

A Casita Community

Fighting displacement in Pacoima with ADUs and CLTs

Terms

Accessory dwelling unit (ADU). Also known as a backyard unit, granny flat, and casita, an ADU is a secondary dwelling unit with complete independent living facilities for one or more persons, either attached to or detached from the primary home on the lot.

Community land trust (CLT). Organizations that acquire and hold land, removing it from the speculative real estate market. The goal of the CLT is to provide permanent affordability for community residents.

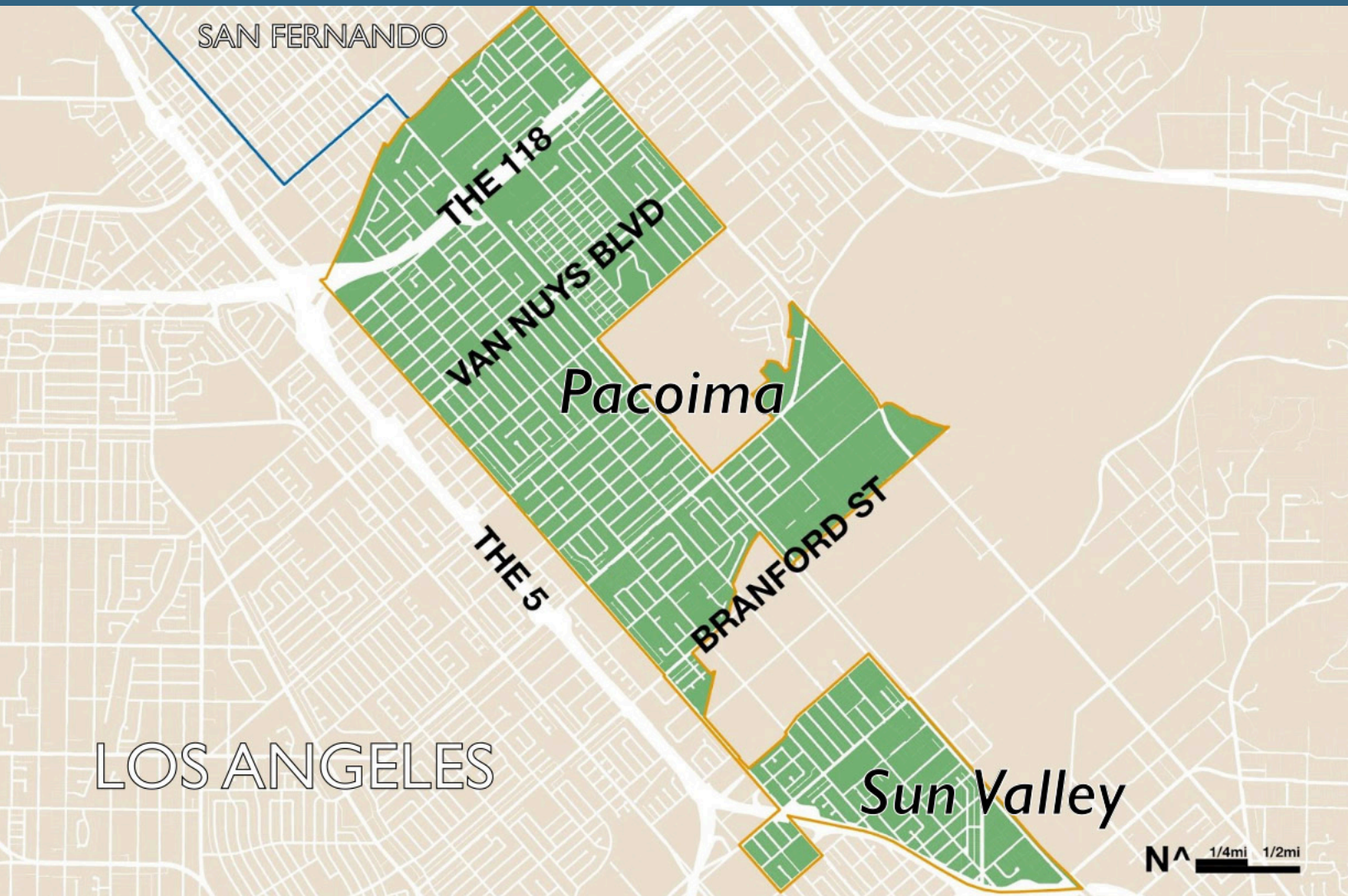
Disclaimer

This report was prepared in partial fulfillment of the requirements for the Master in Urban and Regional Planning degree in the Department of Urban Planning at the University of California, Los Angeles. It was prepared at the direction of the Department and of Pacoima Beautiful, as a planning client. The views expressed herein are those of the authors and not necessarily those of the Department, the UCLA Luskin School of Public Affairs, UCLA as a whole, or the client.

Contents

	STUDY AREA	4
	INTRODUCTION	5
CHAPTER	TYOLOGIES	6
AUTHORS	CATE CARLSON, THOMSON DRYJANSKI & MIKE PETERSON	
	ADU SURVEY	10
	DORA ARMENTA, RAISA MA, JEFF ROSS & MARIO SANDOVAL	
	TENANT EXPERIENCE	14
	JONATHAN HAGAR, ASHLEY MASHIAN, JESSA ORLUK & KAITLYN QUACKENBUSH	
	ADU FINANCING	18
	ZACHARIAS GARDEA & MARLENE SALAZAR	
	CLT FEASIBILITY	22
	ANNA FIGEL, TAYLOR HOLLAND & STEPHANIE LAW	
	CONCLUSION	26
	AWKNOWLEDGMENTS	27

Study area



The study area is defined by the Transformative Climate Communities grant boundaries, shown above. It contains parts of the Pacoima and Sun Valley neighborhoods of Los Angeles, located in the San Fernando Valley.

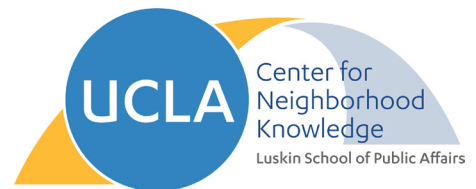
Introduction

This Comprehensive Research Project was conducted in service of Pacoima Beautiful, an environmental justice organization, and its efforts to protect and support low-income residents of their community from displacement pressures.

Pacoima Beautiful (PB) is the recent recipient of the Transformative Climate Communities (TCC) grant, allowing the organization to lead a series of green infrastructure upgrades throughout Pacoima and neighboring areas. Large scale-public investment unintentionally causes displacement due to increasing rent prices from the new amenities, a decline in the production of affordable housing, and increase in higher-end housing. PB seeks to mitigate displacement pressures and ensure the investment benefits current and future residents of Pacoima and surrounding areas.

Central to PB's anti-displacement plans are Accessory Dwelling Units (ADUs) and Community Land Trusts (CLTs). ADUs provide opportunities for multi-generational living, create financial benefits for low-income homeowners, and a large percentage of residences are thought to have a second living unit on the property. CLTs permanently remove land from the speculative real estate market and can thus provide affordable homes to residents in perpetuity.

The goal of this research is to provide a critical understanding of the landscape of accessory dwelling units in Pacoima, resident needs, and anti-displacement methods, such as community land trusts, that will help Pacoima Beautiful design and implement displacement avoidance strategies. The full report is accessible through the UCLA Library.



