.R. § 5.1.52 (emphasis added).

directly affected by the problem, (3) reflect a robust qualitative fit between the nature of the contributing factor and the goals for mitigating or preventing its adverse impact on protected classes. Then, to ensure progress towards fair housing goals, the AFH should set out metrics and milestones for each goal that include specific actions or steps, timelines, and measureable outcomes.

* * *

Thank you for your attention to these comments. We ask that you incorporate these recommendations as you draft the AFH. We look forward to reviewing and providing more detailed feedback regarding the draft AFH in the near future.

Sincerely,

Anne Bellows
Public Advocates

Salimah Hankins
Community Legal Services of East Palo Alto

Doroteo García
El Comité de Vecinos

Thursday Roberts
Fair Rents for Pacifica

Dr. Jennifer Martinez
Faith in Action

Shirley Gibson
Legal Aid Society of San Mateo County

Nikki S. Victoria
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Migrante-Northern San Mateo County

Karyl Eldridge
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Tameeka Bennett
Youth United for Community Action

Enc./

Cc: Jen Garner, BBC Research & Consulting
Kenneth Cole, Director, San Mateo County Department of Housing
Jeff Jackson, U.S. Department of Housing and Urban Development

May 24, 2017

Rose Cade
San Mateo County Department of Housing
264 Harbor Blvd., Bldg. A
Belmont, CA 94002

Re: Special Interests and Civil Rights in Housing: Ensuring the Assessment of Fair Housing Process Provides an Accurate and Complete Analysis of Resident Experiences in San Mateo County

Dear Ms. Cade:

The ongoing Assessment of Fair Housing (“AFH”) in San Mateo County represents a long-delayed step towards fulfilling of one of the promises that this country made when it adopted the Fair Housing Act in the wake of Dr. Martin Luther King’s assassination in 1968. That promise was that public authority would be used to affirmatively further fair housing, *i.e.*, to promote equal housing opportunity regardless of race, national origin, and other protected characteristics.¹ The San Mateo AFH process comes at a crucial moment for the region as the racial and ethnic diversity of our cities and communities is being threatened by a housing crisis that is placing relentless pressure on Latino, Asian immigrant, and African American households.

The community participation process for the AFH, as dictated by federal regulation, is intended to encourage the participation of those who are directly and personally affected by housing inequality, in particular low- and moderate-income persons and members of protected classes under the Fair Housing Act.² As you know, the San Mateo AFH has several instruments of community participation designed to meet this standard, among them a survey regarding community residents’ experiences in housing, several focus groups, larger community meetings, and a public comment period.

It has come to our attention that special interest groups—namely, politically organized landlords and realtors—have been circulating the AFH survey amongst their members in order to bias the survey results away from the experiences and needs of tenants. (Attachments 1 & 2.) In light of this development, we write to provide you with some context regarding civil rights and the current housing crisis affecting renters, and we ask you to take steps to preserve the integrity

¹ 42 U.S.C. § 3608(d) & (e)(5).

² 24 C.F.R. §§ 91.105(a)(2), 91.105(e)(3) & (4); 91.105(i). As HUD explained in introducing the regulation, the purpose of the AFH community participation process is to “[p]rovide an opportunity for the public, *including individuals historically excluded because of characteristics protected by the Fair Housing Act*, to provide input about fair housing issues, goals, priorities, and the most appropriate use of HUD funds and other investments.” 80 Fed. Reg. 42273 (emphasis added).

of the AFH process, facilitate the collection of relevant information, and adhere to the civil rights goals embodied in the duty to affirmatively further fair housing. Specifically, we ask that you:

- (1) Evaluate the input that you receive from landlords and realtors with a critical eye, in light of the civil rights goals of the AFH and the information detailed in this letter;
- (2) Analyze the survey results to limit the undue impact of any interference;
- (3) Create dedicated and tailored focus groups or other forums for gathering information from these two special interest groups;
- (4) Ensure that public participation forums are a safe space for vulnerable tenants, where they will not be subject to harassment or intimidation by landlords and realtors; and
- (5) Include a robust analysis of pressures in the rental market in the AFH, including a discussion of displacement pressures, disproportionate housing needs affecting tenants who are members of protected classes, and the lack of regulations protecting tenants from large rent increases and no-cause evictions—along with clear, measurable goals in the AFH to alleviate and eventually overcome these market pressures.

