



California Apartment Association

4401 Atlantic Ave. Suite 200

Long Beach, CA 90807

March 17, 2025

Mayor O'Brien and City Council
Culver City
VIA Email

Re: (A-3) Right to Counsel -

Dear Mayor O'Brien and Councilmembers:

The California Apartment Association (CAA) represents local housing providers, operators and suppliers along with business owners and real estate industry experts who are involved with a range of rental properties from those that offer single-family residences to large apartment communities. Our members help provide obtainable housing throughout Los Angeles County.

We urge the City to reject item 3-A, conduct stakeholder feedback and a thorough economic analysis before making a final and informed decision.

Best Use of Dollars

The city should analyze the maximum use of available dollars. A cost-analysis should be conducted against alternative programs that could stretch those dollars further and achieve better outcomes.

A 2022 study from Columbia University found "that rental assistance lowers the likelihood that tenants default on rent, rather than making it harder to evict those who have already defaulted. The main result is that the policy reduces homelessness by 45 percent and the eviction filing rate by 75 percent."¹

A cost analysis should be conducted that reviews the best use of available dollars. It costs thousands of dollars to provide legal counsel for one case. Dollars can go much further through a direct rental subsidy, helping more of those in need, preventing a potential eviction and at lower cost per individual.

RTC Programs are Ineffective and Counterproductive

RTC programs *are not* a housing strategy. The 2020 Sargeant Shriver study found that legal counsel was not effective in preventing the removal of a tenant from a unit. Overwhelmingly, whether a person was represented or unrepresented, the tenant was required to move out of the unit at the end of their case. *"Three quarters of cases in both study groups ended with possession of the property awarded to the landlord. That is, three out of four tenants, whether Shriver clients or not, had to move out of the unit at the end of their case".*²

RTC programs do not achieve what their proponents claim. It comes at a high cost and demonstrates little success. RTC laws only delay an eviction and ultimately increase the costs of operations, making housing more expensive and harder to find.

Additionally, the Shriver study found that there was no significant difference in the rate of homelessness between represented tenants and unrepresented tenants. This was true both immediately after their case and one year later.

On the contrary, the Columbia University study found RTC policies resulted in an increase in homelessness of 15%. The current homelessness rates in cities with RTC laws coincide with this finding.

¹ [Boaz, A. \(2023\). The Welfare Effects of Eviction and Homelessness Policies.](#)

² [Judicial Council of California. \(2020\) Sargent Shriver Civil Counsel Act: Report to the Legislature. San Francisco, CA: Judicial Council of California](#)

New York City, San Francisco and Seattle, – cities that pay for this type of legal representation - have seen their homelessness rates increase significantly since enacting said laws.

Housing providers are not in the eviction business, but unfortunately, eviction is a necessary – and often singular – tool for addressing the most disruptive situations or when someone is no longer paying for service.

An emergency rental assistance program would assist in cases where tenants have an urgent, temporary financial gap and prevent the need for legal action. Direct assistance dollars are likely to go further and are a proven way to keep people in their homes. The pandemic relief efforts unequivocally demonstrated, direct rental payments work.

Support Housing Providers

Housing providers have been struggling under government-imposed regulations. Some continue to face significant duress. The city should be doing everything it can to support rental operators and incentivize investment in this essential service. The present regulatory environment is making housing more expensive and harder to find in the region.

If there are alternative solutions that can achieve our shared goal of keeping people housed and produce better outcomes, it behooves the city to explore those options. CAA respectfully requests the council study this issue further before making a final decision.

Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "Fred Sutton", written in a cursive style.

Fred Sutton
California Apartment Association