

Communication from Public

Name: Joanna Gubman
Date Submitted: 09/01/2022 02:31 PM
Council File No: 22-0002-S117
Comments for Public Posting: Please see attached for a letter of support on this resolution on behalf of Urban Environmentalists and YIMBY Action.



Los Angeles City Council
200 N Spring St, Suite 415
Los Angeles, CA 90012

September 1, 2022

Re: Support for AB 2097

Residential and commercial development: parking requirements.

To the Los Angeles City Council:

We are writing in support of the City Council resolution to support Assembly Bill 2097, to eliminate local minimum parking requirements for both residential and commercial buildings.

YIMBY Action and Urban Environmentalists are fighting for a future of abundant housing in order to reduce poverty, end homelessness, eliminate racial segregation, create jobs, and stop climate change. YIMBY Action is a network of pro-housing grassroots activists, with hundreds of activists in the City of Los Angeles. Our advocates speak up in support of all types of housing, rally for pro-housing legislation, mobilize for pro-housing candidates, and broadly popularize a message of “yes” to thriving cities. Urban Environmentalists is our environmental initiative.

AB 2097 will eliminate requirements that homes and commercial buildings near transit or in neighborhoods with less car use be built with more parking than is necessary. By reducing the over-building of parking, this bill would reduce traffic, greenhouse gas emissions and air pollution, reduce the cost of housing to renters

and homeowners, and improve the prospects of small neighborhood businesses fighting to survive during the pandemic.

On-site parking reduces the housing supply by taking up space that could otherwise be used for additional apartments. Providing on-site parking is also very expensive, costing \$30,000 to \$75,000 or more per space to build. This cost is passed on to renters and home buyers, regardless of whether they own a car. In fact, in a recent study by Santa Clara University, researchers found that the cost of garage parking to renter households is approximately \$1,700 per year, or an additional 17% of a housing unit's rent.

In response to the pandemic and the closure of restaurants and small shops, local governments have allowed businesses to expand into on-site and street parking spaces to allow for safe outdoor dining and shopping. These new and more productive uses of parking spaces have shown us the way forward to create more inviting and sustainable neighborhoods, and allow small businesses to survive and in some cases thrive. This bill would remove arbitrary restrictions that prevent small businesses from using their property for its most productive use.

AB 2097 will prevent the wasteful overproduction of parking spaces, and reduce car dependency and carbon emissions. It will also encourage greater transit usage and more housing and business growth near transit, helping to create revitalized and pedestrian-friendly commercial corridors throughout Los Angeles.



This bill does not prohibit property owners from building on-site parking. Rather, it gives them the flexibility to decide on their own how much on-site parking to provide, instead of requiring compliance with a one-size-fits-all mandate.

Thank you for your leadership in addressing climate change and promoting sustainable transportation, affordable housing and livable communities with this important resolution.

Best regards,



Laura Foote
YIMBY Action, Executive Director



Joanna Gubman
Urban Environmentalists, Executive Director

Communication from Public

Name: Susan Park

Date Submitted: 09/01/2022 03:32 PM

Council File No: 22-0002-S117

Comments for Public Posting: Hello: I initially addressed this to LAHSA. But it applies to any entity that receives Federal or California funding including LA City's homeless outreach. Please see attached document.

Equal, full, and meaningful access for unhoused Korean and AAPI in Los Angeles

Has your staff informed members of the public that Korean and other AAPI language assistance is available free of charge? Language access must be for the entire scope of work including programs, activities, information, and services.

It is LAHSA's responsibility, and not the individual's, to take reasonable steps to ensure communications are not impaired as a result of the Limited English Proficiency of an individual.

