



February 2, 2021

Dear Members of the Concord City Council,

We, the undersigned representatives of organizations committed to social and environmental equity, encourage you to take concrete and proactive steps to mitigate the potential impact of reinvestment in Ellis Lake Park on residential and commercial displacement in Concord. Across the country, the research is clear: *investment without protection in low-to-moderate-income neighborhoods spells displacement*. According to a comprehensive literature review conducted by UC Berkeley’s Urban Displacement Project, new park investment tends to increase rents, home prices, and property taxes in the surrounding area—all of which can lead to the indirect displacement of long-time residents, businesses, and non-profit organizations. Moreover, the proximity of a park to the downtown core is considered a “strong predictor of gentrification.”¹

It follows from these findings that the redevelopment of Ellis Lake Park—located at the interface of Downtown Concord and the Monument community—is quite likely to exacerbate the ongoing displacement pressures confronting lower income residents, workers, and businesses. Prior to the coronavirus pandemic, residents of the Monument community—who are more likely to be low-income, immigrant, and Latinx than residents of Concord as a whole—were already facing the most severe rates of housing insecurity in the city. The combination of speculation-driven investment in residential real estate, stagnating real incomes among essential workers, and a lack of robust tenant protections has pushed housing costs up and residents out.² COVID-19 has only aggravated these existing inequities and insecurities. Indeed, Monument Impact—a non-profit community organization that has stepped in to administer emergency financial aid during the pandemic—has received requests for \$1.5 million in assistance. Given the large community of undocumented immigrants, who are both relegated to low-wage jobs and denied replacement income benefits from the federal government, over 55 percent of those requests have come from the Monument community.

¹ Urban Displacement Project. (2020). [Climate Change and Displacement in the U.S. - A Review of the Literature](#), pp. 33-4.

² Center for Community Innovation. (2015). [Concord: Signs of Speculation in the Monument Corridor](#), pp. 2-7.

This is quite simply a recipe for displacement. As the City of Concord encourages increased investment in the area between Ellis Lake Park and Concord BART, we strongly recommend that you link these activities to proven anti-displacement strategies. In a recent survey of cities across the U.S., scholars from UCLA and the University of Utah identified over 25 parks-related anti-displacement strategies (“PRADS”). Some of these PRADS, such as rent control and just cause eviction protections, are central to local policy conversations. Others, however, such as property tax freezes for low-income homeowners and job creation programs, are less often discussed.³ **Robust community engagement is needed to determine which PRADS are suitable to stem the displacement risks of unmitigated new development in the area. Getting the process and the policy right at this pivotal moment will allow Concord to pursue high-quality, green, transit-oriented development *that is inclusive of current residents over the coming decade.***

Indeed, this is what members of the community have been saying for years. As identified in the 2014 *Monument Community Park Assessment Report*—led by Central County Regional Group, First 5 Contra Costa, Monument Impact, and Contra Costa Health Services—residents have been among the most energetic proponents of improving Ellis Lake Park, often driving the project forward. However, as expressed at all five community meetings held this fall, residents are excited about the prospect of Ellis Lake becoming a beautiful, amenity-rich park, but not if it comes at the expense of their ability to remain rooted in the neighborhood. In order to make this project a true success, a dedicated community engagement process is needed to listen to local residents and recommend PRADS that can ensure that new investment in Ellis Lake Park is used to support, rather than supplant, them.

The creation of an anti-displacement task force will not disrupt the project. To the contrary, it will help realize it. And it will do so in a way that serves the current community, combats the cyclical pattern of housing insecurity, and advances equity. Proposition 68 was designed to encourage applications that demonstrate that new investment in green infrastructure will not contribute to displacement. The City’s commitment to anti-displacement activities will thus help to set Concord’s application apart. Conversely, the City’s current approach, which relies upon the rent registry and AB 1482, could hurt Concord’s funding prospects. After all, AB 1482 sets the *floor* for tenant protections in California. Relying upon AB 1482 will set Concord behind, rather than ahead, of other localities. And the forthcoming registry—while an important means of promoting housing security over the long term—is designed to track displacement *after it has occurred*, not prevent it from occurring.

In conclusion, we ask you to take proactive steps to link the redevelopment of Ellis Lake Park to proven anti-displacement strategies, starting with a dedicated community-based task force. You have the power and the responsibility to ensure that this renewed park serves all Concordians, especially residents of the surrounding community.

³ Rigolon, Alessandro and Christensen, Jon. (2019). [Greening without Gentrification: Learning from Parks-Related Anti-Displacement Strategies Nationwide](#), pp. 1-5.

Sincerely,

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4. Betty Gabaldon, President, Todos Santos Tenants Union
5. Bob Lane, Steering Committee, The Faith Alliance for a Moral Economy
6. Chione Flegal, Managing Director, PolicyLink
7. Dave Kludt, Pastor, Open Door*
8. Debra Ballinger, Executive Director, Monument Impact
9. Douglas Leich, Steering Committee Chair, Multi-Faith ACTION Coalition
10. Dr. Tim Thomas, Research Director, UC Berkeley's Urban Displacement Project*
11. Eduardo Torres, Northern California Regional Coordinator, Tenants Together
12. Eric J. Harvey, Ph.D., Parishioner, First Presbyterian Church of Concord*
13. Fr. Paulson Mundanmani, Pastor, Christ the King Church*
14. Fran Biderman, Family Economic Security Partnership
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16. Monique Berlanga, Tenants' Rights Directing Attorney, Centro Legal de la Raza
17. Hector Malvido, Policy Manager, Ensuring Opportunity Campaign
18. Jan Warren, Chair, Multi-Faith ACTION Coalition Housing and Shelter Task Force
19. Josh Anijar, Executive Director, Contra Costa Central Labor Council
20. Julia Zermeño, Chair, Central County Regional Group
21. Kristi Laughlin, Sr. Campaign Director, East Bay Alliance for a Sustainable Economy
22. Laura Nakamura, Concord Communities Alliance
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24. Lisa Justice, Elder, Clayton Valley Presbyterian Church*
25. Rabbi Peretz Wolf-Prusan, Board Member, Jewish Family and Community Services East Bay
26. Rev. Richard Mangini, Pastor Emeritus, St. Bonaventure Church, Concord*
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