While we understand the need to solicit input from all segments of the community, it is crucial that those conducting the Assessment of Fair Housing differentiate between the views of those with a primarily financial stake in the housing market, such as landlords and realtors, and the needs and experiences of members of protected classes under the Fair Housing Act, who the process is intended to engage. Members of protected classes are best situated to describe the challenges they encounter in securing safe, stable housing and equal access to the rich opportunity afforded by San Mateo County's strong economy and good schools. Indeed, bringing landlords and realtors into the same community participation process along with tenants is certain to diminish tenant participation unless this distinction in stakeholder postures is openly acknowledged and appropriate protective measures are taken.

Of course, politically organized landlords and realtors are important players and a proper focus of attention in the AFH. Indeed, their actions are a powerful force in shaping the fair housing issues affecting people of color, immigrants, families with children, and people with disabilities in San Mateo County. In recent years, these special interest groups have perpetuated barriers to fair housing for tenants of color in San Mateo County through their fierce and well-financed opposition to policies that would stabilize housing opportunity and help to stem the displacement crisis. This opposition has been characterized by fear mongering, misinformation and even direct harassment against tenants of color participating in the political process—as described below. We fear that their participation in the AFH may be similar.

The remainder of this letter (1) contextualizes issues related to tenants' rights within the framework of HUD's regulation governing the AFH; (2) summarizes what we know about current participation in the AFH by realtors and landlords; (3) provides some background information about our experiences with these interest groups in the past; and (4) explains why we believe that these interest groups have created significant obstacles to achieving fair housing opportunity.

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1. *HUD Regulations: Civil Rights Issues Relating to Tenants, Housing Needs, and Displacement*

In San Mateo County, where a majority of tenant households are people of color, and more than 60 percent of African American and Latino households are renters, analyzing the state of civil rights in housing by necessity entails an examination of conditions affecting renters in the region.³

For example, the “disproportionate housing needs” analysis required by HUD’s regulation examines whether members of protected classes under the Fair Housing Act—*i.e.*, people of color, people with disabilities, and families with children—experience problems like “cost burden, severe cost burden, overcrowding, and substandard living conditions” at disproportionate rates.⁴ Unquestionably, the high rents and uncontrolled rent increases resulting in high cost burden for the racially diverse tenant population in San Mateo County must be a part of this analysis. Similarly, identifying the contributing causes of overcrowding and substandard conditions affecting tenants of color will also require an analysis of rents, eviction rates, and the presence or absence of laws protecting tenants.

Moreover, in light of the widely acknowledged displacement pressures in San Mateo County’s rental market, an adequate Assessment of Fair Housing will analyze the degree to which tenants who are forced to leave the area are at risk of losing access to the many opportunities to be found in San Mateo County’s thriving economy and strong public schools in the document’s required “access to opportunity” section.⁵ Additionally, the loss of Latino, African American, and Asian immigrant renter households from San Mateo County due to displacement pressures should be examined as a significant threat to County’s diversity in the portion of the AFH examining dynamics of integration and segregation.⁶

HUD’s own guidance regarding the duty to affirmatively further fair housing identifies the “displacement of residents due to economic pressures,” including displacement resulting from rising rents, as a potential contributing factor to fair housing issues such as residential segregation.⁷ To fairly and adequately analyze these fair housing issues, the AFH must consider the presence or absence of protections available to renters, including rent stabilization and just cause limitations on evictions. Indeed, other jurisdictions in the region that are experiencing similar pressures in the rental market have addressed displacement and inadequate tenant protections in recent Analyses of Impediments or AIs (the predecessor to the AFH).⁸

³ HUD AFFH Data and Mapping Tool, Table 16, San Mateo County

⁴ 24 C.F.R. §§ 5.152, 5.154(d)(2)(iv) & (d)(4)(ii).

⁵ 24 C.F.R. § 5.152, 5.154(d)(2)(iii) & (d)(4)(ii).

⁶ 24 C.F.R. § 5.152, 5.154(d)(2)(i) & (d)(4)(ii).

⁷ U.S. Department of Housing and Urban Development, *AFFH Rule Guidebook*, 208 (Dec. 31, 2015), available online at <https://www.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf>. As the guidance explains: “[s]uch pressures can lead to loss of existing affordable housing in areas experiencing rapid economic growth and a resulting loss of access to opportunity assets for lower income families that previously lived there. Where displacement disproportionately affects persons with certain protected characteristic[s], the displacement of residents due to economic pressures may exacerbate patterns of residential segregation.”