Typologies

We examined the built form and social conditions of accessory dwelling units in Pacoima-Sun Valley to explore a causal relationship between the physical environment of ADUs and the spatial practices of the residents who live in them. This speaks to the living situations on the ground in Pacoima and tells the stories of the residents who live there.

We see this as an opportunity to reorient the common portrayals of ADUs and unpermitted dwelling units (UDUs) to more adequately represent the needs of residents in the project area. This research can ultimately be used as a blueprint to inform policy change concerning zoning regulation and development standards, shared housing, small space living, and housing design for multi-generational arrangements.

METHODOLOGY

Using five methods, we created two categories of data. The first uses a satellite survey and a walking survey to catalog the project area's built form, focusing on the presence of ADUs. We organized the satellite survey and walking survey data by block, which allowed the comparison of properties in close proximity of each other.

Our second category uses one-on-one interviews, focus groups and site observation to explore how residents use space and interact with each other on the properties and blocks they share. This data came from sites spread across the project area, which gave a broader picture of the neighborhood as a whole.



The majority of accessory buildings in Pacoima have long been part of the neighborhood's fabric.

FINDINGS

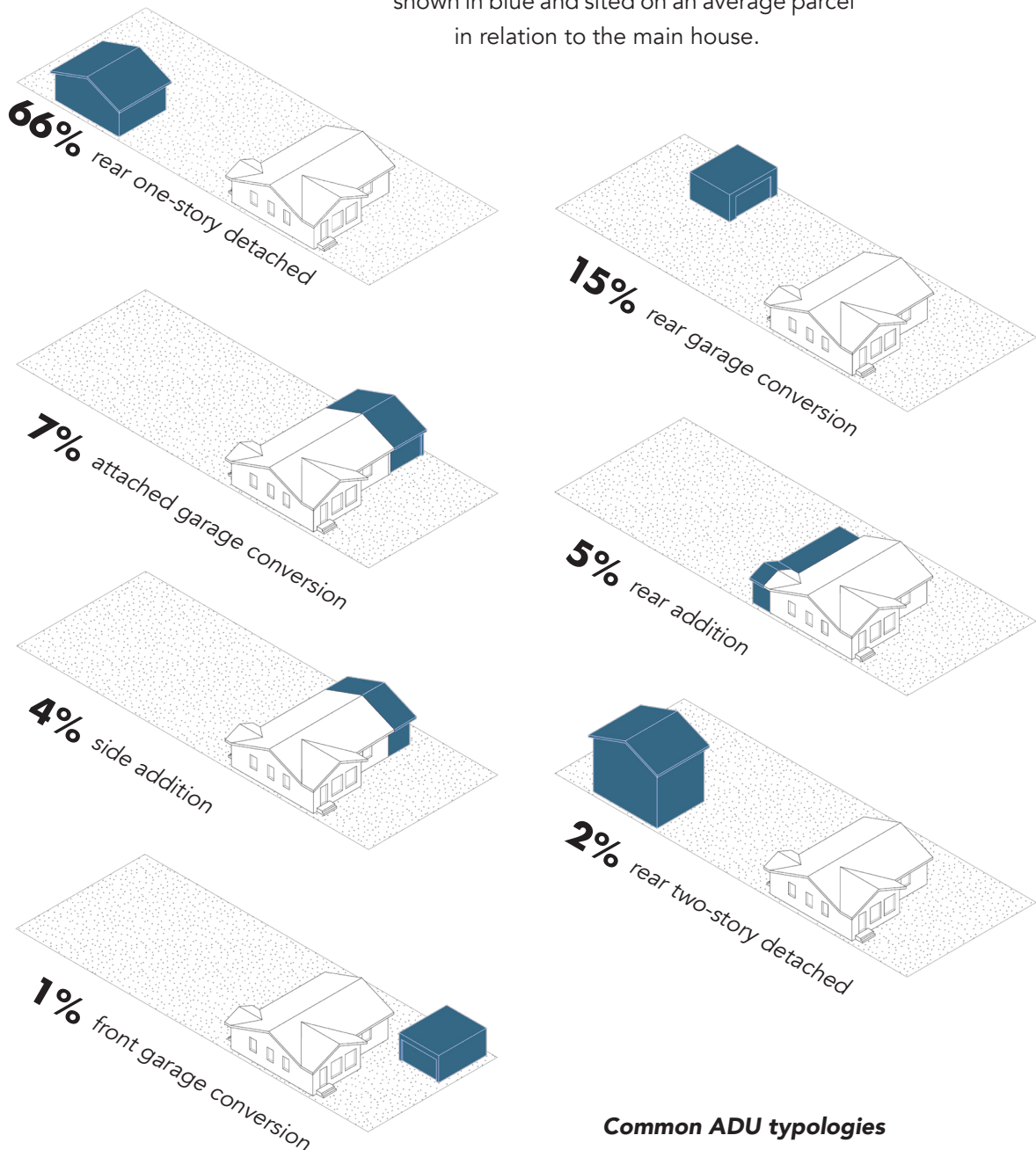
Approximately half of surveyed properties have potential ADUs.

We estimate this number is actually even higher than reported, however, due to inherent limitations to our methodologies. For example, our case study revealed that ADUs can be easily disguised (intentionally or not) to look like single-family homes.

