



"Great Apartments Start Here!"

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Via Electronic Mail

Hon. Mayor Dan O'Brien
and the Members of the Culver City Council
Mike Balkman Council Chambers
9770 Culver Boulevard
Culver City, California 90232

Re: Right to Counsel Ordinance – Agenda Item A-3

Dear Mayor O'Brien and Members of the Culver City Council:

The Apartment Association of Greater Los Angeles (AAGLA) represents rental housing providers throughout Los Angeles, Ventura and San Bernardino counties. More than 80% of our membership are mom-and-pop owners with 20 or fewer units. We have extensive experience with the Los Angeles County Board of Supervisors' recent resolution and are eager to share our knowledge with you.

This ordinance would be a monolithic expansion of legal representation to all renters throughout Culver City regardless of income. The staff report contains **no cost data** regarding costs incurred by other local governments that have already instituted a Right to Counsel, including Los Angeles County for the unincorporated areas, Los Angeles City and Santa Monica. This is an extremely dangerous oversight as it means that the City Council lacks important cost information to determine the impact that such a program is likely to have on the City's existing budget.

Los Angeles County created the Stay Housed LA program after running a pilot program for several years. The main entity running the program is Legal Aid Foundation of Los Angeles, which subcontracts with several legal aid attorney groups, including Bet Tzedek. Attorneys are paid an hourly rate of \$300 per hour on average and the County has been considering raising that rate to \$350 or \$400 per hour for legal representation. **The total program for only the unincorporated areas costs \$21 million for a single year with \$13.4 million specifically for attorneys' fees** (as the program also has a small component for outreach activities and rental assistance). The County's program only covers renters with household incomes at or below 80% Area Median and has several geographic specific priority classes.

Los Angeles City's first year cost was \$7.1 million and a total estimated cost through June 2025 of \$68 million and has specific funds allocated for it. The Los Angeles City program only covers renters with household incomes at or 80% Area Median Income and has prioritization for specific zip codes.

Santa Monica is expanding their pilot program at a cost of \$8 million for a single year and has specific funds allocated for it. The Santa Monica program only covers renters with household incomes at or below 80% Area Median Income and includes several vulnerability factors as well.



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In addition, the staff has failed to obtain a detailed proposal with cost estimates from Bet Tzedek for this additional work as the City's existing legal representation provider. This information should be readily obtainable from Bet Tzedek for the City Council to review and consider before taking this drastic step in creating an ordinance.

As you can see, this program would be extremely expensive for Culver City to implement, costing **millions of dollars each year**, especially as the draft currently contains **no income qualifications for renters**. The City is already facing a severe budget crisis in providing existing core city programs and has recently committed to a new 15-year park development plan. It would be grossly financially negligent for the City Council to approve this ordinance without first identify specific funding for it and obtaining a detailed proposal with cost estimates.

Further, while we appreciate that the City Council is concerned with wildfire victims, this ordinance does **not** address those specific individuals and is a blanket ordinance that would impact all renters. This draft ordinance contains no language making it applicable to wildfire victims, unlike Los Angeles County's recent temporary eviction moratorium. Neither is it a "temporary" ordinance intending to run for a short period of time to assist wildfire victims. As such, there is no reason for this ordinance to be passed as an "urgency" ordinance and to do so would violate basic principles of transparency and good governance.

Lastly, this massive expansion does not even appear to be needed in Culver City. According to the staff report, Bet Tzedek is currently servicing 3 to 4 renters per week at legal clinics and an additional 5 to 6 renters via email or phone. This compared to the total population of Culver City at 39,000 with 45% renters, which is 17,550 individuals. Thus, it is only a tiny fraction of renters that are currently availing themselves of legal representation already being offered.

Given the City's dire budget situation, we strongly urge the City Council to place this draft ordinance on suspense until a detailed proposal is obtained from Bet Tzedek. Only with cost information in-hand can the City Council make a fully educated decision on whether such a massive expansion is warranted at this time. In addition, once the estimated cost is known, the City Council must identify specific funding sources for this expansion. Otherwise, the City's budget discussions will become open warfare as several existing core City programs could be eliminated based on this new enormous financial obligation.

Thank you for your time and consideration. Please feel free to reach out to me directly by telephone at (213) 384-4131; Ext. 309 or via electronic mail at janet@aagla.org.

Sincerely,

A handwritten signature in black ink that reads "Janet M. Gagnon". The signature is written in a cursive, flowing style.

Janet M. Gagnon, Esq.

CC: Daniel Yukelson, Executive Director, Apartment Association of Greater Los Angeles