⁸ See Oakland Analysis of Impediments, 83-84 (2015) (discussing displacement due to the loss of naturally occurring affordable units and analyzing gaps in rent regulations); San Jose Analysis of Impediments, 104 (2017)

These neighboring jurisdictions have it right, as do tenant leaders in San Mateo County. Deeply cognizant of the threat to their ability to remain in their homes and communities posed by the unregulated rental market, tenants in cities around the county have been advocating for ordinances that would establish rent stabilization, just cause, and anti-harassment protections for tenants. These policies would prevent or mitigate disproportionate housing needs resulting from uncontrolled rent increases and evictions; they would also stabilize realistic housing choice for tenants of color—helping to maintain the region’s diversity and to preserve access to opportunity for residents of color within San Mateo County.

Any suggestion by real estate interest groups that tenant protections or other topics related to the rental market are somehow inappropriate to address in the AFH reveals an effort to suppress important data on fair housing and civil rights. We ask that you ensure that the ongoing federally-required effort to collect information about the occurrence of key challenges related to housing, and their impact on tenants and homeowners who belong to protected classes, are not diluted or distorted by interference from these special interest groups.

2. Current AFH Participation by Realtors and Landlords

We understand that at least two emails have sent to members of the San Mateo County Association of Realtors (“SAMCAR”) urging their member realtors to fill out the AFH survey, complaining that the survey was not balanced because it was being circulated to renters. (Attachments 1 & 2.) These emails reveal that SAMCAR has identified the AFH as a politically significant terrain for their ongoing battle against tenant protections, and we anticipate that SAMCAR and politically active landlords will continue to search for opportunities to influence the process.

For the reasons mentioned above, we do not oppose gathering the views of realtors and landlords, and in fact we know that their views can be an important data point for the AFH. For example, we understand that the Housing Department of San Mateo County conducted a focus group with landlords in East Palo Alto as part of the Assessment of Fair Housing. According to a representative of Project Sentinel who was present at the focus group, this conversation has already yielded some important data that should be considered in the AFH. Landlords expressed a reluctance to rent units to people with disabilities, particularly people with physical disabilities, because they did not want to shoulder the financial responsibility to make accessibility modifications as required by law. *See* 42 U.S.C. § 3604(f) (prohibiting discrimination against housing applicants with disabilities and requiring housing providers to make reasonable modifications).

Indeed, we believe that more targeted data gathering from those with a financial stake in the housing market could yield important information about the housing-related challenges confronting people of color and other protected classes in San Mateo County. We would encourage you to host additional focus groups with landlords and realtors using questions

(identifying “displacement of residents due to economic pressures” and the “lack of tenant eviction protection and tenant education” as impediments to fair housing).

tailored to their role.⁹ To that extent that SAMCAR realtors may have participated in the AFH survey responsive to the April 21, 2017 “Call To Action” email message, we encourage you to analyze the survey results with this in mind. If there are notable differences in data trends before and after April 21, 2017, the findings should be weighted accordingly.

3. *Real Estate Interest Groups and Recent Housing Debates in San Mateo County*

The AFH process must be conducted with an open acknowledgement that the power dynamic between tenants as consumers and landlords as housing providers is an extremely lopsided one. Particularly in the current political and economic climate of San Mateo County, landlords and realtors are able to wield tremendous control in individual rental relationships, and their presence in public discourse about the rental market has a chilling effect on renter participation, sometimes to the point of being abusive.

In recent months, landlords and realtors in San Mateo a County have been increasingly explicit in their bias against tenants from protected classes. The rate at which minority tenants are being jettisoned from the local rental market is unprecedented.¹⁰ Trion Properties, upon acquiring a 48-unit building in unincorporated Redwood City in July 2016, served eviction notices to tenants who were primarily Latino families with children after issuing a press release stating that the renovated apartments would “cater[] to young working professionals” from companies like Facebook and Oracle.¹¹ In April 2017, CityLab reported an increase in immigration related threats against tenants by landlords, citing the example of a property manager for a multi-unit complex in Pacifica threatening a single Latina mother with deportation if she refused to agree to a new lease.¹² These are but a few examples of the increasingly visible prejudice with which protected class tenants are met.