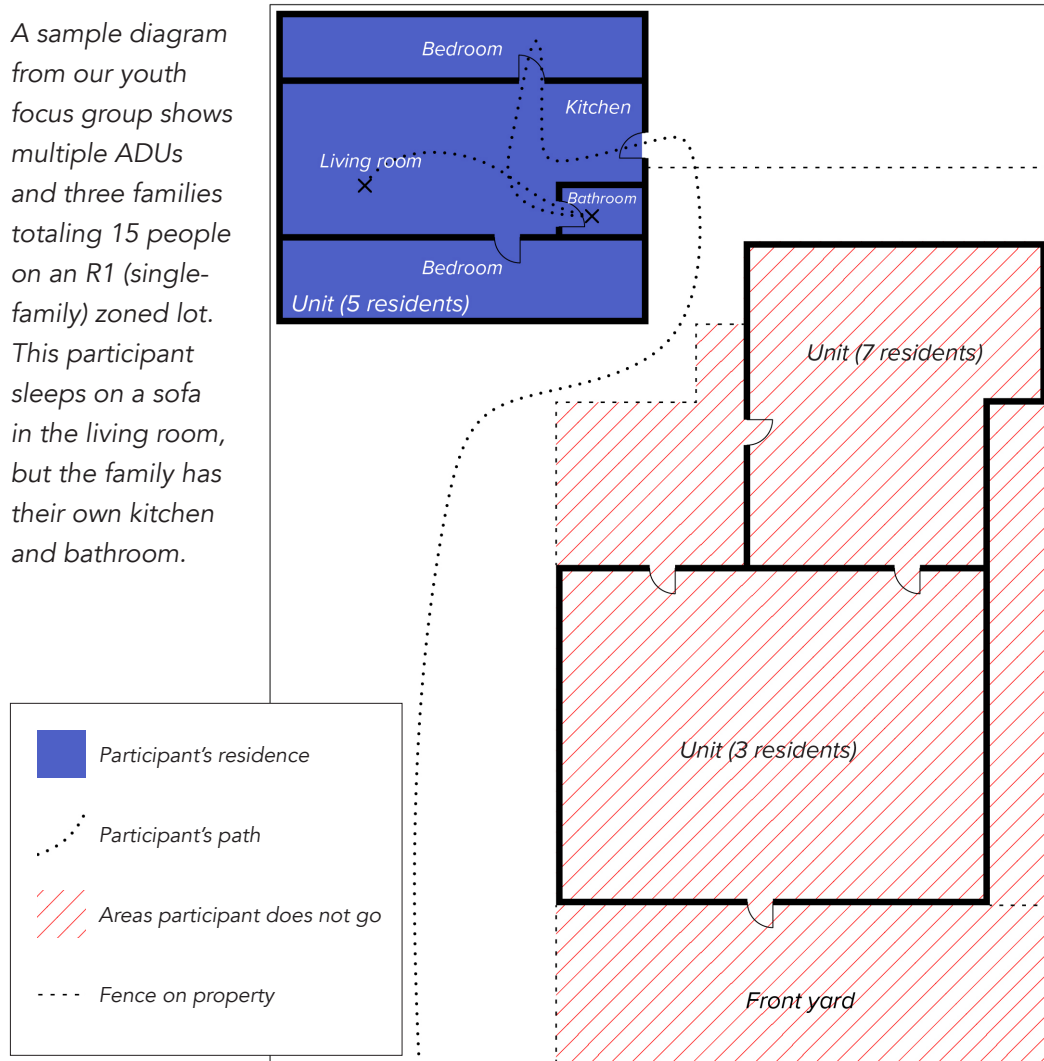
48.5%

of properties had an ADU

Their physical form varied greatly. Overall, we identified seven different built form typologies. Represented diagrammatically below, each type of ADU is shown in blue and sited on an average parcel in relation to the main house.



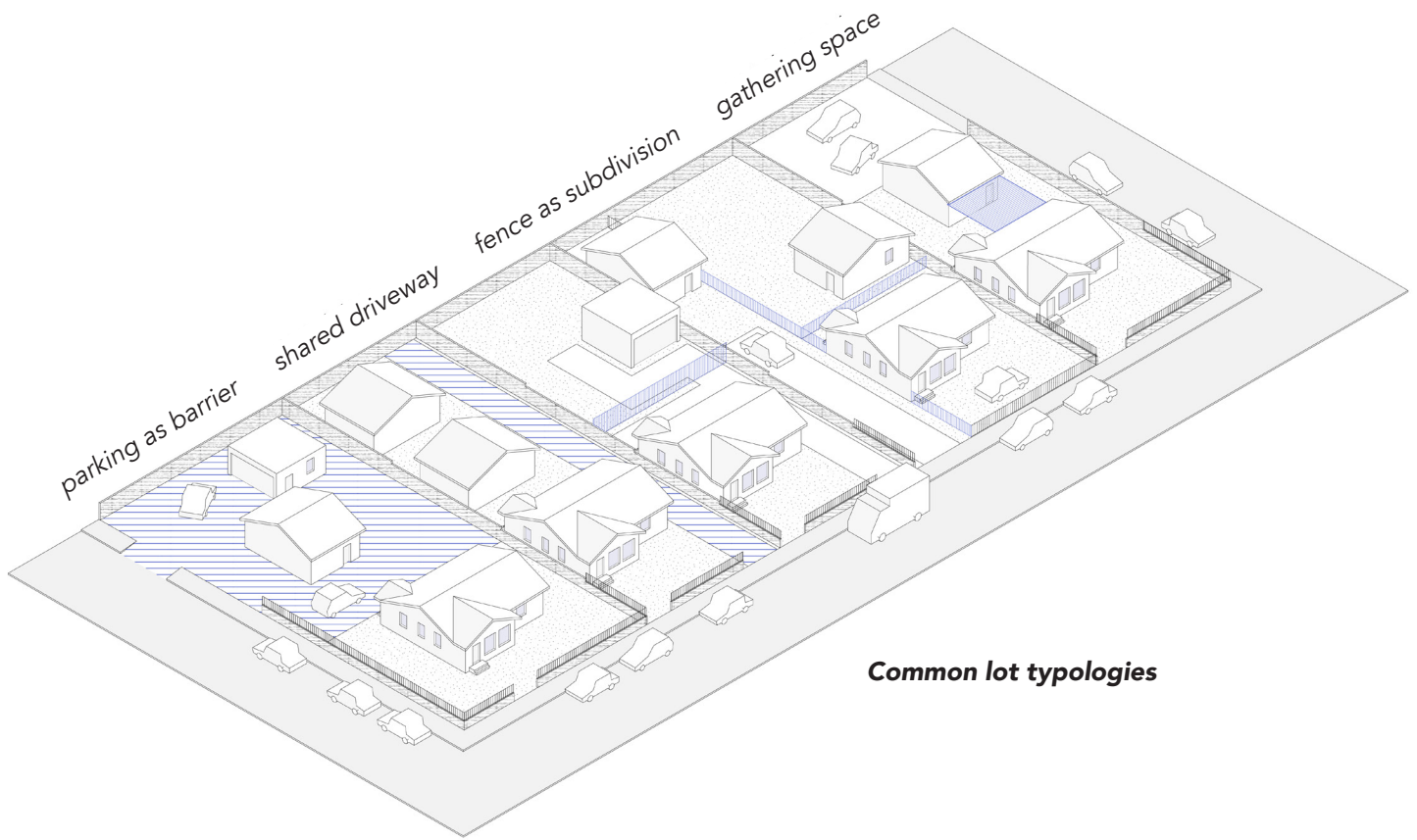
A sample diagram from our youth focus group shows multiple ADUs and three families totaling 15 people on an R1 (single-family) zoned lot. This participant sleeps on a sofa in the living room, but the family has their own kitchen and bathroom.



Many parcels have more than two units, some with more than ten residents. Our sample showed that lots can contain up to four units. They are often overcrowded, resulting in the use of alternative spaces such as living rooms as bedrooms.

There is a need for more inside space. Our focus group participants continually expressed a desire for places to study and concentrate on school work, the privacy of their own bedroom, and space for recreation indoors.

Amenity sharing is low, and interaction is limited. The majority of participants stated amenity sharing was not practiced on their property. Even in places where interaction is possible, our participants said they spent little time in these spaces.



Common lot typologies

RECOMMENDATIONS

Advocate for reasonable reductions in development standards to legalize existing conditions. Allowing one unit per 2,000 square feet of lot area would make it possible to bring many more units up to code. Since the average lot size in Pacoima is larger than 6,000 square feet, this would permit at least three units per parcel, more than the two allowed today (one main house and one accessory dwelling). This is shown on three of five lots above.

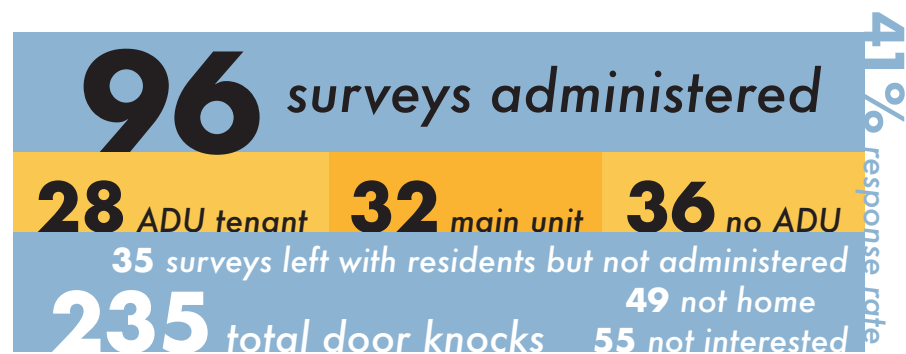
Advocate to increase size limits on ADUs. Accessory dwellings are primary homes for countless families, many with five or more people, but state law expressly prohibits any ADU from being over 1,200 square feet. This causes cramped quarters and grossly impacts youth, who often sleep in living rooms and find it difficult to complete their studies.