- 1) Accessible in native or preferred language.
- 2) Accessible on an equal basis, substantially the same level of access, equal opportunity to participate fully.
- 3) Incorporate language access into outreach activities when necessary to provide meaningful access. Meaningful access is timely, accurate, and effective at no cost to LEP individuals. Meaningful access means access that is not significantly restricted, delayed, or inferior compared to programs, services, and activities provided to English proficient individuals.
- 4) Interpretation modes:
 - a) Consecutive
 - b) Simultaneous
 - c) Sight translation

Federal and State Statutes and Executive Actions Requiring Language Access

Civil Rights Act of 1964

Executive Order 13166

Dymally-Alatorre Multilingual Services Act, Gov. Code 7291, 7293, 7295.2

California Government Code Section 11135

2 Cal. Code Regs 11161 and 11162

California Civil Rights Act

The Bilingual Services Act

What are the LAHSA's protocols for LEP PEH (Person Experiencing Homelessness)?

1. Does LAHSA distribute I speak cards? I speak cards describe an individual's right to interpreter services in English and threshold languages.
2. Does LAHSA use a "Babel Notice"? A "Babel Notice" means a short notice included in multiple languages informing LEP PEH that the communication contains vital information and explains how to access language services to have the contents of the communication provided in other languages.
3. Which threshold languages are spoken by LAHSA outreach and intake staff?
4. Does LAHSA have Intake forms in threshold languages?
5. What are the methods used to identify LEP PEH?

6. Does LAHSA have intake forms with a box where filers or their representatives can indicate the need for interpretation/translation.
7. Is there a language access coordinator? If so, is there a list of multilingual translators available to assist LEP? How does staff access the language access coordinator?
8. Is there an analysis of threshold languages for LEP PEH?
9. Were there bilingual Korean/English speakers on LAHSA's HET (Homeless Engagement Teams)? Specifically in Koreatown?
10. Upon identification of LEP PEH, does LAHSA take reasonable steps to conduct all communication using a qualified multilingual staff member, contract interpreter, or third-party vendor?
11. Are all staff members trained on language access laws, rights, and in-house protocols?
12. Is there marketing and outreach about language access? Posters, fliers, forms, online, and in offices?
13. When the need for language access is apparent, does LAHSA take reasonable steps to ensure that interpretation services and translations of materials are available for all outreach events?
14. What are LAHSA's cultural competency processes and procedures of unhoused Korean and AAPI?
15. What is the language accommodation process?

Data Collection and Management Systems

1. How are requests for interpretation or translations captured? Are language access services documented? If so, how? If not, why not? Is there a tally for each language requested?
2. Does your human resources unit conduct the Dymally-Alatorre language survey? Is a language tally submitted to any government office?

According to LAHSA's 2020 Homeless Count, there were a total of 1930 PEH (Person Experiencing Homelessness) in CD-10. There are approximately 700+ unhoused AAPI in CD-10, or more if we include CD's adjacent to Koreatown.

Korean is a high volume threshold language for unhoused AAPI in CD-10. The greater the number of LEP who speak a particular language, the more an agency must do to provide language access for that group. Korean speaking LEP PEH are well above an arbitrary 5% threshold. Korean speaking LEP PEH in CD-10 represent approximately $\frac{1}{3}$ of all PEH in CD-10. Regardless of numeric metric employed, Korean speaking LEP PEH exceeds reasonable demand or need.

If we look at SD figures, according to LAHSA there are 22,754 total PEH in SD-2. AAPI who are LEP PEH are around the 5% threshold.

If we look at SPA's, LAHSA's total homeless count is 17,121. Homeless LEP AAPI exceeds 5% in SPA 4.

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Homeless LEP AAPI are linguistically marginalized communities who have been abandoned and effectively denied language access in almost every step of their path to becoming unhoused/homeless. And then further denied language access when they become unhoused. From the EDD, tenant's rights organizations, fair housing advocates, and the fractured homeless industrial complex. When there is language access for AAPI, it is fragmented and incomplete.

LAHSA's low frequency of contact with Korean speaking LEP PEH does not absolve the agency of expanding language services. Lack of language access is the barrier, and not lack of need. u8gfLAHSA's services are extremely important. The lives of LEP PEH depend on LAHSA's decisions and care. For programs with life or death implications the duty and obligation to provide language access is the strongest.