In public forums, the hostility directed toward tenants by opponents of rent control has been ferocious. In September 2015, when the City Council of San Mateo was considering renter protection measures and hearing public comment, the Board of Directors for San Francisco Organizing Project/Peninsula Interfaith Action wrote to the City Council describing the intimidation and harassment experienced by tenants in attendance at an open meeting.

⁹ For example, it may be appropriate to ask landlords about, among other things, (1) number and type of evictions; (2) rent increases; (3) position on tenant protections, such as rent stabilization and just cause limitations on eviction; (4) policies regarding language access and renting to non-English speakers; (5) reasonable accommodation policies; (6) experience providing reasonable accommodations; (7) age of the rental unit; (8) yearly expenditure on repairs and upgrades; (9) outstanding maintenance needs; (10) understanding of fair housing laws and protections; and (11) policies on acceptance of Section 8 vouchers (and, if applicable, reasons for not accepting Section 8 vouchers). Similarly, it may be appropriate to ask realtors about (1) the marketing and sale of occupied rental housing; (2) the probable impact of rent stabilization and just cause protections on sales of rental properties; and (3) whether they have experience with or knowledge of clients evicting tenants in protected classes in order to flip properties.

¹⁰ See San Mateo County Eviction Report 2016 (http://www.legalaidsmc.org/eviction_report_2016.html)

¹¹ See “Low-income families face eviction as building ‘rebrands’ for Facebook workers,” by Sam Levin, September 21, 2016 *The Guardian* (<https://www.theguardian.com/technology/2016/sep/21/silicon-valley-eviction-facebook-trion-properties>)

¹² See “In California, Landlords Threaten Immigrant Tenants with Deportations,” by Kriston Capps, April 5, 2017 *CityLab* (<https://www.citylab.com/housing/2017/04/landlords-are-threatening-immigrant-tenants-with-ice-deportations/521370/>)

(Attachment 3). Behavior by landlords and realtors directed to tenants included ridiculing tenants for not speaking English, booing and hissing while tenants were speaking, and physically blocking a tenant from entering the meeting.

Similarly, in recent City Council meetings in Pacifica regarding a proposed ballot measure that would enact tenant protections, the rhetoric by speakers in opposition to the proposed Pacifica ballot measure has mirrored that of the April 21, 2017 “Call To Action” message from SAMCAR (Attachment 1), invoking the prospect of gang members and drug dealers entrenched in neighborhoods because they are impossible to evict.¹³ Speakers bemoaned the “problem tenants” who, in the language of the “Call to Action,” will “harass, disturb, threaten, intimidate, or leer at neighboring tenants and neighbors, commit petty crimes, deal drugs, and engage in gang activity.” A passage from a recent op-ed in the Pacifica Tribune is illustrative:

Why would Pacifica pass rent control? That’s not a rhetorical question. Why would we? Rent control takes away property owners [sic] rights to manager their property and removes their financial incentive to keep their places up. *Owners can’t remove gangs, drug dealers, loud or dangerous neighbors and deal with overcrowding. Care to live down the street from a rent-controlled property?*

*No thanks! We don’t want the same messes rent control created in San Francisco and East Palo Alto, do we?*¹⁴

Such coded language plays to racial fears and prejudices, directly calling on stereotypes linked to crime, overcrowding, and two majority-minority cities. Such fearmongering tactics are designed to stoke resistance to policies that would promote economic and racial diversity.

Intimidation tactics against tenants extend beyond racially charged comments in print and at public meetings. Shortly after a tenant named Barbara O’Neil spoke out publicly about a rent increase of \$1,100 that she received for her longtime home in San Mateo City, her landlords threatened to evict her, using her pets as pretext—even though she had kept cats there for many years with the knowledge and permission of the owners.¹⁵ We understand that many tenants fear similar consequences if they speak out in public about the challenges they face in connection with their housing.

These examples of recent conduct by landlords and realtors give context for the environment into which you invite feedback for the AFH. To bring landlords into the same community participation process with tenants, as if they merely represent an alternate

¹³ This conduct was observed by Shirley Gibson, a directing attorney at San Mateo Legal Aid, one of the signatories to this letter.

¹⁴ Tom Thompson, *Rent control: Pacifica’s big danger*, Pacifica Tribune (April 13, 2017), available online at http://www.pacificatribune.com/opinion/editorials/rent-control-pacifica-s-big-danger/article_21a22500-209a-11e7-83fc-cf3eef08d2ab.html (emphasis added).