Create media that profiles ADUs in the project area. Because the above suggestions are reliant on city and state governments, Pacoima Beautiful should use the stories contained in this report, and others, to publicize a new narrative regarding ADUs, how the community lives with them, and how the many benefits they provide can protect residents in the near and long-term.

Support changes to single-family zoning on a larger, citywide scale. Single-family zoning is a relic of past discriminatory policies and prevents more affordable, safe housing. It's also proven that multi-family housing will not jeopardize the neighborhood's character, as we've shown it's already been present for decades. Changes to zoning codes won't happen overnight, but increasing the supply of housing is crucial to providing permanent options for the most vulnerable populations.

ADU survey

We conducted door-to-door surveys to understand the current ADU landscape. Learning from community leaders, we heard many households in the TCC region live in unpermitted secondary units, without formal leases, as well as in overcrowded housing. We recognize that unpermitted units and tenants without lease agreements are at higher risk of displacement than renters and homeowners with legal protections. To understand the nature of ADUs and magnitude of informal housing in the TCC region, we designed a community-based survey. With the guidance of community members, our survey results provide data on current ADU households, housing conditions, tenant/landlord relationships, and household tenure.



METHODOLOGY

In our survey design phase, we worked with community members to refine our survey questions and process. Following conversations and community workshops, we prioritized questions the community cared about, and phrased them in a relatable, sensitive manner. Understanding the correlation between housing displacement and transit investment, we focused our surveys in areas adjacent to future transit stops. The surveying routes focus on single-family homes primarily in Transit Oriented Community (TOC) overlay zones within the TCC project boundaries. Over a period of three weeks we administered a total of 96 surveys to English and Spanish-speaking main unit tenants, ADU tenants and to residents with no ADUs.

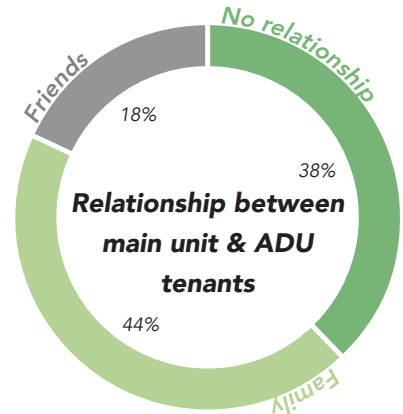
FINDINGS

We found that the relationship between ADU tenants and main unit tenants informed many aspects of the living arrangements.

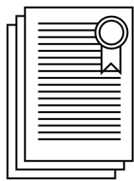
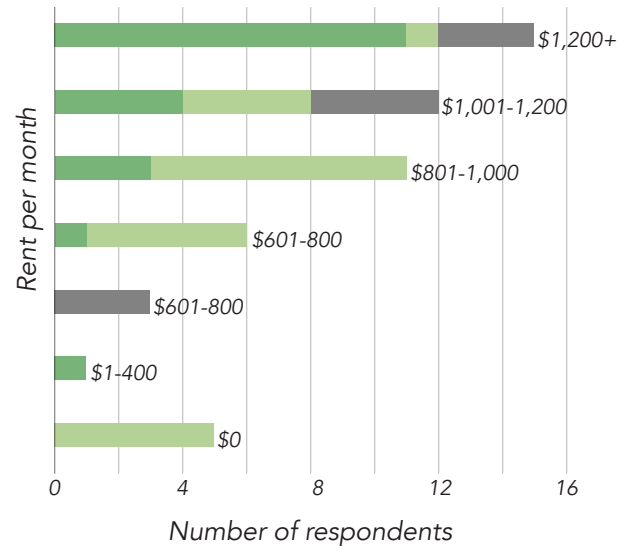
For example, **when ADU tenants were related to residents in the main unit:**

- 1) there was a greater chance the tenant did not have a legal contract
- 2) their reported rent was lower than the average ADU tenant
- 3) the average ADU tenant kept two cars on the property

Survey analysis showed that the average ADU housed a four-person household in a two bedroom one bathroom unit. ADU tenants most frequently responded that they paid over \$1,200 in rent. It is also common for ADUs to be overcrowded, as defined by US Department of Housing and Urban Development, with 45% of ADU tenants having more than two persons per bedroom. We conclude that ADUs can act as an affordable form of housing as they offer below market rent prices.