¹⁵ Bill Silverfarb, “Lawsuit alleges landlord retaliation: school teacher says she was threatened with eviction after speaking to media,” *The Daily Journal* (Feb. 22, 2016), available online at <http://www.smdailyjournal.com/articles/news/2016-02-22/lawsuit-alleges-landlord-retaliation-school-teacher-says-she-was-threatened-with-eviction-after-speaking-to-media/1776425158856.html> .

perspective on tenant issues, would invite this uneven and toxic dynamic into the process. Their participation may give rise to a chilling effect that could corrupt the result. Landlord and realtor perspectives should instead be solicited through the separate, more tailored approach discussed above.

4. *Landlords and Realtors' Actions Are A Contributing Factor to the Displacement of Residents of Color, Loss of Access to Opportunity, and the Perpetuation of Disproportionate Housing Needs*

As the history described above demonstrates, interest groups representing landlords and realtors have used some unsavory tactics and the exercise of significant political muscle to help block policies that would have protected tenants, who are disproportionately members of protected classes, from displacement due to unregulated evictions and large rent increases. Their actions are a contributing cause of the continued loss of equal housing opportunity for members of protected classes resulting from the crisis in the rental market in San Mateo County.

In this way, politically active landlords and realtors are similar to another familiar fair housing obstacle: NIMBYs who oppose the construction of affordable housing in affluent communities. The Guidebook published by HUD on the duty to affirmatively further fair housing, for example, identifies “community opposition”—i.e., “NIMBY-ism,” or “[t]he opposition of community members to proposed or existing [housing] developments,” as a potential “contributing factor” to fair housing issues like segregation—whether the opposition is based on factual concerns or on biases.¹⁶

Moreover, federal courts recognize that NIMBYs’ opposition to affordable housing, particularly when expressed via racially charged stereotypes and coded language, can furnish compelling evidence of intentional discrimination on the part of local governments that accede to their demands. *See also Avenue 6E Investments v. City of Yuma*, 818 F.3d 493, 504-06 (9th Cir. 2016) (discussing how community opposition to an affordable housing development based on racially charged stereotypes can support a discrimination claim under the Fair Housing Act); *Smith v. Clarkton*, 682 F.2d 1055, 1066 (4th Cir. 1982) (citing stated community concerns about an “influx of ‘undesirables’” resulting from a housing project as evidence supporting a Fourteenth Amendment racial discrimination claim).

Similar to NIMBYs who oppose affordable housing in wealthy suburbs, the landlords and realtors’ interest groups in San Mateo County have incited opposition to tenant protections based on untruths and fearmongering, as outlined above, including appeals to racially-charged stereotypes of low-income tenants as gang members and criminals. The actions of these interest groups have contributed to the loss of housing opportunity. Tenants of color have faced unjustified evictions and untenable rent increases without any legal protection, putting the racial diversity of the county at risk. Additionally, by successfully opposing tenant protection policies, landlords and realtors’ interest groups have contributed to the increasing incidence of severe housing cost burden and overcrowding affecting members of protected classes who are renters. The discriminatory effects of the political activities of these real estate interest groups compound

¹⁶ U.S. Department of Housing and Urban Development, *AFFH Rule Guidebook*, 208 (Dec. 31, 2015), available online at <https://www.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf>

the impact of individual instances of discrimination against tenants with disabilities, tenants of color, and immigrants, as described above.

* * *

We hope and expect that the AFH will provide a thorough and factually grounded analysis of the civil rights challenges facing renters of color, tenant families with children, and other members of protected classes caught up in the brutal housing market in San Mateo County. We urge the County to consider this letter and the circumstances described herein when completing the AFH – specifically in identifying contributing factors, prioritizing and justifying the prioritization of these factors to be addressed by fair housing goals, and engaging in goal-setting.¹⁷ Furthermore, we note the AFFH Rule’s requirement that “[i]n prioritizing contributing factors, [HUD] program participants shall give highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.”¹⁸

An honest analysis must identify the fair housing impacts of unregulated rents and evictions, as well as acknowledge the role that real estate interest groups have played in perpetuating displacement pressures and other harms. Local governments who receive funding from HUD, and the consultants they hire to complete the AFH, have the obligation to investigate the causes or contributing factors of fair housing problems, and they cannot shrink from just criticism of interest groups whose actions or views are contrary to fair housing goals.

Sincerely,

Public Advocates

Legal Aid Society of San Mateo County

American Civil Liberties Union of Northern California

American Civil Liberties Union of Northern California - North Peninsula Chapter

Project Sentinel

National Housing Law Project

Enc.

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¹⁷ See generally 24 C.F.R. § 5.154.

¹⁸ 24 C.F.R. § 5.154(d)(4)(ii).

CC: Jen Garner, BBC Research & Consulting
John Maltbie, San Mateo County Manager
Kenneth Cole, Director, San Mateo County Department of Housing
Supervisor David Pine, San Mateo County Board of Supervisors
Supervisor Carole Groom, San Mateo County Board of Supervisors
Supervisor Don Horsley, San Mateo County Board of Supervisors
Supervisor Warren Slocum, San Mateo County Board of Supervisors
Supervisor David Canepa, San Mateo County Board of Supervisors
Jeff Jackson, U.S. Department of Housing and Urban Development

Attachment 1

From: Gina Zari [mailto:gina@samcar.org]
Sent: Friday, April 21, 2017 11:53 AM
To: Gina Zari
Subject: MONDAY -- Rent Control Moratorium: Council Vote

CALL FOR ACTION

OPPOSE RENT CONTROL IN PACIFICA

Monday, April 24th, the Pacifica City Council will vote a SECOND & FINAL time on a Rent Control Moratorium, including “just cause” eviction.

How can you help?

1. **PLEASE JOIN US** at a **Reception at Nick’s Rockaway, 4:30 PM - 6:30 PM** at 100 Rockaway Beach Ave, Pacifica on Monday, prior to the City Council Meeting; RSVP to me (gina@samcar.org)
 2. **THEN, JOIN US** at the Pacifica City Council Meeting at 6:45 PM
 3. **COMPLETE THIS SURVEY** being conducted by **San Mateo County** regarding housing, affordable housing, **rent control**, just cause eviction, relocation payments and other housing topics. Unfortunately, this survey has only been seen being circulated among one specific group: renters. *(To ensure balance, if you know renters who believe in property rights, please pass this survey on to them, as well.)* <https://www.research.net/r/LiveSMC2017>
-

MONDAY, APRIL 24th

4:30 – 6:30 PM

**Nick's Rockaway Reception
100 Rockaway Beach Avenue, Pacifica, CA 94044**

6:45 PM

**Pacifica City Council Meeting
2212 Beach Blvd, Pacifica, CA 94044**

PACIFICA RENT CONTROL FACTS

Rent control will create a stagnant housing market in Pacifica. As household incomes naturally increase, instead of buying a home, renters in a rent-controlled environment are incentivized to stay in the subsidized unit – even when they are making well over \$150,000 annually, preventing scarce affordable housing from being available to those who really need it.

Rent control will reduce the number and quality of rental housing units available in Pacifica. Rent control exacerbates a housing shortage by incentivizing tenants to stay far longer in more affordable units. When government places an artificial control on rent, property owners are not able to adjust rents to accommodate increased costs or unexpected circumstances and properties deteriorate.

Rent control will lead to higher rents in Pacifica. Although people think rent control will lead to lower rents, the exact opposite is true. The rents of available apartments in rent controlled cities are dramatically higher than rents in cities without rent control. In cities without rent control, available units exist all along the spectrum from low-priced to high-priced. In rent controlled cities, the only units available are the highest priced, far above the median rent.

Rent control will take the investment, life savings, and retirement from people in Pacifica who have invested their money in real estate. Many Pacificans have unconventional retirement plans. Rent control ordinances that prohibit property owners from asking for market rate rents unfairly steal from people's retirements.

Rent control will bankrupt Pacifica. Rent control ordinances create substantial administrative costs. Rent controls require the creation of convoluted bureaucratic systems. Rental property must be registered, detailed information on the rental property must be collected, complex systems for determining rents must be created, and processes for hearing complaints and appeals must be established. In Santa Monica in 1996, the Rent Control Board had a budget of more than \$4 million a year to control rents for only 28,000 units.

Rent control will disproportionately harm Pacificans in affordable housing. Poorer families suffer a marked decline in existing housing as the quality of existing housing falls in response to reduced maintenance expenditures. The middle class have greater ability to move out, but poorer families lack this option. In addition, poor families are at a substantial disadvantage when it comes to finding new housing. In a tight market – as we currently have – there are

more people looking for housing than available rental units, giving housing providers far more discretion in choosing among competing potential customers. In rent-controlled markets, housing providers turn to factors such as income and credit history to choose among competing renters.