Rent based on relationship



58% reported that they did not have a contract



78% reported that the ADU tenant paid less than \$1,000 per month in rent

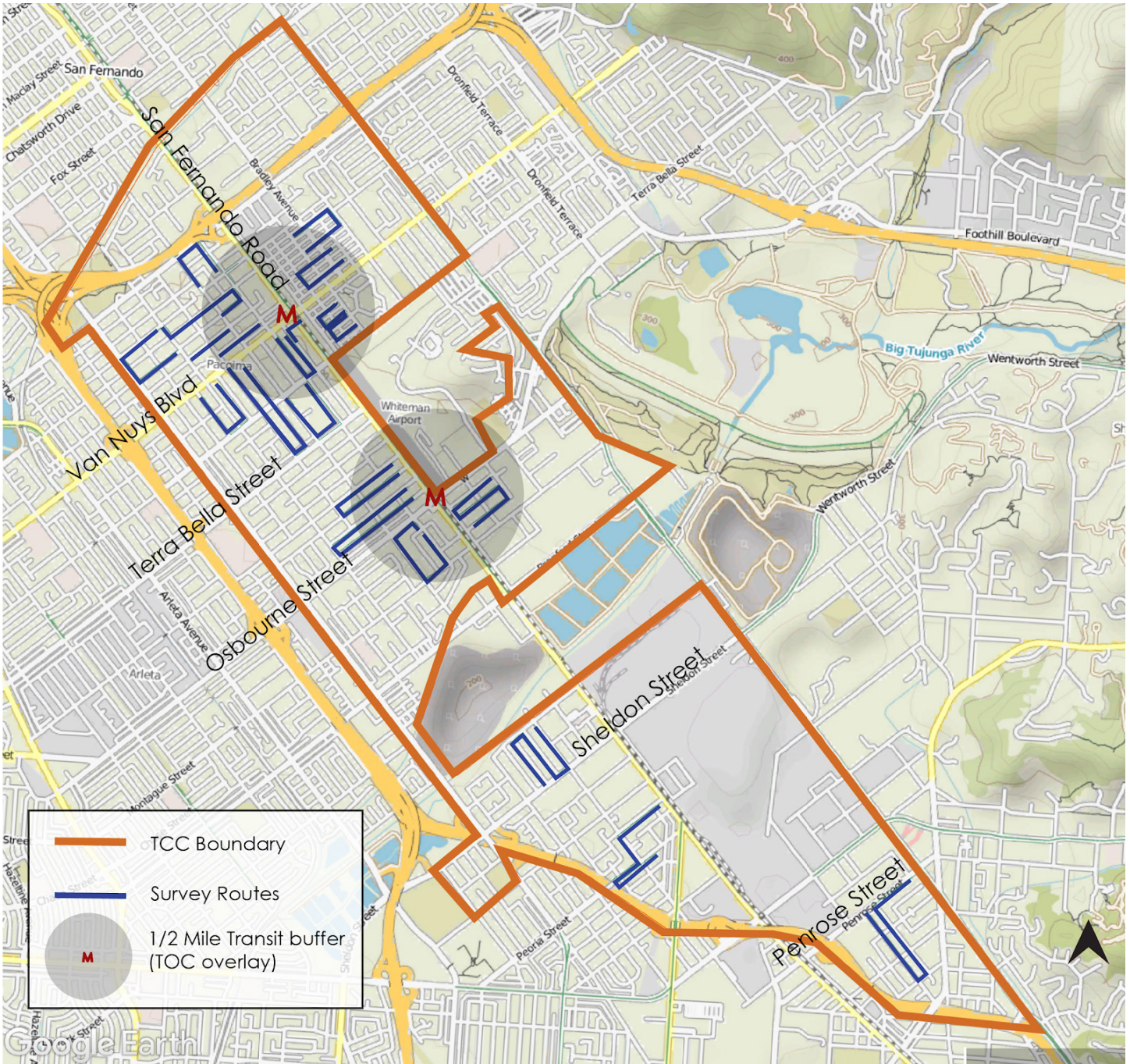


45% reported that the ADU tenant had more than two persons per bedroom



Tenants kept more cars on the property if they didn't previously know the landlord

Survey Route Map



ADU SURVEY

RECOMMENDATIONS

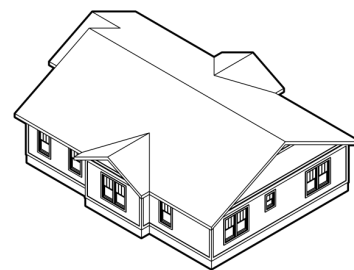
Explore rent stabilization. Our research team recognizes that a variety of populations including renters, low and severely low income individuals and families, and undocumented populations are at a higher risk of losing housing. While the majority of tenants without leases were family members of the owner, where a contract may not be necessary, we want to consider ways in which we can protect renters that do not have a legal contract and would benefit from one. One possible solution we propose is exploring how the city's Rent Stabilization Ordinance (RSO) could be expanded. We argue that this is mutually beneficial as it protects tenants from excessive rent increases and while allowing landlords fair annual rent increases with legal rights.

Demystify the permitting process. The permitting process can be a hurdle for someone who wants to build an ADU but is unfamiliar with construction permits. ADU owners who successfully permitted their unit stated the process was painstaking and confusing. We recommend Pacoima Beautiful gain knowledge of the permitting process to advise residents and reduce barriers to permitting.

Encourage lease agreements through workshops. Entering into a formal lease agreement or any agreement that is legally binding and enforceable can provide security and peace of mind for both the tenant and the unit owner. However, ADU tenants with a formal lease agreement are the minority in Pacoima. We recommend that Pacoima Beautiful offer more resources to homeowners and tenants regarding the mutual benefits of entering into formal lease agreements. Community workshops and information sessions that emphasize the protections and benefits afforded to both parties could begin to change the community's opinion of lease agreements.



Advocate for flexible multi-family zoning. It is obvious that single-family development in Pacoima has been adapted to fit the needs of the community, and this should be reflected in the zoning codes. In preparation for the Arleta-Pacoima Community Plan update, we recommend that Pacoima Beautiful advocate for a change in single-family zoning to allow multiple units on a property.



Tenant experience

Our research provides a snapshot of how renters experience housing instability in Pacoima. Renters are the most vulnerable to displacement, and therefore understanding the nuances of their experience can make more effective anti-displacement programs and policies.

We focused on two research questions: What are the current living conditions of residents, especially in backyard houses? What tenant protections currently exist for tenants in backyard houses and what protections may be missing?

METHODOLOGY

We used three primary research methods: policy analysis, survey analysis, and a series of semi-structured interviews.

Policy Analysis. The policy analysis examines three topics: changes in ADU regulations in California and Los Angeles; tenant protection laws at the state and local level; and code enforcement strategies for unpermitted housing. This analysis illustrates current policy gaps in protecting and supporting tenants of permitted and unpermitted ADUs in Pacoima and models for better serving the needs of ADU residents.

Survey Analysis. We collected 28 ADU Dweller surveys and 32 ADU Owner surveys. We asked questions about living conditions and tenure relationships to help answer our first research question regarding the living conditions of ADU dwellers and how they compare to the City of Los Angeles's Building, Safety and Fire Codes for legal ADUs.

Semi-structured interviews. We conducted 11 interviews with 21 current and former ADU tenants over the course of three sessions. Interviews made space for tenants to share intimate knowledge of the renter experience that surveys alone could not capture. Collectively, they verified some of the most pressing issues facing renters in the area: the legal status of the unit, relationship with landlord, experiences of overcrowding, and consequences faced by those with growing families.

FINDINGS

Our research questions assumed that conditions would be the defining characteristic of the tenant experience. We were wrong. Tenants face a variety of good and bad conditions, but the most important factor influencing their quality of life was the relationship between landlord and tenant. We identified three primary dimensions of the landlord-tenant relationship: expectations, agency, and instability.

“They are doing me a favor by letting me live here.”

-Beatriz

Expectations. Tenants expressed uncertainty or ambivalence over what tasks are the responsibility of the tenant and what tasks are the responsibility of the landlord. Over 69% of tenants do not have a formal lease, which means no delineation of responsibility is in writing. A lack of clarity led tenants to either take on more responsibilities either because they felt they were a burden to the landlord, or to prove themselves a “good” tenant and stave off potential rent increases or evictions.

69% of tenants do not have a formal lease

“In our old house, my daughter used to have friends over. Now, none of that.”

-Susana

Agency. Having agency means being able to make personal decisions about yourself or your family. Tenants expressed a lack of agency over both their physical space and in relation to their landlord. A lack of space, caused by not having enough money for rent or by overcrowding, meant tenants limited behaviors like cooking and entertaining. Tenants who did not know their rights or felt unsupported were less likely to assert themselves in relation to their landlord.

*“You never know when something will happen
and just like that you’re on the streets.”*

-Allison

Instability. Precarious housing has long-lasting effects on the physical and mental health of tenants. We found that a little more than half of renters in backyard homes described their situation as temporary, but about 40% of those renters had lived in the unit for 4-7 years. Tenants might be actively looking for other housing, or they have internalized a general feeling of impermanence.

53% of tenants said living in
an ADU was temporary





UCLA researchers meet Pacoima community members and leaders including Sheila Kuehl, Los Angeles County Supervisor (3rd District), at the Our Voice, Our County Environmental Fair and Expo.

RECOMMENDATIONS

Based on our findings, we recommend the Green Together Collaborative move forward four anti-displacement measures that target the tenant-landlord relationship:

Organize renters and owners. Build a coalition of empowered renters and work with homeowners and small landlords to foster solidarity between normally adverse parties.