Rent control means expensive consumer entry costs. In many rent-controlled communities, prospective consumers must pay substantial finder's fees to obtain a rental unit, due to the scarcity of available housing. And, in some rent-controlled areas, a "gray-market" in rental housing has developed in which units are passed among friends or family members, or new consumers may be required to pay "key money" or to make other payments to current consumers to obtain housing. Sub-leasing is common in rent-controlled cities.

Rent control will artificially destroy home values in Pacifica.

Plummeting values will adversely impact our schools and city services. As home and apartment values decline, revenue from the county also declines. This will jeopardize the long term health of our schools and city infrastructure such as police, fire, and other services.

PACIFICA "JUST CAUSE" EVICTION FACTS

"Just Cause" Eviction will punish good renters in Pacifica. "Just Cause" Eviction ordinances have the detrimental effect of making "good tenants" endure years of harassment, verbal abuse, inconvenience, or dangerous living circumstances where they live in close proximity to drug dealers, petty thieves, and lewd or offensive individuals. Rarely will the "good tenants" testify in court for fear of

their safety. Instead, they will expect the property owner to handle the problem. When it is not handled, the "good tenants" are forced to leave their homes.

"Just Cause" Eviction provisions dramatically increase the cost to evict problem tenants. With "just cause" eviction, the property owner has to prove that "good cause" exists, which requires witnesses and additional trial time. Under these circumstances, the problem tenant's attorney often requests a jury trial, hoping they can persuade jurors, who are less accustomed to dealing with problem tenants. In one San Francisco case, attorney's fees exceeded \$75,000. These costs were passed on to the "good tenants" who suffer because "Just Cause" Eviction ordinances protect the "problem tenant" over the "good tenant."

Month-to-Month leases will be made virtually obsolete in Pacifica. While the tenant can serve the property owner with a 30 day notice, the property owner can only terminate the tenancy if the property owner can prove "just cause" in court. And, while the "just cause" might very well exist, it is extremely difficult to prove this in court, particularly when the good tenants or neighbors are scared or intimidated by going to court and testifying against the problem tenant.

There is no need for "just cause" eviction legislation in Pacifica -

evictions are already costly and time consuming processes for property owners. Evictions can take several months and cost many thousands of dollars. Tenants being evicted often do physical damage to the property. For property owners, eviction is the final alternative to which they turn, not the first.

Gangs and criminal behavior thrive where "just cause" eviction ordinances are in place. In areas where "Just Cause" Eviction ordinances are enacted, it is virtually impossible for property owners to evict gang members due to the burden of proof placed on the property owner. In these situations, it is very unusual that a "good tenant," who is witness to the activities of a gang member, will actually testify in court on what he or she has seen for fear of retribution.

Good renters in Pacifica will experience harassment under the "just cause" eviction ordinance. The worst unintended consequence of all that will be created by this "Just Cause" eviction ordinance is when a property owner – facing several thousands of dollars in attorney's fees and several months in uncollected rent – decides NOT to evict because of this ordinance and leaves the "problem tenant" alone to harass, disturb, threaten, intimidate, or leer at neighboring tenants and neighbors, commit petty crimes, deal drugs, and engage in gang activity.

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Sue Digre, Councilmember
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Deirdre Martin, Councilmember
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Mike O'Neill, Mayor
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o'neillm@ci.pacifica.ca.us

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Attachment 2

From: Gina Zari, SAMCAR Government Affairs Director [<mailto:gina@samcar.org>]
Sent: Thursday, May 11, 2017 10:03 AM
To:
Subject: DEADLINE: FRIDAY -- County Rent Control Survey

SAN MATEO COUNTY ASSOCIATION of REALTORS®

DEADLINE: FRIDAY AFTERNOON

Please complete the survey being conducted by San Mateo County regarding housing, affordable housing, rent control, "just cause" eviction, mandatory relocation payments, and other housing topics. *The results of this questionnaire are likely to help formulate the County's Affordable Housing and Renter Protection/Property Control priorities.*

Unfortunately, this survey has only been seen being circulated among one specific group: renters. So, to ensure balanced results, please complete the survey and forward it to anyone you know who believes in property rights, particularly renters.