Reform code enforcement policies. Encourage the City to adopt a forgiveness program and a life safety grading system, all while ensuring anonymity, and partner with them to use Community Inspectors to perform housing inspections.

Explore affordability covenants. Make it easier for owners to build or upgrade ADUs by waiving permitting fees if owners agree to make their ADU rent-stabilized.

Housing stabilization policies. Push for rent control and other tenant protections that incorporate ADUs, no matter their permitting status.

ADU financing

We evaluated the formal financial products available to Pacoima-Sun Valley homeowners and assessed if these products are accessible to them. To conduct the assessment, we compared existing financial loan policies and the financial status of current homeowners.

Our results show that project area homeowners face financial obstacles that prevent them from qualifying for traditional loans. Yet in the absence of private financing, they have continued to construct and maintain accessory dwelling units through personal savings. This research emphasizes the need to expand affordable capital to a community with a low borrowing capacity like Pacoima.

METHODOLOGY

Our methodology consists of three components: financial landscape analysis, financial stakeholder interviews, and community interviews. We created this research design process to better understand the experience of Pacoima-Sun Valley homeowners who own an ADU in accessing private financing. The data collection not only provides greater clarity into the financial context of the community, but informs our set of recommendations.

Financial landscape analysis. An in-depth examination of existing literature and current financial conditions of Pacoima-Sun Valley. This phase provides information on the local economic context of the study area as well as an overview of the literature on the topic.

“Quiero aprender más sobre cómo financiar una casita.”

“I want to learn more about financing an ADU.”

Financial stakeholder interviews. This phase collects information from local financial experts about existing loan products and policies geared towards ADUs. Additionally, this section provides an opportunity to better understand certain challenges that lenders face when disbursing traditional loan products to a community like Pacoima-Sun Valley.

**“Cuando compre mi casa siempre
tuve planes de usar la renta de
alquiler para pagar el mortgage.”**

*“When I bought my house my intention was always
to rent the ADU to help pay the mortgage.”*

Community interviews. Community interviews gather critical information from homeowners who own an ADU in our study area to determine potential obstacles they face when financing ADU construction or upgrading. Due to the sensitive nature of financial status, instead of holding focus groups, we conducted one-on-one interviews.

FINDINGS

Most often, homeowners use personal savings to fund ADU improvements. From our community interviews, we noticed that a majority of households who had financed improvements to their ADU drew funds from family savings, which suggests a disconnect with traditional, third-party financing.

Pacoima-Sun Valley homeowners cannot access ADU financial products. After examining the underwriting criteria and terms of the loans and the financial status of project area homeowners, we determined the products that the financial institutions we interviewed were offering to be inaccessible based on high qualifying thresholds and pre-construction costs.

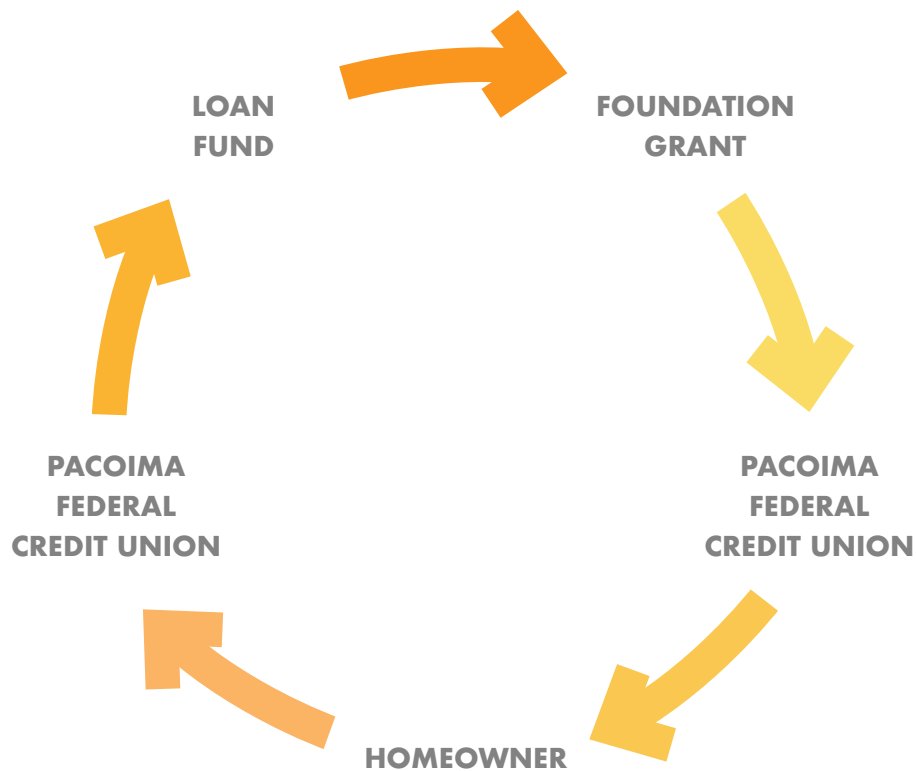
RECOMMENDATIONS

The intent of our recommendations is to expand access to affordable capital and information related to ADU construction and permit processes for project area homeowners. Interviews with financial institutions and local homeowners inform the following set of recommendations.

Navigating the construction process. Our next recommendation helps project area homeowners navigate the construction process more easily and efficiently. From our interviews, we identified two key elements that homeowners had questions about: Certified Contractors Pipeline and Permit Process Awareness. First, based on community feedback, there seems to be an absence of a centralized source for homeowners to access to choose the right ADU contractor. For this reason, we propose to collaborate with the City of LA to create a collated ADU contractor pipeline to make the decision for homeowners less time consuming and more trustworthy. Secondly, homeowners simply did not know the exact way to permit their existing units. For this reason, we recommend partnering with the City of LA to hold community meetings to inform homeowners how to legalize and obtain permits for their ADU.

*“A mi me gustaría hacer un garajito.
Me gustaría obtener un préstamo del banco.
Tenemos buen crédito.”*

“I would like to convert my garage to an ADU. I’d like to get a loan from the bank. We have good credit.



Pacoima-Sun Valley revolving loan fund. The idea is that Pacoima Beautiful finds a willing foundation to grant a certain amount of money to capitalize the loan fund. This grant will then be given to a local financial institution, such as Pacoima Federal Credit Union, to administer and distribute funds to homeowners looking to finance an ADU. The institution can distribute low-interest, favorable-term loans that can provide affordable capital and lower the overall lending risk of the homeowners if they still need conventional, private loans to fund the difference. The loan will be repaid to the loan fund with minimal interest gained, and then distributed back out to the next homeowner.

Community financial literacy education. To ensure that Pacoima-Sun Valley households improve their borrowing capacity to maximize financial resources to fund the high cost of ADU construction, we propose to Pacoima Beautiful to partner with a local financial institution such as Pacoima Federal Credit Union to offer community workshops and classes focused on money management strategies that include saving, investing, budgeting, and income planning.

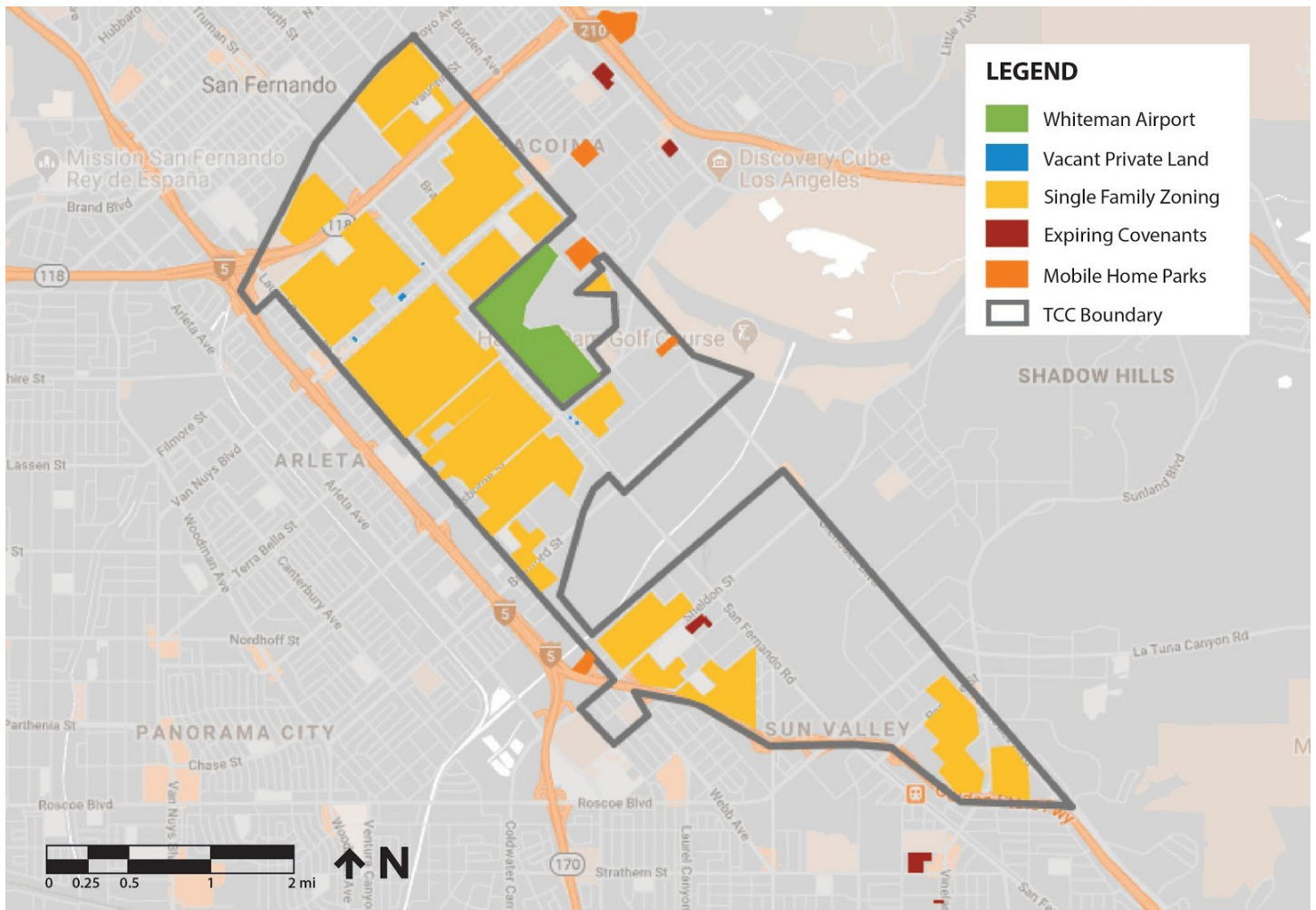
CLT feasibility

The Transformative Climate Communities grant's Displacement Avoidance Plan identified community land trusts (CLTs) as a potential method for combating displacement. CLTs are community-driven organizations that acquire and hold land, removing it from the speculative market. The goal of the CLT is to provide permanent affordability for residents. Organizations throughout the United States have successfully implemented CLTs in various models, such as purchasing land with existing homes or purchasing vacant land for development. CLTs are more likely to be able to offer long term stability because of this divorce of land value from the home.

We examined the variables necessary to establish a successful CLT and provided an overview of the strategies and conditions in which a CLT can thrive. Our research focused on land acquisition strategies as a way to better understand the likelihood of establishing a scattered site CLT. We examined two questions to analyze land acquisition for a CLT in Pacoima, or the Northeast San Fernando Valley. First, we examined the possibilities and processes for land acquisition in the project area. Secondly, we explored the circumstances under which Pacoima homeowners are willing to sell or lease all, or part, of their land for the purpose of a community land trust. Given the large lot sizes and abundance of single-family homes in Pacoima, we believe there is a unique opportunity for a CLT to acquire land through partial land sales from homeowners in the project area.

METHODOLOGY

Our research consisted of a mixed-methods approach. Between March and April 2019, we conducted interviews with 11 key staff, volunteers, and partners who work with three CLTs in Los Angeles: Beverly Vermont Community Land Trust, T.R.U.S.T. South LA, and Tierra Libre Community Land Trust. We also spoke with 16 homeowners in the TCC project area. These interviews consisted of open-ended questions to reveal in-depth information about their willingness to sell or lease all, or part, of their land for the purpose of a CLT. Lastly, we performed an analysis of the land strategies identified through these interviews, augmented with secondary data information from a selection of white papers authored by members of this comprehensive project.



Property types available for CLT land acquisition in the TCC project area.

FINDINGS

Our research on existing community land trusts in Los Angeles and conversations with homeowners in Pacoima has shown that the processes involved in establishing and sustaining a CLT in the Northeast San Fernando Valley will be complex. The following page contains a summary of the findings from the interviews with CLTs in Los Angeles as well as those with Pacoima homeowners.

1/3 of respondents listed space constraints as reason not to lease

3/4 of homeowners willing to lease their land would want to select tenants

88% willing to lease to a community organization

Community Land Trust Interviews

Opportunistic and Strategic	Land acquisition has occurred through an array of mechanisms, some opportunistic and others more strategic. This includes land transfers from local governments, targeting expiring covenants, and neighborhood relationships and networks. In Los Angeles, there is no clear method that has proven more successful than others.
Length of Acquisition Process	It can take a long time to acquire larger properties. Many factors that are outside of the control of a CLT, such as environmental testing and remediation, can slow down the process.
Adverse Impacts	Acquiring properties with existing residents can have adverse impacts. If site redevelopment is necessary, existing residents can be displaced during the construction period. Also, CLTs require more involvement than typical tenant-landlord relationships because of the ownership component. Not all tenants are looking for increased responsibilities. CLTs that acquire properties with residents must plan for this.
Partnerships	Strategic partnerships with community members or technical experts, like legal entities, are key in navigating the complex financial and development processes of establishing a CLT.

Pacoima Homeowner Interviews

Reluctance to Sell Land	Homeowners are reluctant to sell portions of their land. Reluctance to sell stemmed from an unwillingness to fully give up a portion of their property and the uncertainty surrounding a partial sale. However, there was some interest in selling the entire property.
Openness to Land Leases	While there is no interest in selling part of their property, some homeowners are open to long-term land leases for part of their backyard.
Additional Income as a Motivation	Older homeowners who have finished paying their mortgage are less interested in selling or leasing their land because they do not need the income to pay off large debts or expenses. Homeowners stated that the main motivation to sell or lease their land was for income generation.
Unclear Legal Parameters	Although there is interest in the opportunity for an additional income source, there are many questions and concerns about the financial and legal implications of selling a portion of land or adding an ADU onto the property.
Trust in PB	Almost all homeowners are more comfortable with a community organization like Pacoima Beautiful establishing a CLT rather than a government entity.