[Click HERE to complete the County Affordable Housing Survey.](#)

The County will take down the survey on Friday afternoon.



850 WOODSIDE WAY, SAN MATEO, CA 94401

Phone (650) 696-8200 | Fax (650) 342-7509 | [samcar@samcar.org]samcar@samcar.org | www.samcar.org
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Attachment 3



RECEIVED

2015 SEP 29 P 1:04

OFFICE OF CITY CLERK
CITY HALL
SAN MATEO, CA

September 25, 2015

San Mateo City Council Members
330 W. 20th Ave
San Mateo, CA 94403

Esteemed Council Members,

We are writing on behalf of Peninsula Interfaith Action (now SFOP/PIA) to thank you for the effort you have put into hosting important conversations about the housing and displacement crisis facing our families and seniors in San Mateo and beyond. We appreciate your courage for taking on this issue and standing with the most vulnerable in our community.

We also want to respectfully share some concerns that tenants have raised as they've attempted to be part of these community-wide meetings. We want to submit recommendations for how to make this process even more inclusive going forward:

- Professional translation provided by the City
- Functioning audio systems that allow everyone to hear council proceedings
- If a police presence is necessary, a more relaxed presence (residents, especially those with vulnerable status, found the police presence to be intimidating and felt that renters were singled out when people were asked to disperse from the corridor)

Beyond that which the City has the ability to control, and because your vantage point might not allow you to see all that is going on, we also want to make you aware of the behavior of some landlords and realtors who were disparaging and used intimidation tactics towards renters, particularly immigrant renters.

- ~~Anti-tenant-protection advocates booed and hissed when they heard things they didn't agree with~~
- Anti-tenant-protection advocates loudly whispered – with the evident intention of being heard by others – “learn English”, [with sarcasm] “they’re gonna start crying now, get out the tissues...”, when immigrant residents gave public testimony
- Anti-tenant-protection advocates refused to give up seats to renters, even when it was evident that no one else was yet using the chairs
- Anti-tenant-protection advocates harassed SFOP/PIA staff for attempting to provide translation, asking her to stop talking and to leave
- Two anti-tenant-protection advocates followed around a group of renters who were trying to have a private conversation and refused to leave them alone
- An anti-tenant-protection advocate grabbed a renter’s advocacy sticker, tore it up in front of her and said, “You probably don’t even understand what this says.”
- One landlord verbally attacked a tenant in the corridor and used physical intimidation, precipitating police intervention

Many of these behaviors are meant to signal that some voices are less valuable than others. The result of this behavior is that renters, who are already vulnerable and in a lower position of power than the anti-tenant-protection advocates, felt intimidated and excluded and many left early, as a result.

We raise these issues because the City has expressed an interest in bringing all stakeholders to the table. However, this cannot be accomplished if vulnerable stakeholders – renters – don't have equal access and are harassed for participating.

We also raise these issues because the mission of our organization is to create economic and racial equity in the region. While on the face of it, the housing crisis is an economic equity issue, the problem and the political process around it are also being defined by racial inequities. To be clear, all of the experiences mentioned above happened to people of color. White renters and advocates did not report being personally attacked or harassed. SFOP/PIA cannot stay silent in the face of this kind of racism during a public process that should be safe and inclusive for all.

Finally, it should be said that the afore-mentioned pressures to keep renters out of Council Chambers and relegating renters to auxiliary rooms, supported by a police presence, is symbolic of the way renters – particularly renters of color – are excluded from the opportunities that our region has to offer. What does this behavior suggest about the treatment of renters in the intimate power dynamics between renters and landlords?

We hope that the Council will take seriously these concerns and ensure the safe and inclusive participation of all. We are interested in working with the City to find ways that to do this and would be happy to discuss this further. If you would like to do so, our Executive Director Jennifer Martinez will make herself available at 650-796-4160.

Thank you for your consideration,

Members of the Board of Directors

San Francisco Organizing Project/Peninsula Interfaith Action

Liz Jackson-Simpson
Success Center

Aidah Rasheed
Muslim Community Center

Gloria Stofan
St. Peter Catholic Church

Michael Paul Pulizzano
Star of the Sea Catholic Church

Almudena Bernabeu
St. Dominic's Catholic Church

Cc:

Larry Patterson, City Manager
Shawn Mason, City Attorney
Patrice Olds, City Clerk