We created the following analytical framework based on six criteria to assess each of five property type's suitability as a land acquisition model. For all criteria, each property type was rated either low, medium or high, with high being the most desirable for CLT formation.

Site Suitability for Land Acquisition

Evaluation criteria	Whiteman Airport	Vacant Private Land	Single-Family Homes	Expiring Covenants	Mobile Home Parks
Land Affordability	High	Low	Medium	Low	–
Fast Acquisition	Low	Medium	High	Medium	Medium
Level of Impact	High	Medium	Low	Medium	Medium
Replication Potential	Low	Medium	High	Medium	Medium
Community Composition	Medium	Medium	High	High	High
Displacement Avoidance	Medium	Medium	Medium	High	High

RECOMMENDATIONS

We recommend the following series of actions to move forward with determining the feasibility of a Northeast San Fernando Valley CLT.

- 1) **Determine the community priorities and mission** of the CLT through targeted community outreach.
- 2) **Choose which CLT model** and land acquisition strategy is best suited to the priorities and mission by using the framework above.
- 3) **Assess the financial feasibility** of the chosen strategy and identify possible funding sources.
- 4) **Identify opportunities for land acquisition** through formal channels like the City and County of Los Angeles and informal early warning networks using PB's community inspectors and promotoras.
- 5) **Build strategic partnerships** to assist with creating the CLT's legal framework and financial and development models.

Conclusion

Our research illustrates the ways in which Pacoima residents reinvented single-family housing to meet their housing needs. In Pacoima multiple families live in multiple units on single-family lots. Residents spend their whole lives in ADUs and families build ADUs to house their extended family or generate additional income. Our research tells this more complicated story, which helped us form a clearer picture of the Pacoima housing market's strengths and shortcomings in meeting the needs of residents.

There is a common narrative amongst policymakers that ADUs are naturally more affordable and must be formally legalized. Similarly, it is presumed that large multi-family projects are the most accessible and feasible CLT structure for Los Angeles. In many ways, our findings complicate these assumptions. While we found that ADUs are an essential part of the housing stock and that CLTs are successful in other Los Angeles neighborhoods, our research revealed a number of unexpected findings. For example, we found a wide variety of ADU typologies, beyond the typical garage conversion and backyard unit, with up to four families living on the same lot.

We learned that the relationship between an ADU tenant and owner determines the tenants' quality of life, including rent prices and the units' conditions. Homeowners, we discovered, have high debt-to-income ratio preventing them from accessing bank products for ADU construction or permitting. We found willingness among Pacoima homeowners to use their land for alternative CLT models. Our findings reveal that Pacoima's housing landscape is more complex than researchers and policymakers, including us, assumed.

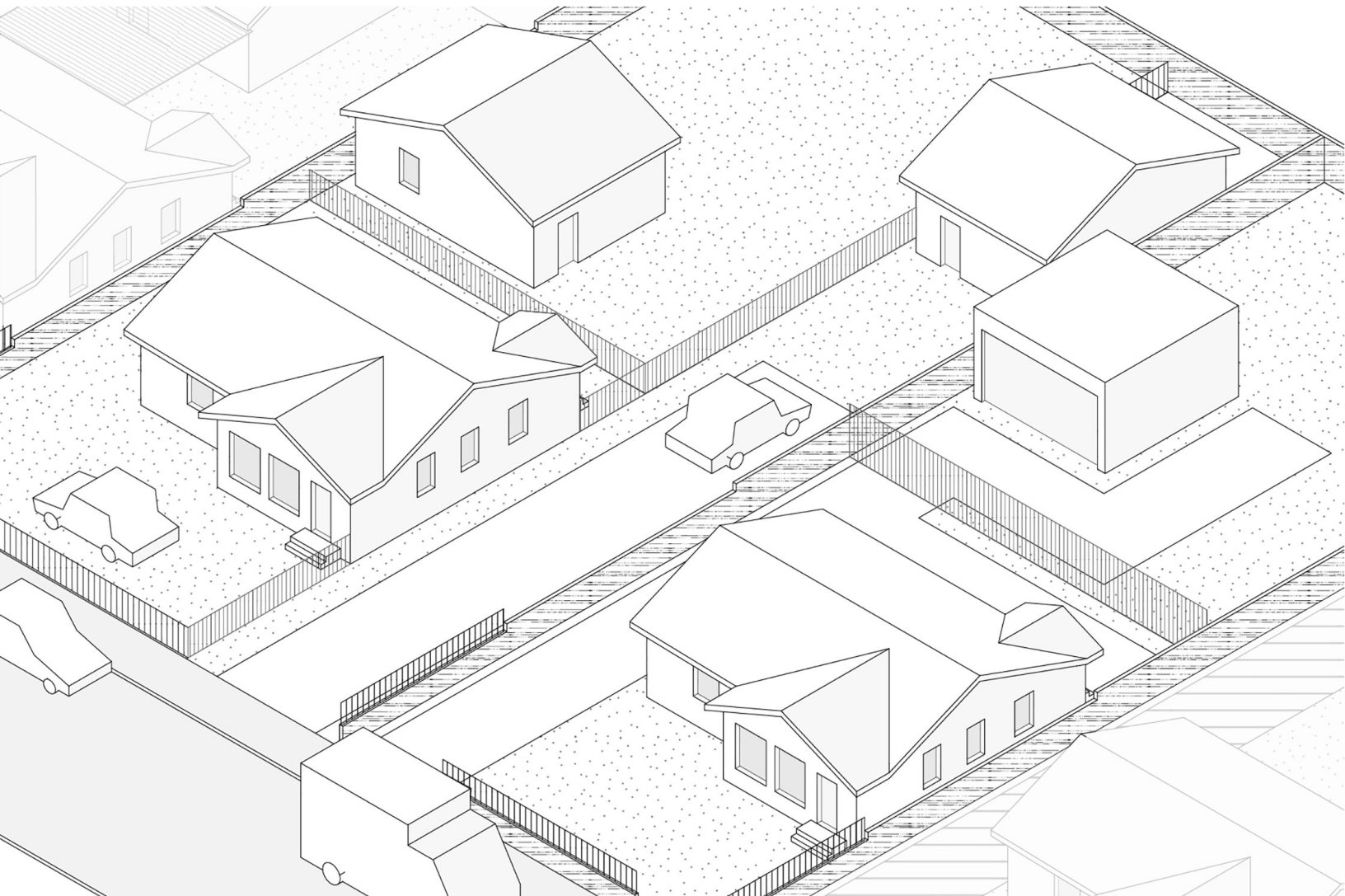
With this knowledge, we provide a framework for anticipated displacement challenges over the next three years of TCC investments. As community advocates, researchers, and policy makers we cannot ignore the complexity residents live out on a daily basis. Instead, we must come together to rethink how we continue to meet the needs of all residents as the community continues to evolve.

Acknowledgments

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A CASITA COMMUNITY

**A COMPREHENSIVE PROJECT SUBMITTED IN PARTIAL SATISFACTION OF
THE REQUIREMENTS FOR THE DEGREE OF MASTER AND URBAN REGIONAL PLANNING
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